

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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Ms. Chloe Stuart, Director
Species Conservation Policy Branch
Ministry of Natural Resources and Forestry
435 James Street South, Suite 114
Thunder Bay, Ontario
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Dear Ms. Stuart:

Subject: EBR Registry Number 013-2587: Seeking Advice on the Future of Caribou in the Lake Superior Coast Range

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, supporters and subscribers, and 740 member clubs, we have reviewed the discussion paper *Seeking Advice on the Future of Caribou in the Lake Superior Coast Range* and provide the following comments for consideration.

General

We found that the manner in which the potential management options were presented in the paper were restrictive. Instead, we feel it is prudent to respond based on the individual components of the Lake Superior Coast Range (LSCR) caribou population.

The Offshore Islands

The offshore islands of Lake Superior (defined in the discussion paper as Michipicoten Island and the Slate Islands, but also including Caribou Island for our purposes) are important strongholds for caribou in their coastal range. With proper management, these islands can (1) continue to act as strongholds for coastal caribou, and (2) potentially act as source populations for future caribou translocations to bolster small mainland herds (see below). As such, the OFAH supports direct control of predators on these offshore islands. This effort should begin as soon as possible – it should not be delayed until a broader LSCR caribou management strategy is drafted. These areas have demonstrated capacity to host large populations of caribou in the absence of wolves and, therefore, we recommend that actions be taken to reduce or remove wolf populations from any offshore islands where they pose a threat to caribou persistence. As wolves are a legally harvested species, we favour lethal removal as the most efficient method in terms of time, effort, and resources.

If lethal removal is not possible for justifiable reasons, the OFAH would not oppose the translocation of wolves given two caveats. First, stakeholder input must be considered with regards to the final destination of the translocated individuals. The destination must be chosen to avoid human-wildlife conflict and promote conservation. An example of such a destination would be Isle Royale National Park in the United States where the translocations would help restore a declining wolf population. The second caveat is that any translocated wolves should be fitted with telemetry collars so information on their behaviour and fate post-release can contribute to our knowledge of translocations as a tool for canid management.

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The OFAH is absolutely opposed to the sterilization of wolves as a management tool. Furthermore, we would only support the penning of cows and calves in extreme circumstances (as a supplement to the lethal removal or translocation of wolves).

Past experiences on the offshore islands has shown that caribou population growth can be rapid in the absence of predators. In order to avoid the boom-and-bust population cycles outlined in the discussion paper, management actions must be taken to maintain the population below the islands' carrying capacities. Two potential options for this are harvest and translocation. Harvest could be achieved through the engagement of local Indigenous communities and supplemented by a limited lottery hunt for licensed hunters, if Indigenous harvest levels are insufficient to meet harvest quotas. This would generate considerable benefit from an important resource while contributing to caribou population stability and persistence.

Section 5.3 of Ontario's *Woodland Caribou Conservation Plan (WCCP)* states that the MNRF will review the use of translocations as a tool for caribou conservation and highlights its effectiveness in specific situations. If this technique is incorporated into the caribou management strategy, the offshore islands represent an ideal source population. The islands are free of white-tailed deer, making it very unlikely any translocations could spread the nematode parasite brainworm. If Chronic Wasting Disease is ever detected in Ontario it would severely limit the translocation of cervids within the province. In this scenario, the isolated offshore islands may be the only viable source populations.

The Nearshore Islands and Mainland

There is obviously considerable uncertainty regarding the size of the caribou population on the nearshore islands and the mainland, as evidenced from the broad range given in the document (between 13 and 227 individuals). Furthermore, the discussion paper does not offer detailed information on the habitat characteristics of the LSCR that have allowed caribou to persist in this area, as the southern edge of the continuous range has moved northward. Only the role of the nearshore islands as calving grounds and the presence of arboreal and terrestrial lichens are mentioned. What are the specific resources that support caribou persistence within the nearshore islands and mainland component of the LSCR, and how are these resources distributed relative to the distribution of caribou?

We feel that answering the above question is a critical first step to management planning within the nearshore islands and the mainland component of the LSCR. Given the socio-economic impact of the proposed habitat and population management actions (e.g. forestry, deer, and moose hunting), it does not make sense to apply management actions to the entirety of the LSCR mainland if caribou use only a small portion of the region. We support additional research to determine (1) the size and distribution of the caribou population within the nearshore islands and mainland component of the LSCR, (2) the specific habitat characteristics that have allowed the persistence of caribou in this region, and (3) the susceptibility of these habitat characteristics to climate change.

Acknowledging the idea of not delaying conservation action due to incomplete information as stated in the WCCP, we suggest that the parks within the nearshore islands and mainland component of the LSCR (Lake Superior Provincial Park, Neys Provincial Park, Red Sucker Provincial Park, and Pukaskwa National Park) should become the primary focus of caribou recovery efforts. Combined, these protected areas make up a significant proportion of the LSCR and management actions could be enacted at a significantly lower socio-economic cost to stakeholders than actions taken in the broader LSCR area. These parks could be an ideal destination for caribou translocated from the offshore islands once those populations are allowed to recover. Individuals from recovered populations within the parks could then disperse naturally throughout the LSCR once they reach a sufficient density.

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We feel that a parks-based recovery approach allows for the conservation of caribou in the LSCR without significant negative impacts to stakeholders. We strongly oppose the proposed habitat management actions that would limit the access or the activities of our members and the forest industry within the LSCR outside of the parks. We also oppose the proposed population management strategy of further reducing white-tailed deer and moose populations as a method of indirect predator control. The *Cervid Ecological Framework* states that Cervid Ecological Zone B, which includes the LSCR, is currently managed for low to moderate moose densities and low deer densities and that habitat management should emphasize both caribou and moose management. We oppose deviating from the current management strategy.

The Discontinuous Distribution (DD)

Section 2.7 of the WCCP clearly states that the “discontinuous range will not be managed broadly for caribou habitat to support self-sustaining populations.” We fully agree with this decision. Given this approach, we feel that the proposed goal of increasing connectivity through the discontinuous distribution is based on a flawed assumption. It assumes that caribou densities in the LSCR and in the continuous range are high enough to cause them to disperse through the DD; however, we know from the discussion paper that caribou density is likely far too low for this to occur. If this is the case, dispersing caribou are not limited in terms of potential home ranges or resources. In the continuous range, caribou should be able to take advantage of their ability to move long distances to establish a home range without leaving the continuous range (i.e. There is no need for them to cross the unsuitable habitat of the discontinuous distribution). Furthermore, the discussion paper states that with climate change, the boreal forest, and therefore the southern limit of the continuous range, is expected to shift northwards. This would further increase the amount of unsuitable habitat that dispersers are expected to cross. These realities make it unlikely that a dispersing caribou will leave suitable habitat to travel across a widening gulf of unsuitable habitat in order to reach the coastal range. Given the high socio-economic costs of managing the discontinuous distribution to increase connectivity between the continuous range and the LSCR, we feel that more information is needed on the basic ecological processes that are required for it to succeed.

Conclusion

The OFAH fully supports additional research to answer the questions highlighted in this response so that future management of caribou can be based on the best possible scientific knowledge and therefore have the greatest chance of success. At the same time, we have suggested concrete actions that can be taken now to aid in the conservation of caribou within the Lake Superior Coast Range.

Thank you for providing the public with an opportunity to provide input on the discussion paper.

Yours in Conservation,



Keith Munro, M.Sc.
Wildlife Biologist

KM/gh

cc: OFAH Board of Directors
OFAH Big Game Advisory Committee
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