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Barton Feilders, Manager
Planning & Research Section, Ontario Parks
300 Water Street, 6th Floor
Peterborough, ON K9J 8M5
Telephone: (705) 755-1730 Fax: (705) 755-1701

c.c.Honourable Donna Cansfield
Minister of Natural Resources
Room 6630, Whitney Block
99 Wellesley Street West
Toronto, Ontario M7A 1W3
Tel : 416-314-2301 Fax : 416-325-5316

Re: Recommended changes to the “Resource Management Plan for the Mainland of Presqu’ile” and the “Resource Management Plan for the Islands of Presqu’ile”.

Dear Mr. Feilders,

Thank you for providing us with an opportunity to contribute changes to the Resource Management Plan for the Mainland and Islands of Presqu’ile Provincial Park. Below we describe our primary concerns with the current proposals, our recommendations and rationale for these recommendations. **Notably, our supporters approve these recommendations.**

The Peaceful Parks Coalition opposes lethal control and harassment of native wild species especially in protected areas. We reject the government’s benchmark for natural carrying capacity because it is poorly defined and based on antiquated environmental conditions that no longer exist today. Management objectives aimed at restoring past population trends require indefinite lethal activities - the antithesis of a natural carrying capacity and a signal that the benchmark for carrying capacity is no longer relevant in the current environment.

Most importantly, we object to the management of wild species because in managing we lose knowledge of the natural world including natural forces that shape wilderness values. It is these wilderness values that govern and regulate ecosystem function and define ecological integrity.

We have four primary areas of concern:

Double-crested Cormorants: With no human intervention, colonial water birds spontaneously gathered on the islands of Presqu’ile to collectively and cooperatively form nesting colonies. Prior to the commencement of management activities, it was one of the healthiest and most diverse colonial water bird colonies on the Great Lakes exemplifying the force of migration and the instinct of reproduction. The colony today is a mere shadow of its previous glory, fragmented and broken with a management patchwork scattered throughout the islands. **The “Draft Management Strategy for Double-crested Cormorants” at Presqu’ile has, in our opinion, failed to reach its objective and has brought much pain and suffering to nesting birds.**

White-tailed Deer: There is an attitude of complacency within Ontario Parks towards the shooting of White-tailed Deer. The proposal to shoot deer for the next ten years was barely discussed in the “Resource Management Plan for the Mainland”, and staff chose not to prepare an issues paper or a management strategy specific to White-tailed Deer for public comment. The conclusion is that there is little political risk associated with a ‘closed-door’ killing program. **Yet the research we reviewed assessing the program to date at Presqu’ile confirmed the results as inconclusive and highlighted inconsistencies in data collection.**

Public Process: We know that the removal of any further public oversight in the lethal control of native wildlife in the provincial parks system sets precedent in Ontario. **The lack of public oversight equals a lack of government accountability** and is often introduced to avoid or intercept highly controversial issues.

Premise of Correctness: These programs currently operate under the premise of 'correctness', in which the government claims it is correct in stating that Double-crested Cormorants and White-tailed Deer are causing negative ecological impacts. **The Peaceful Parks Coalition has never supported the premise of 'correctness'** and this objection is the foundation for our campaign in opposing the control of Double-crested Cormorants and White-tailed Deer in Ontario.

Recommended changes to the "Resource Management Plan for the Mainland of Presqu'île" and the "Resources Management Plan for the Islands of Presqu'île".

- **Remove all language within the two specified documents that continue to perpetuate the notion that Double-crested Cormorants and White-tailed Deer are causing 'ecological' harm to Presqu'île Provincial Park. Instead, describe the impacts of the two native species as 'biological shifts'.**
- **Create a sanctuary for colonial water birds including Double-crested Cormorants on High Bluff and Gull Islands;**
- **Adopt a limited cormorant control program using non-lethal techniques to disturb birds or remove nests during pre-nesting periods in areas not designated as a sanctuary;**
- **Cease the tree planting program on High Bluff Island;**
- **No management of White-tailed Deer on High Bluff Island;**
- **Establish a public working group whose mandate is to act as a public liaison between concerned individuals or organizations and wildlife managers.**
- **Develop vegetative monitoring strategies with an emphasis on restoring fragmented woodlands for the mainland of Presqu'île that are scientifically consistent to further explore the influence of deer browsing in shaping forest dynamics.**
- **Develop non-lethal and non-intrusive mitigation strategies to protect emerging young saplings from deer browsing while permitting the ongoing browsing on other non-target plant species.**
- **Develop advanced research projects that would further enhance our understanding of the relationship between Double-crested Cormorants and White-tailed Deer and the biological shifts they create.**

Double-crested Cormorants:

The Ontario government measures the success of their 'cormorant management strategy' by the simple reduction in the cormorant population and the apparent decrease in tree mortality. But there are other facts to consider.

- **It cost taxpayers almost half a million dollars to administer the program (approximately \$90,000 annually) not including contracting fees or any costs associated with policing during times of shooting;**

- **At the height of the greatest density of the cormorant colony in 2002 at approximately 12.000 nests, all heron species had been increasing their presence on High Bluff and Gull Island. Notably, Ontario Parks confirmed that Black-crowned Night Herons appeared healthy and stable;**
- **Double-crested Cormorant nest counts had begun to decrease substantially from 12.082 in 2002 to 8696 in 2003, a decline of 3300 nests in a single year or 6600 adult birds - a signal that the population had reached its natural carrying capacity prior to management activities;**

With the commencement of the cormorant control program:

- **Great Blue Heron nests began to decline on High Bluff Island.**
- **Black-crowned Night Herons abandoned their traditional nesting site at Sebastopol Point;**
- **Great Egret nest counts fluctuated;**
- **Cormorant ground colonies on High Bluff and Gull Islands abandoned;**
- **Unfavourable media coverage criticizing the actions of the Ontario government;**
- **Persistent protests aimed at raising public awareness of the brutal management practices of Ontario Parks tarnish their reputation as non-partisan wildlife managers, and;**
- **Arrests of protesters and the ongoing police involvement necessary to complete the program.**

Since the program has ceased:

- **Great Blue Heron nests have begun to recover;**
- **Black-crowned Night Herons have resumed nesting on Sebastopol Point;**
- **Great Egret nest counts began to increase;**
- **Double-crested Cormorant nest counts increased slightly and have begun to decline suggesting the population is either settling or it has succumb to external mortality pressures such as botulism, and;**
- **Protests also ceased.**

Please note: nests counts from 2002 to 2008 differ between Ontario Parks' documents.

Ontario Parks claims the 'management strategy' is responsible for a dramatic increase in vegetative growth at 26% but fails to distinguish between their tree planting program and natural succession due to the absence of nesting and roosting cormorants. Vegetation monitoring reports state the obvious – a decrease in the presence of nesting cormorants equals a decline in tree mortality – but provides no new information regarding the biological conversion typical of any cormorant colony situated in trees.

Today, Ontario Parks is no further ahead in increasing the presence of herons on High Bluff Island than they were when they began their 'research and monitoring' program nine years ago.

What we witnessed during days of active management on High Bluff and Gull Island was sheer chaos and panic among nesting birds and the **cruelty inflicted on cormorants did not justify the end goal of increasing net habitat for Great Egrets and Black-crowned Night Herons when their population is not threatened** in Ontario or across their primary range of the United States.

Recommendation: Designate areas that are or have been colonized and overlap as roosting areas by colonial water birds including Double-crested Cormorants as of December 2009 on Gull and High Bluff Islands as sanctuaries. These areas would evolve without active management including but not limited to: shooting, egg oiling, nest destruction, harassment during periods of nest building, incubation, fledging and roosting, destruction of habitat such de-limbing trees, and planting trees or other vegetation.
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Areas where we would support limiting colonization are: trees that have never been colonized despite their suitability, the small tree plantation created by Ontario Parks on the edge of the eastern woodlot adjacent to the composting site, and any trees that naturally establish themselves on the islands outside areas deemed sanctuary. We would support this management strategy for the next ten years.

The **Toronto and Region Conservation Authority** has adopted this management protocol for the colonial water bird colony at Tommy Thompson Park.

While this recommendation may seem too restrictive in comparison to the ease of shooting, we consider it a major compromise. Birds attempting to establish new nests are likely young birds, and the consequences of disrupting the strong instinct to reproduce for the first time and establish fidelity to a colony in which the birds were most likely raised are unknown. However, it is reasonable to suggest that limiting the expansion of the colony could lead to the extinction of the colony. There are also ethical and compassionate issues associated with the harassment of young birds and preventing them from reproducing.

And as such, we campaign against this management practice at Tommy Thompson Park. The difference between Tommy Thompson Park and High Bluff and Gull Islands is that we suspect that the Double-crested Cormorant colony reached carrying capacity at 12,000 nests defined by the dramatic decline of 3300 nests in the next year, and has already carved out its nesting preferences at Presqu'île. Given the current state of the population, there is opportunity for expansion within areas already colonized.

Planting Trees

On our site visit of July 14, 2009, park staff expressed a desire to maintain some wooded assemblage on High Bluff as was originally present when the island was farmed. Wooded areas are primarily situated along the outer perimeter of the island protecting the farm from winds blowing off Lake Ontario. It is unclear why it is important to recreate wooded areas through a tree planting program especially if it perpetuates the killing of native species. It also encroaches on the open areas of High Bluff that have evolved through natural succession from farming fields into ideal breeding and migrating Monarch Butterfly habitat.

Planting trees is a worthwhile program in areas where a natural expansion from an original seed source is difficult such as urban areas. But in protected areas, expansion of wooded areas should begin by designating no development zones in areas adjacent to good seed stock and allow the forest to naturally seed outward. This creates a deeper forest better suited to protect interior species as well as edge species, and limits browse for deer. Planting a small tree plot as was done on High Bluff Island can act as a seed source but **we object to any continuous tree planting program of the islands especially if it infringes on Monarch Butterfly habitat and is cause for disturbing nesting cormorants or killing deer.**

Recommendation: Cease the tree planting program on High Bluff Island.

White-tailed Deer

The Ontario government is asking citizens to accept a 'closed-door' deer management strategy by shooting for the next ten years **without providing the least amount of rationale or information regarding the issues that would warrant such a program.** The casualness in which Ontario Parks treats the killing of deer is directly linked to political risks rather than a humane wildlife policy. This was clearly stated in the 'scoping' document when Ontario Parks graded this issue as a Category B. The Ontario government is also confident that the vast amount of research to date on deer management in other jurisdictions is sufficient to defend any deer management strategy they wish to adopt at Presqu'île.

But assessment reports specific to the vegetation monitoring plots at Presqu'île established as part of the deer management program show that results are inconclusive and data collection too inconsistent to be valuable in assessing the success of the program to date.

The reports also recommend that managers focus on reducing 'sunlight' from forest interiors to promote a closed canopy plant community and reduce browse. While this might be achieved by protecting young saplings from deer browsing through shooting, it is more effective to protect individual seedlings through fencing and naturalize plantation and degraded woodlands within Presqu'île. This would permit continued deer browsing throughout the park to control the spread of invasive plant species.

Presqu'île is not large enough to encompass a complete home range of a deer herd. Deer move in and out of the park, and there are sufficient mortality pressures from sport and agricultural hunting from outside the park that would make killing deer within a protected area unnecessary.

Recommendation:

Revise the "Resource Management Plan for the Mainland of Presqu'île" to include an emphasis on restoration of fragmented and degraded woodlands to a mature and continuous deciduous closed canopy forest, which in turn would limit browse for deer.

Develop vegetative monitoring strategies that are scientifically consistent to further explore the influence of deer browsing in shaping forest dynamics.

And develop non-lethal and non-intrusive mitigation strategies to protect emerging young saplings from deer browsing while permitting the ongoing browsing of non-target plant species.

High Bluff Island

Since 1999, Ontario Parks has recorded a total 147 sightings of White-tailed Deer on High Bluff Island and only eight in the last five years. The low presence of deer on High Bluff Island does not warrant a deer killing program. This proposal appears to be more motivated by the park's tree planting program than any consideration for the protection of island vegetation. **It also fails to recognize the role of deer grazing in preserving the open fields that have become important Monarch Butterfly habitat.**

Recommendation: Abandon the proposal to kill White-tailed Deer on High Bluff Island.

Public Process

Federally and municipally, wildlife management is left to the discretion of wildlife managers and park superintendents with no obligation to seek public input or provide any public reports. There are longstanding **generational** federal and municipal wildlife killing programs that are unknown to the general public.

These 'closed-door' wildlife policies tend to be associated with highly controversial management practices and are intended to mute public criticism and remove government accountability by limiting public communications.

This proposal alone would warrant an application to the Ministry of the Environment for a Part II Order.

The only alternative to a full public process is the establishment of a **Public Working Group** whose mandate is to act as a public liaison between concerned individuals and organizations and wildlife managers. While ministry staff is available to speak with the public regarding wildlife policy and practices, they are not obligated to do so. **This group would be mandated as a public representative body. Unlike advisory groups, this group would not adhere to a protocol of confidentiality.** It would meet with ministry staff and communicate management strategies to the public either upon direct request from concerned individuals or organizations or through a central portal such as a website. This would provide the government transparency the public has come to expect.

Two Examples:

The **Toronto and Region Conservation Authority** has set up an advisory committee to discuss the management of Double-crested Cormorants at **Tommy Thompson Park**. The group is strictly an advisory committee and does not act as a public liaison. Given the controversy of managing Double-crested Cormorants in a City such as Toronto, the conservation authority uses a variety of methods to gage public opinion beyond the advisory group. In addition, to public meetings, they have created a dedicated web page listing all and current information as it relates to Tommy Thompson Park, and make themselves readily available to speak to any interested persons. The outstanding feature in the case of Tommy Thompson Park is **the website dedicated to the dissemination of current information** including notes to the governing Board.

The **Kawartha Highlands Stakeholder Group** is familiar to us all. This group was formed to address the explosive issues surrounding landowner and mining interests, among others, in the formation of the Kawartha Highlands Provincial Park. It was not an advisory group but rather a stakeholder group and not bound to a protocol of confidentiality. Group members were readily available to speak to the press and to members of the public. **It was the spirit of open dialogue that brought a successful conclusion to an otherwise turbulent process.**

Both these case scenarios have something to offer in establishing a public liaison group at Presqu'île, but **we would oppose any model that acts strictly as an advisory group** without a responsibility towards public accountability and government transparency.

Recommendation: Establish a public working group whose mandate is to act as a public liaison between concerned individuals and organizations and wildlife managers.

Premise of Correctness

These programs currently operates under the premise of 'correctness', in which the government claims it is correct in stating that Double-crested Cormorants and White-tailed Deer are causing negative ecological impacts. The measurement in defining negative ecological impacts is the alteration or the absence of a previous environmental condition such as a lot of trilliums verse only a few trilliums, a treed environment to a barren environment. The Ontario government feels ecological equilibrium is reached or biodiversity preserved when all the desired species are representative in numbers predetermined by Ontario Parks.

We must recognize that this definition of 'negative' ecological impacts is contrived by short-term management objectives. It has little resemble to natural carrying capacity or the shifting profile of natural environments.

The Monarch Butterfly

On more than one occasion we have requested scientific data that supports the government assertion that Double-crested Cormorants threaten the Monarch Butterfly. We have received none. On September 2 during a meeting with Ontario Parks, staff confirmed they have a poor understanding of the relationship between cormorants and monarchs. Until the Ontario government can define the relationship between cormorants and the monarch, **we ask that you omit any further reference implicating Double-crested Cormorants as causing the demise of the Monarch Butterfly.**

Recommendation: If the ministry is not prepared to screen their conclusions of the cormorant control program through a peer-reviewed scientific process, then we recommend that Ontario Parks adopt neutral language to describe their work as required by scientific protocol, and remove all references in both documents that are inflammatory towards cormorants and deer. Ecological 'shifts' created by the presence of native wildlife are not negative, and are accurately described as biological 'shifts'.

For example: Today, we now understand the importance of beaver activity in drowning large forested areas in the formation of wetlands, and the vital ecological function of large forest fires in forest regeneration. Until insightful and talented researchers explored the ecological relationship

between species and natural functions that force an immediate environmental shift, generations were taught that these species and processes were 'destructive'.

Advanced Research

Since Ontario Parks has already killed both Double-crested Cormorants and White-tailed Deer for several years but has ceased their programs for the last two years, there is a great opportunity to engage in advanced research that would have wider scientific benefits.

For example: Devise strategies that would measure biodiversity levels in the presence of low deer densities and measure how biodiversity shifts as deer densities increase. The criteria of biodiversity would need to expand beyond the single measure of vegetative growth and should explore **the presence of the biological hierarchy**. A similar study could be designed for Double-crested Cormorants on High Bluff Island.

In some colonies, Double-crested Cormorants choose to form ground-nesting colonies despite the immediate availability of trees. **There may be an ecological rationale for such decisions not immediately apparent at a glance**. Since Double-crested Cormorants tend to choose remote small islands or peninsulas for nesting where soil is shallow, the birds may be deliberately choosing trees that are somehow compromised either by age or site conditions. The presence of cormorants would accelerate tree decay adding organic matter necessary in building soil. **The birds may be intentionally avoiding healthy trees**. There are examples of this at High Bluff Island. There are a few trees that cormorants and their avian companions have rejected as nesting sites although the trees are tall and full canopied (an indication that a tree is healthy), and young newly planted trees in which a study could be designed to test this hypothesis.

Recommendation: Develop advanced research projects that would further enhance our understanding of the relationship between Double-crested Cormorants and White-tailed Deer and the biological shifts they create.

In conclusion, we have participated in this dispute resolution process in the spirit of optimism and transparency. Our ultimate goal is to achieve peaceful and safe nesting grounds for all colonial water birds including Double-crested Cormorants.

To most people, a glimpse of a White-tailed Deer is a prized memory and a symbol of a healthy ecosystem. Yet these animals are managed as a resource only and the role of deer in defining southern forests is forgotten. Our goal is to foster an ecological appreciation for the role of deer in defining our deciduous forests.

Thank You

AnnaMaria Valastro
Campaigner

Please note: In the spirit of public transparency, and with the submission of this briefing paper to Ontario Parks, The Peaceful Parks has resumed their public campaign to protect Double-crested Cormorants and White-tailed Deer.