

Valhalla Wilderness Society

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December 18, 2008

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Hon. Barry Penner
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Re: BC GOVERNMENT'S WOLF SLAUGHTER PROGRAM

Dear Premier Campbell and Minister Penner:

No doubt you are aware of shocking articles in the *Vancouver Sun* and the *Globe and Mail* about the killing of wolves in BC, under your government's program to recover mountain caribou. These programs are killing wild horses and using the carcasses to trap wolves with snares and leghold traps, and then killing them too. The *Vancouver Sun* blog on this subject shows an infuriated public, the likes of which has not been seen in many years. The blog messages have been copied and attached to this submission.

In the face of these circumstances, your government's failure to provide meaningful protection of habitat for mountain caribou is glaring. Do you know that your government has received 12,000 letters about the mountain caribou? That 19 environmental groups have totally opposed predator killing for mountain caribou, and said that any credible plan to save the them would have to end logging of old-growth forest? That 51 scientists have signed a petition saying that the total cessation of old-growth logging in mountain caribou habitat ought to be the first priority, and that predator control is being overemphasized? They have recommended non-lethal control by decommissioning logging roads and getting snowmobiles out of caribou winter habitat, since they give wolves greater access to caribou.

The Valhalla Wilderness Society urges you to stop these slaughter programs immediately. We also deplore the secrecy and even dishonesty under which your government has pursued these programs. Please read the enclosed material and carefully reconsider these programs.

Sincerely,

Craig Pettitt
Director

Cc: Cynthia Wright, Assoc. Assist. Dep. Minister, Env. Stewardship, Env. Canada
Virginia Poter, Canadian Wildlife Service, Env. Canada
Vancouver Sun
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Submission to the BC Government Wolf Slaughter Programs to Help the Mountain Caribou

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1. Events that have generated concern about killing wolves

- Recently a *Vancouver Sun* article (Larry Pynn, Dec. 06, 2008) revealed that the BC government has been paying aboriginal people to kill wild horses to be used as bait in a wolf trapping program in the Cariboo Region.
- The government has referred to this program as “live trapping.” This is terribly misleading, since the majority of the trapped wolves are subsequently killed. Information so far turned up does not reveal how they are killed. This information should be public.
- Subsequent investigation by the *Sun* showed that the BC government had killed 24 wolves over the past year alone. (*Vancouver Sun*, Dec. 15, 2008)
- We consider these numbers to be minimum figures. The government keeps much of its predator control activities secret from the public. How many wolves are being killed may not accurately show up on government records. For instance, a document entitled “Interim Strategy for Predator/Prey Management Actions in Support of Mountain Caribou Recovery: Fiscal 07/08 and early Fiscal 08/09” lists the “predator reductions” for 07/08. However, it does not mention the project in the Cariboo Region, which killed 11 wolves in 07/08. That project is part of the caribou recovery program.
- Between 2001 and 2004 the BC government caught wolves in traps and snares in that region, in the Quesnel Highlands and West Cariboo Mountains, killing 30 wolves and sterilizing 16. The goal was to eliminate 11 packs except for the alpha male and female, which were sterilized and released so that they would fight off new wolves moving into the area. We have no information for 2005-2007.

- When the Quesnel-Cariboo Mountains project began, the project proposal said there were 3 wolf packs, of which only 2 were a risk for caribou populations. By 2004 a Progress Report said there were 11 packs. Now we hear there are 13 packs and that there are more and more wolves all the time. VWS is concerned that this appears to correlate fairly well to established science which says that wolf killing can disrupt wolf social structure, scatter individuals, increase the number of packs, the number of breeding individuals, and the number of offspring.
- The Interim Strategy for Predator/Prey Management indicates a change in strategy. Instead of killing all the subdominant animals in each pack and sterilizing the dominant pair, the new approach is to kill whole packs and sterilize the first pair of wolves that immigrate into the area. Let's be honest, this is a wolf slaughter program.
- Earlier this year, a Creston couple lost their dog, Rosie, whose legs were crushed when she stepped into a trap set for wolves. Rosie screamed in agonizing pain while being driven 23 kilometres to a vet with two traps stuck to her crushed legs.
- It is well known that smaller non-target species of wildlife are caught in these traps (a fact admitted in the Interim Strategy for Predator/Prey); the injuries can be severe, but there is no one to take them to the vet to be euthanized.
- VWS is dismayed by the letter written by BC Fish & Wildlife Director Tom Ethier to Fur-bearer Defenders, Dec. 02, 2008, in response to the death of Rosie. Mr. Ethier stated that the traps are humane for their intended species, the wolf. *No leghold traps are humane!* The steel jaws must snap down on a wolf's leg hard enough that when the animal goes into a frenzy trying to pull loose, he cannot do so. Great pain and injuries do result. Even assuming that the contracted trappers check the traps every 24 hours, that is many hours of agony for the wolves before they are killed, by what methods we know not.

2. Relationship to the mountain caribou recovery program

The BC government has said that all of the above trapping programs were part of its caribou recovery program. Throughout, the government has said that the predator killing would be accompanied by habitat protection, but this has not been the case.

Scientists agree that the chief reason for the decline of the mountain caribou is logging. And the government hasn't done anything to stop it or even slow it down. In 2005, rather than curb logging, the government proposed to go on a killing spree of nine different species of predators and competitive prey of the mountain caribou.

Scientists radically disagree in their views on the role of predation in the mountain caribou decline. There are independent scientists who are furious about the use of predator control to boost mountain caribou numbers. Fifty-one scientists signed a petition saying that the predator control was being overemphasized. It recommended as a first priority for recovery the total cessation of logging old-growth forest in mountain caribou habitat. The scientists recommended non-lethal predator control by decommissioning logging roads and banning snowmobiles to decrease predation on mountain caribou. Predators use logging roads and snowmobile tracks as a means of fast hunting. The government has done no habitat rehabilitation or closing of logging roads, and snowmobile bans have been negligible.

Nineteen environmental groups signed a letter dated November 30, 2006 to government opposing predator control as a means of helping the mountain caribou and advocating an end to logging old-growth forest in the Interior Wetbelt. The BC government had received 12,000 letters on the mountain caribou as of May 2008. A huge number of these arrived in 2006/07 with the outcry against killing predators instead of protecting habitat.

In response, the government eventually promised a plan that would protect 380,000 hectares of caribou habitat. But the policy beneath the plan was “no net loss” to the timber industry. That meant very little meaningful habitat protection. Most of the protection would be at high elevation amongst alpine meadows and sparse subalpine forest — areas that aren’t in the Timber Harvesting Land Base because they aren’t profitable to log. But in reality, the government hasn’t even done that yet. Most areas in the mountain caribou range have seen no new habitat protection; and after thousands of dollars of taxpayers’ funds, a huge amount of public input and media attention, the so-called plan isn’t even finalized, much less approved and implemented.

What has been emerging is the presence of a cynical ploy designed to undermine public demand for protection of the habitat of the mountain caribou. Declining mountain caribou have meant growing public pressure to stop logging old-growth forest, and to ban snowmobiles in mountain caribou habitat. The pressure is not only across Canada, but in Europe as well. By mass killing of predators, the government can produce short-term increases in caribou numbers, making everyone think there isn’t a problem anymore. The pressure will be removed, allowing the logging companies to get away with logging the last remaining spring and early winter mountain caribou habitat. And of course hordes of snowmobiles will continue roaring over prime mountain caribou habitat.

Over the long term the mountain caribou will die out under this program as it is currently shaped, because the old-growth forest grows high amounts of tree lichens that are the mountain caribou’s most important food supply; because old-growth forest provides shelter from early winter storms; and because mountain caribou cannot use young forest, either for food or shelter or travel. Some environmental groups have called the government’s program a “caribou extinction plan.”

3. Why are wild horses being killed?

The facts leading to the death of wild horses appear to be similar to those leading to the deaths of predators: ranchers claim the wild horses are overgrazing the range in the Chilcotin region, causing them to have to buy hay to feed their cattle. With approximately 30,000 cattle and only 400 wild horses on the range, one can hardly claim that the horses are overgrazing the range.

By killing wild horses to use as wolf bait, it appears that the government is simply satisfying the logging industry and the cattle industry at the same time. Aboriginal people, with their long cultural history with horses, would be the people most likely to protest. But with their own people earning money from it, it has become a complex subject for them and they are divided. We trust the government is aware that this is very bad optics in BC, Canada, and Europe.

4. Why many scientists and environmental groups are opposed to predator control.

Predators are part of the natural environment. “Top predators” such as wolves are far, far less numerous than other wildlife, and they have important functions to fulfill:

- A. While top predators do kill healthy prey, a larger percentage of those killed are weakened by disease, poor nutrition, genetic problems, or old age. As a result, predation maintains healthy, vigorous prey populations.
- B. Wolves and cougars leave carcasses at which bears, wolverines, eagles, and many other species feed.
- C. Top predators keep prey populations in balance with their food supply. When cougars and wolves are reduced or removed, their prey will increase, which may have the following results:
 - 1. Deer, elk and moose may multiply rapidly, exhausting their food supply. They then starve to death.
 - 2. Hooved animals (ungulates) will avoid areas commonly used by predators. These areas then offer refugia for various species of plants. When top predators are absent, high numbers of ungulates can damage sensitive plant communities, and severely impact vegetation to cause hydrological damage from erosion, as happened with elk in the Greater Yellowstone Ecosystem until wolves were re-introduced, which quickly restored the balance of nature.
 - 3. Other animals that use the vegetation — such as nesting songbirds and beavers — also disappear. Beavers are important agents of biological diversity. They create ponds, bogs, flooded meadows and rotting debris that foster many species that would otherwise not occur in many areas.
- D. Top predators keep mid-sized predators, such as coyotes, foxes and members of the weasel family, in check. When top predators are missing, these mid-sized species multiply out of balance (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 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).

Both government and independent scientists have advised the public that, in order to maintain caribou populations, wolf killing would have to be massive and prolonged, lasting perhaps 60 to 100 years. So we are talking about long term and perhaps irreparable damage to ecosystems. Yet when the slaughter stops, the wolves will rapidly rebound. The following points are summarized or quoted from a review of wolf control programs and wolf ecology by the US National Research Council in 1997:

- A. “Dispersal is a major means by which wolves expand their geographic range or immigrate to populations that could not otherwise sustain themselves ... when wolves have been intentionally harvested heavily in one or more years during a control effort, their numbers have declined precipitously; but when control efforts have ceased, wolf

numbers have rebounded to 88-112% of the pre-control densities within three to five years ... Annual rates of increase during such recoveries ... averaged about 26%, and were the result of dispersal of young wolves into new territories, rapid pair bonding, territorial establishment and breeding, shifts of pack ranges ... It has been suggested that harvest of wolves can actually result in an increase in the number of packs in an area, but there are few data to support this (but see Peterson and others 1984).”

- B. Not all wolves in a pack breed — usually only the dominant pair, called the alpha male and alpha female, mate. Some packs have two breeding pairs but larger packs have fewer breeders.
- C. When humans increase the mortality of wolves beyond natural levels, the populations of their prey soar. Consequently, biological mechanisms in the wolves kick in to amp up reproduction.
- D. Increased mortality has been shown to result in smaller packs and establishment of new packs in vacated areas; a higher proportion of breeders, increased number of pups in a litter, and increased pup survival.
- E. “Under favorable conditions, wolf populations can increase as rapidly as 50% per year (Hayes 1995).” Potential rates of increase are higher after wolf control programs.
- F. As a result of these factors, a large percentage of wolves has to be killed in a wolf control program, or else the density of wolves will increase.

The interpretation that moose, deer, elk, and their predators, the wolves and cougars, are “unnatural” to mountain caribou range and have multiplied “out of balance” is true only in the context that clearcuts and roads are the true cause of nature being out of balance. These animals are native species in mountain caribou range and they are perfectly natural in the young forest conditions caused by logging. They follow both logging and fires. *This is a problem that the government is trying to solve by cruelty to wolves on one hand, while it creates and expands the problem with the other.* Essentially, the problem can be reduced as follows: we cut down too much old-growth forest, now we’ve killed too many caribou; let’s solve it by wiping out wolves. That, in our view, is a very hazardous, cruel and irresponsible approach.

5. Needs of the mountain caribou are being ignored

As you know, the mountain caribou, an ecotype of the woodland caribou, lives only in BC, for the most part, and is unique in all the world for its adaptations to live in the heavy snows of rugged, heavily forested mountains of the Inland Temperate Rainforest Region. Only British Columbia can save this animal.

The habitat of the mountain caribou is old-growth forest 140 years and older, at all elevations. Scientists agree that the chief cause of the decline of mountain caribou is loss and fragmentation of habitat. This happens chiefly because of logging and logging roads. On October 16, 2007, when announcing its new mountain caribou recovery project, the BC government stated in an information backgrounder:

“Habitat loss and fragmentation has been identified as the underlying cause of mountain caribou population declines since 1995, with mortality by predators as the secondary cause. Halting and reversing habitat loss is central to the plan’s success.”

What this statement does not say is that logging and snowmobile usage *cause* the increased predation — facts that are widely accepted in scientific circles. And why is it that the “central” part of the government’s “plan” has never yet materialized whereas predator control through hunting and government trapping programs paid for with taxpayer’s dollars is in full swing?

Some scientists consider snowmobiling and heli-skiing to be the second greatest reason for the decline of mountain caribou. The presence of the machines displaces the animals from their preferred feeding grounds at a very critical time. Mountain caribou, left alone, could spend the winter free of predation. They go to high elevations where the snow is deep. Wolves cannot travel in snow 40-45 cm deep. This would exclude a lot of mountain caribou habitat from predation, except that skiers and snowmobiles make tracks in the snow, and wolves take advantage of these packed areas. Snowmobiles seek out gentle terrain in the high country so that they can roar 60-100 kph across the snow. The best areas for this are swarmed with snowmobiles which, in packing down the snow, literally destroy the conditions that have made the high elevations safe for caribou in winter.

The government recovery program has done almost nothing to get snowmobiles out of mountain caribou habitat. Instead it has negotiated agreements with snowmobile clubs to monitor themselves, and it’s providing them with money to do it. But it is the very presence of their machines that causes many caribou to avoid prime habitat areas, and monitoring will do nothing about the trails they leave in the snow for predators to follow.

6. What is the best policy for the mountain caribou?

The solutions being sought are all part of the problem of single-species protection. We ought to be addressing ecosystems at risk rather than species at risk. The forest must be protected for all the multitude of values it holds. That is what would give the mountain caribou the best chance of survival. The decline of the mountain caribou tells us that many more species are being lost because of the destruction of our high-biodiversity low- and mid-elevation forests. Scientists have found 283 lichen species in the lowland Inland Rainforest, of which about 75% were found in old-growth.

In addition, the value of these forests for absorbing and storing carbon is so huge that the old-growth should not be logged on that count alone. In a province losing over 9 million hectares of dry pine forest, it is staggeringly ignorant to be logging the remaining old growth of the humid forests.

7. Why government wildlife programs have not earned the trust of the public

Like BC’s Ministry of Forests, which sees its function as assisting logging companies to cut down every stick of accessible forest, some within the departments responsible for wildlife see their job as one of manipulating wildlife populations to make it easy and convenient for hunters to bag their kill, and to keep the ranchers happy that no wild horses are getting any grass, no predators getting any cattle. This view is also promulgated by the political levels of government,

which use the various ministries to serve economic interests that will profit them politically. For such people, be they however few, killing wolves to save an endangered species is the licence they have always wanted. There are hidden agendas riding on predator control, as there always have been.

This has made wildlife management ministries strangely out of step with science, such as that which shows the key functions of top predators in ecosystem health, and the dangers of increasing wolf populations by trying to limit them. And it is likely the reason why predator control so often devolves to least-cost methods that are shockingly cruel and out of balance.

The Valhalla Wilderness Society has reviewed a number of government documents about predator control programs that were not publicly distributed, but neither were they inaccessible to groups such as ours that take the time to do research and make inquiries. These documents uniformly give a portrait of concern for humane methods and much care taken for safety purposes. But the rhetoric does not match what is actually happening on the ground.

For instance, the government document “Interim strategy for predator/prey management for mountain caribou,” speaks expansively of the reasons why trapping and snaring are not a good idea and why mysterious other, more humane, methods must be used. But trapping and snaring are exactly what is happening.

We are told that traps can be set so that they do not catch smaller, non-target species. But why was this not done in the case of the traps that caught Rosie?

The government knows very well that domestic animals such as dogs and cats get caught in wildlife traps. One government trapping proposal for the Cariboo Region is careful to state that there will be signs put around the traps so that people out walking their dogs will be able to remove them from the area. Yet near Creston, the traps that caught the dog Rosie were set next to a road without signs. The Director of Fish & Wildlife, Tom Ethier, in a letter to Fur-bearer Defenders (December 02, 2008) stated: “Regional staff report traps have been tripped, tampered with, and even stolen recently, and it was a Ministry decision not to post this wilderness area.”

These are only representative examples of a lack of good judgment and humane consideration that has always accompanied predator control. In the 1950s, the BC government was leaving 2,000 large poisoned baits annually for wolves (M.M. Paquet, 1997), specifically to make it faster and easier for hunters to bag their “take.” Predator control is born of least-cost methods regardless of the consequences on wildlife, and despite promises to the contrary, that is where it usually devolves.

The government has claimed that it is being “highly selective” in killing only individuals posing a direct risk to caribou. Yet setting out a carcass of rotten meat that will attract any wolf or any other kind of carnivore in the area, with traps and snares that indiscriminately snap shut on whatever steps into them, such as the blue-listed wolverine, is not selective at all. Yet none of the documents report on the “by-catch” of other animals.

The government’s Interim Strategy for Predator/Prey Management states:

“removal of entire packs may be possible in some areas with trapping/snaring (if that is the goal) but if unsuccessful could lead to disrupted pack social structure and ultimately higher birth rates and perhaps subsequent kill rates on caribou.”

Yet, out the other side of its mouth, the government is assuring the public that the killing would be “highly selective” for only certain offending individual wolves. Has the Ministry of Environment already caused a great increase in the wolf population in the Cariboo Region after many years of wolf killing? We do not know. There is no mechanism for independently evaluating these projects.

But we do know that on April 27, 2006, an article by Larry Pynn in the *Vancouver Sun* ran a follow up to a wolf sterilization program in the Muskwa-Ketchika area of northern BC. The article stated:

“Documents obtained by the *Vancouver Sun* through freedom of information legislation show that the wolves being studied have actually increased in number and perhaps increased their level of predation on ungulates as well... Since the study started in 2003, ministry officials have sterilized 26 wolves in two packs at a cost of up to \$2,500 per wolf ... The documents include a letter from Environment Minister Barry Penner saying "the research project has been very successful."

8. Why the mountain caribou recovery program lacks credibility with the public

The caribou recovery strategy has similarly gravely damaged public trust. In October 2007 the BC Government dazzled the world with a bold new plan to protect 2.2 million hectares of habitat for the critically endangered Mountain Caribou. However, in reality the government had simply brokered a deal between the logging companies, snowmobile clubs, heli-skiing businesses and ten environmental groups on a framework for a plan, which chiefly said that it would *not allow any significant impacts to the timber industry*.

The ten environmental groups had formed a coalition called the Mountain Caribou Project, which was represented in the negotiations by California-based ForestEthics, a group that specializes in negotiations with industry, and Wildsight, an East Kootenay environmental group. The groups were forced to sign confidentiality agreements obliging them to keep the terms of the negotiations secret from the public and from their colleagues in the environmental movement. To the outraged protests of many in the BC environmental community, when the agreement was finally announced, the representatives of the Mountain Caribou Project all claimed that they were helpless to achieve any more protection.

For an animal threatened with extinction by logging, the three biggest issues in any protection plan would be: 1) How much will the rate of logging be reduced? 2) How much of the Timber Harvesting Land Base will be protected? 3) Where will the new protection be located?

The deal reached in these secret negotiations answered these questions as follows: 1) There can be no reduction in the allowable annual cut significant enough to affect the logging companies adversely for five years. 2) No more than 1% of the Timber Harvesting Land Base can be protected. Although 1% of the Timber Harvesting Land Base is 115,000 hectares, the negotiating

parties agreed to accept only 77,000 hectares for protection. 3) The location of the protection will be worked out later.

Out of 2.2 million hectares of new protection, only 380,000 hectares would be new protection. The government has been planning to load caribou habitat with hundreds of thousands of hectares of high-elevation protection in areas that are unprofitable to log because they have only poor quality, sparse subalpine forest. This slammed the door on protection of the low- and mid-elevation cedar-hemlock forests that are also important for caribou, as well as many other species. The Valhalla Wilderness Society estimates that after the five-year time slot for logging-as-usual, most or all of the accessible low- and mid-elevation mountain caribou habitat will be fragmented with clearcuts.

In answer to much criticism from within the environmental community, on February 11, 2008 the Mountain Caribou Project issued a statement with the following information on the deal they had negotiated with government. They said there was a government commitment that:

“Elevated predation rates are explicitly recognized as a secondary effect of habitat loss and fragmentation; the plan requires that predation management *be supported by publicly reviewed scientific rationales.*”

Where are the publicly reviewed rationales? At the point that the Mountain Caribou Project sent out this document, behind the scenes MOE was paying native people to shoot Chilcotin wild horses for wolf bait. In addition, increased killing of predators had already been implemented in several planning units under the guise of relaxed hunting regulations that started in 2007. Major changes in the Thompson Region include extended seasons for cougar, wolf and black bear, as well as removal of the bag limit on wolves. The Cariboo and Omineca regions had both removed bag limits on wolves.

What we have had, repeatedly, is fine-sounding claims by government on one hand, and rank, quite opposite action on the other. This has terribly undermined the trust of the public.

9. Conclusion

At many kinds of stores in British Columbia, one can buy postcards with photographs of wolves on them, praising British Columbia or Canada as the place where these animals live. Over many decades a number of wolf researchers, including Farley Mowat and David Mech, have brought to the public both the ecological functions of top predators such as wolves, and the intricate pack life of wolves — especially the elaborate training and care they give their young. These books and films have bridged the gap between humans and fellow species. Wolves have become thrilling living things to be respected. And much of the public “gets” the ecological role of wolves and other top carnivores. Predator control infuriates the public and so governments hide the dirty deeds as best they can until the news leaks out.

Today British Columbians are living in a glaring contradiction, because the government says one thing and does another. Wolves have become the sacrificial lambs of a government, a forest industry and numerous snowmobilers and heli-ski businesses that need to cast the blame and the consequences of their activities on the mountain caribou somewhere else. These groups are not inclined to admit that they are so greedy and selfish that they do not want to give up anything to save an endangered species.

This growing tragedy is about human greed and ruthlessness that can be stopped now, but only if the government sincerely wants to try to recover the caribou, rather than covering up an abject disregard of a major, beloved species unique to British Columbia with fine-sounding but empty words. This is no different from cutting down forests that are British Columbia's greatest terrestrial carbon sink, while planting baby trees in Vancouver and trading carbon credits, or allowing coal development while mouthing climate concerns. This same double-face and double-talk is leading to the destruction of the mountain caribou. The first glimmer of hope for the mountain caribou will be the preservation of the remaining low- and mid-elevation old-growth forests in caribou habitat, as well as rehabilitation of habitat that has already been clearcut.

Sincerely,

Craig Pettitt
Director