

ONTARIO FEDERATION OF ANGLERS & HUNTERS

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: www.ofah.org • Email: ofah@ofah.org



Ontario Conservation Centre

OFAH FILE: 410/794

June 24, 2020

Ms. Leanne Jennings
Species at Risk Recovery Section
300 Water Street
North Tower, 5th floor
Peterborough, Ontario
K9J 3C7

Dear Ms. Jennings:

Subject: ERO #019-1749 Developing government response statements for nine species at risk under the Endangered Species Act, 2007

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers, and supporters, and 725 member clubs. We have reviewed the draft Government Response Statement (GRS) to the Recovery Strategy for the Northern Bobwhite in Ontario and offer the following comments for consideration.

Government's Recovery Goal

The OFAH believes that the ultimate recovery goal should be to restore self-sustaining populations of wild Northern Bobwhite on not only Walpole Island, but also the mainland. Increasing habitat and protecting the current population of Northern Bobwhite is not enough to consider them recovered. This is especially true given the uncertainty about whether or not Northern Bobwhite still persist.

Much of the content of the GRS is contingent on Northern Bobwhite persisting on Walpole Island, even though birds have not been observed since 2013, at which time the population was on a declining trajectory towards extirpation. It is our hope that Walpole Island continues to support a Northern Bobwhite population; however, if the population survey recommended in the GRS yields no positive results, a major rethink will be needed to ensure a plan that leads to the recovery of Northern Bobwhite in Ontario.

In the recovery goal, the government states that it supports investigating the necessity and feasibility of potential augmentation and reintroduction for the long-term persistence of Northern Bobwhite. The OFAH is supportive of reintroduction if the current population is no longer sufficient to support population growth and expansion or has been extirpated. We would suggest that the Ministry of Environment, Conservation and Parks (MECP) develop a strategy to guide augmentation of Northern Bobwhite populations that clearly lays out key decision points such as: threshold needed to take this action (e.g. number of remaining birds dips too low to support the population); location of the most genetically similar birds and how can Ontario obtain them; whether the intention is to have introduced birds crossbreed with existing birds or to attempt to create a separate population; and, most suitable locations for introductions. **The first step to any of the actions or recovery goals will be to determine the size of the current population and whether it is capable of surviving and repopulating effectively without the introduction of outside birds.**

Government-led Actions

Invasive species

The government-led actions include utilizing the *Invasive Species Act* and Ontario Invasive Species Strategic Plan to control invasive species that threaten Northern Bobwhite. The OFAH agrees that this is an essential part of restoring Northern Bobwhite populations, but has concerns regarding its practical implementation. Phragmites management and removal is a long and intensive undertaking that requires an integrated pest management approach including cutting, burning, and the use of herbicides. The effective herbicide for phragmites is not currently permitted for use over water; however, phragmites typically occurs near water. To effectively utilize herbicide, a Pest Management Regulatory Agency label expansion would be required to permit use over water (either permanently or through an emergency expansion). In areas where phragmites threaten Northern Bobwhite habitat, MECP needs to take thorough measures to ensure that it is actively managed if there is any hope to improve habitat. As this is considered a government-led action, will MECP be funding the removal of phragmites in Northern Bobwhite range? Additionally, if the ultimate goal of Northern Bobwhite recovery includes a range expansion, MECP will need to consider phragmites control in candidate areas for population expansion.

Predators

The GRS mentions the various predators of Northern Bobwhite in their current and native range, including raccoons, foxes, coyotes, and domestic cats; however, there are no listed actions associated with predator control except for education about predator impacts. The only mention of predators in the Actions is to assess predation rates, which falls woefully short of what is required for bobwhite recovery. It is our contention that if the population of Northern Bobwhite was headed towards extirpation in 2013, then it is likely that any predation would be very problematic for the population. The MECP should consider working with area trappers and the Walpole Island First Nation to increase the trapping and/or hunting of predators in the areas around where Northern Bobwhite are found.

The OFAH is also concerned about the absence of any mention of wild pigs or feral swine in regard to invasive species or predation pressure on Northern Bobwhite. Ontario is facing an increasing threat from invasive wild pigs becoming established and spreading throughout the province. Nesting success of Northern Bobwhite has been shown to be negatively impacted by wild pigs across the United States (Bevins et al. 2014). Without a tangible management plan to prevent wild pigs from becoming established in Ontario, any recovery efforts for Northern Bobwhite would be functionally useless. The OFAH recommends that the Ontario government include the eradication of wild pigs in the government-led actions of the GRS.

Game Bird Hunting Preserves

Game bird hunting preserves provide important opportunities for upland bird hunters, including the ability to train and use highly specialized bird dogs. Pen-reared Northern Bobwhite are an important hunting opportunity for Ontarians and the OFAH is encouraged to see the MECP include the continuation of permitting for them. These hunting preserves are also offering an opportunity for hunters to learn about and value Northern Bobwhite in a much more meaningful way than most species at risk are valued. It was demonstrated through the Wild Turkey and elk reintroduction programs that hunters who have vested interests in healthy game species populations are invaluable partners in successful restoration. The OFAH views game bird hunting preserves as key partners in Northern Bobwhite recovery both through familiarization and, potentially, as reintroduction sites. In the event that introduction of Northern Bobwhite is necessary to recover the Ontario population, is there a way that the release of Northern Bobwhite for hunting purposes could be integrated into the restoration process? This could include using birds from genetically similar US states as releases in areas close to Walpole Island to ensure that any birds that escape can contribute to the population and supplement the genetics, instead of the worry that pen-reared birds could weaken the genetic integrity of the wild population.

Government-supported Actions

The majority of the actions needed to recover Northern Bobwhite in Ontario are “government-supported” rather than “government-led” and, as such, there is no clear framework for ensuring that these actions will take place in the needed cohesive and coordinated manner. The GRS puts the onus on partners to bring forth projects in line with the government-supported actions, an approach that may or may not result in these actions being undertaken.

The recovery of Northern Bobwhite is entirely dependent on direct involvement and stewardship from Walpole Island First Nation (WIFN). Involvement and leadership from the Indigenous community will be required to implement the majority of actions outlined in the GRS. We understand that WIFN has already done extensive habitat-related work to reverse biodiversity loss (e.g. Walpole Island Land Trust) and we applaud them. The recovery of Northern Bobwhite presents an opportunity to build on these existing stewardship activities and create an opportunity for strong collaboration. The OFAH recommends that the recovery of Northern Bobwhite build upon the successful model that resulted in Ontario's robust Wild Turkey populations. A key component of this success was the formation of working groups that included both governmental and non-governmental partners. Such a working group for Northern Bobwhite would provide important direction and cohesion among both government-supported and -led activities. Having the working group led by Walpole Island First Nation would start the initiative off with a wealth of existing local and ecological knowledge. Additional members of the working group could include MECP, the Ministry of Natural Resources and Forestry (MNRF), the Ministry of Agriculture, Food and Rural Affairs (OMAFRA), the OFAH, the Ontario Federation of Agriculture, and ALUS Canada.

Survey and Monitoring

The OFAH agrees with the assessment that surveying and monitoring is a high priority for the restoration of Northern Bobwhite populations. The Recovery Strategy for Northern Bobwhite in Ontario indicates that the ability for the current population of Northern Bobwhite to sustain itself and to then increase in abundance is unknown. As this is currently the only approved source population for Ontario, due to genetic divergence from neighbouring jurisdictions, it is essential to complete a population assessment to determine the feasibility of restoration. Generating a population estimate and genetic information on Ontario's population will allow managers to determine if the existing population is capable of effectively reaching carrying capacity on Walpole Island on its own. This information is critical in moving forward with restoration efforts, as it determines the best course of action early on in the process. If it is determined that the current population is too small to repopulate Walpole Island and the mainland, then it will be necessary to consider how to best introduce birds from outside populations. Understanding the status of the current Walpole Island population will also change what organizations will be key partners moving forward with restoration.

Research

Understanding the genetics of the existing Walpole Island population is a critical piece in the above-mentioned population status, which determines whether the population will be able to repopulate Ontario without outside introductions. If this research determines that the current Walpole Island population is not large or genetically diverse enough to restore the population, then the MECP must support investigating the need for augmentation of Northern Bobwhite populations. Ontario has examples of success in restoring populations by introducing animals from external sources, such as Wild Turkey and elk. If the current population of Northern Bobwhite is found to be too small to survive, then the MECP should be ready to initiate a reintroduction project. A major component of this will be to locate a suitable source population and begin to build relationships with the relevant US States where those populations exist.

Management and Habitat Protection

Prior to the start of any additional management and habitat protections, the MECP should work with WIFN to determine how Northern Bobwhite protections will impact their community and how those protections will be enforced. Additionally, the existing habitat work that WIFN has done should be leveraged in planning new habitat projects.

There are multiple actions under this objective that indicate that the government will assist landowners with high level habitat management such as developing best management practices, protocols and strategies, but there is very little incentive for landowners to implement these. In order to achieve habitat restoration for Northern Bobwhite, the MECP will need to use the Species at Risk Stewardship Program to help subsidize the costs associated with landowners transforming their land. This money can be leveraged by utilizing programs such as ALUS Canada to provide an incentive for farmers to create or improve Northern Bobwhite habitat on their farms.

The MECP should also consider new programs to incentivize non-farm landowners to create species at risk habitat. These actions should be done in conjunction with Environment and Climate Change Canada (ECCC), as they also have requirements to protect Northern Bobwhite habitat under the *Species at Risk Act*. As ECCC develops their action plan for Northern Bobwhite, the MECP should be involved to align actions being planned and taken.

Outreach and Awareness

The GRS does not indicate that any of the outreach and awareness actions are high priority, but many of the required actions in the other categories require public outreach and awareness. The OFAH believes that the MECP should improve their outreach regarding certain aspects of Northern Bobwhite restoration, which will also have benefits for other species at risk. Encouraging landowners to create and restore habitat will require a comprehensive outreach plan that includes best options for habitat creation, funding options for projects, ways to support Northern Bobwhite while maintaining their farming/land use practices, and any ways that they can report the status of their local Northern Bobwhite populations. Additionally, outreach and awareness will be critical to address predation issues. Free-ranging cats are a significant threat to the restoration of Northern Bobwhite and the public needs to be aware of the implications associated with allowing their cats to be outside and the risk of feeding feral cats instead of contacting an animal control company to remove them. Education about wild pigs will also be extremely important to recovering Northern Bobwhite in Ontario. Landowners in the Walpole Island area will need to be able to identify and report sightings of wild pigs so that MNRF can act quickly to remove them from the landscape. Rapid response to sightings is critical in preventing them from becoming established, and landowners have a role to play in that. The MECP should work with the MNRF and OMAFRA to educate farmers and landowners in the Walpole Island area in how to prevent pig escapes, detect the presence of pigs on the landscape, and report them.

Far-reaching Benefits

The actions taken to recover Northern Bobwhite in Ontario will have net benefits well beyond the species itself. By restoring habitat such as tallgrass prairie, savanna, and open early-successional forests, all the species that rely on these areas will benefit. This will include game species such as ruffed grouse, cottontail, and European hare, but also have net biodiversity benefits by improving songbird, small mammal, insect, reptile, and amphibian communities. The same will hold true for actions taken to control invasive plant species and non-native predators such as free-ranging cats and wild pigs. Restoring Northern Bobwhite habitat and populations provides an opportunity to showcase the benefit of landscape level species management and make significant improvements to habitat and wildlife in Southern Ontario.

The OFAH believes that we can be a key partner in many aspects of Northern Bobwhite recovery through the Invading Species Awareness Program, our experience in restoring Wild Turkey and elk to Ontario, and our ability to leverage to significant volunteer capacity that exists in the hunting community. We look forward to providing continuing input. Thank you for your consideration of our comments.

Yours in Conservation,



Lauren Tonelli
Resource Management Specialist

cc: OFAH Board of Directors
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
Mark Ryckman, OFAH Manager, Policy
OFAH Fish & Wildlife Staff

References

Bevins, S. N., Pedersen, K., Lutman, M. W., Gidlewski, T., & Deliberto, T. J. (2014). Consequences associated with the recent range expansion of nonnative feral swine. *BioScience*, 64(4), 291-299.