

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: www.ofah.org • Email: ofah@ofah.org

OFAH FILE: 406/794
July 25, 2019

Public Input Coordinator
Species Conservation Policy Branch - Wildlife Section
300 Water Street
5th Floor, North tower
Peterborough, ON
K9J 3C7

To Whom It May Concern:

SUBJECT: ERO # 019-0159 - White-tailed Deer Population Objective Setting and Harvest Management Guidelines

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit conservation-based organization, representing 100,000 members, supporters, and subscribers, and 740 member clubs. We have reviewed the draft White-tailed Deer Population Objective Setting and Harvest Management Guidelines (hereafter referred to as "the Guidelines") and submit the following comments for consideration.

As stated in the Guidelines, deer are a highly valued species to both the ecological and socio-economic fabric of Ontario. Specifically related to hunting, deer are pursued annually by approximately 190,000 licensed hunters who contribute an estimated \$275 million to Ontario's economy, and \$9 million directly to the Ministry of Natural Resources and Forestry (MNR) Special Purpose Account, which funds fish and wildlife management in Ontario. Hunter harvest is a crucial tool for maintaining deer at ecologically sustainable levels, thereby ensuring ecosystem health including natural forest composition, regeneration and habitat for many species of plants and wildlife. We are pleased to see the MNR develop clear objectives and guidelines for the management of this important species. This has been a major priority for the OFAH and we have been anticipating these Guidelines since the creation of the White-tailed Deer Management Policy for Ontario in 2017.

In general, we support the Guidelines and the approach they set for deer management in the province. The Guidelines very clearly lay out the data-driven approach that will be used to inform deer management by "integrating a broad range of ecological, social, cultural and economic considerations at appropriate management scales." We applaud this approach, but have significant concerns about the MNR's ability to obtain the information required to inform both the setting of population objectives and the ongoing harvest management, especially without a significant increase in funding for research and monitoring.

Population Objectives

Deer management is complex issue, largely due to a wide range of ecological and socio-economic considerations that must be taken into account. The OFAH's primary interest is always to the conservation of the resource. As such, we completely agree with the statement in the Guidelines that ecological considerations must take priority over socio-economic considerations in order to ensure that future generations of Ontarians can benefit from healthy and sustainable deer populations. We support the general principles that are intended to assist in the development of the population objectives and feel that these principles will contribute to population objectives that are both well supported and clearly communicated to, and understood by, hunters and other members of the public.

In our 2017 letter regarding the White-tailed Deer Management Policy for Ontario, we highlighted the importance of the province investing in deer research to improve the accuracy of the data used for deer management. The importance of this research is elevated by the draft Guidelines, which will rely heavily on ecological and socio-economic data on relatively fine-scales to inform the setting of population objectives. While we are pleased to see population objectives being set based on these values, we feel that the Guidelines do not adequately explain how they will be evaluated at a scale relevant to deer management (i.e., the wildlife management unit [WMU]). Furthermore, without assessing whether historic deer management has successfully addressed ecological, socio-economic and cultural considerations, the historic deer abundance data is not an effective metric on which to base population objectives.

Identifying Ecological Considerations

Deer inhabit a significant proportion of the province and, as such, are subject to different ecological considerations. Deer populations in Southern Ontario face very different ecological challenges and have different ecological drivers than those in Northern Ontario. The ecological considerations in the Guidelines listed are complex, constantly changing and difficult to quantify, especially related to ecological sustainability and deer-ecosystem interactions, such as predation. Deer are a keystone species, meaning that decisions regarding their management can have cascading effects through the ecosystem. The challenge in identifying and incorporating ecological considerations into the setting of population objectives will be in ensuring that the resources exist within the MNRF to collect this comprehensive information at the WMU-scale.

Identifying Socio-Economic and Cultural Considerations

While we are pleased to see the socio-economic and cultural importance of hunting prominently featured, our concerns regarding these considerations mirror those we expressed above regarding the ecological considerations. The draft Guidelines accurately identify that many different socio-economic and cultural interests inform deer management. Quantifying these interests with sufficient detail to inform deer management at the WMU level will be a significant challenge. The Guidelines reference “regular socio-economic surveys” as a robust tool for collecting quantitative information on local interests and concerns. Does the MNRF intend to start conducting regular socio-economic surveys to assess these considerations at a scale relevant to deer management? If not, where would these data come from?

Hunters would welcome the chance to provide input on the socio-economic and cultural considerations related to deer management. The OFAH proposes that the MNRF take advantage of two existing systems to better engage hunters on deer management. First, questions related to hunter satisfaction with their local deer population could be added to the new mandatory hunter reporting system. This would be a low-cost option for collecting WMU-specific socio-economic information. Second, the MNRF should create local fish and wildlife advisory committees at the MNRF district or sub-district level. These committees should follow the effective model used by the Eastern Ontario Deer Advisory Committee, the Manitoulin Island Deer Management Advisory Committee, the Aylmer District Stakeholders Committee and the Kirkland Lake Fish and Wildlife Advisory Committee. These groups are an invaluable tool for collecting socio-economic data at the scale relevant to management and greatly improve MNRF-hunter relations by providing hunters with a direct voice in local wildlife management. The provincial adoption of these committees akin to the existing Fisheries Management Zone Advisory Councils would benefit hunters, the MNRF, and deer.

The OFAH continues to advocate for increased MNRF engagement with Indigenous communities on topics related to fish and wildlife management. We are all users of the same resources and better management will occur when Indigenous and non-Indigenous peoples alike are engaged in the process. It is critically important to establish productive relationships with Indigenous communities that will facilitate knowledge sharing on deer populations and harvest that can be integrated into provincial deer management in a meaningful way.

Setting Population Objectives

While the OFAH continues to advocate for additional quantitative surveys for assessing deer population levels (i.e., browse surveys, pellet counts and aerial surveys), we agree that the historic deer population abundance as measured by deer seen per hunter day can be a useful index for informing population objectives. However, we do not feel that the draft Guidelines demonstrate how the ecological and socio-economic considerations will be linked to this historic data.

The approach described in the Guidelines assumes that deer have historically been at a level that was ecologically sustainable and met the socio-economic needs of Ontarians (i.e. favours the status quo). However, without collecting the ecological and socio-economic data at the same spatial scale and over the same time period (i.e. 15 years) as the historic abundance data, that assumption cannot be supported. An area may have historically had a deer population that was either too high (i.e. resulting in ecological damage via over-browsing or the transmission of parasites to moose, or socio-economic impacts such as elevated deer-vehicle collisions and agricultural damage) or too low (i.e. not meeting socio-economic demands for hunting and wildlife viewing opportunities, or not meeting the ecological role of deer). The historic deer seen per hunter day data provide no information regarding the quality of past management actions. Using primarily these data to form population objectives going forward would result in historic mismanagement becoming enshrined into policy, rather than being recognized and addressed when setting the population objectives.

There will be major challenges in collecting the data required to make these links, but it is crucial if the historic deer abundance is to be used to inform future harvest decisions.

Harvest Management

Under *Population Objectives* we identified the challenge of collecting ecological and socio-economic data across the range of deer in the province. This will be even more difficult for responsive harvest management as the data must be collected on an ongoing or periodic basis at the scale relevant to management if it is to be incorporated. While we completely support the MNR taking this approach, we have significant concerns regarding the ability to do so under current levels of funding. This concern applies to all components of the proposed harvest management framework.

As with the *Population Objectives*, the OFAH supports the guiding principles listed in the Guidelines. We continue to advocate that quota setting decisions should be made at the WMU-scale, but also advocate for greater coordination and consistency in quota setting decisions and hunting seasons across similar and adjacent WMUs. We wholeheartedly endorse the principles of transparency and responsiveness related to harvest management decisions. We recommend that the concept of adaptive management also be included as a guiding principle as it is the centrepiece of effective wildlife management.

Harvest Considerations

We live in a changing world, which has the ability to dramatically alter the conditions under which wildlife are managed. This is especially true for deer populations that can be significantly affected by winter severity and climate-linked diseases such as epizootic hemorrhagic disease (EHD). In the *Harvest Consideration* section, the Guidelines state that deer managers should examine whether conditions that have impacted deer have changed. This will likely be the major challenge for deer management going forward and will require significant investment in terms of research and monitoring beyond the statistical modelling referenced in the Guidelines.

Harvest Management Strategies

This section highlights the crucial role of hunting as a tool to ensure healthy and sustainable deer populations in the province. The OFAH continues to advocate for a review of existing strategies to ensure that sustainable hunting opportunities are not being left on the table. Since 2013, the OFAH has been asking the MNR for a review of the Controlled Deer Hunt (CDH) system. It continues to be our position that many of the Controlled Deer Hunts have never been or are no longer fully subscribed and, as such, there is no need to maintain a restriction on hunter numbers in these areas. The Guidelines state that options "should be explored for simplification, broader consistency and alignment of the controlled deer hunt and other harvest management strategies." We wholeheartedly agree and feel that this is best done through a full review of the CDH system with the goal of converting Controlled Deer Hunts to Regular Deer Hunts in WMUs where the original justification for the CDH system no longer holds true.

The Guidelines contain wording that suggests a requirement for hunters to have written landowner permission when hunting on private property. Is the intent to make this a provincial requirement? Currently, only WMUs 43A, 43B and 44 have this requirement for some or all deer seasons. The OFAH sees no reason for a provincial requirement and we request clarification.

Setting Deer Tag Quotas

Acknowledging our previous comment that ecological and socio-economic considerations must be directly linked to the population objectives based on historic deer seen per hunter day data, we support in general the decision tree for setting tag quotas presented in Figure 2 of the Guidelines. The fact that the decision tree favours the status quo when the local deer population is within the population objective while providing clear guidance on quota setting when the population is outside of the objectives will be well received by hunters. When paired with the guiding principle of transparency, this will increase hunter understanding and confidence in the MNRF management of deer.

One concern that we have about the decision tree is that it relies heavily on the accurate prediction of future deer abundances. Prediction is challenging, especially given the added uncertainty created by climate change. In cases where the population is outside of the objectives, the decision tree appears to prioritize the Predicted Index Status over the Index Trend. This approach may lead to over- or under-harvesting in these situations. To illustrate this, consider a deer population that is above the objective, but has a negative Index Trend under the current quota allocation. If the Predicted Index Status is “above,” the decision tree would advise a quota increase. However, an unexpected climate-linked mortality event such as a drought or an outbreak of EHD could result in a more rapid population decline than anticipated. This type of situation highlights the need to explicitly consider the uncertainty created by climate change and its potential impact on deer populations. Alternately, do structures exist that will allow for emergency adjustments of tags should a catastrophic population decline occur between quota setting and the hunting season?

Finally, while outside the direct scope of harvest management, the decision tree should inform the investigation of non-hunting related factors in the case of deer populations that are below the objectives and not responding to the harvest quota manipulations.

Quota Setting Best Practices

We fully support the quota setting best practices that prioritizes resident hunting opportunities while creating non-resident opportunities where resident demand has been met. Non-resident hunting opportunities represent an important economic driver for Ontario; however, the opportunities of residents must take precedence. The best practices provide greater clarity and certainty on how and when changes will be made to antlerless tag allocations and additional deer tags. Furthermore, effective management through hunter harvest reduces the need for alternate deer control measures such as deer removal authorizations.

Assessing Harvest Management

The OFAH agrees with the requirement for periodic review and refinement of harvest management strategies. These reviews should prioritize, whenever possible, maximizing sustainable hunting opportunities due to the associated ecological and socio-economic benefits to the wildlife and people of Ontario. The OFAH was an advocate for mandatory hunter reporting as a tool to improve wildlife management (a system was put in place in 2019) and continues to provide the MNRF with feedback on the new system. As resource users, hunters must contribute to wildlife management and the MNRF has a responsibility to use the collected information to the greatest effectiveness for achieving sustainable wildlife populations. One piece of information collected as part of hunter reporting that the OFAH would like to see more explicitly incorporated into deer management is the number of wolves/coyotes seen per hunter day. The Cervid Ecological Framework contains target densities for deer as a component of moose and caribou management in acknowledgement of the negative impact high deer densities can have on these species (i.e. through the transmission of parasites or by supporting high wolf densities). Now that the MNRF is receiving wolf/coyote observation data via the mandatory hunter reporting system, the OFAH feels that this is a prime opportunity to explicitly incorporate wolf/coyote densities into deer management. With upcoming completion of the Black Bear Barbwire Hair Trap Study, black bear densities should also be taken into consideration.

The Guidelines reference collecting information on hunter feedback and stakeholder input as part of the assessment of harvest management. The OFAH recommendations for creating more local fish and wildlife advisory committees and including hunter satisfaction and preference as part of the mandatory hunter reporting would contribute significantly to this knowledge.

Chronic Wasting Disease

Objective 5 of the draft MNRF Chronic Wasting Disease Surveillance and Response Plan (“*Ensuring effective long-term management of wild cervids following any response*”) presents possible management actions to be taken if CWD becomes established in Ontario’s wild cervids to the point where eradication is not feasible. One possible action is to re-evaluate population objectives and adopt a harvest management approach to reduce herd size to a pre-determined density of less than 2 deer per square kilometre. It is important to recognize that the approach outlined in the Guidelines does not provide density estimates for deer and the MNRF does not currently have an inventory method for deer that could provide these estimates. If CWD becomes established in Ontario it will require a shift from a trend-based approach to a density-based approach to deer management. This will require new methods of population assessment that can provide density estimates (i.e. pellet counts or aerial surveys) with significantly higher costs. This eventuality should be considered in the creation of these Guidelines.

Conclusion

In closing, we fully support the draft objectives and guidelines despite some concerns and recommendations outlined in this submission. White-tailed deer are incredibly valuable to Ontario and the proposal includes some admirable goals for their management. The OFAH hopes that the province makes the required investment in research, monitoring and public engagement to realize these goals.

Yours in Conservation,



Keith Munro
Wildlife Biologist

KM/jb

cc: OFAH Board of Directors
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish and Wildlife Services
Mark Ryckman, OFAH Manager, Policy
OFAH Fish and Wildlife Staff