

Valhalla Wilderness Society

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ACTION ALERT!

NOW IS THE TIME TO HAVE YOUR SAY ABOUT THE TRAGEDY OF CARIBOU HABITAT DESTRUCTION THAT IS KILLING OUR CARIBOU, WOLVES AND COUGARS

BC invites the public to comment on new permits for slaughtering predators
Please fill in the online survey
at <https://engage.gov.bc.ca/caribou/predator-reduction/>

DEADLINE November 15, 2021

THE VALHALLA WILDERNESS SOCIETY'S VIEW

VWS opposes wolf killing in the region where we work, which is the Interior Wetbelt of BC, inhabited by the "Southern Group" of caribou, aka Deep Snow Mountain Caribou. The habitats of the Central Selkirk, North Columbia, North Cariboo Mountains and Hart Ranges herds of these caribou are proposed for wolf culls from helicopters. We oppose it because:

1. Wolves play key roles in balancing ecosystems and protecting biodiversity.
2. The major causes of the decline of these Deep Snow caribou are the loss and fragmentation of old-growth by logging and roads, and displacement from high-quality winter habitat by snowmobiling and heli-skiing.
3. Non-lethal predator control is necessary for all mountain caribou. Preserving the remaining old-growth and mature forest around caribou herds is a very effective method of non-lethal predator control, and is recognized as such by Environment and Climate Change Canada. Preserving forests that are old enough to be of little use to moose, deer and elk will also block predators. For Deep Snow Caribou, another key form of non-lethal predator control is keeping snowmobiles and heli-skiing out of their winter habitat. Thirdly, deconstructing roads is known to be effective.
4. VWS cannot tell you that lethal predator control is everywhere and always wrong. We do support killing individual cougars in the immediate vicinity of the Central Selkirk herd, which has only 27 animals, for a limited amount of time.
5. As we explain below, the present system of slaughtering predators is being used as a substitute for habitat protection, to preserve or increase caribou numbers and claim "success" while habitat protection is endlessly delayed.
6. It is now widely recognized by scientists that there is a threshold to habitat disturbance, beyond which it will become impossible to achieve self-sustaining caribou herds, if indeed they can be

saved at all. (1) Years of scientific research have shown that caribou populations decline in proportion to the percent of their range that's disturbed. Environment and Climate Change Canada has made it clear that the habitat of some Southern Mountain Caribou herds may be close to the threshold or even past it.

VWS is aware that some herds of the Central and Northern Groups have experienced extreme habitat disturbance. We note that residents of the Peace River area heavily favour lethal predator control, which is already entrenched and fairly *fait accompli*. We are interested to see whether their efforts can turn around caribou decline in the long term. We note that the current predator killing permits were obtained under the promise that it would be carried out for only a short time of 5 years. Now they are asking for the permits to be renewed. It was always known that saving caribou with too little habitat left would require decades of predator control.

SUGGESTIONS FOR THE ONLINE COMMENT FORM

What are the three greatest causes of caribou decline?

VWS believes they are 1) Damage to caribou habitats from natural resource extraction, 2) climate change, and 3) forest fires. We would **not** check predation. The government's own material shows that abnormally increased predation of mountain caribou is caused by habitat loss through logging, roads, pipelines, etc.

Drag and drop the methods of caribou recovery in order of priority.

VWS recommends: 1) Habitat protection (regulating land use); 2) Habitat restoration; 3) Management of motorized winter recreation (snowmobiles and heli-skiing).

Do you agree predator reduction is a necessary action for caribou recovery?

As there is no room to specify non-lethal predator control, we would mark "disagree" or leave it blank.

Respondents are asked whether to add or delete herds from the predator kill list.

VWS directors will check the Deep Snow herds, ie, Hart Ranges, North Cariboo Mountains, North Columbia and Central Selkirk herds, to be taken off the predator control list. Below we tell why we particularly oppose predator control for these herds. However, the ability to add herds to the list is disturbing. Why would predator culls for caribou be considered without scientific data analysis?

The form provides a space for written comments.

Be aware that it only allows 74 words by the count of our computer. At that point it will not add or erase text.

THE MOUNTAIN CARIBOU —The planning material breaks the mountain caribou down into three groups:

- Northern Group — has thousands of animals across a vast area in BC, Yukon and Northwest Territories. VWS has no "boots on the ground" in the north and does not feel we have adequate information about these herds. However, we are very concerned about several Northern Group herds in the Chilcotin that need habitat protection.

- Central Group — Caribou of the South Peace region in BC and Alberta; they number less than 500 animals, suffer from massive habitat disturbance, and are Endangered. In 2018 the BC and federal governments negotiated an agreement with two First Nations that included a sizeable chunk of habitat protection, as well as wolf culls and maternity pens.
- Southern Group — This is the federal government’s name for the Deep Snow Mountain Caribou. They live in BC’s Interior Wetbelt, and are totally dependent on its old-growth Inland Temperate Rainforest. They are the only caribou in the world that spend winter at high elevation in rugged mountains, in snow up to 10 metres deep. Canada’s committee for assessing species at risk has classified them as unique, irreplaceable and Endangered. There are only about 1,250 animals in 16 herds. Three Deep-Snow herds are proposed for renewal of predator cull permits and one herd is proposed for a new permit, representing an enlargement of the area where wolves will be slaughtered. These are the Hart Ranges, North Cariboo Mountains, North Columbia and Central Selkirk herds.

BACKGROUND OF THE PROCESS

Planning to save BC’s caribou began in 1988 and was focused at first on the Deep Snow Mountain Caribou of the Interior Wetbelt. After years in which carefully formulated strategies were shelved and planning committees disbanded, the Mountain Caribou Recovery Plan (MCRIP) was finally created in 2009 and set aside some habitat for each planning unit. The habitat protection contained very little of the low- and mid-elevation forest that the caribou were losing to industry; in fact, a lot of it wasn’t fit for caribou at all due to steep slopes, fragmentation by logging, or fires. So habitat destruction continued, and when the caribou continued to decline, no additional habitat protection has been provided since for the Deep Snow ecotype.

In 2018 the federal Environment Ministry intervened under the *Species at Risk Act*. By then it determined that the 54 herds of “Southern Mountain Caribou” are under ***Imminent Threat to their recovery***. It urged IMMEDIATE action including more predator reduction and new habitat protection. (2)

The only new habitat protection that ensued was a significant amount in the area of several small herds in the South Peace region. The remaining 50+ herds have received no new habitat protection, nor have the provincial or federal governments committed to providing any. Instead BC issued draft “herd plans”. Three years later we have neither habitat protection nor herd plans.

The government says it is consulting with First Nations and “stakeholders” (logging companies, oil and gas companies, snowmobile clubs, heli-ski businesses, hunting and trapping organizations, and regional districts and municipal councils) on the herd plans. All the while some of these same industries are logging more forest, relentlessly reducing the basis for future survival of the caribou. In some cases the government itself holds the tenure to the land and is selling the forest for logging under the auspices of its own Crown corporation, BC Timber Sales.

In the final analysis, VWS believes it is inappropriate in the extreme, at this late date, for the government to ask for more predator control permits without making the slightest commitment to increase habitat protection for other herds besides the couple in the South Peace region. This lengthy history of stonewalling on habitat protection is about the fact that the Deep Snow ecotype inhabits some of the most lucrative forest to log in Canada, and the BC government is dragging its feet so as much of it as possible can be logged. That is the whole basis of this tragic situation, and it is unacceptable.

SUCCESS OR FAILURE?— The chief claim of the government’s engagement material is that its predator culls have largely been successful at increasing their respective caribou herds. Keep in mind this view from Environment and Climate Change Canada:

“In the majority of cases where short-term trends appear to be stabilizing or increasing, the trend is recent and attributed to intensive predator management, sometimes combined with maternity pens and management of primary prey. In the past, the cessation of such actions in the absence of appropriate ecological conditions has resulted in a continuation of caribou declines.”

“Imminent Threat Assessment”, Environment and Climate Change Canada, 2018, Pg 9

Sadly, success or failure is measured in terms of how many caribou there are. This can be very deceptive because the herds fluctuate from year to year; and because habitat destruction is ongoing, there is no guarantee that what is here today will be here tomorrow. As long as predator slaughters are used to aid, abet and prolong habitat destruction, we are moving towards a place where killing predators will NOT be successful. When the ultimate cause of the decline is admitted to be the loss and fragmentation of habitat, success should be measure in the habitat protected.

Already, the claims of successful predator reduction for Deep Snow Caribou are questionable.

The only significant increase has been with the North Columbia herd. The government killed 58 wolves and 11 cougars over 5 years. The herd went from 147 to 159 animals. Previous to those 5 years, over 80% of moose in a wide area surrounding the herd were killed in a program that used hunters. (3) This is rated as a success; but the engagement website material doesn’t tell you that their habitat is still being logged. The 2018 draft “herd plan” states that 35-40% of the remaining old-growth forests is unprotected and is being logged; much of it consists of the low- and mid-elevation old-growth that is crucial to the caribou in spring and early winter. All summer there were protesters on a logging road entering this herd’s habitat.

The engagement material also doesn’t mention that two small fragment herds, the Columbia South and Frisby-Queest herds, were covered by these same lethal predator and moose control projects, but failed to increase. This suggests that perhaps something else was the problem, and both herds have a history of being displaced from their favoured winter habitat.

For the Central Selkirk herd, 23 wolves were killed over two years; additionally 10 cougars were killed from the ground. The herd has produced one new calf, but no significant population improvement. VWS followed the census reports for this herd for over ten years, and there was never a mention of wolf predation on this herd. Over the past three years, the only predation documented on this herd was by cougars. Past government census reports as

well as VWS field observation indicate that displacement from high-quality winter habitat by snowmobiles and heli-skiing is a fact for this herd and is likely the largest cause of its decline.

The government killed many more wolves — 123 over two years — for the Hart Ranges herd. The government's engagement website admits that the increase in the population was only *slight*. It is too early to call this a "success".

The claims of success don't tell you about the failures. The Quesnel Highlands herd failed to experience significant increase after almost 20 years, off and on, of wolf killing and sterilization. An independent review by an expert predator control biologist told the BC government that something besides wolves must be the cause of the decline.(4) The South Selkirk herd was all but wiped out after three years of wolf elimination, cause unknown.

All this indicates that wolf slaughters may not be very effective in the Interior Wetbelt. After all, these caribou alone have protection from predators in winter because they spend it in the high mountains with up to ten metres of snow (as long as snowmobilers and heli-skiers don't pack the slopes, making the caribou more accessible to predators). Something like this received unexpected support from a scientific study.

SCIENTIFIC VIEWPOINTS — In 2019 Serrouya et al (2019) published a statistical analysis that concluded that wolf culls and penning of pregnant cows were the best methods to protect caribou. (3) The authors urged that these methods should be expanded and intensified.

However, another team of six scientists from three universities, headed by a retired Canadian Wildlife Service biologist, spent months re-analyzing the data used in that study. (5) They found "no statistical basis for wolf culls and maternal pens in the conservation of mountain caribou." (Harding et al 2019). However, their statistical analysis suggested that the various ecotypes of caribou respond differently to predator culls and maternity pens. Their peer-reviewed journal article cited the following factors that may explain why:

1. The Deep Snow ecotype is dependent upon low- and mid-elevation forest old enough to grow tree lichens for the food, and also to provide shelter from early winter storms. They may be more sensitive to forest habitat loss than other kinds of caribou.
2. They are uniquely sensitive to variations in yearly snowpack. Such variations can be deadly to these caribou.
3. Wolves are not the primary predators of the Deep Snow Caribou; they constituted only 5 to 10% of verified cases of mortality in studies by Furk et al (2008) and Apps et al. (2013), whereas they account for 50-55% of verified mortalities of the Northern and Central Mountain ecotypes. The cause of most predation mortalities of the Deep Snow ecotype is shared by cougars, bears and wolverines.
4. The Deep Snow Caribou are more vulnerable to snowmobiles and heli-skiing, whereas the other ecotypes of mountain caribou seek out shallow snow so they can dig for terrestrial lichens — not good snowmobiling/skiing terrain. Displacement from high-quality winter habitat in steep mountains makes the Deep Snow ecotype susceptible to avalanches and stress.

In 2020 Dr. Serrouya et al. led another research team that published another paper.(6) They said:

“Short-term recovery actions such as predator reductions and translocations will likely just delay caribou extinction in the absence of well-considered habitat management ... Overall habitat loss has not decreased since the release of federal policy instruments for woodland caribou ... in fact, the mean annual loss after the release of the strategies/plans has increased up to 262% ... In the case of the Southern Group, the stated goal of stabilizing population declines by 2014 has not been achieved, nor has the goal of protecting ‘100% of the high suitability winter habitat’ (MCRIP 2007) due to the continued net loss of habitat in some ranges ... Given the current extent of habitat changes from human causes and forest fire within many woodland caribou ranges, annual predator reductions have been increasingly used to improve caribou survival and avoid their near-term extirpation ... However, this action alone will not lead to self-sustaining caribou populations because the method does not address the ultimate causes of decline ... In this sense, predator reductions are a palliative measure as caribou populations are prone to returning to decline soon after such actions cease ... Further it is likely that effective predator management would become increasingly difficult or impossible, as landscape alternation increases. Our study suggests that unless human-related habitat alterations are adequately addressed, the recovery of most woodland caribou populations seems unlikely.”



MISLEADING RHETORIC ON THE ENGAGEMENT WEBSITE

Government claim: They have made “significant efforts” and spent loads of taxpayer dollars to recover caribou, but it hasn’t worked.

VWS Response: A major part of the money and effort are spent on collaring wolves and shooting them from helicopters; maternity pens; moose reductions and other population management techniques. In 2017, when the government was carrying out wolf culls for only two herds, the federal and provincial government’s Protection Study showed that 54% of caribou expenditures were for these purposes. (7) The engagement material states that in 2020-21, 237 wolves were killed at a cost of \$1.4 million; and that wolf culls cost \$100,000-\$175,000 per caribou herd. What concerns VWS most is that the ongoing destruction of habitat may be sentencing the caribou to extinction. Investing funds into permanent habitat protection would give the caribou their best chance to survive, and provide a legacy for the future that would help protect other species and mitigate climate change. Investing millions of dollars in predator control leaves the public with nothing to show for it if the caribou cannot survive.

Biased statement: “The main threat to most caribou populations is a high rate of predation by wolves, bears and cougars that is out of balance from the natural cycle.”

VWS response: This sentence is inaccurate and contradictory to much that is said honestly on the website. Human activities are the main threat to caribou, especially the loss and fragmentation of habitat. Context on the engagement website shows clearly that habitat disturbance is the initiating cause of elevated predation rates. Yet summary statements that put predation first have become almost jingoistic in government material. This is not

disconnected from the fact that predator killing is being put first before habitat protection. And what result does the government expect to hear from people when they are told the main threat is wolves? The predictable response is demands to kill them.

Claim: "Although wolves are not new to British Columbia, their numbers have increased. The increase can be attributed to discontinuation of large-scale predator eradication programs in the 1980s and to landscape changes in caribou habitat."

VWS response: In the 1950s through the 1980s, in great human ignorance and avarice, the government dropped poisoned baits from airplanes over a large part of BC, killing wolves and many other species besides. (8) Hundreds of wolves were slaughtered from helicopters in the Muskwa-Kechika region to create more game for hunters. (9) The result of these projects was a boom-and-bust cycle in which abundant game created by the wolf culls created a rich feast to give the remaining wolves a quick comeback. Packs were broken up and new groups formed, resulting in more packs and more pups.

Unlike the Deep Snow Caribou, the Northern and Central Groups evolved in close contact with wolves. Why did predation increase and decimate some of these herds? According to a 2014 report from the BC Ministry of Forests (11), the following was the situation of the Central Group at that time: Industrial activities had destroyed caribou habitat at low elevations. Herds that once migrated between high and low elevations now confined to high elevations, but industrial impacts were now encroaching upon high-elevation habitats too. Approximately 142,757 hectares of low-elevation caribou habitat had been clearcut. Approximately 100,000 hectares of low-elevation caribou habitat had been impacted by oil and gas activities. There were 99 oil and gas companies operating in the South Peace region, with over 254 oil and gas wells approved in 2009 alone. (12)

Although killing wolves for caribou had begun in 2014, government biologists had also learned lessons about catering to hunters. The 2014 BC Wolf Management Plan, still in effect, states: "No Reduction of Wolves to Enhance Ungulate Populations for Hunting: In the 1980s BC abandoned predator control programs aimed at increasing populations of game species and current policy does not support predator control for the purpose of enhancing ungulate populations for hunting." (13)

Misleading: The decline of the caribou is an EMERGENCY situation requiring immediate SHORT-TERM intervention in the form of predator killing, whereas habitat protection is a LONG-TERM solution.

VWS Response: The engagement website does say that caribou need both long term and short term solutions. The text and illustrations are laudable in that they include habitat protection as one of the "multiple levers" that are necessary to recover caribou. But what does this mean when there is not even a commitment to protect habitat in the presentation? When these choices are characterized as an "emergency" requiring immediate action versus habitat protection that "takes a long time", which solution is going to get the action and the money? Which solution is any uninformed public going to choose? For how many years should predation be called an "emergency"? When does the "long term" solution arrive if it never gets started because the "short term" "emergency" actions must keep taking priority? Obviously never, because the "short term" solutions allow the habitat to be logged until there's nothing left to protect. Logging of old-growth and mature forests is not slow, it is

imminent in the vicinity of our caribou herds and occurs every year. Why isn't the government telling us that *THAT* is an emergency? Why isn't the short-term solution a moratorium on logging, or simply not signing logging permits around caribou areas? Listen closely to the biologists and their words and illustrations will tell you: the long time is because it takes a long time for clearcuts to grow mature forest that can feed caribou — 140 years. This whole miasma diverts attention from what is really the critical issue: protection for the remaining old-growth and primary forests. That wouldn't take a long time, given a moratorium. Instead we have this situation:

Palm, E. C., et al., “The long road to protecting habitat for species at risk: the case of southern mountain woodland caribou,” *Conservation Science and Practice*, May 2000.

“We use the declining southern mountain population of woodland caribou (*Rangifer tarandus caribou*) in British Columbia, Canada as a case study to show that identification of critical habitat does not guarantee its protection on non-federal lands. Our analyses show that 909 km² of critical habitat identified on provincial lands were logged in 5 years after it was legally identified under SARA [the *Species at Risk Act*]. Existing provincial legislation and policies have provided incomplete protection of caribou critical habitat, and Canada’s federal government has yet to exercise authority under SARA that could protect these areas ... The BC provincial government has attempted to address the proximate cause of population declines (increased predation on caribou) through predator reductions and maternity penning to boost calf survival ... However, these emergency approaches do not address the ultimate cause of caribou declines and should only be used as tools to complement long-term efforts that protect and restore habitat.”

False: Slaughtering wolf packs from helicopters is the most *humane* way to kill them. It is really “*euthanization*”.

VWS Response: Euthanasia means a relatively painless death. The reader can be the judge whether chasing wolves down with helicopters and spraying them with bullets from automatic weapons is humane and painless to the wolves.

Misleading: You can't permanently get rid of the wolves. Every year they come back and you have to go out in helicopters and shoot them again.

VWS Response: Persistent slaughter of wolves annihilated them over much of the US. The ecological damage that was done was devastating. This is why some US parks and states have imported wolves from Canada, to reestablish them. BC also eliminated wolves from a large part of BC some decades ago. But even if that doesn't happen, with the aim to kill 80-100% of wolves per year, ecosystem functions of the predators are largely lost. Today conservation biologists speak of the “extinction of ecosystem functions”. It means that a species might still be present, but not in enough numbers to keep the ecosystem in balance. For instance, a disastrous, fatal disease of deer and other hooved animals, called Chronic Wasting Disease (CWD), is spreading across Canada but has not yet reached BC. Studies have shown that cougars and wolves are capable of early detection of prey animals with CWD. Cougars have been shown to prey selectively on infected animals. (14) These large carnivores are the protection network for BC big-game animals, yet the net is being weakened by massive reductions of predator populations.

HEAVY PRESSURE FROM HUNTING GROUPS — In the winter of 2019-20 the government announced new wolf culls for caribou over a greatly expanded area, having sent the consultation document to a list of “stakeholders”. The list included four environmental groups, five hunting/trapping organizations, ten heli-skiing, cat-skiing and snowmobile groups (mostly commercial), four logging companies and various government representatives. Such a consultation list is heavily stacked toward killing predators.

VWS has viewed materials by various hunting groups. They can be seen to be exploiting the caribou issue, claiming that moose, elk and deer are in the same imperilled state as caribou (which isn’t remotely true). Their issue is this: Habitat destruction in BC is so extreme in some places that even the animals that hunters prize — deer, elk, and moose — are suffering sometimes dramatic declines. Hunts for moose or elk have had to be cancelled in some management units. They are urging increased, systematic, government-sponsored predator killing to make up for the losses, and they include black and grizzly bears as well. You can find a special report on this on the VWS website at www.vws.org

Sources

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