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This letter is in response to Parks Canada's (PC's) request for public input into its plan to eradicate the deer on Sidney Island. <https://iaac-aeic.gc.ca/050/evaluations/proj/81629>

I am a full-time resident of Sidney Island and I am writing in strong opposition of the eradication of not only the fallow deer, (as PC has many times & misleadingly, claimed) but additionally to the killing of all of the Sidney Island Deer. Of note is that PC doesn't know how many fallow deer there are on Sidney Island. The DIA (Detailed Impact Assessment for Eradicating Invasive European Fallow Deer-dated July 2023) states, "The current population size is unknown, but estimates range from 300 to 900 individuals." As per the DIA these indeterminate numbers were gleaned from "personal communication" supplied by two (2) islanders in 2020 & Jan 2021. The range stated is quite frankly absurd. The annual owner hunt on the island since 2018-2019 has taken less than 100 animals each year and has been dropping every year. If the population were any higher than 300, the reproductive rate would have led to an explosion in the population over the last 4 years. This has clearly not happened and confirms that the number of deer on the island is at the low end of the estimated range, or even lower. At 300 deer, you are proposing to spend \$20,000 per deer killed and are claiming that the island cannot support more than one deer for every 8 acres of land.

Parks Canada originally said that the project will go ahead only if it has "Social License". PC have not defined what they consider to be "social license". I would argue that they do not have Social License to Operate (SLO), meaning they do not demonstrate the 3 components that make up a typical SLO.

1. Legitimacy: *this is the extent to which an individual or organisation plays by the 'rules of the game'. That is, the norms of the community, be they legal, social, cultural, formal or informal in nature.*

One example is PC's direct conflict of interest in hiring Coastal Conservation to carry out the project when that same company was involved in pushing it forward from the onset. Of note: Coastal Conservation prepared an "Eradication of Fallow Deer Feasibility Study" for PC in 2012 and now, eleven years later will be the lead contractors on the project and stand to gain a substantial portion of, what I understand to be, \$6,000,000 (6 million dollars) of taxpayer's money. It was not in Coastal Conservation's interests to explore other ways of controlling the deer population that would be more humane and less expensive.

Furthermore, the eradication does not have 50% of the island owners' permission. 46 Lots voted against, 50 lots voted for, 3 abstained and 12 did not vote. Out of 111 lots in total, only 45% of the strata lots voted in favour of the project.

2. Credibility: *this is the individual or company's capacity to provide true and clear information to the community and fulfil any commitments made.*

There are many examples of untrue or misleading information disseminated by PC to the residents of Sidney Island and to the public at large. In my opinion, the most damning is their efforts to keep quiet that ALL the deer on Sidney Island will be killed, not just the Fallow Deer. Of note is that *even this* “call for public input” refers to the eradication of fallow deer only. PC is fully aware that ALL deer will be killed. The current DIA states, “Native Black-tailed Deer will also be eradicated from Sidney Island during the project. Given the nature of the proposed project, the professional eradication team will not be able to reliably differentiate between European Fallow Deer and native Black-tailed Deer...”

Also the UBC study completed over five years between 2013 and 2018, saw the ecology of the island improve with a 30% recovery. There have been no studies since, yet the optics being presented by PC is that the ecology of the island is in severe degradation...there is little mention of the steady and obvious recovery since the massive cull in 2008 and the UBC study of 2013-2018. Moreover, PC’s consistent (and inaccurate) proclamation that eradication of the entire population of deer is the *only answer* to restoration when in fact we are seeing restoration every day with the deer population now being managed by a successful, (and cost free), safe and humane hunt and cull program. Why, if there’s such an urgent problem with the vegetation on the island did only 45% of the Strata Lots support the proposed eradication? The answer of course is that there is no urgent problem any longer. We are witness to exponential recovery since 2018 with wildflowers, shrubs, tree seedlings and songbirds rebounding every year.

Finally, there is no guarantee that the eradication will be “successful”. With approximately half of the islanders opposed to the project, the potential for non-compliance regarding fencing etc. is great. An estimate of the acreage owned by the opposing group is 125-155 acres. Also, there is no proof that the removal of the deer will lead to ecological recovery any faster or better than it is happening now.

3.Trust: this is the willingness to be vulnerable to the actions of another. It is a very high quality of relationship and takes time and effort to create.

Regarding Parks Canada and this project, the public trust & the trust of many of the Strata Owners has been severely eroded due to the points above. The handling of this project has historically ignored the contingent of Sidney Island Owners who oppose the project (who - contrary to what PC and others would have you believe - are mostly not hunters). Our dissenting voice has been mis-interpreted, redacted or thwarted by lies or mistruths produced to convince Sidney Island owners to vote “yes” to eradication. A blatant example of this was obtained in a Freedom of Information (FOI) request where Greg Howald of Coastal Conservation wrote that the number of deer on the island has been reduced dramatically and their impacts “are not really obvious.” He wrote that it would be necessary to demonstrate to the community the ecological change on the island after the Parks Canada cull to “make the effort worth it to the community,” and suggests using people’s vegetable gardens or flower beds to show the benefits of eradication.

Along with approximately half of the lot owners on Sidney Island as well as, (to date)16,000 signatories to Save the Sidney Island Deer petition <https://www.change.org/p/save-the-sidney-island-deer> I am vehemently opposed on so many levels, they include:

Cruelty and undue duress to the animals as they are chased and shot from the air (with little ability to acknowledge a “clean kill”) and rounded up on the ground with dogs and penned with fences or drop

nets, before being shot. The eradication of a renewable and local food source is a travesty. The lack of scientific information on how many deer there actually are on the island, (or even the use of basic math skills, given the declining number of deer taken each year in the annual hunt) shows insufficient basis for a project of this size or cost – (anecdotally I’ve lived full-time, year-round on the island for five years and the number of deer we see are significantly lower each year). The negative impacts of the eradication project on other wildlife, ie; otters, mink, squirrels, birds (including the migratory birds) and marine life must be taken into consideration.

Other reasons we oppose the planned eradication: Parks appears to be under the impression that Sidney Islanders are all part-timers. Actually, there are many full-time residents, including ourselves, that will be highly impacted—and restricted—by the eradication program as it gets underway. The multiple negative impacts on (both full and part-time) residents include - getting to and from and around the island being disrupted and undergoing spot checks, patrols of the shoreline by PC to monitor boats and potential patrols by law enforcement. Having helicopters and ground crews shooting guns on our island at dawn, dusk and night using hunting dogs and infrared cameras, fencing installed across the island with plastic “freezer door” gateways, and or cattle guards, tree & plant pruning to “create shoulder height tunnels” for the hunters or fence installers, “wildlife” trail cameras, patrols by “detection dogs”, numerous night spotlights, noise making machines with loud speakers, bait stations paired with drop nets that are 12-30 metres square. Add to that the number of contractors, support teams, trucks, ATV’s and other vehicles on our roads and trails and the possibility of our dock and our airstrip being utilized by the contractors. The use of tracking dogs and, as per the DIA, “bailing dogs which will actively chase and corner the animal until the professional marksman arrives”. As well there are the animal carcasses, some of which won’t be recovered by the “maximum 20 people” carcass recovery team will have physical and psychological impact on the land, the owners, other animals and birds, and our personal pets. The DIA states, “Some Carcasses that are inaccessible or cannot be located by the recovery team may not be recovered”. Wounded animals that move onto strata lots will be left to die a painful death, since even those owners who finally give permission to access their strata lots cannot, (as per our bylaws) give permission to discharge a firearm on the strata lot to put an animal out of its misery.

The project timelines which were never clearly stated or disclosed to the community until this DIA (which was only made public in July 2023) are frightening. See below, directly lifted from the DIA.

Phase 1: Aerial and Ground Operations:

Approximately 10 days total over a two-to-three-week period. Intended to occur between Nov 1 and Dec 31, 2023. The exact timing will be dependent on contractor availability, weather, and predicted visitation by private landowners on the island...Full contingency period extends to March 31, 2024

Phase 2: Ground Operations:

Seven days a week over a three-to-five-month period between October 2024 and March 2025. Phase 2 is anticipated to largely consist of professional marksmen and trained canine/handler teams searching fenced zones, checking for and removing deer that remain after the Phase 1 population reduction. Project preparations (e.g., staging, installation of temporary fencing) may begin as early as July 2024. April 2025 will serve as a potential extension/contingency period. Demobilization (e.g., dismantling of temporary fencing) could last until May 2025.

Phase 3: Biosecurity Monitoring and Adaptive Management: April 2025 onwards

Our quality of life will be interrupted and forever changed and the loss of peace, quiet and privacy immeasurable. The change to ours and the visitors to the park's experience with nature will be great. Enjoying a sighting of these sentient animals is always a thrill. The loss of the deer will mean another upset to the balance of nature with invasive plants potentially taking over, the DIA states, "*Removal of Deer May Lead to Increases in Invasive Species*" and we are already seeing the understory and grasslands building up to pose greater forest fire threat to the island. Additionally, for hunters, both indigenous and strata owners who hunt, this right and tradition will be forever lost. The question of repopulating the black tailed deer has been skirted and we do not have any commitment by PC to do so. The DIA states, "Black-tailed Deer will be free to naturally re-establish on Sidney Island following the project. There are multiple islands around Sidney Island with robust Black-tailed Deer populations. As Black-tailed Deer readily swim and disperse between islands (Burgess & Russello, 2022), it is anticipated that a population will naturally re-establish on Sidney Island in the years or decades following the project." One must ask, why won't the fallow deer swim over and repopulate?

In closing, I say again that a project of this scope must (or should) have Social License to Operate and PC has not got Social License. I urge all who are involved to reconsider this unnecessary and blatant mispending of our taxpayer's dollars when there are so many better places where that money could benefit many instead of a few self-serving contractors.

Thank you,

Wendy Ord,

Documentary Filmmaker