



Ottawa Field-Naturalists' Club
Club des naturalistes d'Ottawa

November 3, 2022

Re: ERO# 019-4868

To whom it may concern,

The Ottawa Field-Naturalists' Club (OFNC) is Canada's oldest natural history organization, founded in 1863 and incorporated in 1879. The OFNC also has a long history of involvement in the conservation of Alfred Bog. Since 1981, the OFNC has worked closely with a coalition of partner organizations to advocate for the bog's conservation, including the Vankleek Hill & District Nature Society, the Nature Conservancy of Canada, and South Nation Conservation Authority. The efforts of this coalition since the 1980s led directly to the acquisition of the properties now proposed to form Ontario's newest Provincial Park. A summary of these conservation efforts can be found online at <https://ofnc.ca/programs/conservation/alfred-bog>.

The OFNC is pleased to support the proposal to regulate these lands as a "natural environment" non-operating provincial park. Alfred Bog is a rare example of a large, high-quality ecosystem in a part of the country where most of the natural landscape has been destroyed, degraded, altered, or fragmented. We believe that Alfred Bog will benefit from the status and protection that come from this designation. In order to ensure that this proposal is sufficient and effective at conserving Alfred Bog in perpetuity, we would like to highlight a few areas where the proposal needs to be maintained or strengthened.

The use of All-Terrain Vehicles (ATVs) and other recreational off-road vehicles must continue to be prohibited, and this prohibition must be strictly enforced. Alfred Bog, like all peatland habitats, contains soft soils and sensitive vegetative structures that form and grow very slowly, making them highly susceptible to damage from the use of ATVs and similar vehicles. Ruts created by ATVs can also alter the surface flow of water, draining shallow pools that serve as a home for some of the bog's rare species, and drawing them into the path of vehicles.

If hunting is to be allowed throughout the park, we recommend that it be bow hunting only. The use of firearms would create a higher safety risk to all users of the park, and would contribute to litter and contamination from cartridges and projectiles. Whether or not lead ammunition would be permissible, it is likely that it would be occasionally used, and the accumulation of lead over time would contaminate the water within the wetland, and pose a risk of direct poisoning to wildlife. For these reasons we believe that firearm use as a hunting method should be disallowed.

Furthermore, all hunting activities must be subjected to adequate monitoring and enforcement if necessary. If hunting activities are threatening the sustainability of one or more populations of wildlife species within Alfred Bog, or if hunting activities are leading to undue disturbance or alteration of the habitat, changes should be made to the regulations accordingly. If individuals are causing damage to the environment or allowing the accumulation of litter, those individuals must be held accountable through enforcement.



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The nature of Alfred Bog as a wetland, and the reason it is largely a peatland rather than another type of habitat, is intimately related to its hydrology. Unfortunately, this hydrology has been altered over time by drainage and peat harvesting. The current Alfred Bog only occupies a portion of its original historical extent, and some areas of the bog are undergoing rapid vegetative change owing to the drying effects of drainage around the bog perimeter. In order to protect the ecological integrity of Alfred Bog, it is as important to protect its hydrology as much as the land area itself. The conservation of Alfred Bog Provincial Park should include a plan and regulations to prevent further drainage from the periphery of the current bog, and to reverse and repair the effects of the artificial drainage that currently exists.

Lastly, the park should be given the resources and mandate to continue to acquire parcels of land within the extant bog area, as well as parcels around the perimeter of the bog and within the bog's historical area of occupancy. Such lands would serve to act as a buffer for the sensitive, intact bog habitat, to protect it from the effects of agricultural drainage, and to provide an opportunity to slowly restore a rare wetland habitat that also functions as an effective carbon sink.

Overall, the proposal to create Alfred Bog Provincial Park is an important and welcome step in the conservation of this unique natural area. We hope that the proposal is adopted, along with the recommendations we have outlined above.

On behalf of the OFNC,

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