

December 29th, 2021

Public Input Coordinator
NDMNR-FWPB Wildlife Section
300 Water Street 5th floor, North Tower
Peterborough, Ontario
K9J 3C7

Subject: ERO number 019-4637

Proposal to simplify and align provincial white tailed deer hunting seasons

Proposed Regulation Amendment (Line Item #10)

“Start the existing rifles, shotguns, muzzle-loading guns and bows seasons in WMUs 83B and 83C on October 1.”

“This proposed change will allow the hunt clubs on these small, privately-owned islands to better manage the islands deer populations and increase opportunity for clients and club members.”

Proposed Regulation Amendment Response

In my professional capacity, on behalf of my club organization, on privately owned land, within a privately held Hunt Camp and Club dating back as far as 1953 within the Wildlife Management Units in Haliburton County in the Province of Ontario. This region represents upwards of approximately 5000 plus registered White tail deer hunters, Haliburton County provincial voters and associated private large acreage land owners encompassing well in the excess 100,000 acres.

We Strongly Oppose the #10 Proposed Regulation Amendment;

“Start the existing rifles, shotguns, muzzle-loading guns and bows seasons in WMUs 83B and 83C on October 1”.

Approximately 4000 acres and 82 registered hunters (*10) are combined within WMU’S 83B and 83C. Known as Hay Island and Griffith Island.

There was an approved proposal regulation change (ERO Proposal number12-MNR01)(*3) under the Fish and Wildlife Conservation act 2005 (WMU83C) that was approved in 2014 from the existing period of 2.5 weeks to a new open season that would run from October 15th to December 31st (11 weeks), in any year, more consistent with the adjacent Griffith Island WMU 83B. (see attached document)

The ERO Proposal Regulation Amendment (ERO number 019-4637) proposes to extend the hunting season once again an addition two weeks to a total of 13 weeks for both WMU 83B and 83C, starting October 1st thru to December 31st of each calendar year for Rifle, Bow and Muzzleloader.

As stated in the Proposed Regulation Amendment #10 (ERO number 019-4637):

The published White tailed deer hunting activity and harvest dataset (OMNR 2021) only has reporting under the mandatory hunter reporting system for two years, 2019 and 2020 (*10) for WMU 83B and 83C whereas voluntary and mandatory White tailed deer hunting activity and harvest reports have been published and online and reported since 2008 giving the NDMNRF 13 years of data to draw from on White tailed deer wildlife policy management decisions for the Greater Haliburton Wildlife Management Units.

In consultation with the various large acreage private land owners (in the excess of 1200 acre individual parcels) that operate long established Land and Wildlife Managed Deer Season Hunt Camps and Clubs, they are only granted a two week season gun season (13 days). The Greater Haliburton WMU'S resident deer population is part of the Greater Ontario Deer Herd. Selective harvest and land management practices within the privately held landowners properties has proven beneficial regardless of deer tags issued for antlered or antlerless deer. Harvest records documented in 25 plus years of camp ledgers show the total harvest each year by sex and description. With a year over year harvest of five combined average total of antlered or antlerless white tail deer each year. The actual sightings recorded will vary with the number of registered hunters in a one week period with an average of an 8:1 ratio of sightings to harvested deer. No supplementary feeding or unnatural crops plantings are utilized. (*12)

The statements "increase opportunity for clients and club members" "This WMU has a unique deer season and administration" for WMU83B and WMU83C.

These statements reflect a stature of unbalanced privilege, excess and public policy exceptions undocumented in the NDMNRF reference materials or regulations.

There is no reference to NDMNRF policies or reports or exceptions that reflects "a unique deer season and administration" in any of the below referenced documents.

Significant Wildlife Habitat Technical Guide (*1), Natural Heritage Reference Manual, (*2) White-tailed Deer Population Objective Setting and Harvest Management, (*4) White-tailed Deer Management Policy for Ontario (*5) and the Cervid Ecological Framework (*8) Fish and Wildlife Conservation Act, 1997 S.O. 1997, CHAPTER 41 (*13)

The Griffith Island Club members and Hay Island property owner have been granted exclusive private Wildlife Management Unit status far in the excess and exception of what the balance of private land owners can obtain for their private property Hunt Camps and Clubs, regardless of the description of the land mass and location either adjacent to or within the province of Ontario. An island habitat is still subject to Deer migration patterns for safety, survival, food source and procreation of the species either from the main land or away from the islands or two and from any other islands.(*12). One could dispute the resident White tailed deer are not part of the Greater Ontario Deer Herd, however with no NDMNRF biology based reports publically available or studies to confirm genetics and herd history, all is just pure speculation on the origins of the White tailed deer population in WMU83B and 83C. They reside in a private "yard" environment, free from predication and vehicle interactions, cultured for member and client sport shooting. Certainly not a true hunting environment or free range to migrate safely throughout the year off the island.

In no uncertain terms or references, does the "unique" word terminology, concept, administration practices, private licensing, reporting or studies of Big Game Preserves or White-tailed Deer Preserves or Cervid Preserves appear in any of the reference materials listed.

The statement in the ERO 019-4637:

“This proposed change will allow the hunt clubs on these small, privately-owned islands to better manage the islands deer populations and increase opportunity for clients and club members”.

The data from the White tailed deer hunting activity and harvest (*10) for 2019 and 2020 in WMU 83B indicates in 2019, 73 active hunters, 14 Antlered and 58 Antlerless harvested for a total of 72. In 2020, 72 active hunters, 21 Antlered and 48 Antlerless harvested for a total of 69. Griffith Island Club shows on their website a membership of 70 members not including clients or guests. Based on that, they have a 100% success rate on the current 11 week open season. The Club can accommodate 22 individuals in the lodge. With 77 available days to book or reserve a hunting stand from the current October 15th start to December 31st. The proposal requests and addition two weeks for a new total of 91 days to “better manage the islands deer populations and increase opportunity for clients and club members”.

From several first hand source conversations, questions were asked concerning the method utilized to self-manage and administer deer quotas, tag allocation, hunt scheduling and harvest reporting on behalf of Griffith Island Club members and invited clients. An environment of self-wildlife policy administration designates WMU83B as a standalone privately funded self-regulated sports shooting sanctuary for the privileged and influential membership and invited clients. These two particular WMU'S as referenced as “unique” would have continued without any reporting of deer harvest success and hunter numbers if the recent regulation change did not include mandatory reporting as of 2019 and would have remained obscured from public view and scrutiny. There is no public information in any published public report documents on the antlerless deer draw or controlled hunt deer draw results including quotas set for either of 83B and 83C WMU'S

The data from the White tailed deer hunting activity and harvest (*10) for 2019 and 2020 in WMU 83C indicates in 2019, 6 active hunters, 1 Antlered and 0 Antlerless harvested for a total of 1. In 2020, 12 active hunters, 2 Antlered and 0 Antlerless harvested for a total of 2. The success rate during the current 11 weeks is extremely low. Adding additional time to the hunting season does not reflect better management of the deer population rather keeping equal to the status of WMU 83B.

In one Greater Haliburton WMU area, they get 13 days to schedule, manage and harvest the deer population in rifle season; on a 13 year average, year over year, 1845 active hunters with a 317 deer harvest average per year, a 17% success rate. Based on White tailed deer hunting activity and harvest data 2008 thru 2020. (*10)

My concern, what biology based science, reports and data based wildlife management methods does the NDMNRF utilize to justify a further increase of hunting season extension opportunities for WMU 83B and WMU 83C vs those applied to all of the other Wildlife Management Units throughout the province where large private landowner Hunt Club properties exist. If the same methodologies are not applied equally in terms of Administration, Study, Reporting and Wildlife Management decisions, then a clear and visible advantage of financial and undocumented policy privilege is being offered to a selected special interest group and landowners whereas not being offered or considered to other private landowners with privately operated Hunt Camps or Clubs currently practicing Deer Management and Harvest opportunities in their respective Wildlife Management Units.

Within the White-tailed Deer Population Objective Setting and Harvest Management Guidelines (*4) Harvest Management, Specifically page 10 it is documented:

“Socio-economic Rationale – The duration (e.g. days, weeks, months) of a season reflects the appropriate amount of opportunity in relation to hunter demand and population objectives, as well as social considerations (safety concerns, etc.). The timing of deer seasons considers how seasons affect hunter experience and the enforcement of regulations. Consistent seasons among neighboring WMUs provide hunters with more equal opportunity over broader areas and reduces confusion.” Extending to a 13 week full unrestricted firearms season whereas bordering WMU’S are restricted to a rifle season from November 1st thru the 6th. Bow and Muzzleloaders extend the season to December 31st. WMU’S 83B and 83C have no restrictions on rifles, shotguns, muzzle-loading guns and bows.

The Griffith Island Club designates itself as an NPO (nonprofit organization). Club members enjoy ownership of the islands 2300 acres to entertain guests and clients, I have to bring to your attention that any person or persons from any division of the NDMNRF involved in Wildlife Policy Management or Policy Amendments or NDMNRF Ministers that would have a conflict of interest from an accepted invitation and participation in White tailed deer hunt from a member or affiliate vendor guest association of the Griffith Island Club, should declare that involvement and reclude themselves and all associated staff members from decisions for policies amendments pertaining to WMU 83B and WMU 83C.

Hunting in the Province of Ontario is a licensed privilege under the Ontario Regulation 670/98 (Open Seasons - Hunting) made under the Fish and Wildlife Conservation Act. No reference is made to extend any “unique “administration authority to financially privileged private organizations or Clubs and the influentially connected member residents or nonresidents outside Ontario.

The Wildlife of Ontario belongs to all Ontarians regardless of location, the Fish and Wildlife Conservation Act binds us to that statute. Only the Minister of Natural Resources has overall jurisdiction to grant conditions on an authorization at his or her request.(*13). It is documented “a season reflects the appropriate amount of opportunity in relation to hunter demand and population objectives, as well as social considerations”. The addition of two weeks of rifle season in combination with a membership of 70 members in 83B and only 12 members in 83C as to grant an “increase opportunity for clients and club members” is without merit or comprehension based on the only hunter reported activities of 2019 and 2020.(*10) WMU83B was able to harvest one deer on average for each of the 70 members in 11 weeks and 83C was only able to harvest two deer in 2020 for the 12 members reporting. Adding an addition to the 11 weeks of rifle season to 13 weeks with no further publically obtainable data to suggest on how this Proposed Regulation Amendment #10 would qualify under the White-tailed Deer Population Objective Setting and Harvest Management (*4) practices is unjustifiable. The yearly Mandatory Hunter Harvest information, Open hunting seasons and quotas for WMU83B and WMU83C needs to be published in the Provincial hunting regulations in the same manner consistent as all other designated Wildlife Management Units to avoid confusion. This information should not be purposely non-existent in the Provincial hunting regulations (*14) as this Proposed Regulation Amendment (ERO number 019-4637) along with prior passed Amendment of Ontario Regulation 670-98 (12-MNRO14) Open Season Hunting WMU 83C is published public knowledge.

It has been suggested from many conversations that WMU83B and WMU83C should prescribe to a modified hunting season regulation dates adapted from WMU83A. "Consistent seasons among neighboring WMUs provide hunters with more equal opportunity over broader areas and reduces confusion". The two WMU'S would then qualify by the regulations to hunt from October 1st thru December 31st to "better manage the islands deer populations and increase opportunity for clients and club members".

Rifles, Shotguns, Muzzle-loading Guns and Bows

November 1 to November 6

November 7 to November 28,

Muzzle-loading Guns and Bows Only

November 29 to December 4

Bows Only

October 1 to October 31,

December 5 to December 31

If the single most driving force or deflection is to increase the hunting season for rifle only excluding Muzzle-loading gun or Bow methods as not utilized by club members, or to better schedule club members time allotments per hunting stand over a longer period to suit the members individual personal schedule or to change accommodation capacity as a result of Covid-19 Protocols at the lodge or camp, then the request to the Proposed Regulation Amendment #10 should be declined.

On behalf of the roughly 206,000 actively licensed White-Tail Deer Hunters in the Province of Ontario, we would like to express our thanks for your time to review this Proposed Regulation Amendment, ERO number 019-4637.

Respectfully Submitted for your consideration

Attached file :

(PDF) Amendment of Ontario Regulation 670-98 12-MNRO14 Open Season Hunting WMU 83C

References:

*1-Significant Wildlife Habitat Technical Guide (OMNR 2000)

*2-Natural Heritage Reference Manual (OMNR 2005)

*3-ERO Proposal number 12-MNR014

Amendment of Ontario Regulation 670/98 (Open Seasons - Hunting) made under the Fish and Wildlife Conservation Act to change the open season for White-tailed Deer in Wildlife Management Unit 83C (Posting September 14th, 2012)

*4-White-tailed Deer Population Objective Setting and Harvest Management (OMNR 2015)

*5-White-tailed Deer Management Policy for Ontario (2017)

*6-Ontario Regulation 665/98 (Hunting)

*7-Ontario Regulation 670/98 (Open Seasons) under the Fish and Wildlife Conservation Act, 1997

*8-Cervid Ecological Framework, Ecological zone map E3 white tailed deer

*9-Antlerless deer validation tag quotas (Updated November 12th 2021)

*10-White tailed deer hunting activity and harvest dataset (OMNR 2021) (updated March 31st 2021) Grid #'s 1257 1258 1259 1260 WMU 83 B and 83C and grids 746 thru 758 WMU54

*11-2021 White tailed deer seasons for residents of Ontario WMU 83B and 83C (online WMU map description and location). (Note: This WMU has a unique deer season and administration. Please contact the local NDMNRF district office for more information.)

*12-Guidelines for Winter Feeding of Deer in Ontario (OMNR 1997)

*13- Fish and Wildlife Conservation Act, 1997 S.O. 1997, CHAPTER 41

*14- 2021 NDMNRF Hunting Regulations Summary Fall 2021-2022