

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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OFAH FILE: 349A/406/430  
December 5, 2013

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Dear Mr. Salo:

**Subject: Provincial Parks Wildlife Management: A call for a proactive approach**

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 710 member clubs, we have been monitoring the Ontario Parks wildlife management activities in southwestern Ontario. The following outlines some of our concerns with passive and reactive wildlife management, and explains the benefits of a proactive wildlife management in provincial parks. We will use Short Hills Provincial Park to illustrate some of the broader wildlife management issues occurring in a number of southwest provincial parks.

## **Background**

Short Hills is an approximately 660 hectare natural environment class provincial park, located in the Niagara Region. The park applied a passive approach to wildlife management with no harvest of game animals within the park. MNR estimates that the white-tailed deer population is six to seven times the area's natural carrying capacity. The overabundant deer population had a negative impact on local vegetation and land use. In 2012, the MNR proposed a deer harvest, and for two weekends in January 2013 (5&6, 12&13) Short Hills Provincial Park was closed to the public to allow for a bow only deer harvest by Haudenosaunee hunters exclusively. The hunters removed seven deer over the four days with an operating cost of \$24,600, nearly equal to the park's annual budget. Many local residents protested the hunt with safety, fair access, trespass, cost to taxpayers and ineffectiveness representing the majority of the opposition. A second Haudenosaunee deer hunt was planned for two four-day periods (Nov.21-24, Nov.28-Dec.1) in November/December 2013. Similar protests occurred with some incidences of trespass and wounded deer found on private land. No official figures for the number of animals removed or operating costs have been released to this date.

## **Predator-Prey Dynamics: The basics**

In a natural ecological system, predator-prey dynamics allow for a cyclic balance between low and high population abundances of wildlife. In the most simplistic scenario, as the prey population becomes large, the predator population has more to eat and therefore has greater fecundity and survivorship. As the predator population increases, they require more food, thereby reducing the prey population. As prey (food) becomes scarce, the predator population decreases and the prey population slowly rebounds as the cycle continues. The cycle is further complicated by multiple predator systems, interspecies competition for resources, disease (viral, parasitic, bacterial, etc), and the presence of humans.

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### **Passive Approach: Issues in the absence of wildlife management**

There are few places in Ontario with sufficient area and isolation to allow the natural predator-prey cycle to occur. This is particularly true in southern Ontario. Human activities and development have effectively removed the predators required to balance the prey populations in these areas. In many areas of Ontario, hunters are the only functioning predator in the predator-prey cycle. Some provincial parks (e.g. Short Hills) and other protected places in Ontario have adopted a passive approach to wildlife management (i.e. do not allow hunting). This disrupts the cycle allowing for unrestricted prey population growth. These protected areas tend to be isolated pockets of undeveloped land typically surrounded by urban, suburban or agricultural development. In these protected refuges, the prey population will continue to grow, exhausting available food, space and resources. Soon the population density exceeds what the refuge can provide, often resulting in a loss of biodiversity and degraded ecosystem health. Overabundant populations can also negatively impact sensitive and at risk plant communities as feeding behaviors become more general, and animals venture into areas they would not have traditionally utilized. Once ecosystem health is diminished, two things tend to happen with an unregulated overabundant prey population. First, the population will venture outside of the refuge in search of food and resources. Often this leads to human-wildlife conflicts such as vehicle collisions, property damage (e.g. crop damage) and undesirable interactions (pets, ticks, scat, etc). Second, as resources disappear and the weather becomes harsh (winter), the population will face large mortality events due to malnutrition, disease and exposure. Often this is very costly for the public due to carcass removal, vehicle collisions and property damage. Many protected areas depend on healthy and diverse ecosystems to satisfy their mandates and attract the public to generate revenue. The combination of habitat destruction, threats to protected species/habitats and human-wildlife conflict can lead to negative public opinion of the protected area, its managers and the wildlife resource itself. This negative public opinion can have major impact on revenue, funding and tourism. Once the public considers wildlife to be a nuisance, they are no longer treated as a valuable species.

### **Reactive Approach: Limitations of culling**

In response to overabundant wildlife populations, some provincial parks and other protected areas in Ontario have employed the reactionary approach of culling. A wildlife population cull is often a short-term period in which wildlife control agents or park-staff are allowed to remove a finite number of animals from a specific location. This method of wildlife control has proven insufficient and unsustainable. Often population culls are unable to remove the target number of animals in the allotted period. If hunters are able to remove a sufficient portion of the population, then the benefits are usually short-lived as the prey population will quickly return to overabundant levels due to compensatory reproduction (increased space/resources = greater fecundity/survivorship). Generally, even with a short-term population reduction the habitat does not have sufficient time to recover and mortality events associated with overabundance can occur. Population culls in protected areas are often controversial and have led to protests by both local communities and individuals not permitted to participate. Many public concerns are related to misconceptions about hunting in general (e.g. safety of hunting near urban areas); however, culls in Ontario have also been associated with trespassing and wounded animals on adjacent properties. This can lead to a poor public image of those involved in the harvest (hunters, managers, etc.). Managing a population cull is also costly for property managers with little to no revenue generation. The OFAH acknowledges that reactive measures (e.g. culling) of overabundant wildlife can be necessary when populations reach unhealthy levels; however, we feel this is not a sustainable, cost efficient or inclusive solution for long-term wildlife management.

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### **Hunting vs. Culling**

Culls are not hunts. Culls result from the absence of wildlife management to properly manage populations. Therefore, the OFAH questions the effectiveness of allowing a Haudenosaunee deer harvest in response to an overabundant deer population. It is important that the appropriate steps are taken to achieve the ecological goal of reducing the population to sustainable levels. With a population six to seven times the carrying capacity (approx. 400 deer), clearly the seven deer removed in the first Haudenosaunee deer harvest was not sufficient to have any significant ecological impact. The OFAH recommends that the appropriate actions (e.g. culling) be taken to achieve sustainable populations in Short Hills and other provincial parks where overabundant wildlife populations exist. This will help to minimize the current ecological, social and economic impacts currently experienced within the Park and surrounding communities. Once sustainable levels have been achieved, only then can proactive wildlife management, or hunting, be used to maintain healthy, sustainable populations.

### **Proactive approach: The benefits of using licensed hunters to prevent overabundance**

The need for culling can be prevented by permitting ongoing wildlife management (e.g. hunting) to maintain healthy and sustainable populations. The OFAH firmly believes in a proactive approach to wildlife management. A proactive approach would allow both aboriginal and licensed hunters to partake in a recurring harvest of the wildlife population within the provincial 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.

### **Fair Access: For heritage and cultural activities**

Some provincial parks and protected areas have decided to allow hunting but have restricted these opportunities for specific personnel (Haudenosaunee in the case of Short Hills) to participate. The OFAH does not dispute valid aboriginal rights and claims. There may be site specific obligations to provide aboriginal communities with a priority allocation of wildlife for food, social and ceremonial purpose; however, we believe that wildlife populations can be cooperatively harvested to efficiently and effectively meet management targets. The OFAH strongly supports fair sharing of our natural resources, and therefore recommends that publicly accessible areas should also be opened to licensed hunters to help maximize the overall benefits.

**Safety Concerns:** Licensed hunters are required to pass the federal Canadian Firearms Course and the provincial Hunter Education Course, which should alleviate the safety concerns associated with harvest activity near urban areas. In fact, 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. Depending on the location, size and type of land, as well as wildlife management objectives, hunting can be managed as open access or controlled. There are many simple and effective methods to control hunter numbers (permits, limited parking spots, specified blinds, etc.) if necessary.

**Ecological Benefits:** Working collaboratively, licensed and Haudenosaunee hunters could reach and maintain the target population in an area. Maintaining a sustainable wildlife population would allow the habitat to recover from over browse, thereby increasing the protection for species at risk, biodiversity and overall ecosystem health. The population would then have sufficient food and habitat, thereby reducing the threat of mortality due to malnutrition, disease and exposure. The fact that non-licensed hunting is currently occurring within some provincial parks with minimal negative ecological impacts provides great groundwork for opening the area to licensed hunters.

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**Socioeconomic Benefits:** Allowing licensed hunting in Short Hills Provincial Park would generate revenue for both the Ontario Parks Special Purpose Account (i.e. park fees, etc. go directly back into Ontario Parks) and Fish and Wildlife Special Purpose Account (i.e. licence/game seal revenue goes directly back into provincial fish and wildlife management). 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”.

**Research/Monitoring/Assessment Benefits:** Most provincial park management plans include a section dedicated to wildlife monitoring and data collection. Hunters often serve as the eyes and ears of wildlife managers, providing crucial data on the number of animals observed and harvested in an area. The Ministry of Natural Resources uses harvest data to estimate population densities and determine quotas for many game species in Ontario. By allowing hunting in Short Hills Provincial Park, large geographic gaps in data collection could be filled allowing for increased accuracy in population estimates for management decisions.

### Conclusion

In conclusion, it is clear that a recurring proactive harvest, employing fair access and scientifically defensible quota is a feasible, safe and efficient method of wildlife population management in Ontario. The OFAH suggests that proactive wildlife management should be considered in provincial parks as it helps to maintain ecological integrity, while providing many socioeconomic benefits for the parks and surrounding communities (Table 1). There are many examples of publicly accessible multi-use lands in Ontario where hunting by licensed hunters has been incorporated without issue, which provides great groundwork for expanding hunting by licensed hunters in provincial parks to help prevent wildlife overabundance issues. Proactive wildlife management will help protect species at risk, ensure healthy and sustainable populations and ecosystems, as well as promote and conserve the rich culture, heritage, and tradition of hunting in Ontario.

The OFAH would like begin discussions with Ontario Parks on how to initiate proactive wildlife management, using licensed Ontario hunters, to address overabundant wildlife populations in Short Hills and other provincial park in the Southwest Zone. The OFAH looks forward to discussing these opportunities further with Ontario Parks.

Yours in Conservation,



Chris Godwin  
Land Use Specialist

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Attach.

cc: OFAH Board of Directors  
OFAH Land Use/Access/Trails Advisory Committee  
Angelo Lombardo, OFAH Executive Director  
Dr. Terry Quinney, OFAH Provincial Manager of Fish and Wildlife Services  
Greg Farrant, OFAH Manager of Government Affairs and Policy  
Matt DeMille, OFAH Assistant Manager of Fish and Wildlife Services  
Brian McRae, OFAH Zone/Member & Club Services Liaison  
OFAH Fish & Wildlife Staff

**Table 1:** A comparative chart depicting the ecological, socioeconomic and population impacts of passive, reactive and OFAH recommended proactive wildlife management approaches.

	<b>Passive Approach</b>	<b>Current Reactive Approach</b>	<b>OFAH Recommended Proactive Approach</b>
<b>Wildlife Management</b>	<ul style="list-style-type: none"> <li>No management actions</li> </ul>	<ul style="list-style-type: none"> <li>Population cull</li> <li>Controlled periodic harvest</li> <li>Harvest by aboriginal hunters</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing/recurring harvest</li> <li>Scientifically defensible quota</li> <li>Fair sharing</li> <li>Harvest by Aboriginal hunters</li> <li>Priority allocation where warranted</li> <li>Harvest by licensed hunters</li> <li>Ontario Hunter Education Course</li> <li>Canadian Firearms Course</li> </ul>
<b>Population</b>	<ul style="list-style-type: none"> <li>Unsustainable population growth</li> <li>Overabundance/crash/scarcity</li> </ul>	<ul style="list-style-type: none"> <li>Target abundance rarely achieved</li> <li>Temporary population reduction</li> <li>Compensatory reproduction</li> <li>Quick rebound to overabundance</li> </ul>	<ul style="list-style-type: none"> <li>Target abundance achieved</li> <li>Sustainable population reduction</li> <li>Healthy population maintenance</li> </ul>
<b>Ecological Impacts</b>	<ul style="list-style-type: none"> <li>Over browse</li> <li>Reduced biodiversity</li> <li>Reduced ecosystem health</li> <li>Stress on vulnerable/ at risk species</li> <li>Large mortality events</li> <li>Lack of winter forage/shelter</li> <li>Malnutrition</li> <li>Disease/Die off</li> </ul>	<ul style="list-style-type: none"> <li>Over browse</li> <li>Reduced biodiversity</li> <li>Reduced ecosystem health</li> <li>Stress on vulnerable/ at risk species</li> <li>Lack of winter forage/shelter</li> <li>Malnutrition</li> <li>Disease/Die off</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable browse</li> <li>Increased/ maintained biodiversity</li> <li>Increased ecosystem health</li> <li>Available winter forage</li> <li>Normal mortality patterns</li> <li>Strong/resilient ecosystem</li> </ul>
<b>Socioeconomic Impacts</b>	<ul style="list-style-type: none"> <li>Public Safety</li> <li>Increased human conflict</li> <li>Increased vehicle collisions</li> <li>Increased property damage</li> <li>Minimal revenue generation</li> <li>Cost of carcass removal</li> <li>Cost of damage to vehicle/property</li> <li>No Benefits</li> </ul>	<ul style="list-style-type: none"> <li>Public Safety</li> <li>decreased human conflict</li> <li>decreased vehicle collisions</li> <li>decreased property damage</li> <li>Poor hunter relations</li> <li>Community &amp; hunter protest</li> <li>Poor hunter image</li> <li>Limited revenue generation</li> <li>Cost to manage cull</li> <li>Limited Benefits</li> </ul>	<ul style="list-style-type: none"> <li>Public Safety</li> <li>Significantly reduced human conflict</li> <li>Significantly reduced vehicle collisions</li> <li>Significantly reduced property damage</li> <li>Boosted hunter relations</li> <li>Increased hunting opportunities</li> <li>Inclusive approach</li> <li>Substantial revenue generation</li> <li>Ontario Special Purpose Account</li> <li>Owner/Operator/Local community</li> <li>Optimal Benefits</li> </ul>