



15 March, 2001

Hon. John Snobelen
Minister of Natural Resources
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Dear Mr. Snobelen:

This letter serves as our official response to the recommendations made to you in the final report Algonquin Wolves Advisory Group. As such it is an official comment under the Environmental Bill of Rights to **EBR posting number PB01E6001**.

The Canadian Parks and Wilderness Society is Canada's grassroots voice for wilderness. With a national membership of 25,000 and growing, CPAWS has chapters across Canada, including two in Ontario, the Wildlands League and Ottawa Valley. CPAWS Ottawa Valley has an active membership of about 1800 in eastern Ontario and Quebec, including people in the communities around Algonquin Park that would be affected by your decisions regarding Algonquin wolves.

We present this submission on behalf of our members who have a concern about the health of Canada's parks and wilderness ecosystems. We present this submission also on behalf of the many thousands of members of the general public with whom, through our public outreach activities, we have had discussions about the wolves of Algonquin Park and who support our efforts. It is with confidence, then, that we assert that our following recommendations represent not just the views of an isolated group, but of a much broader public representing many walks of life.

The subject of Algonquin Park wolves captures the interest of people for many reasons. The critical role wolves play in the park ecosystem and the broader provincial landscape is of immediate concern to our members as an organization devoted to the protection of parks and wilderness areas. It must be noted that for many, this concern also encompasses deep emotional, spiritual, and philosophical aspects that deserve respect and consideration.

The mandate of your Algonquin Wolves Advisory Group (AWAG) was to provide recommendations to you for the long-term conservation of the wolves of Algonquin park and the surrounding areas. With this as the point of departure, management decisions must be evaluated and implemented from a foundation of sound science for the best decision to be made. Should there be doubt or contention surrounding particular aspects, the precautionary principle must prevail.

As a conservation biologist and member of the population biology working group of the Algonquin Wolves PHVA workshop, I am closely familiar with details and implications of the statistical analysis and data associated with the studied population.

Year-round closed season is key to success

The single most important decision facing your ministry is the decision to go beyond the recommendations of the AWAG with respect to introducing closed seasons on the hunting and trapping of wolves in the townships surrounding Algonquin Park. All other recommendations in the AWAG report are secondary and can only play a supporting role.

The AWAG report identifies the hunting and trapping of wolves outside the park boundaries as the principal threat to the wolf population. The weakness of the one recommendation aiming to solve this problem (recommendation 18) results from an impasse within the AWAG, which you must break.

Conservation goals and sound science point to the need for a full year-round closure of hunting and trapping in all townships falling within 10 kilometres of the park and in the townships of Hagarty, Alice, and Petawawa. We call upon you to build on the AWAG recommendations by regulating this full closure. We will support nothing less.

Broad public support for a full closure

The support for a complete year-round closure of wolf hunting and trapping in the townships surrounding Algonquin park extends far beyond environmentalists. We have an ongoing dialogue with our members and the general public in the local communities, as well as throughout eastern Ontario.

Your office has received:

- Well over 10,000 letters and cards calling for year-round protection, from people from all walks of life including individual hunters.
- Hundreds of these are from people in the affected communities around the park.

Sources of support include:

- Individual hunters: Several letters to your office and under the EBR process are from local hunters who acknowledge the need for the closure of wolf hunting in the area. The current lobby against a full closure clearly does not represent all affected hunters, and probably represents only a minority of affected hunters. The ethical hunters group A Hunters' Voice, speaking on behalf of its Ontario

members, has indicated unequivocal support for the full closure.

- Local residents: Residents of the affected communities make up a disproportionately high proportion of the people who have written in support of the full closure.
- Native trappers and hunters: The Algonquins based in Golden Lake have clearly stated their position in favour of the full closure.
- Cattle farmers: Representatives from the Ontario Cattlemen's Association have stated at the PHVA conference and in communications since then that they will accept the full closure, given minor modifications to existing compensation measures.
- The general public: This issue has developed a significant presence in the media, and announcing a complete measure to protect the Algonquin Park wolf population is a good news story. There can be little doubt that the general public of Ontario will take notice and embrace such an announcement as a serious conservation effort. I am certain that this same public would greet half measures, such as a partial closed season, with cynicism, disappointment, and little respect.

Proposed seasonal closure would be ineffective and unmanageable

Our insistence on a complete year-round regulation against killing wolves in the 10 Km zone is based on sound conservation science. The partial closed season recommended in the final AWAG report falls short of ensuring a sustainable wolf population. Consider the following:

- Mortality would still exceed recruitment. During its deliberations, the AWAG was able to calculate the theoretical impact of management options on the Algonquin wolf population. The partial closed season recommended in the AWAG report would result in an annual mortality of at least 22%, still exceeding the annual recruitment rate of 21%, resulting in continued population decline. This theoretical calculation is based on some unrealistic assumptions such as 100% compliance with closed seasons and the removal of all snares from the bush during the closed season. Actual mortality would be significantly higher, placing the population at continued risk.
- It is not practical to propose a partial closed season on trapping. Snares set during the open season would remain and continue to cause mortality during the closed season. The majority of the mortality from trapping is not from registered, managed traplines, but from the indiscriminate setting of neck snares that are left behind and never checked - the intention is to kill wolves rather than harvest pelts. A seasonal closure of trapping is in effect an open season.
- Only a complete closure will meet conservation goals. Population modelling conducted during the PHVA conference found that a complete closure would significantly reduce the risk of population decline, whereas a partial closed season as recommended by AWAG would only reduce the probability of extinction from the current 100% down to 98%.
- Algonquin Park staff have insisted on a year-round closure in 4 townships used by wolf packs that are used for the popular public wolf howls. A year-round closure is deemed necessary in order to have a sufficient certainty that these packs will be protected. The same applies to the other park wolf packs.

Comments on other AWAG recommendations

Two references in the introductory section of AWAG's report need to be addressed, as they are not dealt with further in the recommendations. Section 3.1 refers to the period in the Park's history nearly half a century ago when it was policy to exterminate wolves and suggests that there was no decline in numbers. A further reference suggests that kill rates as high as 40% may be sustainable as long as wolf productivity and prey populations are high. We question the validity or utility of either of these references in a discussion concerning the present-day Algonquin population. The first is a scientifically unsubstantiated opinion and ignores differences in the broader landscape and human densities and activities of many decades ago. The latter suggestion does not recognize characteristics peculiar to the Algonquin population, specifically its low recruitment rate. These references are inappropriate and potentially misleading when considering management decisions of today.

Many of the other recommendations will serve to augment the required year-round closure and ensure the conservation objective for the wolves and for the park, and our comments on these will be brief. We consider it inappropriate to enter into a discussion regarding AWAG's recommendations regarding logging techniques within Algonquin park ostensibly for prey enhancement purposes, as CPAWS finds it unacceptable for logging to occur within any park.

We would encourage a movement away from intensive monitoring of the park wolf population, as they have already endured many years of study and provided us with an abundant source of information. Consideration should be given to conducting censuses on wolf populations outside the park as provincial population estimates appear to be based on speculation, personal opinion and anecdote rather than scientific evidence. Relying on these accounts to make management decisions is highly unreliable. Scientific research (gathering population statistics) should be based on counting live animals, not merely reports on how many animals have been killed for the fur harvest in a given year as is currently done. The most important monitoring need will be the need to monitor compliance with new regulations against hunting and trapping around the park.

We wholeheartedly endorse the recognition of the need for enhanced education and communication measures to be able to share more information with the public about this population of wolves, and the role of wolves generally in a healthy functioning ecosystem. We would gladly support any measures in this regard.

Conclusion

We are prepared to offer you our complete support if you accept the AWAG recommendations with the enhancement of the closed season being year-round. We are prepared to make this support public, both in major urban centres and in the communities near the park. Such a decision on your part would indeed be visionary and would propel Ontario to the forefront of park management and carnivore conservation - a decision worthy of celebration.

For reasons summarized above, we are not able to support anything less than a complete year-round closure.

Time is of the essence. It is time to act.

Sincerely,

ORIGINAL SIGNED BY JEAN LANGLOIS

Mr. Jean Langlois, M.Sc.
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