## ONTARIO FEDERATION OF ANGLERS & HUNTERS



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Email: christie.curley@ontario.ca

Ms. Christie Curley, Manager Wildlife Section, Policy Division Ministry of Natural Resources and Forestry 300 Water Street Peterborough, Ontario K9J 8M5

Dear Christie:

Subject: Proposed province-wide extension of the varying (snowshoe) hare season from March 31 to April 30.

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we wish to address the decision to change the closing date of the hunting season for varying (snowshoe) hare in much of Northern Ontario from June 15 to March 31, beginning with the 2017 hunting season. Since the implementation of this change, many of our members have contacted us to express the social and cultural importance of this hunt and the negative impact this change has had. Hunting hares with family over the Easter weekend is of great importance to many Northern Ontario residents, a tradition that is no longer possible under the new season limit. We feel that the decision to shorten the season was not based on strong scientific evidence. We have reviewed the relevant scientific literature and wish to present a more appropriate scientific source on hare reproduction and from that source propose an alternate end date to the season.

Through discussions with MNRF staff, we learned that the varying (snowshoe) hare season was shortened in order to avoid the orphaning of leverets. To support the choice of March 31 as the end date for the season, MNRF staff cited Kurta (1995), which states that mating starts in March and the hares have a 37-day gestation period. However, Kurta (1995) is not peer-reviewed scientific literature and, is instead, a field guide to the mammals surrounding the Great Lakes Basin. None of the supporting literature cited by Kurta (1995) in the snowshoe hare section was conducted in Ontario. In our opinion, this is not an appropriate source on which to base management decisions.

OFAH staff reviewed the existing snowshoe hare peer-reviewed scientific literature to assess the level of scientific support for the MNRF's position that a March 31 season end date was necessary to avoid orphaning leverets; Newson (1964) refutes this position. This study was conducted on Manitoulin Island and involved the necropsy of female hares over three years (1959-1961). They found no pregnancies in nearly five hundred hares necropsied between October and March, and found that the first conceptions occurred in early April.

Given the findings of Newson (1964) and the accepted 37-day average gestation period for varying (snowshoe) hares, there is no biological evidence supporting the position that a March 31 season closing date is required to prevent the orphaning of leverets and, in reality, the season could be safely extended to April 30 under this line of reasoning.

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Murray (2000) examined factors affecting first litter conception date among varying (snowshoe) hare populations between Alaska and Ontario and found no statistically significant correlation between conception date and latitude. If conception date does not vary across that geographical scale, it is highly unlikely that it varies within Ontario. Following the MNRF's stated rationale for setting the season end date, we feel that an April 30 closing date should be applied province-wide.

We support evidence-based management decision-making, but the source of the evidence must reach a certain level of scientific literature. Only in cases where Ontario-specific research on a particular species does not exist, management decisions can and should be based on research from other jurisdictions. The question of varying (snowshoe) hare reproduction is not such a case, as Newson (1964) is a robust and rigorous study conducted in Ontario.

Thank you for considering our concerns.

Yours in Conservation,

Mark Ryckman, M.Sc. Manager of Policy

MR/gh

cc:

**OFAH Board of Directors** 

OFAH Small Game Advisory Committee Angelo Lombardo, OFAH Executive Director

Matt DeMille, OFAH Manager, Fish & Wildlife Services

OFAH Fish & Wildlife Staff

## References:

Kurta, A. (1995). Mammals of the Great Lakes Region. University of Michigan Press, Ann Arbor, xii + 376 pp. Murray, D. L. (2000). A geographic analysis of snowshoe hare population demography. *Canadian Journal of Zoology*, 78, 1207–1217.

Newson, J. (1964). Reproduction and prenatal mortality of snowshoe hares on Manitoulin Island, Ontario. *Canadian Journal of Zoology*, 42(20), 987–1005.