

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 349A/400B/420-I
May 3, 2019

Ms. Heather Nelson
Regional Operations Division, Thunder Bay District
Ministry of Natural Resources and Forestry
435 James Street South, Suite B001
Thunder Bay, Ontario
P7E 6S7

Dear Ms. Nelson:

RE: ERO 013-4408 Creation of the Amethyst Highlands Fish and Wildlife Enhanced Management Area

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit, conservation-based organization representing 100,000 members, subscribers, and supporters, and 740 member clubs. We have reviewed the proposal for the creation of the Amethyst Highlands Fish and Wildlife Enhanced Management Area (EMA). The OFAH is generally supportive of Crown land being classified as Enhanced Management Areas where it is used to preserve the quality of natural resources while maintaining or improving opportunities for hunting, fishing, and trapping. We commend the Ministry of Natural Resources and Forestry (MNRF) for this pragmatic land use planning exercise that will help ensure the sustainability of Brook Trout populations in the area, while maintaining access for traditional uses (e.g. fishing, hunting, and trapping).

Access

The OFAH supports the maintenance of recreational opportunities in the Amethyst Highlands. Forest roads are essential for outdoor recreationalists to access opportunities in Northern Ontario. While we are very supportive of the preservation of existing roads, we want to ensure that at no time in the future are these roads actively decommissioned in a way that causes them to be impassable (either via regulation or physical barriers). The policy report states they may be closed if the original intent is completed; however, the OFAH asks that these roads remain unobstructed for recreational users to prevent the loss of hunting, fishing, and trapping opportunities. Additionally, the policy report indicates that roads will be maintained but not upgraded for recreational purposes. Our support for the establishment of this EMA is contingent on continued access to the area for angling, hunting, and trapping. Maintenance must include things such as replacing water crossings that have deteriorated or are unsafe. As there will be no new roads or trails allowed to be constructed for recreational purposes, existing access must remain usable otherwise hunting, fishing, and trapping in the area will be severely restricted.

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Fisheries Management

In 2017, the MNRF produced a draft report on *The Brook Trout in Ontario* that outlines widespread population declines. One of the primary threats identified in the document is unsustainable land use practices within watersheds. Certain activities like aggregate and mineral extraction, commercial hydro development, or the construction of new roads and trails, have the potential to degrade water quality and negatively impact hydrological regimes, which are essential elements required for Brook Trout to carry out their life processes. Prohibiting activities that have the potential to negatively impact water quality and groundwater recharge within prescribed setback distances of the Brook Trout lakes will contribute to the sustainability of the resource. The OFAH would like to see the development of a provincial Brook Trout management strategy that outlines actions and tools (such as access manipulation) that can be used to optimize fishing opportunities with Brook Trout productivity/sustainability.

The EMA also contains lakes designated for Lake Trout management, but the policy report does not indicate how the EMA will incorporate the requirements under the Provincial Policy Statement for designated Lake Trout lakes. It is important to outline all sensitive habitats and any protections they are given.

Thank you for considering these comments.

Yours in Conservation,



Lauren Tonelli
Resource Management Specialist



Adam Weir
Fisheries Biologist

LT/AW/jb

cc: OFAH Board of Directors
OFAH Fisheries Advisory Committee
OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish and Wildlife Services
Mark Ryckman, OFAH Manager, Policy