Ms. Melody Cairns  
Zone Ecologist  
Ontario Parks, Southwest Zone  
659 Exeter Road  
London, Ontario  
N6E 1L3

Dear Melody:

Subject: Public notice for a Category ‘B’ project evaluation – white-tailed deer population management.

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 675 member clubs, we have reviewed and are generally supportive of the proposed white-tailed deer management program in the Pinery and Rondeau Provincial Parks.

We recognize the potential negative impact of overabundant white-tailed deer populations on plant communities and the need for ongoing, active population management. The most effective, efficient, and often the only practical means of addressing ecosystem damage is through regulated hunting. While we understand and agree with the need to reduce deer densities in these parks, we have a few questions and concerns with the proposed management plan.

- Has Ontario Parks set a specific deer population objective for each park? The variable recruitment rate and “deer herd reduction target percent” suggests that there is no specific population objective for either park, which is a necessary inclusion in any deer herd reduction plan. To reduce the uncertainty in your deer herd reduction program, is Ontario Parks willing to commit to improving its population estimation methods?

- Based on the information that you provided, aerial surveys are not always conducted to census deer populations in the Pinery and Rondeau Provincial Parks. As a result, you must project a mid-winter population size using an assumed recruitment level and a March population size that is estimated from modeling. Given the high level of uncertainty in population estimates, your deer herd reduction targets are entirely arbitrary and scientifically indefensible.

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- It is our understanding that the annual deer herd reduction is carried out by government staff and local First Nations. We believe that Ontario Parks has not given due consideration to the resource users (licensed hunters), whose enjoyment of the resource directly supports its management by contributing licence fees to the Special Purpose Account. Annually, over 200,000 white-tailed deer resident and 6,000 nonresident licences are sold, contributing several million dollars to the economy. We believe that regulated hunting is the most practical and socio-economically beneficial method of controlling and managing big game populations. Allowing licensed hunters to participate in the deer herd reduction would provide optimal socio-economic benefits from this resource through licence fees. Participation by licensed hunters does not conflict with either the *Pinery Provincial Park Management Plan* or the *Rondeau Provincial Park Management Plan*. As such, we strongly encourage Ontario Parks to, where possible, make use of local licensed hunters to aid in the management of overabundant deer populations in Rondeau and Pinery Provincial Parks.

In closing, we support the proposal to extend the period of white-tailed deer management in Rondeau and Pinery Provincial Parks. Thank you for the opportunity to provide comments.

Yours in Conservation,

[Signature]

Mark Ryckman  
Senior Wildlife Biologist  

/cc: OFAH Board of Directors  
OFAH Big Game Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
Dr. Terry Quinney, OFAH Provincial Manager of Fish and Wildlife Services  
Matt DeMille, OFAH Assistant Manager of Fish and Wildlife Services  
Dawn Sucee, OFAH Fish and Wildlife Biologist