

ONTARIO FEDERATION OF ANGLERS & HUNTERS

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Ontario Conservation Centre

OFAH FILE: 340
March 3, 2021

To Whom it May Concern:

Subject: Lake Simcoe Protection Plan Review

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 appreciate the opportunity to participate in the 10-year review of the Lake Simcoe Protection Plan and offer the following comments.

The OFAH supports the Lake Simcoe Protection Plan (the Plan) and the commitments made under it, that set out actions to conserve fisheries, manage invasive species, and improve water quality. Lake Simcoe is southern Ontario's largest inland lake and supports Ontario's largest inland fishery. Due to the socio-economic importance of this waterbody, which is on a scale that is unparalleled across the province, the OFAH urges the Government of Ontario to implement and uphold all aspects of the Plan.

Lake Simcoe Fishery

Lake Simcoe is designated as a Provincially Significant Inland Fishery and brings in nearly one billion dollars to Ontario's economy annually. The health of the lake and understanding of the aquatic ecosystem rely heavily on essential monitoring programs, such as those carried out by the Ministry of Natural Resources and Forestry (MNRF) Lake Simcoe Fisheries Assessment Unit (LSFAU). The data provides valuable information to fisheries managers and stakeholders about the status and trends of the fish community. As such, the OFAH urges the Ontario government to reinvest and enhance funding towards the LSFAU and ensure the appropriate resources and staffing are available to continue to carry out this important work. Previously, Lake Simcoe had a dedicated fisheries biologist, and we see value in reappointing someone in this position to specifically oversee and manage one of the province's most important fisheries. One major shortcoming we would like to highlight is the potential for changes to be made to conservation authorities by the government and the significant impact this would have in aquatic monitoring in the Lake Simcoe tributaries. The MNRF does not conduct aquatic monitoring in Lake Simcoe tributaries and relies heavily on the Lake Simcoe Region Conservation Authority (LSRCA) for this important information. The Plan, the health of Lake Simcoe, and the many socio-economic and cultural benefits the fishery provides rely on an ecosystem-based approach that includes an understanding of the watersheds, the connecting systems, and the lake itself.

To achieve the goals and objectives set out in the Plan, there must be sufficient intergovernmental cooperation and partnerships between the Ministry of Environment, Conservation, and Parks (MECP), the MNRF, the LSRCA, and the Government of Canada. The approach must be a collective effort that breaks down jurisdictional barriers and ensures every relevant agency is working towards the same goals, while also removing unnecessary red tape that may hinder actions or decision-making for the benefit of Lake Simcoe. Moving forward, we would like to see evidence that these levels of government are indeed working together on addressing the needs of Lake Simcoe and following through on commitments outlined in the Plan to support a thriving, sustainable fishery.

The OFAH would like to see continued efforts towards the Lake Simcoe Fish Community Objectives (2011), as they provide targetable milestones to strive for that will benefit the health of Lake Simcoe. Lake Trout are a sought-after flagship sportfish and key economic driver in Lake Simcoe, but due to various stressors, full recovery and establishing a stand-alone naturally reproducing population is likely unachievable at this time. Moreover, there needs to be a balanced approach that also includes a long-term, sufficiently funded, strategic stocking plan for Lake Trout. More investments are needed towards research and science to better understand priorities for Lake Trout and actions that can be taken to address these issues, including funding to support restoration and rehabilitation initiatives. These investments can also be used beyond Lake Trout to benefit other fisheries restoration objectives such as the Muskellunge Restoration Project. The OFAH supported the move towards renewing the annual stocking goal of 100,000 Lake Trout into Lake Simcoe, but there is room to finetune stocking levels as well as explore opportunities to enhance and improve stocking success. Addressing action items set out in the Lake Simcoe Fish Community Objectives and supporting stocking initiatives lends itself directly to fulfilling many of the commitments set out in the Plan.

Invasive Species

The Plan does a good job at identifying the prevention of new introductions of invasive species as a target. The OFAH agrees that, in general, prevention is a better use of resources than management of the invasive species already in Lake Simcoe. Unfortunately, there are limited options for managing the invasive species already present in Lake Simcoe. For example, quagga mussels, spiny waterflea, round goby, and starry stonewort are all established and likely impossible to remove without significant costs, long-term management, and widespread environmental damages. Alternatively, there are aquatic invasive species that are nearby that can be prevented with strategic investments and conservation initiatives. The OFAH's Invading Species Awareness Program (ISAP) has been managing water soldier since 2008, with hopes to prevent its spread and eventually eradicate it. Without this important program, water soldier could easily spread into Lake Simcoe and have devastating impacts on the ecosystem, recreational activities, and shorelines. While the Plan outlines preventing new introductions as a target for Lake Simcoe, it does not speak to how new invasive species will be addressed if they are detected.

The OFAH suggests that the Plan include a commitment to creating a rapid response framework for Lake Simcoe. In developing a rapid response plan, the MECP should work with the MNRF, LSRCA, the ISAP, and other stakeholders in the area. This would facilitate the creation of a framework for how new invasions are dealt with when they are detected, prior to them becoming established, and is critical to the prevention of new invasions into Lake Simcoe. Within the framework, organizations would be responsible for different aspects of the response. The ISAP is the organization that collects invasive species detections through the Invading Species Hotline, EDDMapS Ontario, and iNaturalist. The MNRF and LSRCA could be the field component to the removal of any new invasive species as soon as they are detected. This rapid removal process is essential for any hope at stopping the spread within the lake and hinges on adequate funding and ongoing support of important conservation initiatives like the ISAP.

Water Quality and Land Use

As the human population continues to increase and communities expand in the Lake Simcoe area, water quality and land use within the watershed will experience increased pressures. Additional development and urbanization will lead to more runoff and nutrient loading into the lake. The Plan outlines ways to attempt to reduce the impacts that new development will cause, as well as improving systems to help minimize the effects the current population has on the lake. In addition to enforcing existing regulations and implementing current policies, the OFAH suggests the MECP consider green infrastructure and nature-based solutions to improve water quality. Increasing green space around the lake, including in developed areas, can help mitigate some of the water quality issues, while providing the social benefits associated with green spaces. With increasing human populations and, by extension, housing needs in the area, more constraints will need to be established on where and how development can take place to meet the targets laid out in the plan.

Successful implementation of the targets and objectives laid out in the Plan rely heavily on active participation and support from the public, which can be achieved by fostering meaningful connections to Lake Simcoe through investments made to encourage and promote recreational activities like angling. In the face of the economic downturn caused by the pandemic, Ontario needs infrastructure investments such as these to create jobs and drive economic stimulus, while generating long-term conservation, economic, and social benefits. In our feedback on the 2021 Pre-Budget Consultation to the Government of Ontario, we noted that fishing (and hunting) remains a strong economic sector for Ontario and has considerable room for growth with proper investment. As such, we ask that the government make immediate investments in municipal infrastructure projects like boat launches, dedicated and accessible fishing areas, and docks that can promote and facilitate access for Canadians to participate in water-based outdoor recreation. These shoreline infrastructure investments can easily integrate naturalization and restoration projects that achieve Lake Simcoe Protection Plan objectives. Fishing and the outdoors sector have remained relatively strong throughout the pandemic and can continue to be a source of economic and social strength as the people of Ontario seek safety in these activities that also offer mental and physical health benefits. Given the importance of Lake Simcoe to so many people, including communities, the OFAH recommends that the Government of Ontario work with municipalities in the Plan area to invest in shoreline infrastructure that can integrate access and naturalization projects.

Partners

The Plan relies on collaboration and participation of various partners and stakeholders already invested in the health of Lake Simcoe. The MECP must better engage with the various committees that were formed, such as the Lake Simcoe Stakeholder Advisory Committee and the Lake Simcoe Fisheries Stakeholder Committee, to continue to support actions and strategies laid out in the Plan. Additionally, many aspects of the Plan are implemented by the LSRCA; due to their experience, it makes sense to maintain LSRCA's traditional involvement in monitoring and assessment work in the Lake Simcoe watershed and for the government to provide support where necessary. If the LSRCA is no longer able to do this work, then the Government of Ontario needs to fill that gap. As mentioned above, the ISAP is a key partner in the early detection and response to invasive species and would like the opportunity to work with MECP to develop a response plan for new invasions. With that said, the Ontario government should prioritize reinvesting in partners, such as the ISAP, when it comes to improving outcomes for Lake Simcoe.

Closing Remarks

The OFAH believes that the Plan is a valuable and robust policy for ensuring the many issues facing Lake Simcoe are identified and addressed. However, there are issues with the implementation of aspects of the Plan that need to be improved if long-term success is going to be achieved. Without adequate funding, dedicated resourcing, and intergovernmental partnerships, the Plan will be toothless in its implementation.

The issues facing Lake Simcoe are going to be exacerbated by an increasing population and a warming climate. With climate change, invasive species will become an even bigger threat, cold-water fisheries will be increasingly stressed, and water quality impairments will worsen. The MECP should integrate climate resiliency strategies into all aspects of Lake Simcoe management and planning to ensure the protection of this valued resource for generations to come.

The OFAH would like the opportunity to work with the MECP and the MNRF on how to improve outcomes for Lake Simcoe moving forward. Thank you for the opportunity to comment and for your consideration.

Yours in Conservation,



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