

ONTARIO FEDERATION OF ANGLERS & HUNTERS

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Ontario Conservation Centre

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To Whom It May Concern:

Subject: ERO 019-4995 Conservation Agreement for Boreal Caribou in Ontario

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. Boreal caribou are part of Ontario's native wildlife heritage and ecology and, as such, are deserving of sustainable management attention. At the same time, boreal caribou exist on a complex landscape, both in terms of ecological conditions and the management responsibilities for the various species and activities occurring in the same space. In our response we endeavour to highlight these complex situations to ensure the resulting Conservation Agreement creates meaningful benefits to caribou, while at the same time supporting, or at the very least avoiding, determinantal effects on other species such as moose.

Complex responsibilities for cervid management in Ontario

Ontario has responsibilities for the management of Ontario's four native cervid species: American elk, white-tailed deer, moose, and caribou as defined by the *Cervid Ecological Framework* (2009) and the associated species-specific policy documents such as the *Moose Management Policy* (2009). A key component of moose management is the population objective range (POR) for each wildlife management unit (WMU) with a moose hunting season. These PORs, which were developed through examination of the scientific data and extensive public consultation, represent a specific moose management target to reach by 2030. According to publicly available information on the status of WMU-level moose populations (NDMNR, 2021), the Churchill, Pagwachuan, James Bay, Keskami, and Lake Superior Coast ranges, as well as the Discontinuous Distribution, all overlap or wholly contain WMUs where the moose population is below the lower limit of the POR.

In our opinion, this is the critical lens that must be applied when developing and implementing the conservation measures in the proposed Conservation Agreement. Parallel to the Conservation Agreement's stated purpose of maintaining and recovering self-sustaining local populations of boreal caribou, the Ontario government has an equal responsibility to achieve these 2030 moose population targets. It's also critical to note that moose population estimates are derived from moose aerial inventories (MAI), which are conducted on a three-to-five-year rotation. Therefore, the 2021 moose population snapshot referenced above will likely change over the course of the Conservation Agreement's five-year time period.

The OFAH does not see this as a *de facto* conflict between moose and caribou management. While we do have concerns about conflicting goals, we also see opportunities for the conservation measures proposed in the Conservation Agreement to support improved management for both species.

Potential avenues of conflict between moose and caribou management and suggestions for their mitigation

Recognizing the Ontario government's dual responsibilities to recover boreal caribou and achieve the 2030 moose population objectives, we see two primary points of conflict: different habitat requirements for boreal caribou and moose, and the diversion of financial, staff, and equipment resources dedicated to management from moose to boreal caribou.

Moose and boreal caribou have different habitat requirements and, therefore, we do see the conservation measures related to creating or preserving caribou habitat as presenting a challenge to moose management, especially in WMUs where there is a need to also grow the moose population to reach the 2030 objectives. Our hope is that the proposed Caribou Science Plan for Ontario will help develop habitat prescriptions that can support both healthy moose and boreal caribou populations whenever possible. This would further be supported through the development of specific goals for the creation of habitat and protected areas, as well as their integration into broader commitments (e.g., the *2020 Biodiversity Goals and Targets for Canada*).

The Conservation Agreement describes extensive actions that will be taken over the next five years in support of maintaining and recovering self-sustaining local populations of boreal caribou in terms of monitoring, research, and policy development and implementation. The OFAH absolutely supports this approach but at the same time recognizes that there are limits to the capacities within the two ministries responsible for the management of moose and boreal caribou: the Ministry of the Environment, Conservation and Parks (MECP) and the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNR). Recognizing these limitations, we are concerned that additional funding from the federal government will not address these limitations unless it is properly invested in staff and equipment, something that might be challenging over a five-year agreement period. An example is the potential for the proposed Boreal Caribou Monitoring Program to compete with the MAI Program for experienced staff and aircraft time. The OFAH absolutely supports a rigorous caribou monitoring program and see it as fundamental to effective caribou management and potentially beneficial to moose as well (see below). However, it takes time to adequately train personnel to conduct aerial surveys of large mammals from aircraft and the supply of helicopters in Ontario is limited. Once again, recognizing the dual responsibilities of maintaining and recovering self-sustaining local populations of boreal caribou and achieving 2030 moose population objectives, the Conservation Agreement must support the needed capacity for the management of both species.

Opportunities in the Conservation Agreement to support both boreal caribou and moose

We do see a significant opportunity for the Conservation Agreement to provide benefits to moose management, despite being focused on caribou. While moose and boreal caribou have their own distinct ecologies and associated management needs, they are also faced with common challenges. These include climate change, the northward expansion of white-tailed deer, predation, parasitism, disease, and the interactions between these factors. Taking a holistic approach to addressing these challenges and supporting it through the Conservation Agreement would ultimately benefit both species. For example, while the northward spread of white-tailed deer is primarily a moose challenge at this time, that expansion can reasonably be expected to continue. Taking steps to address it now would both support moose populations and remove a potentially significant stressor on caribou, especially in the southern ranges. This will necessitate longer-term thinking than the five-year period of the Conservation Agreement, but neither moose nor boreal caribou management are short-term issues.

While we do have concerns about expanded boreal caribou research and monitoring diverting resources from moose programs, we also see significant potential benefits to moose *provided there is adequate investment in staff and equipment*. First, while moose and caribou surveys will likely require distinct methodologies based on the ecology of the focal species, supplemental data should be collected that could inform the management of moose during caribou surveys and vice versa. A good example of this is the standardized collection of non-target species (e.g., white-tailed deer and wolves) observations. These data, while likely not robust enough to generate population estimates, could provide population trend indices. These indices would be extremely useful, especially in situations where we suspect a growing or expanding population of conservation concern (e.g., white-tailed deer). The standardized collection of non-target species observations was a central request in our 2021 letter on the importance of MAIs to the Ontario Minister of Natural Resources and Forestry. From follow-up discussions with NDMNRF staff, it is our understanding that this has been put in place for MAIs and we would like to see that extended to caribou surveys. Second, we see investment in boreal caribou monitoring as resulting in a net improvement of aerial survey methodologies for large mammals. In our 2021 MAI letter, we raised concerns about the fact that MAIs are dependent on specific snow conditions, conditions that will likely become less common under climate change. With both the increased management attention on aerial surveys for caribou and the associated federal funding, it is our hope that new methodologies will be explored to ensure that Ontario has an aerial survey system for both moose and caribou that is robust in a changing world.

Spatial and temporal scale of the proposed conservation measures

We appreciate the thoroughness and the scope of the conservation measures laid out in the proposed Conservation Agreement but do have questions about both the spatial and temporal scale of their implementation.

The Conservation Agreement has an overarching goal that refers to the recovery of boreal caribou at the “range scale,” a purpose that references “local populations,” and states a recognition that a “landscape-level” approach will be required. The only one of these spatial scales that has been explicitly defined in this consultation process, via a map included in the email announcing the posting on the Environmental Registry of Ontario (ERO), is the range scale. We recommend either explicitly defining “local populations” and “landscape-level” or, and this is our preferred option, removing those terms from the Conservation Agreement and using ranges as the fundamental unit of boreal caribou management. This would ensure that the population estimates and habitat states collected under the proposed range-scale monitoring program would be directly relatable to the Conservation Agreement’s overarching goal. Should the existing range boundaries not be appropriate, the proposed caribou range boundary review and update will provide the opportunity to adjust them accordingly. If a landscape-level approach (e.g., larger than the range-scale) is needed, it should be based on combinations of ranges. Basing boreal caribou management on a clearly defined set of spatial boundaries will also allow it to be integrated with other relevant spatial units such as WMUs and cervid ecological zones.

We recognize that there needs to be a defined length for the Conservation Agreement but feel it necessary to reiterate that five years is an extremely short time frame, especially for a species such as boreal caribou which is reliant on older, undisturbed habitat. Along the same vein, five years is a very short time frame over which to apply the Conservation Agreement’s guiding principle of adaptive management. We sincerely hope that this agreement persists in some form after that five-year window, as we do see the conservation measures outlined in the ERO posting having a significant positive impact on boreal caribou and, we hope, ancillary benefits to moose.

Given the five-year time limit, we are concerned that some of the conservation measure timelines are in conflict with each other or may be progressing without allowing time for key supporting information to be collected. An example of the former concern is that the proposed range-scale boreal caribou monitoring program will be happening in parallel with the range boundary review. While the OFAH fully supports precise population assessment and see it as necessary baseline data for effective caribou management and recovery, we are concerned that the boundaries of those sampling units may be changed either as the monitoring is taking place or after the initial round of surveys has been conducted. How would this affect the ability to compare the results of consecutive surveys and relate this to the population goals at a range scale and the effectiveness of management actions at achieving those goals?

In past submissions related to caribou, most recently our 2018 response to EBR Registry Number 013-2587: *Seeking Advice on the Future of Caribou in the Lake Superior Coast*, we highlighted the need to ensure that resources and management actions are focussed in areas where there is a reasonable chance of recovering boreal caribou. Attempting to recover boreal caribou in areas where it is likely not feasible is not efficient or cost-effective and would cause unnecessary conflict with other management responsibilities (e.g., moose) and have unnecessary socio-economic impacts. For this reason, we support the conservation measures that will gather the fundamental information on the distribution of boreal caribou and the habitat characteristics on which they rely. However, we are concerned that the five-year timeline may result in some management actions being taken before this necessary baseline data is collected and analysed. A prime example is the proposed development of a Lake Superior Coast Range (LSCR) Management Plan. Even back in 2018, there was considerable uncertainty about the size and distribution of the population on the mainland and near-shore islands, as well as the distribution of resources that had allowed that population to persist while the southern limit of the continuous boreal caribou range had retreated northwards. Since then, boreal caribou have been extirpated from Michipicoten Island, the most significant concentration of caribou in the LSCR. As such, crucial information about this population's size, distribution, habitat, and potential for habitat restoration will need to be gathered through conservation measures 1.1, 1.2, and 1.3 to inform management planning. However, that information will not be available in time to inform the proposed development of a LSCR Management Plan. In general, we have concerns about proceeding with management actions, potentially with trade-offs to moose and socio-economic costs, before the necessary baseline information has been collected and feel that the five-year time constraints may lead to this eventuality, both for the LSCR and other components of the Conservation Agreement.

Socio-economic considerations

The OFAH is pleased to see that socio-economic factors will be taken into account while implementing the Conservation Agreement. While we are a conservation-first organization and our primary responsibility is to the resource, economic activities do play an important role in supporting wildlife populations when they are applied and managed appropriately. In particular, the forestry industry plays an important role in the creation of early successional moose habitat. This highlights yet another consideration that must be factored in given the dual responsibilities to moose and boreal caribou management that we have highlighted throughout this submission.

When considering socio-economic factors, the economic importance of moose hunting, especially in Northern Ontario, cannot be ignored. The most recent estimates from the NDMNRF are that moose hunting annually contributes \$200 million to Ontario's economy. Furthermore, because all hunting licence sales go directly into Ontario's Fish and Wildlife Special Purpose Account, which is earmarked for wildlife management activities, ensuring that sustainable moose hunting opportunities are made available wherever possible further increases the available funding for science, research, monitoring, and other management actions. As such, the presence of healthy moose populations directly contributes to the economic prosperity of northern communities and the tourism industry through the provision of sustainable hunting opportunities. These sustainable hunting opportunities must also be accessible, which is another factor to consider as part of the discussion around forest access roads and boreal caribou conservation.

Importance of management informed by science

The OFAH is a science-based organization, and we support that same focus in the Conservation Agreement. We support the creation of a Caribou Science Plan for Ontario with the goal of filling knowledge gaps. A central component of our moose advocacy has been the need for the NDMNRF to practice whole-system management which considers all factors influencing a moose population such as harvest, predation, habitat, disease, parasites, climate change, and more. We see definite value in applying the same approach to boreal caribou.

One key component of effective, science-based management is an accurate assessment of harvest levels. The OFAH recognizes this and that is why we have supported the implementation of mandatory hunter reporting for provincially licensed hunters. While the licensed harvest of woodland caribou in Ontario has been prohibited by legislation since 1929, the species remains listed under the *Fish and Wildlife Conservation Act, 1997* as a game mammal. Rights-based harvest of boreal caribou does occur and people exercising Section 35 harvesting rights under the Constitution are not required to report their harvest to the NDMNRF. Recognizing this and the Conservation Agreement's commitment to Indigenous collaboration and engagement, we ask that the agreement include a commitment from the Ontario government to include conversations about rights-based harvest as part of that engagement. Seeking to build relationships to facilitate the sharing of harvest data is not a statement that harvesting is a conservation concern. Licensed moose hunters report harvests in units where the harvest rate is negligible and likely has minimal population impact. Harvest is simply a factor that can influence large mammal populations and, therefore, should be quantified.

The Conservation Agreement builds upon or continues to utilize existing Ontario management actions and policies related to boreal caribou. To ensure that the Conservation Agreement is building upon a solid foundation, we feel that reviews of the effectiveness of these past actions and policies are warranted, if they have not already occurred. For example, under the forest management planning conservation measure, the Conservation Agreement proposes to continue to integrate the direction in the Forest Management Guide for Boreal Landscapes (BLG) into forest management plans. Has the past application of the BLG been audited to ensure that it is having the predicted positive benefit in the creation of boreal caribou habitat?

The Conservation Agreement recognizes the role of predators and, as such, we feel that it is relevant to reiterate a long-standing OFAH request that wolf and coyote harvest management in Northern Ontario be revised to reflect the current scientific understanding. We refer you to our 2019 submission to ERO 019-0406 *Proposed changes to wolf and coyote hunting regulations in Northern Ontario* (OFAH, 2019) for a more detailed discussion of our concerns, but the core issue is that the management of these animals is based on a flawed assumption that hunters cannot distinguish between wolves and coyotes. Research conducted by NDMNRF staff has shown that hunters can distinguish between gray wolves and eastern coyotes. As such, we reiterate our request that the harvest of wolves and coyotes be managed as two separate species in WMUs where the intermediate Algonquin wolf is not present.

Conclusion

The OFAH appreciates the opportunity to provide input into the development of the Conservation Agreement. We look forward to further engagement on boreal caribou and are pleased to see commitments to stakeholder engagement featured prominently in the Conservation Agreement.

As stated throughout this response, there is a need for the Conservation Agreement to reflect the Ontario government's multiple management obligations, especially the complex interplay between boreal caribou, moose, and their predators. Our hope is that through increased research and monitoring, supported by adequate funding and investment in staff and equipment, the conservation and management of both these species can be supported. We do fully believe that boreal caribou are deserving of sustainable management attention and see the potential for the Conservation Agreement to significantly contribute.

Yours in Conservation,



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References

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