

ONTARIO FEDERATION OF ANGLERS & HUNTERS

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Ontario Conservation Centre

OFAH FILE: 440

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To Whom It May Concern:

Subject: Multi-species Action Plan for Rouge National Urban Park of Canada

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 Multi-species Action Plan for Rouge National Urban Park of Canada (the Plan) and offer the following comments for consideration.

In general, the OFAH is very supportive of the Plan and the overall approach that Parks Canada Agency (PCA) is taking. We believe that implementing measures that will have multi-species benefits is the best way to make meaningful progress with the species at risk in Rouge National Urban Park (RNUP). These actions will also provide positive outcomes for other, not-at-risk species and potentially provide social benefits to RNUP visitors. The OFAH would like to offer the following general and measure-specific suggestions, which we believe will increase the ecological and social benefits of the Plan.

Measure 28: Develop a Rouge Beach Restoration Concept and Design

The OFAH suggests the creation of fishing areas when developing a restoration plan for Rouge Beach. Dedicated fishing areas will allow the park to strategically position anglers where the park wants them, thereby avoiding highly sensitive habitats. These fishing areas could also help to improve the accessibility of fishing in the RNUP. Examples of how to enhance fishing opportunities while protecting specific areas and species can be found in "*Fishing in Your Backyard: An Urban Recreational Fisheries Strategy for the Lake Ontario Northwest Waterfront.*" This document was created for the purpose of promoting angling in sensitive urban environments and would serve Parks Canada well when considering dedicated fishing areas on Rouge Beach. The OFAH offers our assistance in the development of designated fishing areas during the Rouge Beach restoration design.

Measure 35: Implement Farm Plans

The OFAH suggests that when PCA begins the farm planning process that they review the ALUS program format. ALUS (Alternative Land Use Services) works with farmers to alter farming practices or convert marginal farmland to support and improve habitat and to protect species at risk. There are many examples of ALUS projects that PCA can adapt for their own purposes when implementing the farm plans. ALUS provides compensation to farmers to incentivize them to delay their haying to protect bird species, replant trees and grasslands, and create wetlands. Additionally, ALUS is a farmer-led and driven program which allows for better farmer engagement and uptake. These types of projects could easily be implemented as part of the farm planning process that the PCA is suggesting for RNUP.

Measure 55: Feasibility Study for the Management of Hyperabundant White-tailed Deer in RNUP

The OFAH would like to offer our expertise to PCA in determining the best course forward for RNUP to manage their hyperabundant white-tailed deer population. We recommend that as part of a feasibility study, that PCA consider implementing an urban bow hunt for deer within RNUP. This could have wide reaching ecological, economic, and social benefits to RNUP. Deer hunting is used throughout the province to manage deer populations (including reducing overabundant deer populations) in a cost positive way. Allowing harvest of deer within RNUP would also provide monitoring of the health of the population. Deer hunters in Ontario are often the frontline of disease detection in deer populations, especially in detecting chronic wasting disease (CWD) should it ever enter Ontario. The MNR uses harvested deer to test Ontario’s deer herds to monitor for the presence of CWD Ontario. Ontario hunters are extremely well trained in regulations and safety, they are engaged, and would appreciate the opportunity to hunt in RNUP. There are existing examples of urban bow hunting opportunities in the City of Thunder Bay and the Municipality of Shuniah. Both of these places have rules governing how deer hunting can take place in urban centres to avoid conflict including bow hunting only, hunters must be in a stand of at least 3m and 75m from a dwelling or highway, and Shuniah also allows hunting below 3m if hunters are 100m from a dwelling or highway. The OFAH sees a great opportunity for a controlled bow hunt in RNUP that would address the overabundance of white-tailed deer and would appreciate the chance to further work with PCA on implementation.

Partnership Opportunities

There are multiple measures within the Plan that the OFAH could assist with in partnership with PCA; specifically, habitat and species restoration, invasive species management, and outreach and education. Through the Lake Ontario Atlantic Salmon Restoration Program (LOASRP), the OFAH has been working to improve stream habitats and reintroduce Atlantic Salmon back into Ontario waterways. These activities directly tie into *Measure 40: restore aquatic habitat in RNUP* and *Measure 65: support introduction initiatives*. We are supportive and appreciative of RNUP being a reintroduction location for the LOASRP and would welcome any opportunity to further this partnership through aquatic habitat restoration efforts.

The OFAH also runs the Invading Species Awareness Program (ISAP), which has been delivering invasive species programming for almost three decades. Through the ISAP we would be a willing partner in many of the measures laid out in the Plan. The ISAP runs a reporting system for invasive species through both EDDMaps Ontario and iNaturalist to be able to detect invasive species and be alerted to any new introductions. These programs would complement *Measure 45: promote RNUP iNaturalist project* and *Measure 46: promote citizen science opportunities* by adding an invasive species monitoring component to them. The ISAP could also provide assistance and expertise to *Measure 36: produce an invasive species management plan* and *Measure 65: targeted surveys or collection of samples for eDNA analysis*. We are also able provide and coordinate invasive species identification training and outreach to members of PCA and/or guests of RNUP to help accomplish a number of additional invasive species related measures in the Plan.

Throughout the Plan, outreach and education is a reoccurring theme that gets listed in many different measures. Through a wide variety of our programming, the OFAH has outreach and education presentations and materials for a variety of topics that we would be willing to partner with RNUP to deliver. The LOASRP can deliver specific outreach related to Atlantic Salmon and could set up a classroom hatchery so that visitors of RNUP can see how Atlantic Salmon hatch, grow, and are released. As mentioned above, the ISAP can deliver outreach related to identification, reporting, and preventing invasive species in RNUP. Additionally, the OFAH can assist in fishing-related outreach to RNUP visitors including our TackleShare program that lends out fishing equipment to locations to make fishing more accessible to everyone. The OFAH would also like to work with PCA to develop signage for fishing areas that explain the species available and assist with keeping anglers away from particularly sensitive habitat.

Conclusions

The OFAH is supportive of the measures that the PCA are proposing in RNUP and we believe that they will have positive outcomes for species at risk. We would appreciate any opportunity to discuss the partnership potentials that we have suggested above and look forward to working with PCA in the future.

Thank you for considering our comments.

Yours in Conservation,



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