PEACEFUL
PARKS
COALITION

December 11, 2009

John Gerretsen
Minister of the Environment
1st Floor
135 St. Clair Avenue West
Toronto, Ontario M4V 1P5

Dear Minister Gerretsen,

The Ontario Ministry of Natural Resources (MNR) has developed two independent resources management plans for Presqu'ile Provincial Park – **Presqu'ile Resource Management Implementation Plan Park Mainland** and **Presqu'ile Resource Management Implementation Plan High Bluff and Gull Islands**. Both these resource management plans introduce long-term culling programs for Double-crested Cormorants and White-tailed Deer and 'other' unspecified wildlife while eliminating public oversight until 2019.

We need the Ministry of the Environment to send to a Full Environmental Assessment the two MNR resource management plans because they lack:

- Clear goals for the long-term wildlife control programs;
- Scientific evidence supporting long-term wildlife control;
- No process to measure impacts on targeted species;
- No adequate mechanism to measure success of the program;
- No adequate mechanism for deciding when to terminate management actions;
- Considerations of geographical scale;
- Justification for eliminating public oversight;
- Provision for broad public consultations.

If these resource management plans are permitted to go forth as they are, they will set the standard for limited public consultations with limited access to information on 'closed door' resource management programs that eliminate public scrutiny within publicly owned Provincial Parks.

Since MNR has provided the public with a very narrow 30 days to apply for a Part II Order for one or both resource management plans, we have combined our discussion of the two resource management plans to comply with this deadline.

The following discussion will focus primarily on White-tailed and Double-crested Cormorants because the ministry has provided some background information regarding the control of these two species. The ministry has provided no information regarding the need to control 'other' (unspecified) wildlife.

Within this discussion, we will show that MNR has no 'ecological' justification for killing cormorants or deer, and has a history of shifting goals without shifting objectives as they are successfully challenged on their 'ecological' rationale; that wildlife control programs and terms such as 'hyper-abundant is a value judgement, and differ from scientifically defined 'ecological integrity' and 'natural carrying capacity'; and that common to all wildlife control programs is an underlying political conflict related to human/wildlife conflicts rather than 'negative ecological impacts'.

We also analyze original studies from both Ontario national and provincial park agencies and provide supplementary scientific studies to show that there is a severe lack of scientific research to justify wildlife control programs. We have included correspondence discussing our concerns with ministry staff. These notes are important because they are unrehearsed responses to genuine enquiries. We also provide documentation measuring public response to wildlife control in protected areas.

Our recommended changes to the Presqu'ile Resource Management Implementation Plan Park Mainland and Presqu'ile Resource Management Implementation Plan High Bluff and Gull Islands are found in Appendix 1.

Special Note: In August 2009, we requested through Environment Canada's Access to Information Act the recent Canadian Wildlife Service census of all colonial water bird colonies throughout the Canadian Great Lakes. This information is original data and can provide an overall perspective as to whether Double-crested Cormorants threaten their avian companions, as stated by MNR. It should also provide greater details as to the longevity of colonial waterbird colonies, their fluidity and species composition. However, Environment Canada has delayed the release of this information until December 15, 2009. Therefore, we will be submitting this information with a supplementary discussion as soon as it is released to us. Correspondence to and from Environment Canada is found in **Appendix 1.6.**

Sincerely,

AnnaMaria Valastro
Peaceful Parks Coalition

LACK OF CLEAR GOALS:

The ministry describes its goals for long-term wildlife control in several ways:

- to protect ecological integrity
- to increase biodiversity
- to maintain habitat diversity
- to protect woody vegetation which provides habitat
- to protect natural heritage
- to restore natural ecosystem dynamics
- help sensitive species

The Draft Management Strategy for Double-crested Cormorants at Presqu'ile Provincial Park 2002 stated its goals as:

"In order to protect representative woodland flora and fauna and the aesthetic beauty of High Bluff Island while retaining maximum diversity of nesting colonial bird species, it is proposed that Double-crested Cormorants be removed from the western woodland of High Bluff Island" **pg. 1 Appendix 2.3**

The Presqu'ile Cormorant Management Strategy Assessment 2003-2006 defines the goal of the strategy as follows:

- to protect representative woodland flora and fauna of High Bluff Island, Presqu'ile Provincial Park, while retaining maximum diversity of nesting colonial bird species. **Appendix 2.4**

In the final **Presqu'ile Resource Management Implementation Plan High Bluff and Gull Islands 2009**, the stated goal is:

- to maintain representative diversity of species and their habitats using an adaptive management approach that is ecosystem-based.' Pg. 12 **Appendix 2.1**

Specific to cormorant management, it states:

- 'To manage the cormorant population to prevent the loss of specific woody habitat areas and permit recovery of woody habitat'. Pg 17 (Ibid.)

It goes on to state that this management approach will focus on the protection of three target species: Monarch Butterfly, Great Egret, and the Black-crowned Night Heron. What's not clear is whether cormorants will be managed only in areas where the target species are found exclusively, or if they will continue to manage cormorants throughout the islands to **increase** woody habitat, or both.

As MNR is successfully challenged on the ecological need to kill cormorants, they shift their goals to ones that are less clear and therefore the ministry's success in meeting them is difficult to measure. Furthermore, how any of these goals are consistent with the provincial policy on cormorant control established in 1998 still remains unclear. The policy states:

"Control of the cormorant numbers should only be considered in specific local areas if the birds are found to be having significant negative, ecological impacts on habitats or other species.' EBR # PB7E6005 **Appendix 3.1**

While MNR believes their cormorant control program on High Bluff and Gull Islands meets the provincial policy criteria, they have not shown scientific evidence to prove the ecology is being significantly impaired.

They can only point to the visual impacts of tree mortality in the western woodland, but cannot articulate how these impacts, in such a small area, can cause ecosystem failure.

The following excerpt from the report '*Cormorant Nesting Pressure and Tree Health At Tommy Thompson Park, Toronto 2008'* well articulates the ecological significance and historical perception of Double-crested Cormorants among resource managers:

"Currently, ecosystems in North America are rebounding from a DDT-driven abiotic regime shift in the 1950s and 1960s that caused the demise of many upper tropic-level predators, including colonial waterbirds, such as the formerly abundant Double-crested Cormorant (Hatch 1995, Wires and Cuthbert 2006). This regime shift resulted in an increase in island and peninsular forest communities in the Great Lakes ecosystem in the absence of a species which contributed to the barrens suitable for ground-nesting waterbirds. Humans have become familiar with the forested state of what was formerly waterbird barrens, however, the 1970s ban of DDT in the North American environment has led to the re-colonization of the Great Lakes by cormorants, which are now able to act, once again, as biotic agents of regime change pushing the forest ecosystem through a shift to a rocky barren ecosystem (Wires and Cuthbert 2006). This is creating concern to people and agencies that feel that barrens are not an optimal ecosystem from a human perspective." Pg. 13 **Appendix 6.3**

Simply put: **MNR believes that 'live' trees have greater biological value than rare habitats, and any species that eats or kills trees, such as deer, cormorants, beavers, rabbits, voles and so on, can have 'negative ecological impacts'.**

The 'Presqu'ile Resource Management Implementation Plan Park Mainland, describes the purpose of resource management as:

- Conservation of natural communities, processes and significant species;
- Restoration or enhancement of natural features and processes that have been, or may be, lost or degraded;
- Elimination or reduction of the threat of 'alien' species where possible
- Creation of opportunities for park visitors to appreciate and learn about the diverse communities and wildlife of the park in ways that do not threaten existing natural values;
- Protection of the safety of park users. Appendix 2.2

How these goals relate to overall wildlife control are unclear. Except for killing wildlife, it is unclear how operational plans will be implemented to achieve these goals. Therefore, the impacts on targeted species cannot be measured nor can the success of the program.

While the MNR insists that both White-tailed Deer and Double-crested Cormorants and other so-called nuisance wildlife are welcomed at Presqu'ile Provincial Park, they are not welcomed in naturally occurring populations or if they interfere with resource management objectives. They are welcomed as remnant populations only – where their impacts are no longer visible. To sustain this remnant population, realistically MNR would need to manage indefinitely or until the targeted species become extirpated. Extirpation is a real possibility especially with Double-crested Cormorants.

Therefore, specific goals, objectives and measurable outcomes are necessary.

PUBLIC PROCESS

Double Crested Cormorants

Depending on which Ministry of Natural Resources' document one reads, the killing of Double-crested Cormorants (DCCO) is either a 'research and monitoring' program or a 'management' program.

The difference is notable because as a 'research and monitoring program', the MNR can bypass public consultations (Section 11, Regulation 334 Environmental Assessment Act) but as a 'management' program public consultation is necessary.

The Presqu'ile Resource Management Implementation Plan High Bluff and Gull Islands: Appendix 2. *Record of Screening for Cormorant Management. Purpose and Rationale* clearly states: 'Cormorants have been managed at Presqu'ile since 2002'.

However, in July 2000, MNR filed an Exemption to Public Comment regarding a five year research and monitoring initiative to measure the negative impacts of Double-crested Cormorants. The study area involved several cormorant nest sites throughout the province including Presqu'ile Provincial Park. EBR # PB 00E6009 **Appendix 3.2**

In 2002, MNR announced it would initiate lethal control of Double Crested-Cormorants as part of their research and monitoring program, which includes Presqu'ile Provincial Park. Within the same notice it also announced a Draft Management Strategy for Double-crested Cormorants at Presqu'ile. EBR # PB02E6004 **Appendix 3.3**

The notice, while open to public comment, was confusing. As a research and monitoring program, the ministry had previously filed an Exemption to Public Comment, and since Presqu'ile was part of this research and monitoring program it was unclear whether the draft management strategy was part of the Presqu'ile Park Plan, or part of the broader research and monitoring program.

The notice received 1597 comments primarily as a response to the lethal control of cormorants through egg oiling. Shooting had not yet been introduced.

In both cases, the public was never given a clear scientific proposal in support of a lethal research and monitoring program or scientific rationale in support of a draft management strategy. Instead the ministry blurred the boundaries between 'research and monitoring' and 'management'.

At Presqu'ile, we have always contended that management of cormorants was a political decision without any scientific rationale. This claim is supported in the MNR Presqu'ile Provincial Park – Management Planning Management Plan – Ontario Parks Position on Major Issues October 2000. MNR agreed to develop a cormorant management strategy after strong protests objected to the omission of a cormorant control strategy in the preliminary park management plan. **Appendix 3.8**

At this time, we also received a copy of the Minister's Briefing Note reviewing the issue of controlling Double-crested Cormorants across Ontario. This briefing note was sent anonymously. **Appendix 3.9**

From the discussion, it appears the Minister's Note was written just prior to the announcement of the five year research and monitoring program. The discussion centres on the political consequences of initiating control, and outlines how the programs and public consultations will proceed.

It is clear from the briefing note that the ministry had always intended to kill nesting cormorants at Presqu'ile, and that early attempts to practice non-lethal control was a necessary step of elimination to move forward with lethal control by shooting.

The briefing note also states that once control is initiated, it would be very difficult to stop, lending support to our assertion that the ten year culling extension is indefinite.

As late as the end of 1999, the government's position on the issue of Double-crested Cormorants was that there was no good ecological evidence to support a provincial strategy on cormorant population control. This was after extensive national and international consultation with the United States such as New York State and the U.S. Fish and Wildlife Service. The ministry concluded that cormorant control should only be considered in specific local areas if the birds are found to be having significant negative ecological impacts on specific habitats or other species. **Appendix 3.10.**

The intent was control should be the exception not the rule.

The lack of good ecological evidence was interpreted by proponents of cormorant control as a lack of evidence that measured what they perceived were obvious negative impacts to fisheries and trees by nesting cormorants. And since the birds are fluid, a local approach to cormorant management was seen as ineffective and just moved the "problem" to another location.

The intent of the five-year research and monitoring program was clearly stated: "MNR requires defensible evidence of significant negative effects before long-term management recommendations can be developed or implemented."

MNR filed an 'Exemption to Public Comment' in July 2000, excluding public comment and public scrutiny questioning the scientific legitimacy of a research and monitoring program that aims to justify a long-term lethal control of a native species.

The MNR provided a long list of potential adverse effects caused by the presence of Double-crested Cormorants: **local reductions in fish stocks, risks to other wildlife and certain rare habitats, negative impacts on water quality and odour, and possible transmissions of certain diseases and parasites.**

One by one these potential adverse effects were quietly dropped from the ministry's agenda with no explanation or scientific research to prove, one way or another, that they were no longer ecologically significant. As controversy grew over the lethal control and harassment of cormorants at Presqu'ile, MNR narrowed the objectives for their program to a more 'ecologically defensible' rationale, the protection of three colonial water birds: Great Blue Heron (GRBH) , Black-crowned Heron (BCNH) and the Great Egret (GREG) .

As it became evident that a strong correlation existed between management activities and the decline of Great Blue Herons, the ministry narrowed their objective once again to the protection of Black-crowned Night Herons and Great Egrets only and added the Monarch Butterfly to the list after the program ended in 2007.

All other considerations were no longer relevant including the protection of rare habitat and the Great Blue Heron. The ministry ceased all public consultations in 2005 and 2006, and never consulted the public on its new and narrower objectives.

In April 2002, less than two years after initiating its research and monitoring program, the ministry approved a policy decision for a 'Draft Management Strategy for Double-crested Cormorants at Presqu'ile Provincial Park' prior to the conclusion of the five-year monitoring program. **Appendix 2.3**

In 2004, the ministry announced the shooting of 6000 cormorants for the next three years. This proposal was open to public comment and received 840 comments. The Ministry of the Environment received an application for an EA review and ordered that a scientific committee evaluate the 2004 cull prior to continuing any further culls in 2005 and 2006. EBR # PB04E6007 **Appendix 3.4**

A recommendation to was made to the Minister of Natural Resources by a scientific committee established by MNR to continue the culls through to 2006 with no further public consultations. **(It is notable that members of this scientific committee are anonymous, likely to avoid public scrutiny, yet the same committee recommends suppressing opponents and developing a local communication strategy. The committee references only ministry documents to support their recommendations, and in 2006, the same committee recommended a long term cull of cormorants.)** EBR #s XB05E6001 and XB06E6013 **Appendix 3.5**

Direct link to committee recommendations: http://www.ontarioparks.com/English/pres_planning.html

In 2006 the ministry posted a public consultation to an amendment to the DCCO management strategy at Presqu'ile announcing an extension to the program into 2007. EBR # PB06E6032 **Appendix 3.6**

In November 2008, the ministry posted an Information Notice announcing the Presqu'ile Resource Management Implementation Plan for High Bluff and Gull Islands endorsing a lethal management strategy for White-tailed Deer and Double-crested Cormorants for the next ten years with no further public consultations. EBR # 010-4477 **Appendix 3.7**

Using an information notice only, the ministry introduces for the first time the need to kill cormorants to protect the Monarch Butterfly; their intention to lethally control deer on High Bluff Island, and eliminate public oversight
for ten years.

Please note, the MNR has removed from public viewing the original draft proposal 'Presqu'ile Resource Management Implementation Plan High Bluff and Gull Islands'. This is unusual. All other draft proposals remain available on the Presqu'ile Provincial Park website, Park Planning Section. Having reviewed the drat proposal online, we cannot include a copy here.

The ministry now generally describes the need for lethal management as 'maintaining habitat diversity' - a convenient phase that does not lock them into species specific protection and/or ecological definitions.

This sets precedent in Ontario, yet the ministry limited public consultations to a Notice of Information only.

The office of the Environment Commissioner has taken note of the persistent practice by MNR of limiting public consultations, and has written extensively about this in the 2008/2009 Annual Report and supplementary report. The ECO's full analysis is found in **Appendix 3.11**

An excerpt is included here.

Environmental Commissioner of Ontario 2008/2009 Annual Report Supplement

1.2 Ministry of Natural Resources – Policy

1.2.4 Presqu'ile Provincial Park Islands Implementation Planning Description

- On November 24, 2008, MNR posted an information notice on the Environmental Registry to notify the public that project planning for cormorant and deer management and vegetation restoration on the islands at Presqu'ile Provincial Park was being carried out under the Class Environmental Assessment for Provincial Parks and Conservation Reserves (Class EA).
- The ECO sent a letter to MNR on December 5, 2008 expressing concern with MNR's use of an information notice rather than regular consultation under the EBR for this environmentally significant policy. The ECO expressed deep concern that MNR's choice may have the effect of limiting public scrutiny by circumventing the proper EBR public consultation process and limiting the ECO's ability to report to the Ontario Legislature on this initiative.
- The ECO strongly urged MNR to post a regular proposal notice on the Environmental Registry to provide for full public notice and comment as required under the EBR.

Ministry Response

- At MNR's request, ECO staff met with MNR on February 9, 2009.
- MNR explained that it considered this project planning to be an undertaking under MNR's Class EA, and not a policy proposal. MNR also stated that it has policy in place on cormorant management, and that it was mainly implementing that policy.
- MNR noted that public consultation would occur pursuant the Class EA. MNR believes that a higher quality of consultation results from using its Class EA stakeholder lists than soliciting province-wide comments using the Environmental Registry.
- In May 2009, MNR responded to the ECO's December 2008 letter, confirming its position that "project implementation activities, such as the resource management implementation plan at Presqu'ile, are not considered policy" and that the implementation plan does not contain new policy.

ECO Comment

- The ECO disagrees with MNR's position that consultation under the EBR was not required, and is disappointed that MNR refused to post a regular notice on the Environmental Registry. Section 32 of the EBR exempts instruments under the Environmental Assessment Act, not policies. Further, the Class EA for Provincial Parks and Conservation Reserves is not intended to be used for the preparation of management direction or area policies.
- The ECO is deeply troubled that MNR views the Class EA process as preferable to the EBR consultation process. The ECO is concerned that MNR is characterizing policies and programs as falling under the EA process in cases where that may not be appropriate. The ECO urges MNR to reconsider its approach for future policy development related to projects covered by this Class EA and others, and to make full use of the Environmental Registry to allow for transparent and open consultation with the general public, rather than limiting consultation to a smaller group of stakeholders.

It is clear that as far back as 2000, the initiation of the research and monitoring program and /or cormorant control program at Presqu'ile was politically motivated. It was rushed and developed without a clear scientific foundation. It was simply intended to rationalize and implement a lethal control program of nesting cormorants across Ontario, including Presqu'ile, and as such, introduced their intentions in piecemeal proposals to limit public consultations and avoid full public scrutiny.

Please note: In the Notice of Completion documents, the ministry neglected to record hundreds of petition letters opposing both the killing of Double-crested Cormorants and White-tailed Deer in the mainland and islands of Presqu'ile Provincial Park. Our letter of complaint to the Minister of Natural Resources is in Appendix 1.6

We suspect that letters from the general public were not recognized because MNR posted an information notice only, and was not soliciting comments from the general public.

PUBLIC PROTESTS – DOUBLE-CRESTED CORMORANTS

So anxious was the Ontario Ministry of Natural Resources to control public scrutiny and witnesses to the shooting and disturbance of nesting birds, that they applied harassment techniques and employed illegal tactics against protesters. These are well documented in a formal complaint brought forth to the Ontario Ombudsman. **Appendix 4.10**

The MNR assured the ombudsman's office that they have suspended any further culling operations at Presqu'ile and therefore the ombudsman also suspended the complaint. However the complaint, which includes the arrest of Peaceful Parks' volunteers will be reactivated when culling resumes at Presqu'ile.

Specifically, court records and the subsequent police investigation report involving Peaceful Parks' volunteers is very detailed. It provides a clear description of the extreme behaviour of park officials and local police. **Appendix 4.9**

If both Presqu'ile Resource Management Implementation Plans go forward without public oversight, protests and tensions will be re-ignited. **Appendix 5.4**

PUBLIC PROCESS

White-tailed Deer

The Presqu'ile Resource Management Implementation Plan, Park Mainland was never posted on the Environmental Bill of Rights Registry for public comment. It was posted only on the planning section of the Presqu'ile Provincial Park website. It was filed as a Category B project with limited public consultations.

The initial proposal to begin a deer reduction program at Presqu'ile in 2003 was never posted for public comment on the Environmental Bill of Rights Registry either. It was considered an implementation of the park management plan completed in 2000.

The scoping document states that there was little public and agency concern regarding the shooting of deer in other jurisdictions, namely Rondeau, the Pinery and Point Pelee National Park, and that the issue was thoroughly explored in the park management planning process.

The park management planning process was completed in 2000 but public consultations began five years earlier in 1995 – 14 years ago. A detailed description of the results of public consultations from the park planning process is found in **Appendix 3.8**. Thirty-nine individuals, mostly supportive, commented on the issue of a deer cull.

In the recent limited consultations, most individuals opposed an extended deer cull, and hundreds of petition letters opposing an extended cull were not recorded in the final document. **Appendix 2.2 pg. 39**

Here is what the Environment Commissioner said in his 2008/2009 Annual Report regarding the practice of MNR consistently limiting public consultations on controversial issues:

"There is some question as to whether MNR uses the flexibility provided in the parks class EA appropriately. The EA process assigns projects to one of four categories based on their potential for negative environmental effects and public concern. These categories then stipulate what steps MNR must undertake for a project, ranging from the approval to proceed without further evaluation or consultation (Category A) to an individual environmental assessment (Category D). While many types of projects are pre-assigned a category, the ministry has broad discretion to categorize a project as it sees fit.

The lower the assigned category (if Category A is considered the lowest level of assessment and Category D the highest), the less assessment and consultation is necessary. In simpler terms, it involves less paperwork and less time, as well as less of a chance of adverse public reaction because notice of the project is not as widespread.

MNR does not track or count Category A projects undertaken in Ontario's provincial parks and conservation reserves. Beyond this lowest category, the ministry has chosen to make every other undertaking a Category B project since 2004 with only one exception. It is only once a project has been rated as a Category C that a more detailed environmental study report (ESR) and wider consultation is required.

For example, since 2004, culling cormorants and deer in protected areas have been handled as Category B undertakings. Such projects are profound decisions to make. They may be beneficial to the maintenance and restoration of the ecological integrity. However, such projects still should be viewed as being of high public concern meriting more thorough consultation, as well as requiring detailed environmental study reports to explain the impacts and alternatives."

(Environmental Commissioner of Ontario / Annual Report 2008/2009, pg 56 and 57) The full analysis if found in **Appendix 3.11**

If this plan is allowed to proceed as is, with no further public involvement, the shooting of deer will have continued for 24 years with no public scrutiny.

PUBLIC PROTESTS – WHITE-TAILED DEER

Contrary to remarks made in the scoping document, there has been persistent opposition to the killing of White-tailed Deer in provincial and national parks.

Enclosed is a completed collection of newspaper articles from 1989 to 1993 related to the proposed cull of White-tailed Deer at Rondeau Provincial Park. **Appendix 5.5**

In May 2007, a literature review was done on behalf of Parks Canada regarding ungulate control in protected areas. An excerpt of the report titled, "Ungulate Control in Protected Areas: A Review of Options", Brian McLaren and Damian Tom-Dery, May 28, 2007 is found in **Appendix 7.1** b). A copy of the complete report can be delivered upon request. It was provided to us by Rondeau Provincial Park.

The above report reviews case studies of ongoing deer culls in southwestern Ontario, including Point Pelee National Park, Rondeau and the Pinery. It writes that historically, deer control was initiated to avoid human/wildlife conflicts.

Human/wildlife conflict was the rationale supporting deer culls throughout the 20th century but persistent public protests ended each cull. In the 1980's Point Pelee National Park devised a communication strategy that convinced the public that 'ecological integrity' was at stake if deer were not killed routinely. They reviewed literature produced in other jurisdictions, primarily from the United States, to support their claim that deer were having a 'negative ecological impact'. The report concludes that the public was pacified by this argument. The ministry of natural resources adopted the same strategy and coordinated regional deer culls.

Resource managers took advantage of the growing public concern over environmental protection to truncate public concerns over wildlife welfare by presenting the issue as being 'good for the overall environment' to essentially resolve local human/wildlife issues.

Strong opposition to the killing of deer exists in all management areas and not just provincial parks. In 2009, the MNR cancelled a proposed extension of the deer hunting season in southern Ontario into the winter months because of opposition from both the general public and sport hunters. EBR # 010-5648 and EBR # 010-5337 **Appendix 5.1**

The Peaceful Parks Coalition has been active in the deer management issue for years both through a rural resident perspective and an environmental/wildlife welfare perspective. A sampling of our work in found in **Appendix 5.1** and **5.2**

DISPUTE RESOLUTION PROCESS

Double-crested Cormorants

We requested a Dispute Resolution Process to resolve outstanding inconsistencies that persisted in annual operational reports and understand the shift of goals that occurred throughout the Draft Management Strategy for Double Crested Cormorants.

The Dispute Resolution Process was difficult because the ministry reluctantly agreed to the process, and there were no guidelines to help define the procedure. We believed if the ministry entered into a dispute resolution process, then they were open to negotiating a resolution. But the process was ad hoc and at the discretion of the ministry.

In our initial meeting with the ministry, we were not permitted to ask any questions, only state our objections. Outstanding questions were submitted in writing to the ministry and they eventually offered us a written response. **Appendix 1.2**. The written response was simply a rebuttal to issues raised and very few of our questions were answered. **Appendix 1.3**

The ministry remained non-communicative, and limited access to valuable documents especially vegetative studies as they related to the management of deer.

We insisted on a more thorough process that permitted time for negotiations, but the ministry did not offer any resolutions. Our second and final meeting was scheduled on September 2 and the ministry gave us until September 14 to submit our recommendations with no follow-up meetings to discuss common ground.

While they agreed to a Dispute Resolution Meeting, their effort was not genuine. **Appendix 4.4** provides a chronological account of correspondence before and during the Dispute Resolution Process. The frustration with the lack of open dialogue is apparent in these letters. In the end, the ministry did not adopt any of our recommendations. **Appendix 1.1**

WHITE-TAILED DEER

We also requested a Dispute Resolution Process regarding the Presqu'ile Resource Management Implementation Plan for the Park Mainland regarding the deer and wildlife reduction program. This management plan is a separate plan than the 'Presqu'ile Resource Management Implementation Plan for the Islands'.

While we were granted a Dispute Resolution process, the ministry failed to facilitate a process even after we insisted that they combine the two procedures. The ministry simply refused to discuss the issue of deer management on the mainland and only released vegetative documents after repeated requests. The discussion of deer management was briefly reviewed in the ministry's response to our written questions. There was no open dialogue as it relates to the deer reduction program on the mainland.

The ministry provided us with notes of the final meeting of September 2, 2009. It is evident from these notes that the ministry limited the exchange of documents and dialogue regarding deer management. They dismissed our concerns believing there were no grounds for a challenge given the insurmountable data supporting their position. And that was the end of that.

In the final document, 'Presqu'ile Resource Management Implementation Plan for the Park Mainland', in the section summarizing public consultations, there is no mention that a Dispute Resolution Process took place. We concur with this statement. While we requested and were granted a Dispute Resolution Process, none was facilitated.

DEADLINE EXTENSION FOR AN ENVIRONMENTAL ASSESSMENT SUBMISSION.

The ministry provided the public 30 days to apply to the Ministry of the Environment for Full Environmental Assessments. Given that there are two resource management plans and the severity of the issues, we requested an extension of the deadline. In our case specifically, we are waiting for information requested through Environment Canada regarding the recent Canadian Wildlife Service census of colonial water bird colonies throughout the Canadian Great Lakes. The information request spans from 1989 to 2009 and is the most current data on the status of colonial water birds in Ontario, even more current then the information contained in the Breeding Bird Atlas, which is current until 2005.

This information is original data and can correct many of the assumptions put forward by Ontario Parks regarding the status of colonial water birds in Ontario including Presqu'ile Provincial Park. It should provide greater details as to the longevity of colonial water bird colonies, their fluidity and species composition. Correspondence to and from Environment Canada is found in **Appendix 1.6**

The Ontario Ministry of Natural Resources denied our request for a deadline extension stating that they have already conducted broad public consultations and have compiled with all legal requirements under the Class EA for Provincial Parks and Conservation Reserves. Their response letter is found in **Appendix 1.6**

As evidenced above, the rationale for denying an extension is false. The ministry solicited public comments regarding an extended cull of nesting cormorants and deer on the Presqu'ile islands only through an information notice, and the ministry has *never* solicited broad public consultations on an extended deer reduction program or general wildlife control on the Presqu'ile mainland.

The ministry has acted in bad faith towards the public and its relations with stakeholders in resolving outstanding issues regarding their wildlife management practices.

ECOLOGICAL INTEGRITY

The basic argument behind the objections of the Presqu'ile management plans can be summarized in three words: *ecosystem, ecological integrity and hyper-abundance*, (also referred to as over-abundance).

These words have been so widely and so cynically co-opted in our time that they barely retain a shred of their original meanings. The definitions continue to change and be redefined to reflect resource management objectives as needed to avoid successful challenges to management decisions.

As recently as 2007, just prior to the public announcement by Point Pelee National Park to shoot thousands of nesting cormorants at Middle Island, Parks Canada redefined the term hyper-abundance, and in turn the definition was adopted by MNR and incorporated into final Presqu'ile Resource Management Implementation Plan High Bluff and Gull Islands. Pg. 1. (footnote 2)

In September 2009, the Ontario Ministry of Natural Resources released its *Ontario Protected Areas Planning Manual*

It defines ecological integrity as follows:

"Ecological integrity refers to a condition in which biotic and abiotic components of ecosystems and the composition and abundance of native species and biological communities are characteristic for their natural regions and rates of change and ecosystem processes are unimpeded."

This definition is not contained in the Provincial Parks and Conservation Reserves Act and is deliberately written to incorporate the option of managing native species they decide are hyper-abundant.

The words ecosystem and ecological integrity originally defined universal principles that provided a standard measure in which to understand the degradation of our environment.

Ecosystems originally referred to specific ecological processes that sustained a matrix of form and function, and are 'closed' or fully sustaining systems, such as drainage of watersheds to form lakes or larger bodies of water, large forested areas of similar species, wetlands that filter water and act as flood plains, and includes invisible micro-

organisms. It was understood that ecological integrity was maintained if the form and function of ecosystems was also maintained.

Resources managers exploit these definitions by calling any place an ecosystem, and by ignoring the short term shifting profile of natural environments in maintaining long term ecological integrity. A healthy ecosystem includes a variety of specialized landscapes to maintain specialized species, and these landscapes may shift in the short- term but collectively act to maintain ecological equilibrium in the long term as defined in ecological time.

We recognize the loss of ecological integrity when basic functions begin to breakdown such as species decline, birth defects, persistent toxin contamination, disease, the loss of large predators both terrestrial and aquatic, rapid glacier melt, lack of carbon absorption and severe weather shifts. These examples were the first major clues that alerted scientists that a very serious biological shift was happening.

It is misleading to link environmental shifts through natural processes such as the drowning of forested areas through beaver activity in the formation of wetlands, grazing by large herbivores in the formation of prairie lands and forest fires in forest regeneration as a loss of ecological integrity simply because these processes change the current environment. These environmental shifts take years to complete a full cycle and must be recognized for what they are. While the ministry recognizes these natural successions, they reject that cormorants create a similar cycle stating that cormorant colonies are permanent.

Activists fought hard during the revision of the old Provincial Parks Act (Ontario) in 2007 to include the term 'ecological integrity' as being the first priority in Provincial Parks and Conservation Reserve management. The intent was to ensure that Ontario's protected areas were managed, first and foremost, to protect the natural features and any natural processes that still existed. The inclusion of the term 'ecological integrity' was to undermine the growing trend in managing Provincial Parks and Conservation Reserves as revenue generating devices as opposed to biological reserves that protect wilderness values.

If government agencies are permitted to redefine these universal standard terms to best suit resources management objectives than there is no measurement in which to challenge their decisions.

The term hyper-abundance is a fairly recent term to describe the resurgence or population increase of ***native*** wildlife, often after years of over-exploitation or suppression through contaminates. These animals are termed 'hyper-abundant if they begin to alter resource management objectives. Nowhere is this more glaring than in the early discussion papers noting the increase of white-tailed deer in southern Ontario.

These papers were written prior to the widespread management of deer in protected areas and the discussion is open and unprovoked by political pressure. 'Over-abundance' (in later years referred to as hyper-abundance) relates primarily to human/wildlife conflicts and ***not*** ecological integrity. In some papers they clearly distinguish natural carrying capacity verses over abundance.

Both Double-crested Cormorants and White-tailed Deer are considered top predators that shape their immediate environment (aquatic and herbivore). These influences while consumptive are also replenishing and serve to restore equilibrium over time. They contribute to the creation and maintenance of rare habitat such as barrens for colonial waterbirds and prairie grasslands. At the same time they replenish their environment through seed dispersal and soil stabilization. To compare their impacts or their population numbers to widespread activities that profoundly disrupt ecological function, such as clear cutting, monoculture, pesticides and herbicides, industrial pollutants and urbanization is extreme and inaccurate.

RESOURCE MANAGEMENT IMPLEMENTATION PLAN FOR HIGH BLUFF AND GULL ISLANDS

The annual reports describing the management operations at High Bluff Island can best be described as 'technical reports' or 'operational reports' but not scientific studies. Appendix 2.6

Good scientific studies develop a hypothesis and aims to enhance our understanding of a particular subject. Vigorous studies designate a 'control' in which to comparatively measure data from the study, and often conduct an extensive literature review prior to designing a study.

At Presqu'le no base data was collected prior to management other than nest counts and vegetation inventories – the information needed to show an inverse relationship between cormorants and trees - and no hypothesis presented. The review of studies is limited to internal documents including policy documents. Notably there is a lack of references from academic and leading ornithologists. Arguments in support of their program are circular - quoting themselves in support of themselves.

Common to all wildlife management control programs is the narrow collection of data to endorse the objectives of the management plan. Wildlife impact assessments are often made in one or two visits measuring a snapshot of a biological cycle, and limit data collection to only those areas that are perceived as having the greatest 'negative ecological' impact. If management objectives fail to yield the desired outcomes, resources managers either blame the targeted wildlife species for causing extensive damage and /or comment that it will require years of wildlife control to measure significant successes. Nowhere is this inherent bias better demonstrated than in the reports assessing widespread deer control programs in provincial and national parks. We discuss this in more detail as we review the rationale for killing deer.

The inherent bias within the cormorant control management plan has limited our understanding of the complexities of colonial waterbird colonies and has caused much pain and suffering to nesting birds including Double-crested Cormorants.

The greatest examples of inherent bias within the work from Presqu'le are:

- that a small area of standing trees have more biological value than significant rare habitat such as barrens;
- the lack of acknowledgement of the strong correlations between management activities and the disturbance of nesting birds;
- the denial that Double-crested Cormorants of all colonial water birds, except perhaps terns, are island and water dependent and have limited suitable nesting sites in Ontario;
- that the Ministry of Natural Resources has jurisdiction over the majority of significant cormorant colonies throughout the Great Lakes and has either actively managed or is proposing cormorant control within all these areas;
- the lack of concern that active management at Presqu'ile has increased cormorant nests at Tommy Thompson Park, and by their own definition are placing the largest Black-crowned Night Heron colony on the Great Lakes at risk;
- that according to the ministry's own mapping, Black-crowned Night Herons and Great Egrets had adapted to the presence of nesting cormorants by establishing nests on the peripheral of the larger colony;

- that impacts of nesting cormorants are concentrated to very specific locations – immediately beneath their nesting site and impacts vary depending on site conditions and the health of trees;
- that cormorants likely choose trees that are already comprised either through age and/or site condition, and that the process of decaying vegetation is a building block in the formation of soil;
- that monarch butterflies utilize a variety of roosting sites but are breeding and nectar habitat dependent;
- that colonial waterbirds were thriving prior to active management;
- that both Great Egrets and Black-crowned Night Herons are not at risk and expanding their range in Ontario;
- that colonial waterbird colonies are fluid with fluctuating species composition over time;
- that Gull Island while no longer supports trees has evolved into one of the greatest concentrations of waterbirds on the Great Lakes.

Even if the ministry did not collect baseline control data prior to the commencement of management, they had the opportunity to collect it since active management ceased during the last two years. At the very least, control data should have been collected on nest disturbance, nest abandonment and nest takeovers by Double-crested Cormorants – all stated 'threats' posed by cormorants to their avian companions.

As a result of an EBR Review request, The Ministry of the Environment ordered comparative studies in 2004 in other locations. The Ministry of the Environment also ordered that the ministry include: clarification of the objectives of the strategy, the addition of information about the recovery of Double-crested Cormorants and recognition of their importance to biodiversity.

Species composition and colony size are significantly varied between colonies, and the sites chosen for comparative studies were disturbed either through passive management – Hamilton Harbour or through tourism – Chantry Island. By all accounts, neither of these sites were creditable control sites. The best control site is High Bluff Island and Gull Island at Presqu'ile Provincial Park. Therefore, if the ministry is to apply adaptive management as they claim, then baseline control data from Presqu'ile remains an important dataset before any culling resumes.

Please note: We have not received a copy of the study at Hamilton Harbour despite having made several requests. While MNR references the study, it also notes that results of the study were related verbally to park staff (email correspondence Tim Bellhouse MNR). **Appendix 1.5 (green tagged)**

The ministry has only portrayed Double-crested Cormorants as a negative force on the landscape and the loss of cormorants on High Bluff and Gull Islands is of no concern to the ministry.

(Pg. 16 Presqu'ile Resource Management Implementation Plan High Bluff and Gull Islands).

SIGNIFICANT HABITAT

In October 2000, MNR released its **"Significant Wildlife Habitat Technical Guide - Appendix 5.1** The guide sets criteria for resource managers to identify significant wildlife habitat and remains in use today. While the entire guide is provided, areas specifically discussing White-tailed Deer and Double-crested Cormorants are tagged.

The usefulness of this guide is that it was written by a section of the ministry that was political detached by the pressures of deer and cormorant management. It evaluates the significance of habitat based on wildlife needs. It recognizes colonial waterbird colonies as one dynamic entity and as being fluid. Interestingly, it does note the political pressure associated with cormorants and advises managers to consider extra protection to compensate for social pressure.

The most current wildlife inventory from Presqu'ile Provincial Park was written 1989. **Presqu'ile Provincial Park Wildlife Update (Appendix 5.2)** provides much needed gaps in information regarding the habitat uses of Black-crowned Night Herons and the Monarch Butterfly at Presqu'ile. While cormorants had begun to nest at Presqu'ile by 1989, nest numbers were low in comparison to future years. However, it is notable that the deer population was substantially increasing at this time across southern Ontario.

The manual provides the results of a monarch butterfly tagging program at Presqu'ile, and describes the areas within the park heavily utilized by migrating monarchs. It emphasizes the need to recognize nectar and breeding areas in the park during fall migration and southerly migration points to ensure complete migratory route protection. It also identifies roosting characteristics.

Interestingly, concern is expressed regarding woody vegetation succession as diminishing open nectar fields. While shrubs and trees provide roosting areas, canopy cover will eventually eliminated open fields crucial to monarch survival. **High Bluff Island has never been assessed for monarch butterfly habitat and/or migration value.** Correspondence Assist. Deputy Minister Rosalyn Lawrence Jan. 2009 **Appendix 1.4**

(Please note, Deputy Minister Lawrence states dozens of monarchs visit High Bluff Island during the fall migration. In the final plan, MNR states thousands of monarchs visit the island during the fall migration).

The Presqu'ile Wildlife Update 1989 also describes areas within the park used by Black-crowned Night Herons. Black-crowned Night Herons nested on High Bluff and Gull Islands and the marsh area. The birds shifted their nest sites around the park but relocated the colony onto High Bluff Island with the appearance of nesting cormorants and remained there for the next 20+ years. It also notes that the average nest counts for Black-crowned Night Herons at Presqu'ile is 40.

The manual further describes the current White-tailed Deer situation at Presqu'ile and the characteristics of natural carrying capacity.

Therefore, the best source of information from Presqu'ile suggests that the monarch's fall migration route is concentrated along the mainland shore, in particular Owen's Point, and that Black-crowned Night Herons followed cormorants to High Bluff Island but have used alternative nesting sites within the park in the past.

The study, **Cormorant Nesting Pressure and Tree Health at Tommy Thompson Park, Toronto (Appendix 5.3)** raises important questions regarding the biological shifts created by a colony of nesting cormorants from a treed environment to a barren environment. Given that this biological shift is concentrated in a very small area, the report questions whether the value of these very specialized habitats do not add biological richness to the overall landscape matrix.

This question holds true for High Bluff Island that comprises a tiny fraction (38 ha.). of Presqu'ile Provincial Park (937 ha.). The original two woodlots on High Bluff Island are comprised of only 10 ha. – approximately 1/4 of High Bluff Island, and only the western woodlot has experienced rapid tree mortality. These trees were likely compromised by site condition prior to the arrival of cormorants because the trees grow close to the limestone

shore where soil depths are shallow. The eastern woodlot is away from the shoreline and in a depression that floods routinely. The trees and sub-canopy are surviving despite the presence of nesting cormorants.

Since the impacts of cormorants on the eastern woodlot are not significant, vegetative studies conducted at High Bluff Island from 2000 through to 2006 focused on dieback in the western woodlot. **Appendix. 2.4**

The Tommy Thompson Park study triggers the question as to whether a small woodlot remnant, left over from a previous farm, holds greater biological diversity than a barren landscape. This is not to say that trees and forests are not the greatest carriers of biological diversity, but ecosystems contain a variety of landscape features that combined host a richness of diverse species. It is impossible and dangerous to claim that one general habitat has greater biological significance than rare habitat.

BIAS IN STUDY SELECTION AND RESULTS

We have included several studies conducted by Linda Wires and Frances Cuthbert from the University of Minnesota. Both Wires and Cuthbert are considered leading North American experts on colonial waterbirds and their research is considered as 'breaking ground' on many areas of colony dynamics. Their studies are widely ignored by the MNR and/or misquoted. **Appendix 5.4**

For example, MNR is heavily reliant on a paper from 2005 written by Chip Weseloh, C. Pekarik and T. Havelka entitled 'The cormorant threat at 43 Black-crowned Night Heron colonies on the Great Lakes: A protocol and Assessment' **Appendix 5.5**

It is well understood that bird species within colonies will "elbow" for space including nests (Cuthbert 2002, Wires presentation 2007) **Appendix 5.4**. But Weseloh, a strong proponent of cormorant control, exploits these common colony interactions to conclude that the presence of cormorants threaten their avian companions.

There is simply no evidence to justify this conclusion, and it is scientifically irresponsible to make such statements without follow-up studies. Furthermore, Weseloh iterated the same notion in the Breeding Bird Atlas entry for Black-crowned Night Herons 2005 **Appendix 5.6**, and misquoted the Cuthbert study which accurately states:

"Despite a steady increase in breeding cormorants in the U.S. Great Lakes over the past two decades, population trends of Great Blue Herons and Black-crowned Night Herons do not indicate cormorants have negatively influenced breeding distribution or productivity of either species at a regional scale," and "…site use data and field observations indicate Double-crested Cormorant presence has not caused Black-crowned Night or Great Blue Heron declines or abandonment except under special circumstances.

We discussed our concerns with Mr. Weseloh and his response is found in **Appendix 5.7**

In the Draft Resource Management Implementation Plan for High Bluff and Gull Islands page 13 –14 it states:

"The tall trees used by great herons are likely to be lost as a result of past damage by nesting cormorants. Great Blue Herons nest in many locations within Ontario and their continental population is not at risk. Therefore, the likely loss of nesting opportunities for Great Blue Herons at High Bluff Island, while it might be considered a loss of biodiversity, is not a threat to the species."

The same can be said of Great Egrets and Black-crowned Night Herons. Neither species are "at risk' in Ontario or in their greater range throughout the United States. Their population and range has steadily expanded since

nesting activities were first recorded in Ontario. On the contrary, Great Blue Herons have experienced a significant decline in Ontario (please see correspondence Don Sutherland MNR). **Appendix 6.8**.

Populations of Great Egrets and Black-crowned Night Herons are not firmly established in the province because Ontario presents the northern edge of their range. Their population can fluctuate greatly and as such the ministry's Natural Heritage Centre has assigned egrets and night herons ranks of S2 and S3 respectively – very rare and rare to uncommon.

The Great Lakes basin and lakes in Manitoba are the primary nesting areas for Double-crested Cormorants. The birds should be present in large numbers, nonetheless the Natural Heritage Centre ranks Double-crested Cormorants as a S4 – uncommon but not rare; may be widespread and relatively common, but some cause for long-term concern due to declines or other factors. **Appendix 6.8**

Great Blue Herons form smaller colonies but are widespread throughout the province. Great Blue Herons are not considered migrants and should be well established in Ontario. Their status has recently been downgraded to a S4. **Appendix 6.8**

These ranks only define the abundance of a species within the province and the same abundance index is applied to all species regardless if they are migrants or not. The Committee on the Status of Species at Risk in Ontario (COSSARO) considers these ranks when evaluating the status of a species, but it is only one factor in combination of many others such as population expansion. Therefore, the lower provincial 'Sranks' for Black-crowned Herons and Great Egrets are not a signal these populations are at risk.

Yet MNR exploits the 'ranks' assigned to each species as justification for killing cormorants and withdrawing protection of Great Blue Herons.

The decline of Great Blue Herons and the movement of Black-crowned Night Herons can be a direct result of the disturbance caused by management activities but the ministry refuses to acknowledge this correlation.

We have enclosed video footage of shooting at High Bluff Island to demonstrate the level of disruption that occurs during shooting periods. **Appendix 5.9**

Presqu'ile used up to four shooters. Each shooter shot one bird at a time. One shooter aimed at one nest likely caused the level of disturbance captured on video, therefore, even if ministry gunmen shoot fewer birds to maintain the current cormorant population, the same level of disturbance should be expected.

The most erroneous statement made by ministry staff is that cormorants usurp nests of Black-crowned Night Herons on the lone willow tree on Gull Island, also known as Sebastopal Point. This is the most frustrating but also the best illustration of the fraudulent conclusions presented by ministry staff regarding the effects of their management activities on other nesting birds. 'Presqu'ile Annual Report on the Management of Double-crested Cormorants for 2007' pg 20. **Appendix 2.6**

Black-crowned Night Herons have been nesting on Sebastopal Point peacefully with no interference by cormorants for the entire history of the colony. Cormorants would roost along the gravel shore but never nest in the willow tree. Roosting on the shore does not pose a threat to nesting herons.

Double-crested Cormorants fled the island to avoid intensive management in 2007. In the period since the ministry stopped active management, night herons have resumed nesting on Sebastopal Point. This was confirmed during our site visit in July 2009.

MNR continues to perpetuate this idea in their final Presqu'ile Resource Management Implementation Plan High Bluff and Gull Islands by placing undue emphasis on protecting the lone willow tree on Gull Island. **Appendix 2.1**

The abandonment of two ground nesting cormorant colonies is likely a result of persistent disturbance by oiling and monitoring operations. The ministry refuses to make this link claiming that predation by foxes caused the two colonies to abandon, and that cormorants do not defend their nests.

One ground nesting colony was on Gull Island and the other on High Bluff Island. Both ground colonies are adjacent to larger gull colonies and water depths of at least 2 metres separate the islands. Foxes could have swam across and eaten cormorant eggs exclusively, but it is more likely that repeated disturbance through oiling and monitoring over a period of 7 years caused the birds to abandon.

Ground colonies at Presqu'ile continued to shrink as oiling continued until finally the remaining colonies were too small to survive. **Appendix 2.1 pg 19**. Defenses against predators are well evolved in cormorant colonies. The best defense against mammals is to nest in trees but ground nesting colonies have well evolved strategies too. **Appendix 6.13 b)**

Their nests are built in tight clusters with a diameter equal to the 'beak' length of each bird. Each bird can ward off predators to the edge of its nest while the next bird does the same covering the entire area. Nests on the outside of the colony are most vulnerable because part of their nest is open and undefended.

These nests are so close together that it is very difficult to walk any ground nesting colony. The birds also regurgitate fish to distract gulls from their eggs. Cormorants do not defend their nests through swooping or pecking at intruders, as do terns, but this behaviour is not guaranteed to distract a hungry fox.

It is difficult to accept that in the 20+ years cormorants have been ground nesting on the Presqu'ile islands there has existed no mammalian predation on the birds, and only by coincidence has a coyote and /or fox disturbed the colony at the same time as active management and monitoring. The ministry simply dismisses any link between active management and the disappearance of ground nesting cormorants at Presqu'ile, and they have repeatedly failed to reply as to whether the abandonment of cormorant ground colonies was a desired outcome as part of their overall management strategy.

The ministry lists 116 ground nests on High Bluff Island in 2009. On our site visit in July 2009, no ground nests were active on High Bluff Island.

In **Appendix 6.13** we have included studies measuring the disturbance levels within a cormorant colony.

The MNR also fails to acknowledge that all colonial waterbird species were thriving prior to active management and had adapted to the presence of nesting cormorants. Notably, Black-crowned Night Herons and Great Egrets had distinct nesting areas along the outer edge of the larger colony whereas Great Blue Herons and Double-crested Cormorants nested together in the upper canopy. 'Ontario Parks. 2008. Presqu'ile Cormorant Management Strategy Assessment 2003-2006'. **pg. 17 Appendix 2.4**

Nesting cormorants did not impact nest sites of Black-crowned Night Heron as is evident in the following description: "Two factors made the monitoring of BCNH nests a challenge. First, BCNHs nested in densely-foliated shrubs and trees, making detection and observation difficult." **pg 16 Ibid. Appendix 2.4**

Despite the presence of nesting cormorants for 20+ years on High Bluff Island, Black-crowned Night Herons had suitable densely foliated habitat and their population peaked at 84 nests.

Any intrusion of cormorants into well established heron nesting areas is likely due to the ministry's management program - shooting, cutting down trees and the ongoing human presence during nesting periods. **The concerns that cormorants threaten Great Egrets and Black-crowned Night Herons because they will eventually kill the trees needed to sustain them has not materialized in other colonies, or in population trends because colonial waterbirds cooperatively establish their own niche within the greater colony.**

Only on the smallest islands, and under special circumstances will the presence of cormorants push out their avian companions. It is impossible to predict whether the presence of nesting cormorants will reduce the presence of Great Egrets and Black-crowned Night Herons at Presqu'ile.

However, we do know:

- the population of Double-crested Cormorants had reached habitat saturation at Presqu'ile and across their geographical range, and their population was declining prior to the initiation of cormorant management activities;
- despite the large presence of nesting cormorants, all heron species were thriving at High Bluff Island prior to active management;
- both Black-crowned Night Herons and Great Egrets had adapted to the presence of nesting cormorants and had very specific undisturbed nesting areas within the larger colony;
- Black-crowned Night Herons have nested in other areas within Presqu'ile.

Gull Island is the only example the ministry consistently provides as a 'doomsday scenario' if cormorants are not managed. Trees have not regenerated on Gull Island because it is a gravel shoal with a very thin layer of soil. Gull Island could only support stunted trees with a recorded maximum height of 2.5m. (McCrae). The ministry admits soil depth prevents them from replanting Gull Island.

This is not to say that the woody vegetation had no biological value, but the loss of shrubs does not represent a negative ecological shift but rather natural succession. Gull Island today is rich in ground nesting birds and used by a host of shorebirds.

There is greater value in preserving the wilderness values of a naturally evolving colonial waterbird colony than forcing and twisting a waterbird colony into a contrived shape.

For all the above reasons, we question the justification for continued cormorant control on the islands of Presqu'ie.

Please note: we requested archival unpublished reports cited in the draft resource management implementation plan for the islands describing the nesting sites of colonial waterbirds on Gull and High Bluff Islands including Double-crested Cormorants during the dispute resolution process. These reports were not forthcoming by MNR. They might have confirmed more accurately nesting sites of colonial waterbirds, and how each species adapted to the presence of each other.

VEGETATIVE STUDIES

The vegetative studies from Presqu'ile measured tree die back primarily in the western woodlot. The western woodlot is located along the limestone shore where soil depths are likely to be shallow and tree health comprised. It also represents the largest cormorant colony on the island. A significant portion of the western woodlot was a snag forest when staff began active management.

The eastern woodlot holds a smaller cormorant colony and sits inland in a depression that floods regularly. It is an even-aged swamp forest dominated by red ash. According to the ministry, the eastern woodlot has a diverse sub-canopy of red ash, choke cherry, ironwood, eastern white cedar and basswood. The presence of cormorants has not seriously deteriorated this stand of trees and a diverse sub-canopy of woody vegetation thrives; nonetheless the ministry killed thousands of nesting birds in the eastern woodlot.

Vegetative studies to measure the impacts of deer browse and nesting cormorants across all the provincial parks that implement wildlife control are done by the same person, Dr. Saawan Koh. It appears Dr. Koh began his work with the ministry as a graduate student and continued his work through a private company, TerraSystems.

We flag this detail because a scientifically based program would employ more than one person for the same work to ensure consistency in results. Yet Dr. Koh has been assessing vegetation in provincial parks such as Rondeau and Presqu'ile for approximately 15 years and has been a strong proponent of killing wildlife.

Despite the presence of thousands of birds, the western woodlot maintains a sub-canopy of basswood, ironwood and choke cheery, and according to MNR these species are recovering after only five years of active management. **Page 6 Presqu'ile Resource Management Implementation Plan High Bluff and Gull Islands**

Also on page 6 it states: "These groves and the live understory areas of the western woodlot are preferred habitat for Black-crowned Night Herons and Great Egrets, and are used as roosting areas by migrating butterflies."

The MNR wants it both ways. It claims that without active management cormorants will destroy woody vegetation needed to sustain other tree nesting colonial waterbirds, yet it describes a live and diverse sub-canopy of native trees despite the presence of nesting cormorants for the last 20+ years.

During the dispute resolution process we had hoped to receive clarification regarding persistent inconsistencies and contractions noted throughout the entire cormorant control program but we were not permitted to ask any questions during our meetings regarding the details of the program. **Appendix 1.5**

The ministry also engaged in the delimbing of snags and the removal of 21 trees in the western woodlot impacting not only nesting sites for cormorants but also Great Blue Herons because Great Blue Herons at Presqu'ile nested deep among cormorants in the upper canopy. Originally, the ministry wrote they had removed 7 trees only but during the Dispute Resolution Process, they admitted they felled 21 trees but insisted all trees were only used for roosting. (The Presqu'ile Draft Resource Management Implementation Plan High Bluff and Gull Islands has been removed from the Presqu'ile Park Planning website, and therefore we cannot provide a page reference)

What is important to understand but not made clear in the ministry's reports is that the woodlots used by nesting cormorants on High Bluff Island are very small. Combined they equal approximately 10 ha. (one hectare = 100m sq.). At the greatest density, the cormorant colony reached just over 12.000 nests or 24.000 birds. It was the largest colony on the Great Lakes, and the birds occupied all suitable nesting habitat (the

tallest trees) on High Bluff Island. The distinction made by the ministry that cormorants are occupying 'new' trees or that the birds 'shift' nesting sites or that trees felled by staff were not nesting trees only roosting trees is false because all trees best suited for nesting were utilized by cormorants during peak density and roosting sites overlapped nesting sites.

Therefore, at peak cormorant capacity, vegetation thrived on High Bluff Island, just not at the abundance levels MNR preferred.

CARRYING CAPACITY

The ministry has published only one paper to date resulting from the cormorant "experimental control" research and monitoring program on Lake Huron announced in 2000 - 'Density-dependent growth of double-crested cormorants colonies on Lake Huron, 2006'. Appendix 5.10 The paper is interesting because it concludes that density-dependent regulation defines natural carrying capacity in the cormorant population. It states that once the cormorant population had occupied all suitable island habitats along northern Georgian Bay and the North Channel of Lake Huron, the population stopped expanding and began decreasing in 2003. It has since stabilized and no further population growth is expected. This pattern was noted across the larger geographical range including Presqu'ile Provincial Park.

The cormorant population reached peak capacity at Presqu'ile in 2002 with 12.082 nests or 24.164 nesting adults. In 2003 the nest count declined by 3386 nests or 6772 nesting adults - a ¼ reduction in the population, and a signal that the population had reached habitat saturation. The population on Lake Huron declined by 30%.

The ministry has not implemented any further population control on Lake Huron because it is recognized that if the ceiling on carrying capacity is removed by thinning the population through culling the population would begin to increase once again.

We included this study to demonstrate the difference between natural carry capacity and the 'carrying capacity' as defined by park staff. 'Carrying capacity' is defined by the goals of park managers to maintain woody vegetation. Park mangers are imposing a false 'carrying capacity' on the cormorant and deer population and therefore will need to sustain an indefinite cull to sustain the populations at levels their prefer as long as these species are present in southern Ontario.

We already see sustained generational wildlife control programs in other jurisdictions such as the Ring-billed Gull control program managed by the Toronto and Region Conservation Authority, and deer management programs from Point Pelee National Park. Language is deliberately used to confuse the public between what is a natural process and an artificial process.

The ministry study measuring the density-dependent regulation principle in wild populations is very useful because it demonstrates that habitat availability and competition for food limit population growth, and this principle applies to current environmental conditions.

PRESQU'ILE RESOURCES MANAGEMENT IMPLEMENTATION PLAN PARK MAINLAND

The rationale for killing White-tailed Deer is identical to that of Double-crested Cormorants except it has the benefit of being implemented prior to the public's common understanding of 'ecosystems' and 'ecological integrity'. Nonetheless, both Point Pelee National Park and Rondeau Provincial Park were forced to cancel annual deer culls in 1972 because of public opposition.

The outstanding feature in both these two issues is that MNR refuses to accept that populations of Double-crested Cormorants and White-tailed Deer are regulated by the density-dependent regulation principle. They explain that both species have benefited from human activity such as farming, sport hunting, fish stocking and the lack of predators, and their population is now beyond a natural carrying capacity. Natural carrying capacity was reached before European settlement of North America.

This argument has no scientific validity, yet it is entrenched in the retort of wildlife managers. Habitat saturation and competition for food regulates the populations of all wildlife species. Whether habitat and food are in greater abundance today, natural or artificial, than hundreds of years ago, the density-dependent principle still applies.

Populations of both deer and cormorants will follow this predictable biological pattern. This pattern of 'boom and bust' is well articulated in older documents discussing deer management. If government agencies are not willing to wait until deer populations reach natural equilibrium, that must to be recognized as a management decision.

We have reviewed all the current deer management programs in southern Ontario - Point Pelee National Park, Rondeau Provincial Park, Long Point National Wildlife Refugee and Presqu'ile Provincial Park. These papers were provided to us through the corresponding government agencies.

Several outstanding features are common to each report:

- vague goals - not explicitly stated but generally implied through discussion – a goal to increase preferred tree species characteristic to the Carolinian Forest type and/or establish a closed canopy forest state;
- desired tree and plant species are present at high deer densities but at lower abundance;
- increased vegetative density after a deer cull is often dominated by one or two aggressive plant species including non-native invasives, and these plant species remain dominated over time;
- long-term vegetation density and diversity in control (grazed) plots return to pre-cull levels similar to long-term deer exclosures;
- no data collection regarding biodiversity levels prior to the removal of deer, and;
- no value placed on the role of deer in shaping forest dynamics.

One of the most unique landscape features found within the Carolinian Ecozone is Oak Savannahs. Deer grazing maintain this mixed landscape of tall grass prairie plants (many of which are considered threatened throughout their biological range) with red oak, white cedar and white pine. In particular, savannahs provide red oaks with an opportunity to grow in full sun spreading their branches out to full capacity. These sun grown red oaks are the climbing trees of past generations.

The concern with deer browse is particular to the recruitment of young saplings into the canopy of woodlands to eventually replace older trees. Browsing slows the recruitment of young saplings through direct consumption of seedlings and seeds. The intention of deer culls is to maintain or restore a closed canopy forest with an understory plant community characteristic of low light conditions.

This may sound reasonable except deer culls are not working because resources managers are indiscriminating removing the top herbivore that shapes the very landscape they are trying to protect. The results after 30 years of management are inconclusive. While there may have been a general 'greening' of the overall landscape, it may not be representative of a natural or sustainable landscape. When the results are disappointing, authors simply blame the deer or other wildlife. At Long Point, the increase of ground cover has also increased the presence of rabbits and voles (pers. comm. Jeff Robinson Canadian Wildlife Service). Rabbits and voles are also herbivores. With the removal of the top herbivore, deer, other herbivores have increased suggesting there is a biological niche for herbivores in that particular landscape that is being ignored by wildlife managers. Presqu'ile staff has encountered the same issue on High Bluff Island. Staff mow vegetation around planted trees on High Bluff Island to prevent rodent browse. (Presqu'ile Annual Report on the Management of Double-crested Cormorants for 2007. Pg. 8)

Of all the reports, the Long Point study, 'Monitoring Vegetation after a Reduction in Deer Browsing at Long Point, Lake Erie: 2008. **Appendix 7.2** is by far the best written with results well-organized. It is the longest running deer cull in Ontario (from 1989) and has maintained consistent data. The results of the Long Point study are duplicated in other studies from Rondeau and Presqu'ile.

The Canadian Wildlife Service killed nearly 500 deer over the winters of 1989/90 and 1990/91. They measured a rapid vegetative response to reduced deer browse. But as time went on, diversity and density levels returned to original browse levels. In plots where density was consistently more abundant, it was represented by one or two plant species. Note worthy is the non-native Red Raspberry (Rubus idaeus) which remains dominate throughout all study plots and the native vine River Bank Grape (Vitis riparia). River Bank Grape is the longest of all Carolinian vines. Its population is controlled through natural wildfires. In the absence of fire it can be very aggressive choking out other plants and reaching into tree canopies.

The stabilizing of plant communities to original exclosure levels is also noted in studies from Rondeau and Presqu'ile Provincial Park.

The Long Point study also measured the growth of woody plants (trees and shrubs) by counting the number of stems in each plot. Desirable Carolinian woodland species such as Sassafras was well represented prior to the deer cull but increased its presence in the sub canopy after the cull.

Some species were reduced. Others increased their presence by a measure of only a few stems. This begs the question as to whether better results could have been achieved by simply planting saplings taller than two metres (height beyond deer browse) or protecting young seedlings through fencing. Planting trees is as artificial as killing deer.

No other management option was explored.

Point Pelee National Park began deer culls in 1991. After a brief assessment on the impacts of deer browse on rare plants, the park decided to kill the resident herd. There has been no monitoring of the program since and is the best example of negligent resource management.

The studies from Point Pelee National Park are of special interest. In the report, 'Vegetation Management Objectives- Effects of BrowsingBy White-tailed Deer, 1990.' **Appendix 7.4** the authors distinguish between natural carrying capacity and resource management objectives. They also discuss the misinterpretation or the manipulation of the data that estimates deer populations prior to European settlement. The original research shows that deer numbers were not evenly dispersed across the landscape. Some areas sustained very high deer densities.

Deer densities across North America prior to European settlement were averaged as a calculation and it is this average – the overall lowest density number available - that resource managers have maintained as the natural carrying capacity of White-tailed Deer.

BIAS IN STUDY SELECTION AND RESULTS

The Point Pelee studies are noteworthy in other ways. In the report, 'The Effects of Deer Browsing on the Rare Plants of Point Pelee National Park, 1990.' **(Appendix 7.5)**, the researchers observed that deer browse was heaviest along deer trails and focused their assessment in these areas. They assessed each plant for browse severity. Of 24 plant species assessed, only 4 were heavily browsed. Of 23 rare woody plants assessed for deer browse, only 3 plants displayed greater than 50% deer browse. This was at the height of deer densities in southern Ontario.

Ignoring the conclusion of their own assessment, the authors concluded based on studies from other North American jurisdictions that a "range of species is becoming extirpated, since few species in North America are adapted to intense, repeated herbivory". The very next year, in the winter of 1991, Point Pelee National Park killed the resident deer herd.

The authors also noted that woodlands of Point Pelee National Park are on a thin sandy peninsula, and management objectives to restore a closed canopy forest state may not be possible. Nonetheless, Parks Canada continues to kill deer at Point Pelee National Park.

The study from Rondeau Provincial Park, Oct. 2000 Revision for Applied Vegetation Science: 'The long term effect of herbivory by white-tailed deer (Odocoileus virginianus) on woodland ground flora', **Appendix 7.6**, has the greatest level of bias, and as such we will be asking the Centre for Applied Science in Ontario Protected Areas (CASIOPA) to review it. This report triggered a long term 10 year killing program of White-tailed Deer at Rondeau and the Pinery Provincial Parks from 1999 to 2009.

For example, in the Abstract the authors present a case that deer browse accelerate the presence of invasive plant species. They write:

"By 1995, long-term (17 year-old) deer exclosures contained greater amounts of characteristic Carolinian woodland species such as the spring-flowering ephemerals *Arisaema triphyllum* and *Trillium grandiflorum*. In contrast, continually grazed, unexclosed plots and recent (1991) deer exclosures sampled in 1995 contained higher levels of non-native and "weedy" species (e.g. *Berberis thunbergii* and *Oxalis europaea*)."

We have attached the accompanying Appendix associated with this study and have highlighted plant species that are listed as non-native. A simple comparison confirms that the greatest density and variety of non-native plant species are present in ungrazed 1995 plots (middle columns).

To make sense of the written report, we assessed all the plant species listed in the Appendix, and found that a clear trend emerged over the long-term study period that reflects similar trends in other study areas in Ontario. Over the long-term, density levels revert back to levels found in original ungrazed plots.

On page 7, section Results, the authors write:

"The respective mean percentage cover values among all plots for species in 1981 and 1995 are given in the Appendix, and it is apparent that the major differences can be ascribed to changes in abundance rather than species turnover. Nevertheless, a number of disappearances are evident. These include the shrubs *Cornus racemosa, C. rugosa, Lonicera bella* and *Symphoricarpos albus*; the orchids *Corallorhiza maculata* and *Epipactis helleborine*; the ferns *Dennstaedtia punctilobula, Onoclea sensibilis* and B*otrychium virginianum*; and ten graminoid species, six of which are carices."

Again, a simple comparison of the raw data in the Appendix shows that all the woody vegetation (shrubs) listed in the above statement was only present in grazed plots. These plants were not represented in ungrazed deer exclosures. Orchids and ferns were present in both control grazed plots and ungrazed deer exclosures. These plants disappeared in both control and ungrazed plots indicating that some other factors may be causing the disappearance of these species.

Please note: *Epipactis helleborine* is an introduced plant.

On page 9, section Discussion, it states:

"The 1995 survey of the herbaceous plant community indicates that this has not happened. Instead, regeneration of all woody plant species has been affected. Very few tree seedlings were scored in plots. While the average cover values for *Acer* spp. (maples) were similar to those scored in 1981, and spicebush cover has increased, values for *Fagus grandifolia* (American beech), *Quercus velutina* (black oak), *Carpinus caroliniana*, and *Carya ovata* (shagbark hickory) were all lower or were zero. "

Again, a simply fact checking exercise using the Appendix shows that each species listed above displayed the greatest decline within ungrazed deer exclosures or declined in both control plots and ungrazed deer exclosures simultaneously.

The bias in this report is blind to other factors that may be impeding growth and unfortunately limits our understanding of current forest conditions.

There is broad acknowledgement of the shortcomings of exclosures in measuring the impacts of deer browse. Deer exclosures create an unrealistic zero browse baseline. Control plots are often built adjacent to exclosures attracting deer that in turn browse more heavily just outside the exclosure. They are also very small, often no larger than 2m sq. and can yield lopsided results. The problems with using exclosures are reviewed in 'Ecological Impacts of Deer Overabundance, 2004, **Appendix 7.10 e)**

The same people that evaluated Rondeau Park and Point Pelee National Park in 1992 did the vegetative studies at Presqu'ile. The author of the summary report, '2007 Summary of the interaction between white-tailed deer *(Odocoileus virginianus)* and vegetation,' is unknown. **Appendix 7.9 a)**

Similar to all the past and present reports on deer management in Ontario, no clear goal is articulated to the public and no clear results can be seen. The 2007 Presqu'ile summary, noted above, acknowledges an increase in indicator species but states the increases are statistically insignificant.

Without a clear goal, it is difficult for the public to assess these programs. The MNR for one reason or another has been reluctant to share the Presqu'ile vegetative studies. These studies were released upon repeated requests and then only a few days before we were to submit out recommendations regarding the Presqu'ile Resource

Management Implementation Plan for the Mainland. These studies were never publicly released and no vegetation analysis was done for High Bluff Island specific to deer grazing.

Identical to the studies measuring the impacts of nesting cormorants, deer impact statements only perceive White-tailed Deer as a negative force on the landscape displaying acute bias in the research.

We consider this type of management approach to be very dangerous because it denies scientifically established ecological principles in favour of management. The focus than becomes the success of management operations verses an honest interpretation of responses.

In the meantime, the removal of top predators in a crusade to 'save our ecosystems' by resource managers is altering our landscape in ways that are poorly understood and inflict great pain and suffering on wildlife.

The Presqu'ile Resource Management Implementation Plan Park Mainland was never posted on the Environmental Bill of Rights Registry for public comment. It was only posted on the planning section of the Presqu'ile Provincial Park website. It was filed as a Category B project with limited public consultations.

The initial proposal to begin a deer reduction program at Presqu'ile in 2003 was never posted for public comment on the Environmental Bill of Rights Registry either. With this new plan, the ministry intends to limit public oversight for ten years until 2019.

The scoping document states that there was little public and agency concern regarding the shooting of deer in other provincial parks, namely Rondeau, the Pinery, and Point Pelee National Park, and that the issue was thoroughly explored in the park management plan.

The park management planning process was completed in 2000 but public consultations began five years earlier in 1995 – 14 years ago. If this plan is allowed to proceed as is, with no further public involvement, the shooting of deer will have continued for 24 years with no public scrutiny.

The deer culls of southern Ontario provide the best examples of government negligence as it relates to wildlife control programs. As seen with Point Pelee National Park, which already has a 'closed door' long-term wildlife control program with no public involvement or scrutiny, there is no requirement to produce scientifically creditable assessment reports. The culls quietly continue unknown to members of the public. **Appendix 7.3**

CRUELTY

Double-crested Cormorants

We have enclosed a 4 minute video of wounded birds at Presqu'ile Provincial Park from the 2005 cull, as well as footage showing the level of disturbance during culling operations. The footage speaks volumes as to the rawness of a cull. After the public release of the footage, park management shut down the surrounding waters around High Bluff Island, effectively removing all witnesses to any further culling operations. While these images are very powerful, disrupting birds during times of nesting is equal to disrupting any species during times of pregnancy regardless of the method used.

Harassment: While this may appear to be a harmless control method, it can cause such extreme stress in the wild birds that they abandon ideal nesting sites, not just for that particular nesting season, but permanently. It forces birds into less optimal habitat, and may contribute to nest failure. It may also cause loss of body mass due to stress, and compromise the bird's overall vitality.

Egg Oiling: Egg oiling is a lethal method of population control because it aims to reduce the overall bird population. The objectives are equivalent to that of shooting but the results are achieved over a longer time period. The application of mineral oil on eggs suffocates the embryo inside, and fools the adult bird into believing their eggs are still alive. This keeps the adult sitting on its clutch and discourages re-nesting. (Cormorants will attempt to produce a second clutch if their first clutch fails. Nesting behaviour continues until summer days begin to wane - a natural marker for nesting birds that signals the end of the nesting season). Egg oiling controls bird populations by suppressing the production of hatchlings compounded by natural mortality of adults.

Double-crested Cormorants are dedicated parents and will not leave their nests during incubation. The effects of egg oiling on nesting adults can result in incubation behaviour being extended up to two extra weeks. Average incubation period is 3.5 weeks. While sitting on their nests, adults do not feed, do not drink, and are susceptible to exposure. It interferes with natural reproductive instincts, and causes disturbances similar to that of harassment. This is also true for night oiling.

Nest Removal: This technique involves knocking nests out of trees with long poles or destroying ground nests. To avoid re-nesting attempts by cormorants, nest removal should occur late into the incubation period destroying both nests and eggs or chicks.

Shooting in short intervals: Point Pelee National Park devised a strategy to shoot nesting cormorants in short rotating intervals to give remaining birds 'a rest'. It is unknown and definitely unproven that extending the shooting over a longer period of time but in short intervals causes less stress to nesting birds. This would not corroborate with eye witness reports to shooting episodes at Point Pelee National Park and/or Presquile Provincial Park.

Unless wildlife is severely injured, there is no humane method to kill wildlife that does not want to be killed.

WHITE-TAILED DEER

Deer are counted and killed during the winter, when the animals congregate in their winter deeryards. Winter deeryards are considered significant habitat for White-tailed Deer, especially yards that support large herds because they protect deer in harsh winters and provide winter food. Significant Wildlife Habitat Technical Guide, **Appendix 6.1**

In southern Ontario, protected areas are an island of green in a sea of intensive agricultural and provide ideal winter habitat for White-tailed Deer. Shooting deer during times of greatest vulnerability in winter conditions combined with low food availability and pregnancy of females can have a profound long-term impact on the herd.

We have decided to include a letter written in response to a MNR proposal to extend the deer hunting season in southern Ontario into the winter months. This proposal was posted for public comment in April 2009 EBR # 010-5648, Comment ID 120270. It reads:

"I am in no way a biologist, but this topic has peaked my interest. If the average deer gestation is 180 -200 days, and the average deer conceives early to mid November, then the impregnated doe will have finished her first trimester by mid January. We all know that the first trimester in any pregnancy is vital to the future development of the young, for this is the time that their organs, digits begin live. In the second and third trimester is when those organs and bones, etc, develop and strengthen to sustain live in the outside world.

So we as hunters will be in the bush at the time when deer are yarding up, therefore, deer sightings will be substantially higher as we search food sources to hunt. So what does this mean, well it adds pressure to the doe and of course the fetus. Now I am in no way claiming to be an individual that is pro live, however, I can not help but wonder what will this do to the quality of the deer in these areas. If we are pushing deer, during this time that deer are relying heavily on fat sources that they have developed in the previous months and are trying to save their energy levels to help them survive the winter months, and we are out there disturbing their natural ability to sustain live during these times. I can't help but wonder what this will do to their ability to last a winter like we are having now. Will it weaken them to the point that if they are not harvested in the two week extended period in January, and they survive my hunt, have I just not weakened them enough to allow the yotes an easier kill, or even worse a long slow death by natural causes.

Furthermore, if they do survive this time period, will they not use up a lot of their fat reserves during this two week period from being pressured from hunters causing them to lose a lot of their stored fats that is to be used to properly sustain the live that they carry through late stages of March and April, waiting for spring to come and allow them to restore energy through new foods.

Deer, through the winter months go through negative energy, in other words, they use more energy than they replenish, therefore, the fats that they develop in November and December are there to help them get through March and April, and if they have wasted that energy try to survive that extended hunt then they can not sustain live inside them.

To go deeper, lets say they do manage to birth, will that fawn not be born awfully weak and again making it more vulnerable to death by natural cause and or yotes. I just can not seem to get over the fact that I feel that there are just too many negative factors that could have a very adverse effect on both the number of deer and the quality of the deer herds if we allow ourselves to hunt them during that critical time of redeveloping themselves. If we weaken the herds, would this not simply invite a population growth of predators in those very same areas.

When it first was mentioned I was overwhelmed thinking only of myself, getting that extra two weeks to hunt, but when I sat down and thought this through I just wonder what long term negative affect it would have. I will follow this closely and see what developes from it but I really think you need to look outside the box on this one and be a little more creative.

Couple ideas, maybe, open up the season mid September, fawns are already weaned, antlers are developed, deer are basically in the best shape of the cycle. Maybe offer a third shotgun season and offer hunters a second season rather than allowing a single season.

But I think if you ask most hunters, we would all favor an early start to the season. To compound the issues, most Bucs have already lost their antlers and sex determination would be near impossible during a hunt at this time.

I wonder what other negatives there are to an extended season that I have not thought of, and/or what would be the positives of this anyways, You have mentioned economic positives.

You mention less road accidents, however I would argue this point as most feed areas at this time of year are near roads, ie corn fields, and deer bed very close to these food sources, therefore pressuring them may actually increase accidents.

I look forward to the outcome, and would hope that if a season is to be extended it would be earlier in the year rather than later.

Thanks for the oppurtunity to comment!"

There is much research studying the energy requirements of over-wintering deer herds. **Appendix 7.4**. However, the letter above combines public concern with an accurate yet simple description of the potential harm of a winter deer cull whether it is conducted by sport hunters or park staff.

CONCLUSION

Now that MNR has devastated the populations of Double-crested Cormorants and White-tailed Deer at Presqu'ile, they will kill additional animals to "maintain habitat diversity:, i.e. – kill a few animals here and there as needed. However, the goals are broad enough that they can be adjusted at the ministry's discretion, a practice referred to as "adaptive management". In their opinion, no other oversight, other than theirs, is required. And the public, not having the same level of knowledge, is not useful in making project evaluations.

Shooting will be the last consideration in the case of cormorants but deer control will be by shooting only. As for 'other' wildlife, no specifics are provided by MNR as to how control will be implemented.

The Ontario Ministry of Natural Resources states that the resource management implementation plans are limited to Presqu'ile Provincial Park, yet it describes the benefits of complimentary regional culling programs and also references the impacts of dispersing nesting cormorants on other regions namely, Tommy Thompson Park in Toronto. It also describes the need to kill deer and cormorants because they cause 'ecosystem' negative impacts.

It is disingenuous to claim that intended management activities are limited to one small area. As shown in the discussion above, deer culls are organized regionally in winter deeryards when concentrations of deer are greatest and females likely pregnant. This practice reduces the population significantly and can have a long-term impact of local deer herds.

Soon after the New York State Department of Environmental Conservation began culling nesting cormorants on state-side islands on Lake Ontario, the Ontario Ministry of Natural Resources announced their lethal control of nesting cormorants at Presqu'ile and Lake Huron. Soon after the Ohio Fish and Wildlife Service began shooting nesting cormorants on the state-side Lake Erie Archipelago Islands, Parks Canada initiated its own shooting program on Middle Island, Point Pelee National Park. The Ontario Ministry of Natural Resources has followed suit announcing their intention to begin shooting cormorants at East Sister Island Nature Reserve also on Lake Erie completing lethal management of all significant cormorant colonies on Lake Ontario and Lake Erie.

We are asking for Full Environmental Assessments for both MNR resource management plans because we believe they are seriously flawed, based on political pressure rather than a solid scientific foundation. The lethal control of native species needs to be properly scrutinized because these programs are accelerating without proper monitoring due to the lack of funding for resource management projects within protected areas.

Sincerely,

AnnaMaria Valastro
Peaceful Parks Coalition