

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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February 12, 2018

SAR Recovery Section
Species Conservation Policy Branch
Public Input Coordination
Ministry of Natural Resources and Forestry
Policy Division
Species Conservation Policy Branch
300 Water Street
Peterborough Ontario
K9J 8M5

Dear Sir/Madam:

Subject: EBR Registry 013-1813: Request for additional information to be considered in the development of the recovery strategy for Algonquin Wolf under the Endangered Species Act, 2007

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 draft recovery strategy for Algonquin Wolf and we have some serious concerns about the recommended management direction.

Recovery Objectives

The recovery strategy recommends mitigating or eliminating known threats to Algonquin wolves (human-caused mortality and hybridization with coyotes) as a primary objective. One mechanism to restore Algonquin wolf populations is to give them the opportunity to expand into areas they do not currently inhabit. There is a belief that the elimination of hunting and trapping will theoretically restore the natural social structure of wolf packs and reduce hybridization with coyotes (as per Rutledge et al. 2010). However, the landscape is currently saturated with canid packs of various genetic identity (Eastern coyotes, Algonquin wolves, and hybrids) that segregate themselves spatially from neighbouring packs, and there is no evidence to suggest that a more natural social structure will allow Algonquin wolf packs to *actively displace* the Eastern coyote/hybrid packs that saturate the landscape. Displacement of these other individuals will be necessary to allow dispersing Algonquin wolves to establish new territories and expand their range. This barrier to expansion will continue to exist until harvest prohibitions on other canids, specifically coyotes, are removed. A similar situation is currently playing out in North Carolina, where the red wolf reintroduction program is attempting to create a coyote-free buffer zone to reduce/eliminate the probability of hybridization with red wolves.

Habitat Requirements of a Habitat Generalist

The recovery strategy states that urban areas and areas with high human use are little used by Algonquin wolves. Despite this assertion, the Algonquin Wolf Recovery Zone (AWRZ) appears to include many areas that would meet this description – areas that do not, and likely never will, support Algonquin wolves. The OFAH is opposed to expanding existing harvest prohibitions, and that any attempt to expand existing harvest prohibitions must be preceded by a township-by-township analysis of habitat suitability (e.g. human disturbance, farming operations, etc.). Any township that cannot support Algonquin wolves must be excluded from the recovery zone. Without a detailed habitat suitability analysis, large geographic zoning that results in blanket restrictions cannot be justified. Please provide us with more detailed background information that was used to delineate the AWRZ.

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Ancillary to this recovery strategy, we feel that it is vital for sustainable forestry activity to continue in areas where it is currently permitted (including Algonquin Provincial Park). Forest management plans consider the provision of habitat for moose, deer, and beavers, all of which are important prey species for the Algonquin wolf. If habitat is incapable of supporting healthy prey populations, then recovery of the Algonquin wolf will certainly fail. Protection of den sites and other important habitat features is also addressed by the Forest Management Guidelines for Conserving Biodiversity at the Stand and Site Scales, demonstrating that existing legislation can be an effective tool/complement to achieve ESA objectives.

Mortality Rates and Causes

The recovery strategy continues to list hunting and trapping as the primary cause of Algonquin wolf mortality (p. 10), despite the recent expansion of harvest prohibitions to include the vast majority of known Algonquin wolf packs. What evidence exists to support the claim that hunting and trapping mortality is still the primary cause of total mortality, given that Rutledge et al. (2010) suggests that natural mortality has replaced anthropogenic mortality in APP? This claim is deliberately misleading in order to justify further expansion of harvest prohibitions. Furthermore, even if anthropogenic mortality continues to be the greatest cause of mortality, what evidence is there to suggest that the level of anthropogenic mortality is limiting Algonquin wolf populations? We agree with the need to conduct population viability analyses, and expect this analysis to precede any additional harvest restrictions.

Genetic Introgression from Coyotes

While it may seem important to protect individual Algonquin wolves, it may be more important to ensure that the genetic building blocks of the Algonquin wolf are maintained now and into the future. Genetic swamping by Eastern coyotes could result in further genetic dilution as a result of management actions that make it impossible to reduce coyote abundance. If harvest prohibitions are to remain in place and/or be expanded, the government must demonstrate to the public that continued hybridization with coyotes will NOT jeopardize the genetic integrity of Algonquin wolves. To date, the government has abjectly failed to do so.

Furthermore, the information in Table 2 fails to mention that Eastern coyotes are a non-native species in Ontario. How does the MNRF intend to address the obvious conflict created by protecting a non-native species (coyotes) in order to recover a threatened species (Algonquin wolves)?

Prey

The recovery strategy uses a 20-year old reference to claim that “no studies have shown that Algonquin wolves have inhibited the growth of the central Ontario deer population,” in an attempt to assuage fears about negative impacts on other species. It also states that canid predation does not seem to be a major cause of calf/adult moose mortality – but both of these assertions are only true at current wolf and coyote population levels. Since the government’s goal is to *increase* Algonquin wolf populations and the recommended approach also aims to eliminate coyote harvest, has the MNRF made any attempt to predict/model the impact of a *fully recovered* Algonquin wolf population and an unmanaged coyote population on the central Ontario deer population? The OFAH, and the hunting community at large, are justifiably concerned that the predator-prey balance will be upset to the point that it degrades our hunting and trapping heritage even further.

Population Density

Figure 4 leads us to conclude that Algonquin wolf density can be expected to peak at approximately three wolves per 100 km², even in high quality habitat. If this density is extrapolated to the proposed AWRZ (39,000km²), it translates to approximately 1,170 Algonquin wolves. How does this population size relate to the recovery goal? Is it even realistic to expect anything near that density given that much of the proposed 39,000 km² AWRZ is not high quality habitat? COSSARO justified listing the Algonquin wolf as threatened because there are “likely less than 1,000 mature individuals” in Ontario. How many mature individuals would be expected in that population of 1,170 wolves, and how would that compare to the government’s population objectives? What degree of “recovery” is possible given the realities of current and future habitat availability? Even at the high end of density estimates, we likely won’t achieve the recovery goal regardless of how big the AWRZ is. This reemphasizes the need for government to focus recovery efforts where they have a realistic chance for success. A larger recovery zone will not translate into larger recovery success. It will, however, have a significant impact on hunters, trappers, farmers, and wildlife management.

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Protection of Property

Wolf and coyote depredation continues to be a challenge for Ontario's sheep, cattle, and dairy farmers. For some producers the problem can be quite severe. The Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) distributes millions of dollars in compensation annually for livestock killed by coyotes (and wolves). Currently, a person can kill Algonquin wolves if they pose an imminent threat to people, livestock, or animals. The OFAH believes that this exemption should be maintained at a minimum. We also understand that OMAFRA is undertaking a thorough review of the Wildlife Damage Compensation Program, with the goal of ensuring farmers are fairly compensated when livestock are killed by predators. Has the Ontario government estimated the potential increase in compensation payouts in the face of an unmanaged coyote population?

General Comments

It is unacceptable to provide a paltry 30-day public comment period for a highly technical strategy with repercussions that are expected to extend for a minimum of 50 years in Central Ontario. This also leaves hunters, trappers, and farmers with a perception that the government is not committed to having meaningful consultation on an issue that is very important to them.

The strategy recommends eliminating hunting and trapping mortality in the AWRZ, but also recommends obtaining biological samples from hunters and trappers in the AWRZ. Prohibition of hunting and trapping will make it impossible for the government to rely on resource users for biological samples and will eliminate any possibility of stewardship activities.

There are processes and mechanisms for wolf conservation already in place that regulate the sustainable harvest of wolves and coyotes in Ontario. The OFAH was supportive of the 2005 Wolf Conservation Strategy with the understanding that the implementation of wolf harvest data collection would help the MNRF demonstrate, over a relatively short time frame, that wolf and coyote hunting and trapping are fully sustainable activities in Ontario. The Committee on the Status of Species at Risk in Ontario (COSSARO) report states that, "The Algonquin Wolf population appears to be stable," and there is "No evidence of a population decline" under the current management system. Furthermore, the government is required to develop a recovery strategy and government response statement; however, there is no requirement for the MNRF to ban legal, regulated hunting and trapping. There should be a way for the ESA to recognize existing conservation measures that mitigate apparent "threats" to the recovery species (i.e. hunting and trapping regulations under the FWCA, wolf/coyote game seal requirements, etc.). This would allow these existing regulations to serve as a complementary management and recovery tool. Setting effective conservation policy requires an analysis of the effectiveness of, and unintended consequences of, using harvest prohibitions to restore Eastern wolf populations, as well as an open discussion of alternative management solutions such as those mentioned above.

Thank you for considering our concerns.

Yours in Conservation,



Mark Ryckman
Manager of Policy

MR/gh

cc: OFAH Board of Directors
OFAH Big Game Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff

Literature Cited

Rutledge, L.Y., B.R. Patterson, K.J. Mills, K.M. Loveless, D.L. Murray, and B.N. White. 2010. Protection from harvesting restores the natural social structure of eastern wolf packs. *Biological Conservation* 143:332-339.