

LONG TIME RESIDENT, NON-HUNTER, EXPRESSES HIS VIEWS ON PARKS CANADA'S ERADICATION PLAN...

I'm providing some background info as to why so many of us don't approve of this project. They went through the motions of asking for feedback on their draft Impact Assessment, although they have no intention of changing course in any way.

First, my own background. We've owned property on Sidney Island for 20 years. As you probably know, about 80% of the island is actually private, in the form of a bare land strata corporation. I spent 10 years on the Strata Council, and managed the 6 year approval process and then the construction of our community's breakwater and dock project. So, I've seen first hand all of the many changes to the island as the strata community has developed and matured to deal with them.

Most crucially perhaps, I'm not a hunter. Much effort has gone into trying to make this out as a fight between those who hunt and those who don't. A majority of the owners who oppose the project don't hunt. There are many reasons to oppose this proposed project that have nothing to do with maintaining the annual deer hunt on Sidney Island.

The key things that Parks says and why they simply don't stand up to any scrutiny:

- *Claiming too many deer on the island.* They cite a ridiculous range of between 300 to 900 Fallow deer, which is based upon wild guesses by people and no analysis. The reality? There cannot be more than 300, and probably somewhat less. How do we know? Since 2018, the deer harvest has been below 100 Fallow deer each year, dropping to only 79 in the last year. The annual hunt that the strata corporation holds each year continues to get fewer and fewer deer every year - despite it being oversubscribed. If there were any more than 300 Fallow deer, with less than 100 taken each year since 2018, the population would have grown a lot and the hunters would find more and we'd see more. They get less each year and we see less each year. In fact, way back in 2008, when we did have a serious deer population problem, a goal of getting it down to 300 animals with an annual hunt taking about 100 to keep things stable was cited. Well, we clearly reached that and Parks has simply decided to ignore it.
 - At 300 deer, \$5.9M works out to nearly \$20,000 per deer. What a waste of taxpayer money. Surely, we could use it to do some real good, such as helping the opioid crisis, housing, and on and on. They want to spend nearly \$6M to get rid of 300 deer on a mostly private island.
 - At 300 deer, and over 2400 acres of land, there is only 1 deer for every 8 acres of land.
- *Claiming that the forest can't recover without killing all of the deer.* Well, in fact, the understorey is recovering quite nicely thank you. In fact, in 2019, a serious study by a biologist reported that a 30% recovery had taken place thanks to the reduced deer browsing at that time. It's worth noting that the annual hunting was still taking over 400 animals just a few years prior (423 in 2015/16), so it's great news that this much recovery had already been docu-

mented. Since 2018, the annual hunt has taken less than 100 animals per year. However, there has been no effort to update the report and document how much better things are now. Why? Because the truth would show how unnecessary this huge expense and disruption this eradication project would be? No one on the island won't cite a vast improvement since the deer numbers were brought way down, and all of this was done without any contribution from any level of government. Are things still worse than Portland Island where there were never any Fallow Deer to begin with? Certainly. However, recovery takes time with 300 deer or zero deer. Will spending \$6M and causing enormous disruption and taking huge risks make things any better quickly? Their own comments in emails cited from a FOI request show that they know it won't.

- *Claims that since the population has rebounded in the past, it could easily happen again.* The facts: Since the strata corporation was formed and took this on seriously, the population has only ever dropped, now down to the targeted sustainable goal of around 300 animals. During that time, a deer capture facility was built and used, with a mobile abattoir brought to the island and venison shipped off and sold. After the population was reduced to the point that this wasn't viable, hunting continued with professionals involved in organizing it each year. After the population was further reduced, the annual hunt with owners and guests became the only necessary tool and it has been refined to the point that today we have a very steady state. All of this was done while Parks messed about with plans and restarts on plans and cost escalations working with their one contractor - Coastal Conservation. Parks could have simply taken advantage of a private strata corporation owning 80% of the island - already running an annual hunt - as a continuous partner to ensure that the number of deer remains controlled, but has never even considered that. I guess it's out of the box thinking for government that would be too bold?
- *First Nation access to traditional plants can't happen without this.* They love to cite this, but ignore a few key things here. First, 80% of the island is private and not accessible for this purpose anyway. Within the 20% of the island that is Parks Canada, if they really can't get certain plants to grow because of a few remaining deer, Parks could create an enclosure area for this purpose for a lot less than \$6M.
- *Just going after Fallow Deer.* They endlessly downplay and ignore (except buried away in fine print) that all of the native black tail deer will be killed too. They can't complete this with just the helicopter shooting exercise that is getting all the attention. To ever have any hope of completing this, they are going to spend a second year putting up kilometers of fencing across the island to divide it into zones. Then they will send hunters and dogs into these zones. They finally admitted that the dogs can't tell Fallow Deer from Black tail, so they will be all be killed. I've seen panicked deer running at fencing when we had deer capture ongoing. They break legs and if found they then have to be shot to put them out of their misery. Hardly the clean easy humane kills that Parks likes to claim.
- Support from all of the partners - a "social license". The support from strata owners dropped every time there was any kind of vote on proceeding. The last vote was yes from only 52% of the owners who did vote, and only represented 45% of the strata lots. For the project to succeed, Parks knows that they need permission from owners to access many of the strata lots -

which make up about 300 acres of the land - to get deer flushed out. The strata bylaws prohibit any firearms used on strata lots, even if access is granted. What does this mean for any wounded animal that ends up on a strata lot? What about lots that didn't give permission? Parks just ignores and dismisses these concerns, as they do about all of the impact to other wildlife on the island. My own question about having helicopters flying low over trees where bald eagles nest was dismissed by saying the island is on the approach path to Victoria airport. Absurd and arrogant comments like this have been too often the norm. We have many animals, such as Douglas squirrels, on the island that dogs will also chase. All of this is ignored because of a few hundred deer.

Money is clearly the driver for this proposal, not science. When Parks first approached us, around 2010, they discussed a \$1M project with us paying \$100K of it. A few years later they came back and said they'd pay for it all, the full \$1M. In July 2012, the one and only contractor that they've ever worked with - Coastal Conservation - presented a plan for the deer eradication project. Then, things went quiet until 2018 when Parks suddenly announced a restart to the whole thing starting with an MoU that would include us and the First Nations. That became the year that Parks cites for the start of this. In reality it's just the start of the last iteration. The MoU happened in 2020, and suddenly the project ballooned to \$5.9M. After working it for 13 years and escalating their cost from \$900K to \$5.9M, it seems that there are clearly too many jobs and contracts involved for them to take an honest look at the need for it (or lack thereof).

We did have a deer problem, but we took care of it ourselves. Parks is now like a fire brigade arriving 5 years after a fire was put out, demanding to break down the front door with an axe.

So why do so many of us oppose it? The lack of any need. The waste of money. The many risks. The loss of privacy we've enjoyed. The disruption for at least 2 years. Most of all, the loss of what was a small tight knit community, now badly divided for at least a few more years, possibly permanently.

Rob Milne