ONTARIO FEDERATION OF ANGLERS & HUNTERS



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Mr. Travis Cameron, Acting Zone Ecologist Ministry of Natural Resources and Forestry Ontario Parks, Southeast Zone 300 Water Street Peterborough, Ontario K9J 3C7

Dear Mr. Cameron:

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 725 member clubs, we have reviewed the Presqu'ile Islands Resource Management Implementation Plan 5-Year Review, and offer the following comments and questions.

This review is part of Ontario Parks' commitment to evaluate cormorant resource management after five years of implementation (2011-2015). The OFAH applauds Ontario Parks for openly reviewing management implementation activities and assessing their ecological impact. This information is helpful in fully assessing the effectiveness of actions taken to date, and establishing a sound management plan moving forward.

Current Management Tools

Since 2011, Ontario Parks has only been using non-lethal cormorant management, including removal of tree nests, roost disturbance, and the creation of artificial nesting enhancements. At times during the past five years, management efforts have focused on encouraging cormorant nesting on the ground and constructed platforms. These strategies have even included predator exclusion fencing.

While we appreciate the intent of these strategies is to minimize tree nesting, we cannot understand why Ontario Parks would not allow natural predators to help control cormorant populations to achieve broader objectives. What is the justification for excluding natural predators from the island?

Ecological Impacts and Ecological Integrity

The use of only non-lethal cormorant management in Presqu'ile since 2011 has resulted in a population increase from 3,854 nests to 5,425 nests in 2015. During the same period, other colonial birds were on the decline. Presqu'ile was the only Great Blue Heron colony on Lake Ontario, but there have been no nesting attempts observed since 2013. There were 26 nests in 2011, and 10 unsuccessful nests in 2013, mainly due to nest takeovers by cormorants. The loss has been attributed to the loss of suitable nesting trees and competition with cormorants for remaining nesting sites. Great Egrets experienced a 56 percent decline in nests in Lake Ontario, mainly due to a decline in the Presqu'ile colony (65 percent; 32 to 11 nests on High Bluff Island). The review also states that "nesting colonies on Lake Ontario remain limited for Great Egret and Black-Crowned Night-Herons, highlighting the importance of maintaining nesting habitat at Presqu'ile." The number of live and dead trees declined between 2011 and 2015, with live trees declining by 17 percent.

The evidence is clear – cormorants continue to have significant impacts on Presqu'ile's island ecosystems. The management actions taken between 2011 and 2015 are not sufficient enough to maintain the ecological integrity of High Bluff and Gull islands.

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Maintaining ecological integrity is a primary objective for Ontario Parks under the Provincial Parks and Conservation Reserves Act, 2006. Ecological integrity is defined as "a condition in which biotic and abiotic components of ecosystems and the composition and abundance of native species and biological communities are characteristic of their natural regions and rates of change and ecosystem processes are unimpeded."

In the context of ecological integrity, how does Ontario Parks rationalize restricting control efforts for cormorants during the past five years at the expense of other species? How is the loss of Great Blue Heron colonies in Presqu'ile considered to be maintaining ecological integrity? How will Ontario Parks address the risk of losing other species, such as Great Egret and species at risk like the Black-Crowned Night-Heron when there are other tools that could have been used to control cormorant populations?

Under current management, cormorant populations and their ecological impacts continue to increase. How can Ontario Parks rationalize not using every available management tool at their disposal moving forward to protect the overall biodiversity and ecological integrity of Presqu'ile Provincial Park?

Other tools for cormorant management

An Ontario Parks' assessment showed that lethal cormorant management (egg oiling, nest removal, and culling) between 2003 and 2006 was successful. Management reduced the Presqu'ile cormorant population from 12,082 nests in 2002 to 3,855 nests in 2007. Tree nests were reduced by 69 percent on High Bluff Island, and ground nests by 86 percent on both islands compared to pre-management levels. That same assessment concluded that "continued management of cormorants would be required on High Bluff and Gull Islands to protect and restore priority woody habitat areas and retain maximum diversity of nesting colonial birds and other species." Despite Ontario Parks' own assessment, no management occurred between 2008 and 2010.

We appreciate the fact that Ontario Parks is attempting to maintain ecological integrity on the islands of Presqu'ile, but are severely impeded in effectively doing so because of a 2010 directive from the minister of the Environment under the authority of the Environmental Assessment Act; however, the 2010 directive does not preclude Ontario Parks from using the full suite of cormorant management tools, including culling and egg oiling.

The Next Five Years

The review clearly states that the "full suite of management activities described in the Islands RMIP, including culling and egg oiling, may occur in the next implementation period (2016-2020), if monitoring indicates it is necessary." The OFAH fully supports the use of all management tools to efficiently and cost-effectively address the ecological concerns of cormorants in Presqu'ile Provincial Park. Lethal control measures should be implemented as soon as possible to prevent further degradation of Presqu'ile's ecological integrity.

What are the indicators or thresholds that have been, or will be used by Ontario Parks to determine what cormorant management actions take place?

What cost-benefit analysis has Ontario Parks done related to cormorant management in Presqu'ile Provincial Park? This analysis should consider ecological, economic, social and cultural costs, and benefits inside and outside the Park. What direct and indirect annual expenditures on cormorant management have been incurred since 2003? What has been the return on investment directly or indirectly attributable to these expenditures? What cormorant management strategies provide the greatest return on investment? How is this analysis integrated with decision-making related to cormorant management? These questions must be fully answered before proceeding with the next phase of cormorant management in Presqu'ile.

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The OFAH fully supports efforts to restore vegetation that has been lost due to cormorants; however, this management approach should not be used as a substitute for effective preventative action towards vegetation loss. Restoration is a long-term strategy that will not prevent further short-term extirpation of important species from Presqu'ile Provincial Park or even the region (e.g. Great Blue Herons from Lake Ontario).

Conclusion

The management of cormorants in Presqu'ile Provincial Park has considerable implications. There are obvious and direct implications for the island ecosystems within the park, but there are also broader ecological, social, cultural, and economic considerations beyond Presqu'ile's boundaries. Therefore, it is imperative that sound cormorant management decisions must be made. We fully expect that Ontario Parks will objectively assess the ecological and cost-effectiveness of their actions during the past five years, and use adaptive management to establish a cormorant management plan that truly maintains ecological integrity now and in the future.

The OFAH appreciates the opportunity to review and comment on cormorant management within the park, and would welcome an opportunity to further discuss our questions and concerns with Ontario Parks staff.

Yours in Conservation,

Matt DeMille, M.Sc.

Manager, Fish & Wildlife Services

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