

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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OFAH FILE: 430/794  
January 24, 2014

Mr. Rob Cunningham, Park Superintendent  
Ministry of Natural Resources  
Provincial Services Division  
Ontario Parks, Presqu'ile Provincial Park  
328 Presqu'ile Parkway  
Brighton, Ontario  
K0K 1H0

Dear Mr. Cunningham:

**Subject: EBR Registry Number 012-0486: Presqu'ile Provincial Park Management Plan Amendment**

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 710 member clubs, we have reviewed proposed amendments to the Presqu'ile Provincial Park Management Plan. We have identified some concerns and have provided additional management options for your consideration below.

**Waterfowl:** The OFAH is very pleased that the controlled waterfowl hunt will remain in Presqu'ile Provincial Park (Section 2.3). Waterfowl hunting is a positive long-standing heritage activity within the park and should be maintained for both wildlife management (Canada goose) and its significant cultural values. We also find the statement in section 6.5 "Under no circumstances will the duration or the extent of the hunt be increased" to be very restrictive, inconsistent with other planning direction/policies and incompatible with adaptive management. The OFAH recommends that future additional locations/opportunities surrounding the park should be considered in addition to the current hunt, instead of as a replacement.

**Fish:** The OFAH is pleased to see that commercial and sport fishing continue to be permitted. We however question the validity of the statement in section 6.4, "commercial fishing in Presqu'ile Bay and Lake Ontario might be affecting park birds." Statements like this should not be made in the absence of site-specific empirical evidence. Who is the MNR working with and/or what is the MNR doing to gather this information?

**Mute Swans:** According to the Presqu'ile Resource Management Implementation Plan (2012):

*"Invasive alien species like the Mute Swan (Cygnus olor) are currently nesting in the marsh areas of the park. Mute swans are aggressive birds and may affect other marsh nesting species. It is possible that they have contributed to the decline of some of these species. In particular, black tern (Chlidonias niger - Special Concern) disappeared from the marsh at about the time Mute Swans became established."*

The OFAH is concerned that mute swans are not mentioned/addressed in the Park Management Plan. Section 6.5 of the plan states that "if already established alien species threaten park values a program for their eradication may be developed if feasible and practical." What are the management plans for dealing with the invasive mute swan population at Presqu'ile Provincial Park? If a management plan exists, where can it be found and why was it not included in this amendment?

...2

Rob Cunningham  
January 24, 2014  
Page Two

**Cormorants:** Presqu'ile Provincial Park has a long history of dealing with devastating impacts that double-crested cormorants have to the vegetation, habitat, and other species within the park. According to the Presqu'ile Resource Management Implementation Plan, the number of cormorant nests increased from 3,159 to 12,082 between 1994 and 2002. From 2003 to 2006 cormorants were culled within the park with high degree of success, decreasing the total number of nests to 2,819. In 2007, the culling of cormorants was stopped, while non-lethal management methods (e.g. nest removal, nest deterrents, alternative nest site construction, etc.) continued to be explored, and the number of nests has currently fluctuated around 4,000. Although there may be some merit in the non-lethal control of cormorants, most of the activities are time-consuming, expensive (staff and materials), and inefficient compared to culling. The OFAH recommends that park managers remain vigilant in their monitoring of the cormorant population, and consider reinstating the cull if the negative impacts to the habitat continue and/or restoration efforts are destroyed. There is a wealth of scientific research demonstrating how quickly populations can become overabundant and the devastation they have on an environment, we hope the MNR will not allow this to continue/happen with cormorant population in Presqu'ile, considering they have a cost-efficient, effective, and proven management tool (culling) at their disposal.

**Deer:** The OFAH was pleased to see a commitment to maintaining the "deer population at a level that is within the carrying capacity of the park's deer habitat and sustainable in the context of the park environment." The OFAH firmly believes in a proactive approach to wildlife management. We noticed that the plan called for deer reductions to be performed by park staff or through partnerships under the direction of park staff. The OFAH strongly recommends that hunting by Ontario licensed hunters be considered within the park for deer management. A proactive approach should allow for an inclusive recurring harvest of the deer population within the park based on a scientifically defensible quota system. We believe that managing wildlife populations over the long-term will prove to be more sustainable, efficient, and cost-effective relative to reactive culling methods. The following points address the common concerns and misconceptions associated with hunting in multiple-use areas, as well as some of the benefits of allowing hunting on publicly accessible lands.

- **Safety:** Hunting in Ontario is one of the few recreational activities that require proof of competence before engaging in the activity. Licensed hunters in Ontario must pass both the Canadian Firearms Safety course and the Ontario Hunter Education course before obtaining necessary hunting licenses. According to the Canada Safety Council and the National Safety Council, hunting is responsible for only 0.001% of accidents in Canada, which is far less than car accidents, insect bites, contact sports, and even lightning strikes.
- **Liability:** Many landowners and operators are concerned with liability. As a result, proof of insurance (e.g. OFAH membership \$3,000,000 public liability insurance coverage) has been used as a requirement to participate in public hunting opportunities (e.g. Simcoe County Forest).
- **Wildlife Management:** The Ministry of Natural Resources (MNR) regulates the harvest of game species in Ontario. The absence of active harvest of game species (e.g. white-tailed deer) can result in overabundance, leading to over browsing, lower biodiversity, and reactive culling of nuisance animals. Licensed hunting is a low impact conservation activity that prevents wildlife populations from reaching nuisance numbers, while contributing to the maintenance of ecosystem health, biodiversity, and overall ecological integrity.
- **Fair Access for Heritage and Cultural Activities:** The OFAH strongly supports fair sharing of our natural resources. The OFAH does not dispute valid aboriginal rights and claims; however, we believe that publicly accessible areas should be opened to licensed hunters as well to help maximize the overall benefits. We believe that wildlife populations can be cooperatively harvested to efficiently and effectively meet management targets.

Rob cunning Ham  
January 24 2014  
Page Three

- Sustainable Development and Socio-economics: Allowing licensed deer hunting in Presqu'ile Provincial Park would generate revenue for both the park (e.g. permits) and contribute license/game seal revenue directly back into provincial fish and wildlife management through the Fish and Wildlife Special Purpose Account (SPA). Local businesses and communities would also benefit from the presence of licensed hunters, who require fuel, food, equipment, supplies and accommodation. Hunters would also be present during off-peak seasons, as hunting occurs outside of typical tourist seasons, generating revenue in local communities during these "slow seasons."

In conclusion, the OFAH is pleased that waterfowl hunting will remain within the park. We have concerns with the environmental impact of the current cormorant population and non-lethal control methods being investigated/implemented within the park. We suggest that mute swans be included in the wildlife management section of the plan, and request to see the management plan for this invasive species. We caution making statements about the impact of commercial fishing to park birds without sufficient evidence. Finally, we suggest that hunting by licensed hunters be considered by park managers as an effective tool to maintain the deer population within the park, while highlighting the many benefits that come with this management option.

The OFAH appreciates the opportunity to review the proposed amendments to the management plan and look forward to your response to our questions.

Yours in Conservation,



Chris Godwin  
Land Use Specialist

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cc: OFAH Board of Directors  
OFAH Zone E Executive  
OFAH Zone F Executive  
OFAH Land Use/Access/Trails Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
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