

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 411/413
March 29, 2019

Honourable John Yakabuski
Minister of Natural Resources and Forestry
Whitney Block, 6th Floor, Room 6630, 99 Wellesley Street West
Toronto, Ontario, M7A 1W3

Honourable Rod Phillips
Minister of Environment, Conservation, and Parks
Ferguson Block 11th Floor, 77 Wellesley Street West
Toronto, Ontario, M7A 2TS

Honourable Ernie Hardeman
Minister of Agriculture, Food, and Rural Affairs
11th Floor, 77 Grenville Street
Toronto, Ontario, M7A 1B3

Dear Ministers:

Subject: Ontario Fur Managers Federation's Position on Algonquin Wolf Management

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest non-profit, conservation-based organization representing 100,000 members, supporters, and subscribers, and 740 member clubs.

In a recent letter to your three Ministries (attached), the Ontario Fur Managers Federation (OFMF) voiced their opposition to additional bans on wolf and coyote harvest in Ontario. We share many of the concerns outlined in the letter, and would like to take this opportunity to reiterate our opposition as well. Restrictions to wolf and coyote harvest have significant impacts on hunters, trappers, farmers, and the conservation of Algonquin wolves themselves.

For additional background on our position, attached please see OFAH comments on the Algonquin Wolf Recovery Strategy and consider these concerns before taking any future management actions. If you would like to discuss further or wish additional information, please do not hesitate to contact me.

Yours in Conservation,

Matt DeMille
Manager, Fish and Wildlife Services

MD/jb
Attach.

cc: Chloe Stuart, Executive Director (Acting), Deputy Minister's Office, MECP
Christie Curley, Director (Acting), Species Conservation Policy Branch, MNRF
Willis Deline, President, OFMF
Robin Horwath, General Manager, OFMF
OFAH Board of Directors
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SUBJECT : Why OFMF stands against further bans on wolf and coyote harvest in Ontario

On behalf of the Ontario Fur Managers Federation (OFMF) and the 6000 volunteer members we represent, we respectfully submit the following comments regarding the conservation strategy proposed for the Algonquin wolf under COSSARO.

First and foremost, trappers all across Ontario are stewards of the land and they take the conservation of furbearing animals very seriously. For this reason, the OFMF recognizes the importance of this issue, and the importance of managing this file properly, as much for the conservation of the Algonquin wolves as for the balance of ecosystems.

Before we start with our comments, the OFMF would like to point out the following.

Wolves of Ontario have been harvested for over 100 years, and coyotes were harvested ever since they arrived in our province. During all these years, through all this time, animal populations experienced fluctuations in abundance, some caused by natural processes, other caused by changes to the landscape such as urbanization, development, expansion of agriculture, etc. Albeit all this, all furbearers of Ontario have remained abundant, thanks in part to the management efforts and proper stewardship of trappers across Ontario. Trappers of Ontario are trained in wildlife management through the mandatory provincial trapping course, which puts great emphasis on the importance of sustainable harvest to ensure long-term abundance of furbearers on the land. Since 1997, this course has contributed to certify over 10,473 trappers or potential trappers throughout the province.

Not surprisingly, furbearer populations in Ontario are as healthy as ever, and some have flourished, even despite intensive harvest, beyond our wildest expectations (e.g., coyote, beaver, raccoon). Moreover, we are witnessing the return of some animals that were once extirpated (e.g., wolverine) and welcoming new species that occur with increased frequency in Ontario because of climate change (e.g., grey fox, Virginia opossum).

Respectfully, we submit that management of wildlife populations in Ontario started long before researchers ever became involved. Trappers of Ontario have harvested furbearers in a sustainable manner for hundreds of years, and we are well aware of the importance of a sustainable fur trade. Our province hosts the only two international auction houses of wild fur in the world, one in Toronto and one in North Bay. Our position as leaders in the management, sustainable use and conservation of furbearers started in the 1970s, thanks to the effort of trappers and biologists who saw the need to better understand the resource. Today, Ontario is still considered as a model in North America for the management of its traplines and sustainable harvest of furbearers.

Our long-term and successful track record is why we are surprised by the ongoing discussions regarding the conservation of wolves in Ontario. Trappers have harvested wolves in Ontario, Quebec, Manitoba and elsewhere for centuries, long before scientists gave them all kinds of different names! And the fact that wolves still occur today in good numbers throughout Ontario and elsewhere is a testimony that the harvest was sustainable all along : had we failed as managers in the past, the wolf would no longer exist!

Lately, the infatuation with the conservation of wolves in and around Algonquin Provincial Park has led to much debate within and scientific and conservation world. Our own organization has supported earlier conservation measures established in 2001, even though they impeded on our activities and lifestyle.

We are now aware that some individuals, who work for our own Government within the Ministry of Natural Resources and Forestry, are lobbying for additional conservation actions.

This document is meant to explain why we will NOT support any further restrictions on harvest of wolves and coyotes.

As we present our arguments, we humbly ask that the Government of Ontario be reminded of our successful track record. The proof of our success is the fact that we still have eastern wolves today! So why change a model that was proven to work for hundreds of years?

This being said, we are thankful for the opportunity to voice our concerns and explain our rationale in opposing any further or additional bans on wolf and coyote harvest in Ontario. We therefore respectfully submit the following thoughts and comments for your consideration.

1- The COSSARO report clearly shows that there is no urgency that warrants immediate action.

The Committee on the Status of Species at Risk in Ontario (COSSARO) is clear : the status of the « Algonquin wolf » is « stable » (Appendix 2; Patterson and Murray 2008). Therefore, the OFMF would like to remind managers and politicians that there is no urgency to act now as the population of eastern wolves is NOT DECLINING. This is also supported by two other major publications, the Committee on the Status of Endangered Wildlife in Canada (COSEWIC 2015) and the Ontario Recovery Strategy Series for Algonquin wolf (Beacon 2018). In fact, eastern wolf populations are currently considered either « relatively stable » (COSEWIC 2015: page 2), stable (Beacon 2018 : page 17) and the ecology of Algonquin wolves is considered to have returned to « normal » inside Algonquin park (Rutledge et al. 2010).

It is also noteworthy that since the ban on harvesting of wolves in townships surrounding the park happened in 2001, mortality rates have not decreased, but instead remained similar, switching from human-induced to natural mortality. The Draft recovery Strategy (Beacon 2018) is clear, and provides the following data :

2001 (prior to harvest ban) :	42% harvest, 21% natural causes, 37% unknown
2003-2007 (post ban) :	16% harvest, 84% natural causes

This also led two researchers to claim that « Our reanalysis show that the perceived threat to the viability of APP wolves was greatly exaggerated (Patterson and Murray 2008). Thus, considering that populations are stable inside the park (see above), considering that mortality rates have not changed following the ban (see above), considering that wolves have already returned to their natural state (see above), we therefore argue that there is no immediate threat to the conservation of eastern wolves that warrants immediate action. This is good news, since it provides the time to consider and address the other issues presented below.

2- The current harvest of « canids » by trappers in areas surrounding the protected zone reveals that harvest of « Algonquin wolves » is minimal, and much below recognized threshold for sustainable harvest.

As stewards of the land, The OFMF encouraged trappers in all areas surrounding the protected buffer zone to submit DNA samples of all canids captured in the fall of 2017 and winter of 2018. Overall, 300 trappers voluntarily agreed to participate in this research initiative and in total, 392 unique genotypes of « canids » were analyzed.

The results were as follows :

- 294 were eastern coyotes (294 of 392 = 75.0%)
- 49 were hybrids of two groups (12.5%)
- 24 were admixed or « hybridized extensively » (6.1%)
- 14 were gray wolves (3.6%)
- 11 were Algonquin wolves (2.8%)

Therefore, the harvest by trappers consisted of 75% coyotes, 18% hybrid canids, 4% gray wolves and only 3% eastern wolves. If we consider the population estimates for wolves provided in the COSSARO report (250-1000 « mature » wolves; COSSARO 2016 Executive Summary), the 11 Algonquin wolves harvested legally by trappers represents no more than 1 to 4% of the total population. If we use the estimates in COSEWIC 2015 of 151-170 « mature animals », then the harvest rates would be 6-7%. Furthermore, these estimates are likely biased because many of the wolves harvested were likely juveniles since they are usually more vulnerable to harvest and are more often « dispersers ». So the impact on the population of « mature Algonquin wolves » can be safely evaluated at less than 5%.

In North America, harvest rates of 30-35% are considered sustainable for wolves when human harvest is the primary cause of mortality (Murray et al. 2010). As a comparison, the state of Montana opened a season on wolves when the population was estimated to have reached 500 animals and the annual harvest quota was set at 75 wolves (15% of the estimated population).

We conclude that the harvest rate of eastern wolves in Ontario is well below the recognized threshold for sustainable harvest. This is further supported by the fact that eastern wolf populations are stable (COSEWIC 2015; COSSARO 2016) under the current harvest regime.

3- The impacts of protecting eastern coyotes have not been addressed nor evaluated.

The impact of some of the actions considered may have unforeseen or negative impacts on wolf conservation and yet, they are not addressed or evaluated in either the Draft Recovery Strategy (Beacon 2018), COSSARO (2016) or COSEWIC (2015). One of these issues is how populations of eastern coyotes will respond to further protection. The

protection of eastern coyotes raised several issues and concerns, but at least three issues relate directly to the conservation intention of COSSARO.

The first issue is whether further protection of coyotes in additional municipalities, most of them being better coyote habitat than wolf habitat (Otis et al. 2017), could in fact lead to increased hybridization risk between eastern coyotes and dispersing Algonquin wolves. Hybridization already is recognized as one of the threats (COSEWIC 2015), and most research suggest hybridization occurs in marginal areas where solitary or dispersing wolves encounter more abundant coyotes. Current research already has shown that dispersers travel to areas outside of « established » wolf packs, and as such, are less likely to encounter wolf mates, more likely to encounter coyotes during breeding season.

Protecting eastern coyotes may also increase hybridization with wolves, simply by the density difference of the two species. There are some reports that « normal wolf structure precludes matings with coyotes » but the greater numerical abundance of coyotes (which reach higher densities than wolves) will therefore lead to more contact, and this measure could be counterproductive for the conservation for wolves. Protecting eastern coyotes could thus have negative effects on Algonquin wolves by increasing hybridization in marginal wolf habitats. This question has been raised as one of the « great unknowns », and we believe it deserves proper research before we accept additional bans on harvest that may be counter-productive for the conservation of the Algonquin wolf.

A second issue regarding the ban on harvest of coyotes is the fact that « ...very little overlap has been documented among Algonquin wolves, eastern coyotes, and other admixed canids (Benson and Patterson 2013) » (Beacon 2018 : page 19). If eastern coyotes are more abundant and not harvested, could there be a risk that they prevent Algonquin wolves from expanding their range, or even slowly invade existing Algonquin wolf territories inside Algonquin Park? This issue is recognized in Beacon (2018) on page 21 : « The presence of the eastern coyote and other admixed canids limits expansion outside APP, as most of the known canid habitat is occupied by territorial canid packs and territoriality exists regardless of ancestry of the individual pack members (Benson and Patterson 2013) ». The presence of gray wolves is also considered a limiting factor (Beacon 2018 : page 21). We fail to understand how providing coyotes with further protection will « help Algonquin wolves » when coyotes compete with Algonquin wolves, breed with Algonquin wolves, and limit the distribution of Algonquin wolves.

Last but not least, is the issue of unknown effects on other species of increased population of Eastern coyotes. Coyotes have long been persecuted and nonetheless have remained not only very common, but they have constantly expanded their range north, south and east. Providing coyotes with protection from harvest goes against common sense in wildlife management: this species can tolerate extreme harvest pressure, is extremely adaptable, often colonizes cities and urban areas at great costs

to society (e.g., Chicago, Montreal, Los Angeles, etc.) and with huge impact on prey species. There are also great costs involved due to depredation of livestock, pets, even attacks on humans, which, albeit extremely rare, seem to occur mainly where coyotes are protected. Can we afford the protection of eastern coyotes without first evaluating the risk on agriculture, environment and even public safety?

4- The impact on deer and moose populations are unknown and/or ignored

Wolves and coyotes are predators of white-tailed deer, and wolves also can have significant effects on populations of moose. The abundance of white-tailed deer and the fact that global warming will likely increase their density and range in Ontario suggests that they are unlikely to face conservation threats, but populations of deer could definitely experience decreases in density, especially at the northern limit of their geographical range in Ontario. The economic benefits of hunting in Ontario are well documented. In 2016, our province sold 188,116 resident licenses, 4,145 farmers licenses, 3,427 non-resident and 8,124 additional deer licenses. The value of these licenses sold was \$9.84 million for resident licenses along with an additional \$850,000 for non-resident license for a total of \$10.69 million to the province of Ontario. This does not represent the millions that hunters spent in the economy during the hunt for equipment, food, hotels, gas, etc. A big part of that money is spent in small towns and rural areas where employment is scarce and the economy weak. Any further bans on harvest of wolves and coyotes could have negative impacts on deer populations. What can the OMNR tell us about any potential reduction of deer abundance caused by any further bans?

Moose management is even more problematic as Ontario seems to undergo a decline in harvest in recent years and the causes seem difficult to pinpoint. We also know that moose is a staple food for many Indigenous nations, and we wonder if further bans could lead to further reductions in moose abundance? Such would obviously have an impact on Indigenous Nations, but also on sport hunting in Ontario. In 2017 alone, over 90,000 resident and non-resident moose hunting licenses were sold in Ontario, and over 84,719 residents applied for the annual draw. We do not believe that Ontario hunters would appreciate further limitations on hunting moose or deer should such measures be necessary because of further protection of « canids ». For certain, we believe the Minister of Natural Resources and Forestry should provide estimates of possible scenarios and present these to indigenous and non-indigenous hunters, and other user groups, before any further bans on wolf and coyote harvest are implemented.

5- The proposed actions in COSSARO target only one of the threats (harvest) – but none of the other threats identified by COSEWIC (2015).

COSEWIC lists four threats « actual or imminent, to populations of habitats ». They are hunting and trapping, land conversion, road networks, and genetic swamping from eastern coyotes (COSEWIC 2015, page 7).

We are surprised that only one of the four threats identified in COSEWIC (2015) is addressed by COSSARO (2016). This is even more surprising since the latest research indicates that where harvest bans were established, mortality rates did not change after the implementation of the ban in surrounding townships in 2001. Why then is COSSARO (2016) still focused strictly on hunting and trapping and other factors are ignored completely?

COSEWIC's report (2015 : page 7) lists « land conversion » immediately after hunting and trapping, yet the COSSARO report completely ignores a major issue of land conversion, that is the issue of logging inside Algonquin Park. This is especially puzzling because research clearly states that forest canopy and mature forests are key determinants of habitat suitability for Algonquin wolves (Otis et al. 2017). Yet, what action will be taken to limit or mitigate logging activities inside Algonquin Park? Some reports claim that over 70% of Algonquin Park undergoes logging activities – why is this not discussed?

Further linked to « land conversion » is habitat fragmentation. COSEWIC (2015 : PAGE 2, lines 91-94) states that « Habitat loss and fragmentation associated with road networks and urbanization is expected to continue outside protected areas and likely will deter population expansion. » If COSEWIC (2015) predicts that range expansion is unlikely because of habitat fragmentation and urbanization, then why is COSSARO (2016) suggesting that by simply banning harvest, wolves will expand their range? If urbanization and fragmentation are the main issues, why is COSSARO (2016) not providing measures to stop fragmentation and urbanization?

Road networks are also listed as a threat in COSEWIC (2015). Scientific reports mention clearly that wolves in Algonquin Provincial Park avoid the southwestern portion of the park where human activity (tourism) is the greatest. If the conservation of APP wolves is so critical, why is limitation of « road networks » and human activity not discussed? Could the reduction or limitation of human activity inside parts of Algonquin Park help provide more habitat for Algonquin wolves? Has this been considered?

Finally, the threat of genetic swamping with coyotes. We have discussed this issue in detail in one of the previous sections (*point 3 : The impacts of protecting Eastern coyotes have not been evaluated nor addressed*). Our main point is : if four threats are identified, why is the latest document still focused on only the first issue (hunting and trapping) when the scientific evidence already has shown that mortality rates do not change when wolves are protected from hunting and trapping?

In the absence of such discussions, we wonder whether the people working for the Ministry of Natural Resources and Forestry simply contemplate « further bans on harvest » simply because it is easier to force conservation measures against smaller user groups instead of tackling the real but larger issues of management of human activities such as tourism and logging? Is Algonquin Park or the Ministry of Natural Resources and Forestry experiencing mission-drift because of agenda-driven lobby groups, or even lobby from individuals within its own Ministry?

6- The interests of Indigenous Nations are ignored / under-represented.

The Ontario Fur Managers Federation represent 6000 trappers, aboriginal and non-aboriginal, that actively contribute to wildlife management all over the province of Ontario. Although OFMF recognizes that its membership is mostly non-indigenous, it nonetheless recognizes the importance of hunting and trapping in the culture, lifestyle and subsistence of indigenous nations. The implications of any further bans on wolf and coyote harvesting is likely to lead to further reductions in populations of key animals such as moose and white-tailed deer, and OFMF feels that such impacts, once properly quantified, should be clearly detailed and explained to Indigenous Nations. OFMF further wonders whether First Nations have been consulted on what this ban actually means for their activities on the land, and the abundance of the resources they exploit?

Currently, both COSSARO (2016) and COSEWIC (2015) fail to address the impact of any further bans on First Nation communities. The only reference in the Draft Recovery Strategy is a vague reference to a resolution that has no date, no location, no individuals nor any nation mentioned, and for which veracity cannot be confirmed (Beacon 2018 : page 3 and Appendix A). Which First Nations have been consulted and when? Were they told about the potential impact on moose populations? Did they comment?

Modern management of wildlife in Ontario cannot be done without the involvement of Indigenous Nations. In the absence of proper consultations, the Ontario Fur Managers Federation would feel extremely uncomfortable endorsing any further bans that could impose restrictions or would have undesirable consequences for the life and culture of fellow harvesters of Indigenous ancestry.

7- Financial consequences of further bans are not proposed nor detailed.

Conservation costs money, yet none of the reports provided by the Government of Ontario, be they COSSARO (2016) or Beacon (2018) fail to address financial implications of any conservation measures.

As stewards of the land who have been managing natural resources for hundreds of years at no costs to society, we are not surprised of this omission because modern conservation often embraces utopic visions and idealistic rules which have no foundations on financial reality. Management of canids currently is a free service provided to the Government of Ontario by trappers and hunters who seek to exploit this sustainable natural resources for a small profit. In doing so, most trappers and hunters inject considerable sums of money into local economies, often in rural areas where money, jobs and business is scarce.

We also know that the government of Ontario provided over \$577,620 in claims for cattle or livestock killed by coyotes and wolves. With any further protection of wolves and coyotes, how many more claims will be filed for depredation of livestock, and how much more will it cost to the Government of Ontario? Are the farmers of Ontario willing to pay the price of additional conservation for « canids » whose populations are stable?

We further ask whether financial compensation has been considered for loss of income for trappers (native and non-native) that would be affected by any further bans? We feel these financial matters should be well detailed and be explained clearly. Conservation comes with a cost, and the OFMF is not willing to bear this cost alone, and we are certain that the the Indigenous nations, the farmers of Ontario, the hunters of deer and moose, the private hunting outfitters, and all business associated with the hunting and trapping industry feel the same way. It is easy enough to propose conservation actions when one is sitting at a research desk, but who in the real world will pay for such measures?

IN CONCLUSION

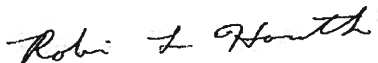
The Ontario Fur managers Federation believes it has done its part in embracing the conservation of Eastern wolves established in 2001 by accepting the ban for hunting and trapping of wolves in 40 townships surrounding Algonquin provincial Park. We feel that the evidence that we have now is clear that no further bans or protection is warranted because populations are stable, harvest is minimal and well-below the sustainable thresholds, and the consequences of any further bans have not been explored enough, especially the impact of any further protection of coyotes.

For all these reasons which are fully detailed above, the Ontario Fur Managers Federation firmly oppose any further initiative to protect wolves or coyotes by the Government of Ontario.

The Ontario Fur Managers Federation stands proud of its heritage of sustainable harvest of all furbearers in Ontario. We remain committed to the wise use of all natural resources, and cherish abundant and healthy animal populations. We believe that our submission is a direct testimony of our dedication, and wish to continue to be considered as allies to the Ministry of

Natural Resources and Forestry of Ontario, in the safeguard, perpetuation, and sustainable use of all wildlife species.

Respectfully submitted,



Robin Horwath, General Manager

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 Ontario Sporting Dog Association
 Ontario Federation of Anglers and Hunters
 Ontario Federation of Agriculture
 Ontario Sheep Marketing Board
 Cattlemans Association
 Fédération des Trappeurs Gestionnaires du Québec
 Fédération Québécoise des Chasseurs et des Pêcheurs
 Ontario Fur Managers Federation Board of Directors

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OFAH File: 411/794
February 12, 2018

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

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