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February 9, 2009

Donna Cansfield
Minister of Natural Resources
6th Floor, Room 6630
Whitney Block, 99 Wellesley St. West
Toronto, Ontario, M7A 1W3

Re: Registry Numbers 010-5338, 010-5337 and 010-5648

Dear Minister Cansfield,

Two weeks ago, we submitted comments regarding the Ontario government's new proposal to extend deer hunting across the province. After requesting further information from ministry staff and speaking with other related agencies, we would like to offer the following additional comments.

On January 15, your ministry issued a press release stating that *"Deer populations in some parts of Ontario are rapidly expanding, resulting in increased damage to crops and more deer-related collisions on our highways."*

Ms Cansfield, did you know that when we asked your staff to provide us with their research listing the areas where deer populations 'are rapidly expanding causing crop damage and deer-related collisions', they were unable to do so?

Do you also know that the **Ontario Soil and Crop Improvement Association** has hired the **George Morris Research Centre at the University of Guelph** to update their 1998 report *"Wildlife Impact Assessment For Ontario Agriculture"* (a report that is quoted in the ministry's *Strategy for Preventing and Managing Human-Deer Conflicts in Southern Ontario*, May 2008)? They too approached your ministry for statistics linking deer with increased crop damage because they lack the funds to conduct an independent survey of farmers. Your ministry could not offer the George Morris Centre any additional information either.

But on page 17 of the ministry's report *"Strategy for Preventing and Managing Human-Deer Conflicts in Southern Ontario"* (May 2008) it states:

"Deer are currently managed as discrete populations at the Wildlife Management Unit (WMU) level, with southern Ontario's land base segregated into 49 management units. **Annually, deer managers evaluate current population conditions within each WMU and assign:**

- A population trend;
- An indication of hunter demand;
- An indication of winter carrying capacity; and
- An indication of social tolerance to deer issues (e.g., concerns about agricultural damage, vehicle collisions, environmental impacts).

Yet, these results are never specifically quoted in the report, nor are they available upon request, nor does it state whom the ministry surveys. In fact, when we asked your staff to please provide us with a list of Wildlife Management Units where deer hunting opportunities will be extended, they wrote:

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"Deer antlerless validation tag and additional deer seal numbers are developed by the Ministry of Natural Resources biologists on an annual basis and reflect a variety of local circumstances, such as habitat, deer populations, hunting pressures and success rates. These allocations will be set over the next few months."

Even though you are prepared to extend deer hunting into the winter when deer are most visible, most vulnerable and most likely pregnant, your staff cannot confirm where these new hunting areas will be, nor do they list crop damage and/or vehicle collisions as a primary consideration in allocating new deer tags and seals. The original correspondence from Deb Stetson, Manager, Wildlife Section is enclosed.

Also included in this correspondence is the number of *Deer Removal Authorizations (DRAs)* issued to farmers by the ministry to kill deer that are causing or could cause crop damage in the year 2007.

Farmers can receive a *Deer Removal Authorization* permit without experiencing crop damage. They only need to record that deer are in the vicinity of their farm. These permits are considered 'preventive', therefore *Deer Removal Authorizations* are not a good measure of actual crop damage but it does provide some measure of farmer tolerance towards deer.

In either respect, *Deer Removal Authorizations* from 2007 are few in most areas of the province including Ontario's 'bread basket' region of southwestern Ontario. Since the ministry could not, or would not, provide any further records of *DRAs*, we have requested records from 2000 to 2008 through the Freedom of Information and Protection of Privacy Act to better understand the need to expand the deer hunting season based on crop damage.

If your ministry cannot substantiate that crop damage is increasing because of deer densities, then you should not be making such statements in a press release.

Our understanding of farmer attitudes towards the presence of wildlife in and around their property is very positive, and many farmers have a sense of responsibility towards wildlife. But your ministry simply assumes that hunter success rates automatically translate into high deer densities and this in turn must mean a higher rate of crop

damage and deer-related collisions. Your ministry comes to this conclusion based on one piece of information – their survey of sport hunters.

Using one piece of distant information to change policy or regulation would certainly prove fatal in the private sector but yet it is commonplace in the public sector. Deer densities do not always indicate an increase in population. As habitat for wildlife rapidly shrinks, animals will concentrate in remaining suitable habitat creating the illusion of abundance when the opposite is true. This is commonly referred to as the 'source-sink' effect.

Small woodlots in southern Ontario, the last refuge for white-tailed deer, are rapidly disappearing with the massive extension of urban sprawl. So serious is the disappearance of woodlots in southern Ontario that some municipalities are developing strategies for their protection pitting them against developers. A recent (2008) decision by the **Ontario Municipal Board (OMB)** ruled in favour of the **City of London** to authorize

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the protection of 'significant' woodlots from development. The group of developers, who lost their challenge at the OMB, are now proceeding with a court challenge taking issue with the obscure term 'significant' (woodlots). Local governments are now taking action to preserve even the smallest woodlots because only small woodlots remain.

We also question the ministry's persistent claim that because landscapes have been converted to agricultural use, that this has benefited deer populations. The exact same claim is applied to any 'nuisance' wildlife that feeds on seeds (grain) such as the Canadian Snow Goose, squirrels, raccoons, and so on. But rarely are these claims substantiated. While deer and other wildlife can survive, and even thrive on contrived landscapes such as monoculture agricultural land, it does not replace the richness and diversity of natural landscapes that obviously were more abundant in the past than today.

It is equivalent to claiming that because North Americans are generally over weight, and a certain percentage even obese, we are a healthy and robust population because we have an abundance of food. In the past, people were likely healthier with less food because they were thinner and the quality of food was better.

The proposed plan to reduce the abundance of deer is at also odds with a key principle of sustainable wildlife management: that we should keep common species common to ensure they aren't placed at risk in the first place. The logic applied by the ministry is if sport hunters can take deer with ease, in other words, are common, then there must be too many. It is a bizarre and contradictory method of wildlife management.

Through our correspondence with ministry staff, they have indicated that the ministry is currently reviewing the relationship between increased hunting activity and deer/ car collisions. We appreciate this effort, however we urge you to initiate a thorough examination of this relationship. The ministry has reviewed this issue before through the work of Bruce Pond but the review was too simplistic. If deer-related collisions are as much of a human threat as your ministry claims, then it would seem appropriate to examine all possible factors contributing to increased deer-related collisions, **but especially sport hunting.**

According to the **Ministry of Transportation**, car collisions with deer coincide with times of greatest hunting activity – during the deer hunting season and at dawn and sunset. But the ministry dismisses this strong correlation citing the natural movement of deer during the rutting season and into winter habitat. But if this logic holds true, then it would be reasonable to assume that a similar number of deer-related car collisions would occur during their spring migration too. While deer-related collisions do occur during late spring, occurrences are far fewer than in the autumn during hunting season.

There is no rutting season in the spring, but there is a new generation of young. If deer populations can double every year as your ministry claims, then there would be a greater number of deer every spring – a higher density. Yet deer occurrences are fewer than during the deer hunting season.

The Sifton Bog is a small unique nature reserve within the boundaries of the **City of London**. The Ontario Ministry of Natural Resources, in partnership with the Upper Thames River Conservation Authority, has been pressuring the City of London to kill white-tailed deer that frequent the Sifton Bog. They recommend the city allow a bow hunt.



One reason cited by both government agencies is the impacts of high deer densities on vehicle collisions. But according to the **City of London Police Department**, there were 205 deer-related collisions in 2004 and 149 in 2007 with 11% or 16 occurring within a kilometer of the Bog. *This represents a 27% decline in the number of deer-related collisions even though the population of deer in the Sifton Bog doubled during that same period.* This statistic demonstrates that the vast majority, 89% of all the deer-related collisions, occurred elsewhere in the London area.

There is currently no deer hunting permitted in the Sifton Bog or its surrounding area but deer hunting is popular in areas adjacent to the city.

The McGuinty government has expanded big game hunting opportunities fifteen (15) times since 2004, not including deer hunting in protected areas such as Bickwood Oak Woods and the Kawartha Highlands, and new partnerships between landowners and sport hunters. Even though your ministry has steadily increased deer hunting opportunities, you have failed to measure the success of these programs in reducing deer/human conflicts. But other non-lethal programs in other jurisdictions have proven successful, yet the ministry refuses to explore other options to sport hunting.

With one of the highest deer-vehicle collision records in the province, the **City of Ottawa** launched a public education campaign '*Speeding Costs You Deerly*', in the Fall of 2006. In just two years, this award-winning but modest campaign has been responsible for a 34% reduction in deer-related collisions. After the initial year of the campaign, a Decima survey showed that 62 percent of Ottawa residents recalled the campaign, and the key messaging resonated with 71% of those respondents.

Given our preliminary research into the need to expand deer hunting opportunities, we are of the opinion that:

- the ministry has failed to substantiate their claims that deer crop damage has increased and deer are the cause of wildlife-related vehicle collisions;
- there is a strong correlation between intense hunting activity and deer-related collisions;
- the continued expansion of deer hunting indicates that sport hunting may not be an effective method of reducing deer/ human conflicts;
- other non-lethal options recommended by the Ministry of Transportation to reduce deer-related collisions have proven effective in some jurisdictions, and;
- the question as to whether crop damage by deer has increased, decreased or remained the same must be answered before implementing an extended deer hunt.

Therefore we recommend that the ministry:

- publicly release annual surveys conducted in each Wildlife Management Unit so the public can understand the method and rationale in promoting an extended deer hunt to reduce deer/human conflicts;
- commission a proper and thorough survey of farmers in partnership with the Ontario Soil and Crop Improvement Association to assess the current level of crop damage experienced by farmers;
- commission **independent** research to explore the correlation between intense deer hunting and increased deer-related collisions;
- evaluate sport hunting as an effective tool in reducing deer/human conflicts;
- delay any further expansion of the deer hunting season until a non-lethal, 'best practices' strategy has been implemented, and;
- delay any further expansion of the archery deer hunting season until the ministry has reviewed the wounding rates for bow hunting.



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Thank You

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