

Valhalla Wilderness Society

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SUBMISSION ON THE 2012 DRAFT WOLF MANAGEMENT PLAN

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I. Core Management Elements

The overall objectives of the draft Plan include two goals: 1) to ensure a self-sustaining population throughout the species' range, and 2) to provide for consumptive and non-consumptive use of wolves consistent with Ministry program plan. In reality, the draft Plan contains:

- NO clear conservation directives for wolves;
- NO substantive recognition of role of wolves in ecosystem health, public enjoyment and tourism (viewing);
- NO planning for benchmark carnivore protection areas where wolves are not allowed to be killed and areas where wolves are protected for their intrinsic values and for tourism/viewing.

To our considerable shock, the section "Measuring Progress" on page 31 equates "consumptive and nonconsumptive use" only with "Hunting/trapping", and the performance measure listed is "*maintain liberal season lengths and bag limits of 2 or more, where conservation allows!*"

Almost every one of the "management tools" listed is about killing wolves. The only exceptions are 1) harassing them, and 2) "public campaigns" — to inspire "motivation" to up the "wolf harvest"!

While admitting that in most instances constant killing of wolves is not a solution, this draft plan is all about killing more and more wolves through various measures. In other words, the proposed management plan is clearly, in disguise, enshrining the province's War on Wolves with no plans to recognize other values such as their role in maintaining healthy ecosystems and tourism/wildlife viewing values. The plan only furthers the scapegoating of wolves, enshrining in our cultural mindset constant shooting and trapping of wolves as the only way to treat them.

What, then, are the real core elements of wolf management in this draft plan?:

1. Two-zone management system — zoning BC into a) areas where there are livestock depredation and/or species at risk (mountain caribou and any other species at risk, probably including Golden Marmot), do and will have no bag limits or seasons on killing wolves, and where the government will undertake targeted removal of individuals and packs; and b) every-where else — hunting and trapping as usual, with specified season lengths and bag limits.
2. Adaptive Management — The Plan proposes to jiggle the above parameters as needed to maintain "self-sustaining populations" of wolves.

3. Machine-gunning wolf packs from helicopters — Management Tools for the future include “aerial shooting”, which is characterized as “the most effective and humane.”
4. Role of the Conservation Officer Service — One of the goals of the draft plan states: “Clarify the responsibility for damage prevention and control through a policy or strategy that articulates the roles and responsibilities of landowners, the conservation Officer Service, and relevant agencies in delivering actions aimed at reducing conflicts.”

II. VWS Response To Core Management Elements

VWS, along with many other environmental groups in BC, and a huge mass of the public, vigorously rejects these elements, and has for years. Attached, please find an open letter sent to the BC government on May 3, 2010, signed by 19 (later expanded to 23) environmental groups, declaring: “The undersigned organizations are strongly opposed to the killing of large carnivores (wolves, cougars, bears, wolverines) to save the mountain caribou ... The government has proposed to escalate the elimination of wolves by shooting them from helicopters. A summary of key points included:

1. Predation did not cause the decline of the mountain caribou.
2. Killing top predators will not save the mountain caribou.
3. Top predators play critical roles in maintaining healthy ecosystems.
4. Predator control practices include the killing of the majority of wolves over large areas for many years. History shows that this extirpated wolves over a large part of their range.
5. Large carnivores are intelligent animals with amazing family relationships. They have an intrinsic value in and of themselves, and a right to life.
6. The following methods of predator control are cruel and unbecoming to the dignity and principles of the human race:
 - a) chasing wolves with helicopters and shooting them from the air; b) leghold traps and snaring; c) the use of poison.

These objections had the support of, and were written with the advice of, numerous ecologists and biologists. On April 28, 2011 eight environmental groups sent the government a letter stating that we had learned that a draft Wolf Management Plan was being created, and that a representative of our groups ought to be consulted. Additionally, we submitted the following recommendations for the draft Plan:

1. Establish large, no-hunting sanctuaries.
2. Implement “fair chase” hunting methods into Wildlife Act and Hunting & Trapping Regulations through no hunting of wolves from aircraft, watercraft or terrestrial vehicles.
3. No use of bait to hunt wolves.
4. Shorten the wolf hunting season to February 28th in all regions. This eliminates hunting during the birth and raising of wolf pups.
5. Set low regional quotas for each WMU that limit the number of wolves that can be harvested each year through hunting or trapping.
6. A specific game seal for hunting wolves should be required for both residents and non-residents.
7. Ban the use of neck snares in trapping, as they have been banned elsewhere for their cruelty.
8. Mandatory reporting of wolves hunted and trapped in all regions of BC and accurate inventory of wolves and harvest data in each Wildlife Management Unit

No consultation occurred. The draft Management Plan now shows no acknowledgement of our input. Despite lip-service about “conservation” of wolves and “maintaining self-sustaining populations” of wolves, the Plan offers no areas at all where wolves may live a natural pack life, where people may enjoy viewing wolves or just knowing they are there, and where scientists can study natural predator-prey relations. While the draft Management Plan speaks of principles of “fair chase” in hunting, its own proposed method of removing wolf packs by helicopter is not “fair chase.” And reporting requirements for people killing wolves are to be removed.

A. Killing wolves to protect caribou

Unlike killing wolves to protect livestock (which the government has carried out on a small scale where wolf depredations could be verified by a Conservation Officer) killing to increase the population of prey species requires intensified, prolonged killing over a very large area. Government biologists knew this when some of them began to push for this program.

We’ve had 11 years of spurious wolf-killing “experiments” to increase mountain caribou, on top of many years of more

“experiments” killing wolves to boost the populations of big game species. In 2006 the *Vancouver Sun* exposed sterilization experiments in the Muskwa-Ketchika that had actually *increased* the wolf population. There has been no learning from these experiments, as there has been in the Yukon. One is forced to the conclusion that BC scientific studies of wolf killing are used as a cover for continuing antediluvian wildlife management practices that cater to big-game hunters and ranchers.

The draft Plan acknowledges that for 11 years, since 2001, the government has been killing and sterilizing wolves to increase mountain caribou, and that no such increase has occurred. The draft Plan does not reveal the total figures of wolves killed or sterilized over the last 11 years in the Quesnel Highlands. It is entirely possible that these experiments have increased and scattered wolves. Now some elements within the government obviously wish to use this as an excuse to advance to extreme killing. This is based on the assumption that if only more wolves can be killed faster, caribou will increase, but this assumption is very questionable.

1. At the time that the government killing programs began, some scientists hotly disputed the claim that wolf predation was responsible for the decline in mountain caribou. They pointed out that there were no data showing that wolves were killing the caribou.
2. The problem that is most glaring is that some of our smallest herds — the ones where the government most wants to kill wolves and shoot them from helicopters — have very little intact habitat left, and the current government refused to protect all of what was left during the Mountain Caribou Recovery Program. Habitat fragmentation by logging continues in the areas of these herds under the name of caribou habitat protection.
3. The government has refused to significantly curb snowmobile use and heli-skiing in winter habitat of even the most endangered mountain caribou herds. This is said by prominent caribou biologists to be one of the leading causes of mountain caribou decline. Large areas of new mountain caribou habitat could be created by banning snowmobiles from historic winter range.

A report recently released by the Ministry of Environment, “Winter Recreational Activities in Mountain Caribou Habitat: 2007-2010 Monitoring and Compliance” indicates that snowmobile use in critical winter habitat is rampant. Most of the snowmobile closures are only partial; they allow snowmobiles to use roads and clearcuts, but this allows the machines to pack down the snow over extensive areas, giving wolves easy access to caribou areas. Most of the closures are not legal, but voluntary only. The snowmobile clubs have negotiated agreements with the government to monitor themselves and put up signs. But aerial monitoring by the government in 2007-2010 found widespread violations of both legal and voluntary closures, with more violations in voluntary areas.

This non-compliance has increased over time, despite efforts to increase the number of signs. During two days in February 2010, the government surveyed 48 high country basins with snowmobile use in South Selkirks, the area of one our most endangered herds, and found the voluntary agreements or legal closures were being violated in over 60% of the basins.

Because of these factors, it is not at all a foregone conclusion that more intense wolf killing will result in increased mountain caribou. Intensified killing over large areas means losing the ecological functions of wolves and tossing aside humanitarian concerns. The ecological functions to be lost are:

1. Wolves remove big game animals that are weakened by disease, poor nutrition, genetic problems, or old age, thus promoting healthy, vigorous prey populations.
2. Wolves keep prey populations in balance with their food supply. When cougars and wolves are reduced or removed:
 - Deer, elk and moose may multiply rapidly, exhausting their food supply, and starve to death.
 - High numbers of ungulates can damage sensitive plant communities, resulting in a loss of species, possible hydrological damage from erosion, and inability of forests to recover after logging. Animals that use the vegetation — such as nesting songbirds and beavers — may also disappear.
 - Mid-sized predators, such as coyotes, foxes and members of the weasel family increase (Hebblewhite et al. 2005, Ripple and Beschta 2003, Crooks and Soule 1999, Wilson 2004.) As a result, their prey, constituting many kinds of small wildlife, are also reduced or eliminated. It is believed that about 75 species of songbirds in California may have gone extinct for this reason. (Crooks and Soule 1999).

In summary, healthy wolf packs increase biodiversity by promoting the survival of plants and small animals. Eliminating wolves can wipe out other species. Although the draft Plan acknowledges the role of wolves in keeping ecosystems healthy, it skims over these details, understating them considerably, and goes on to characterize wolves as a menace to species at risks. This substantial contradiction reflects an anti-wolf bias that leans towards the policies the government wishes to continue implementing and to enshrine in formal policy.

B. Inhumane means of killing wolves

Lastly, intensified killing of wolves forces governments to undertake and allow ruthless, cruel methods. The methods now proposed by the government are chasing wolf packs with helicopters and machine-gunning them. Equally cruel is the allowance of hunting and trapping during the denning and pup rearing season, which means that pups will starve to death in their dens or be shot with their families.

In Alaska, Yukon and BC shooting wolves from helicopters has been the subject of massive public outcries. These practices are morally repugnant to a large percentage of the public. As representatives of the public, elected officials, bureaucrats and biologists have a responsibility not to engage in behaviour that misrepresents the moral principles of our society, and humane treatment of animals is a very strong principle in civilized countries. Instead the government now proposes TO USE OUR TAX DOLLARS in this ruthless behaviour that, according to the Yukon 2012 Wolf Management Plan, is very expensive:

“The 1992 Yukon Wolf Conservation and Management Plan was focused primarily on ungulate recovery and much emphasis was placed on large-scale, scientifically-based, government sponsored wolf control programs and the need to research and test this methodology. Today, much has been learned about the impacts, long-term effectiveness, and costs and benefits of this technique. There appears to be little interest from Yukoners and the general public to focus so much effort on this management approach ...

“Aerial control is no longer a recommended management tool. Strong public opposition, high financial costs; the short-term impacts on wolves and ungulates, and the lack of community involvement weigh against this approach.”

C. Killing wolves to protect livestock

The draft Management Plan is severely biased towards the ranching industry. VWS finds it offensive that the draft Management Report includes “pressure to reduce wolves to protect livestock and species at a risk” as a rationale for its future management policies, while concealing the fact that it has been besieged by letters from the public decrying wolf killing for years. There is no admission that there are other ways to address the ranchers’ losses, and little is said about the former program to compensate ranchers for these losses. We are just told it has come to an end.

The grazing industry greatly exaggerates its losses. — The BC Cattleman's Association has at times claimed that ranchers lose \$15 million a year due to wolf predation. Yet columnist Stephen Hume calculated that for ranchers to lose that much money, wolves would have to eat 19,736 yearling steers a year; but in 2011 there were only 21,000 yearling steers in the whole province. Alternatively, wolves would have to eat more than 215,000 calves every year; but in 2011 there were only 153,000 calves in the whole province. (Hume, *Van. Sun.* Oct. 9, 2012). ***It is exaggerated claims such as these that are behind the “pressure” that the government feels compelled to recognize and formally enshrine in its future Wolf Management Plan.***

The ranchers’ are using public land at very little expense. — The government should compensate ranchers when the Crown's wild carnivores kill the ranchers' livestock. But the ranchers are also grazing their cattle on public land. As of the 2005 Range Act, the grazing fee per month for a cow and her calf is only \$1.68. Government programs also provide fencing for ranching tenures. It is likely that this amounts to a subsidy.

The government had a good compensation program supported by the environmental community — In 2009 the province initiated the "BC Wild Predator Loss Prevention Pilot Project," funded by \$1.55 million over 3 years from the federal and provincial governments. The Ministry of Agricultural and Ministry of Environment kicked in funds, in addition to the \$4 million a year under the BC Agriculture Plan, with matching federal funds of \$6 million a year. The mandate was not only to compensate ranchers for losses to wild predators, but also to provide preventative measures. When livestock was killed, a Conservation Officer would inspect the kill to determine whether it really was killed by wild predators. If so, the

Conservation Officer would undertake targeted trapping, and the rancher would be compensated for part of the cost of the livestock. By having the Conservation Officer do this, the trapping was limited to immediate area of the problem and done by an independent professional, and only in cases where wild predator kills could be verified.

Compensation costs were minimal — In 2011 the government verified 133 wild predator kills and paid out \$63,800. Not all the losses were due to wolves; some were caused by bears, coyotes and cougars. There were about 55 losses of cattle to wild predators in 2010, compared to 525,000 head of cattle in BC. Studies in Canada and the US show that about 80% of livestock mortality is caused by disease, poor nutrition and severe weather. About twice as many cattle die while being transported to the slaughterhouse as are killed by wolves. (columnist Stephen Hume, *Van. Sun*, Oct. 9, 2012, and Aug. 29, 2011)

133 livestock kills in 2011, costing \$63,000, and for this we are supposed to declare open season on all wolves in the grazing lands, much of which are public lands exploited at minimal expense by ranchers! If there are insufficient funds to continue compensating ranchers, raise the cost of grazing on public land by a few pennies.

D. Ongoing dismantlement of Conservation Officers Service with increasing control of wildlife policy by vested interest

Some of this draft Plan is cloaked in unclear language composed more of inferences than statements of fact. The plan infers that the government intends to turn control of handling livestock deprecations over to the ranchers, who will then be given free rein to blast away at wolves whenever they want. This appears to be no different than cutbacks that have been debilitating the Conservation Officer Service for years. These same cuts have virtually destroyed the Ministry of Environment, which is cut of the same cloth as the federal cutbacks that have all but destroyed the Department of Oceans and Fisheries. This item in the draft Plan, then, augurs the final depowerment if not outright destruction of the Conservation Officers Service in the way that our Ministry of Forests was depowered, by shifting it onto logging companies to regulate themselves.

This shift includes closure of the former system of compensating ranchers for livestock losses, discontinuation of having a CO verify livestock losses to predators, and telling the landowners to solve the problems themselves by killing as many wolves as they want.

Apparently the Conservation Officer Service will be partnering with what the Management Plan calls “the full suite of stakeholders” including: livestock producers and producer groups, industry, the Ministry of Agriculture, the BC Wildlife Federation, the BC Guide Outfitters Association, the BC Trappers Association. These are all rancher or hunter groups, and with this they are taking a big step of increased control of our wildlife. No environmental groups are listed here, and in all likelihood none should be. They would be so out-voted by vested interests that they would be paralyzed to achieve anything meaningful except give the "stakeholders" a facade of inclusiveness. This amounts to the foxes managing the chicken coop. ***When one sees that the thrust of this is the destruction of our government environmental protection system, and the privatization of wildlife management into the hands of those who have an interest in killing animals, what wildlife friend would want to participate?***

E. Adaptive Management System – On page 28 a system of continual adjustment of hunting regulations and wolf pack killing is shown. Not for nothing is this called a “Bayesian Belief Network”. It will be interpreted according to the beliefs of the scientists using it, and it instigates belief that conservation management is taking place. Appearing within a report of such outrageous bias against wolves and towards vested interests in killing them, and in a context in which all our environmental agencies are down to skin and bones, this diagram is dismaying.

III. VWS RECOMMENDATIONS

1. Extend the deadline for public input to January 30, 2013.
2. Set aside large areas of the province where wolves are protected from any killing, so that wolves can develop natural packs and behaviour, which will provide benchmarks for scientific research and as areas where people can watch wolves.
3. NO helicopter killing of wolves.

4. NO leghold traps or snares.
5. Programs to increase mountain caribou by killing wolves have failed and should be discontinued.
6. To save caribou the government should 1) stop logging old-growth forest in mountain caribou range, 2) ban snowmobiles from winter range (current bans are inadequate and not enforced), and 3) roads built in caribou range need to be obliterated to prevent easy access by predators.
7. Return to former species licence, quotas, bag limits, restricted seasons, and mandatory reporting of kills for hunting wolves.
8. Continue government programs for compensating ranchers for losses to wild predators.
9. Fund an adequate Conservation Officer Service. The Conservation Officer Service should not partner with vested interests such as ranchers; this is the foxes running the chicken coop.
10. Practice prevention by providing education and incentives to improve protection with fences, guard dogs, shepherds, etc.

IV. THE DRAFT MANAGEMENT PLAN

Comparison to the Yukon Wolf Management Plan

VWS has compared the BC draft Wolf Management Plan to the Yukon 2012 Wolf Management Plan. We believe the Yukon Plan would have raised considerable objection in BC because, for one thing, its best goals have very little in the way of action items, which means a lack of firm commitment to put them into action. And its heavy reliance on “adaptive management” means that managers are being given the discretion to change things howsoever they wish. Nevertheless, the Yukon Plan convinces us that it is sincere in wanting to balance conservation of wolves with harvesting and control. The BC draft Plan does not.

Why does the Yukon plan convince? Because in the beginning it admits that the wolf control programs and the use of aerial killing were very expensive and didn’t work except in the short term. This is the core of it that the BC government has been denying.

VWS does, however, appreciate the effort of the BC biologists to give us a Plan with more factual substance. We doubt that the Yukon Plan would have satisfied BC residents, who have been participating heavily in these issues for many years. However, the Yukon Plan gets right many things that the BC Plan gets wrong, or just doesn’t get at all.

The difference is immediately evident in the great photos and paw prints decorating the pages. These are public education tools. The message of these graphics is that wolves are esteemed and valuable. Although the BC plan admits that in most instances constant killing of wolves is not a solution, much of this ecoscience language becomes a thin veil tossed over a plan to enshrine the province’s War on Wolves into formal policy. The BC plan only furthers the scapegoating of wolves, enshrining in our cultural mindset constant shooting and trapping of wolves as the only way to treat them.

In the Yukon plan there are goals such as “Manage wolf populations in recognition of the enjoyment and appreciation that Yukoners and visitors have in experiencing wolves in Yukon wilderness.” ... “Conserve wolf populations in recognition of the role of wolves in ecosystems and the maintenance of biodiversity.” ... “Promote research, education programs and information sharing to enhance understanding of wolf behaviour and ecology and management decisions affecting wolves.” These goals become believable because the management plan *itself* evinces these values. And while substantive action items are few, there are some that are quite significant, such as:

“Provide input to land use planning and environmental assessment processes to protect known dens and mitigate disturbances to wolves during the period of pup rearing.”

“Amend wolf trapping and hunting seasons in regulation to enable an adaptive approach to management. Seasons should be coordinated to the extent possible to facilitate enforcement, but must be closed during the birthing and rearing period.”

“Continue to incorporate opportunities in the Environment Yukon wildlife viewing program to learn about wolves and their ecological role, and provide outreach materials for use by the wilderness tourism industry and recreationalists.

Surely there must be people in wildlife management in BC who are painfully embarrassed by the lack of such elements in the draft BC Plan.

The Yukon team held public meetings in 14 communities, reflecting a government that no longer has anything to hide or to hide from, and that welcomes the opinions of residents. Contrast this to the near shut-out of the many voices in BC that want wolves to be protected. This organization first began to learn about policy changes threatening wolves through leaks. The letters of the public are slammed into file drawers if not put through the paper shredder, and the government rarely mentions them.

It is by its consistency of tone, action and frank honesty that the Yukon plan succeeds in convincing one that the government is actually changing its tune, even though initial action items may be few, and even though VWS does not agree with all of its provisions.

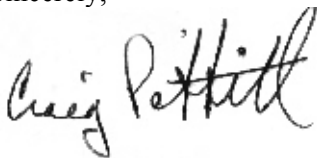
But the critical key to the trust that the Yukon document inspires is especially on the first page where it openly admits that the huge programs to increase ungulate populations by killing wolves from helicopters didn't work except in the short-term, were very expensive, and did not have public support.

Why did the BC draft plan omit any recognition of these facts reported by the Yukon government? Why did the shift in the policies and tone of the Yukon, after many years of wolf slaughter, not signal to the BC government that its position is outdated and insupportable?

Instead, the draft BC plan quotes a report on predator management from The Wildlife Society, a North American organization for professional biologists. Having read this report, which states some surprising things that would not characterize the views of many wildlife biologists we know, we are reminded of the serious split in the scientific community on these issues. The inclusion of this material in the draft BC Plan only represents those biologists working for the BC government quoting US biologists who have the same outlook as they do. There is a whole community of other biologists who have been enraged at the government's wolf killing programs. The Yukon's new plan corroborates what these biologists have been telling us, and, in our opinion, is a far more reliable source of information than The Wildlife Society report, which smacks of having been written for the very purpose to which it's being put.

If this draft BC Plan is finalized without significant changes, we doubt that putting in beautiful colour photos of wolves and decorating the pages with paw prints will make it palatable to the public. Most likely it will enrage people all the more, when they arrive at the problem elements we cite here, because the disparity between appearances and reality, claims and actions, would be intolerable.

Sincerely,



Craig Pettitt, Director
Valhalla Wilderness Society