Muskies Canada Inc. ("MCI") Comments In Response To

Draft Management Plan For Fisheries Management Zone 15 ("The Plan")

MCI is an organization whose goals include protecting and enhancing the muskellunge fishery in Canada through the wise use of the muskellunge resource and participation in research projects, habitat protection and improvement projects, and scientific studies of the species. As such, MCI are primarily interested in contents of the Plan that relate to muskellunge. Following are comments with respect to those contents:

1) **References to illegal stocking of muskellunge.** MCI is not aware of any evidence documenting illegal or unauthorized stocking of muskellunge in Ontario. It is possible, if not most likely, that all instances of introduction in FMZ15 involved stock from the Deer Lake Hatchery which produced Kawartha-strain muskellunge for the purpose of stocking from 1938 to 1991 but that currently available documentation of these stocking events do not represent a complete data set. It is less reasonable to presume that some other party was able to successfully procure or produce enough muskellunge to have been successful in creating a muskellunge population with stocking. MCI suggests removing "illegal" and "unauthorized" from all references to introductions of muskellunge in the Plan. While MCI agrees that unauthorized introductions of *any species* are to be discouraged, there is risk that including unnecessary negative language in reference to muskellunge could contribute to existing biases in a manner contrary to one of the Plan's general Goal Statements – "Education: Improve the general public's respect for natural resources…"

2) **Muskellunge Strategy.**
    a. MCI supports the muskellunge management Goal to "Maintain the Muskellunge Fishery within FMZ15".
    b. MCI understands and accepts Advisory Council preference for zone-wide regulations to remain unchanged at the provincial minimum standard.
    c. MCI strongly supports the single Exception currently included in the Plan. All associated details of the exception that aligns regulations of the Pickerel River to those of the connected waters of the French River are reasonable and well presented, including at Table 4.19, so should be subject to no further revision.
    d. It is the opinion of MCI that achieving the Goal of maintaining the muskellunge fishery within FMZ15 may require two additional exceptions and MCI would like to request consideration of an enhanced Minimum Size Limit ("MSL") of 111.8cm (44") for the Madawaska River and the Petawawa River. Regulatory Guidelines For Managing The Muskellunge Sport Fishery In Ontario allows various benchmark MSLs as options to maintain quality of a muskellunge fishery: "Based on the ultimate growth potential of muskellunge in a particular waterbody…, minimum size limits can be used to provide various qualities of fisheries". MSL of 111.8cm is among the benchmarks available in the Guidelines.

Additional to MCI comment 1)d:

- 111.8cm MSL is supported by growth potential on the Petawawa River and Madawaska River as suggested by data of the MCI Angler Diary Program. The Plan acknowledges the MCI Angler Diary Program as a viable data source for consideration in management decisions.
- In the case of the Madawaska River, local MCI representatives noted that: "This population is facing more fishing pressure due to the expansion of both the western suburbs of Ottawa and the ever-growing Arnprior and additionally by-catch pressure from walleye anglers on this popular local walleye destination." Also, it seems likely that the ecological and habitat change that took place in the 1960s with construction of 5 generating stations and dams and flood control measures has already impacted native fish populations, including muskellunge. MCI does have some information about the quality of the muskellunge fishery on the Madawaska River prior to damming and urbanization and can provide to the Ontario Ministry Of Northern Development, Mines, Natural Resources And Forestry and/or Advisory Council on request.
- Proposed exception for Madawaska River should be limited to the lower section of the river from Calabogie Lake Dam downstream to the boundary with FMZ12 at Arnprior.
- Proposed exception for Petawawa River should include the entire river from Lake Travers in Algonquin Park to the boundary with FMZ12 at Petawawa, including Black Bay and Barron River upstream to First Chute Falls.

We at MCI look forward to receiving a response to the above comments but especially to MCI comment 1)d.

Thank you for the opportunity to provide input.

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