

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 411/794
May 30, 2017

Recovery Planning
Environment and Climate Change Canada
15th Floor, Place Vincent Massey
351 St. Joseph Boulevard
Gatineau, QC
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E-MAILED
05/30/17

Dear Sir/Madam:

Subject: Management Plan for the Eastern Wolf (*Canis lupus lycaon*) in Canada

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 740 member clubs, we have reviewed the proposed *Management Plan for the Eastern Wolf in Canada* (hereafter the Plan). While our comments are generally focused on Ontario, many of our concerns are relevant to the rest of Eastern wolf range in Canada. Please consider these comments as part of the public consultation process.

Threats

Like many species at risk, the Eastern wolf management is plagued with knowledge gaps. Addressing these knowledge gaps should be a priority for the Management Plan, and must be completed to evaluate the effects of past management actions (e.g. harvest prohibitions in Ontario) and before any additional restrictions are considered.

Threat 4.1: Linear corridors are listed as a significant threat to Eastern wolves, but the Plan fails to acknowledge that linear corridors also improve prey searching efficiency for wolves, potentially resulting in higher predation rates on moose and deer. This omission results in an incomplete and biased picture of the role that linear corridors play in eastern wolf ecology.

Threat 5.1: Hunting and trapping are listed as a threat to individual Eastern wolves, but the Plan does not adequately address the fact that these heritage activities have been prohibited across most of Eastern wolf range in Ontario, or the level of risk that remains. On page 19, the Plan states "in areas where wolf hunting is or was prohibited, but where Eastern coyote hunting is allowed, Eastern wolves were likely killed because they were confused with Eastern Coyotes". This statement is completely unsubstantiated, and even the cited document does not effectively support that statement. This suggests an anti-hunting and anti-trapping bias in Eastern wolf research and management.

Threat 5.3: Eastern wolf populations are not limited by habitat availability, but rather by prey availability (i.e. moose, deer, and beavers). Ontario's forest management and silvicultural practices are designed to create habitat for moose, deer, and beavers, which produces a net benefit for Eastern wolf populations. This benefit should be explicitly acknowledged in the Plan.

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Threat 6.1: To our knowledge, no research has been conducted to assess the impact of wolf howls on the ecology, behaviour, and movement of Eastern wolf packs in Algonquin Provincial Park. To date, it has been assumed that wolf howls are a benign activity. The “Recreational Activities” threat should be expanded to include wolf howls, and a research program (independent of Ontario Parks and the Ontario Ministry of Natural Resources and Forestry) should be initiated to determine if this intrusion into Eastern wolf habitat makes them more accepting of human presence.

Threat 8.3: The Plan states that hybridization is “a significant threat to the long-term maintenance of the genetic integrity of the Eastern Wolf”. There is no genetically pure Eastern wolf, and we will never be able to recreate it – extant Eastern wolves are, in fact, hybrids. We believe it is contradictory to provide legislative protection to a hybrid while also considering hybridization as a threat to that hybrid.

Spatial Segregation of Canid Packs

One mechanism to restore Eastern wolf populations is to give them the opportunity to expand into areas they do not currently inhabit. The landscape is currently saturated with canid packs of various genetic identities (Eastern coyotes, Eastern wolves, and admixed individuals) that segregate themselves spatially from neighbouring packs. It is highly unlikely that Eastern wolf populations will increase and expand outside of protected areas (APP and Kawartha Highlands Provincial Park) because there is no unoccupied space for them to expand into. Eastern wolves will be unable to expand their range unless 1) a void is created on the landscape, or 2) they can successfully displace coyote or other hybrid packs. This barrier to expansion will continue to exist until harvest prohibitions on other canids, specifically coyotes, are removed.

Pack Social Structure

Genetic evidence suggests that the existing harvest prohibition may have restored the natural social structure of Eastern wolf packs, which “is important for effective resource use (i.e. knowledge of prey distribution and ability to detect, pursue, and subdue prey), pup survival and, may be effective, at least in part, at precluding hybridization with coyotes due to the lower turnover of individuals within packs, and the tendency during hybridization events for genes to flow from the more common into the rarer species” (Rutledge et al. 2010). While we recognize the importance of this natural social structure, there is no research to suggest that it will allow Eastern wolves to outcompete coyotes and hybrids, which will be important for the expansion of Eastern wolf range in Ontario. Furthermore, anthropogenic mortality has been replaced by increases in natural mortality through strife, limiting the ability of Eastern wolf populations to expand.

Management Objective

The OFAH has serious concerns about the unrealistic management objective that is being proposed. In order to reach an effective population size of at least 500 mature individuals, it is estimated that a total population size of at least 2,500 wolves is required within the Extent of Occurrence. Given that the landscape of Southern and Central Ontario is already saturated with canid packs of various genetic identities, there simply is not sufficient room to support that many wolves. Achieving this population size would also require the inclusion of Eastern wolf range in Quebec. To our knowledge, genetic mixing is extensive in Quebec, which presents a significant barrier to achieving this objective.

Conservation Measures and Actions

Strategy 1.7 states “Where trapping of large canids is authorized, promote the use of humane trapping standards.” Canada is a leader in the development and use of traps that meet ISO standards under the Agreement on International Humane Trapping Standards (AIHTS). This statement further suggests an anti-trapping bias.

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Strategy 1.10 calls for the development and application of “management measures that target white-tailed deer, moose and beaver harvesting rates in order to maintain the natural predator-prey dynamics of the Eastern wolf”. In Ontario, moose and deer have been managed intensively for decades through the *Fish and Wildlife Conservation Act*. Science-based harvest regulations and the provision of prey habitat through forest management will generate far greater benefits for Eastern wolf populations than many of the Conservation Measures listed in the Plan. Existing statutes (e.g. *FWCA* and the *Crown Forest Sustainability Act*) have resulted in the effective management of wildlife that meets the needs of predators and human uses such as hunting and wildlife viewing. Eastern wolf management should recognize (and benefit from) these existing regulatory tools.

Thank you for considering our comments in the decision-making process. We look forward to continuing to work with the federal and Ontario governments to find realistic and workable solutions to species recovery that balance the conservation of species at risk and socio-economic benefits for the people of Canada.

Yours in Conservation,



Mark Ryckman
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MR/gh

cc: OFAH Big Game Advisory Committee
OFAH Small Game Advisory Committee
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Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff

Literature Cited

Dickie, M., R. Serrouya, S. McNay, and S. Boutin. 2016. Faster and farther: Wolf movement on linear features and implications for hunting behaviour. *J. Appl. Ecol.* 54(1):253-263.