



JUST BEINGS

WOLF AWARENESS



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cc. Honourable Steve Thomson
Minister of Forestry, Lands and Natural Resource Operations
P.O. Box 9049
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November 21, 2013

Dear Mr. Macdonald, thank you for listening to our concerns about the BC draft wolf management plan put forward in November of 2012 during our last meeting. We have learned that in the short public comment period that followed (less than 3 weeks), 1614 comments were submitted in opposition to the plan, which is a substantial number. More than one year has now gone by and there is no information available about what stages the draft is at. I am disheartened by the whole process and would like to bring forward my concerns about this as well as reiterate the ecological and ethical aspects that are missing from the original draft.

In terms of the original draft plan as it was laid out, it was lacking information and citations from recent peer reviewed scientific publications which are extremely relevant to management methods. In honesty, it seemed like a high school paper lacking a thorough understanding of wolves as a species or evolutionary unit. The comment period was unjustifiably short for realistically capturing the majority of public concerns. While many of the comments submitted requested an extension of the comment period and a proper peer review of the draft plan, both of these requests made on behalf of scientists, NGO's and public were denied. The information I have received from the government, specifically Tom Ethier, FLNR Assistant Deputy Minister of the Resource Stewardship Division has been superficial and not answering my questions. A colleague of mine with similar concerns has received the same form letter in response to his questions and this is inadequate. The process seems to be lacking transparency and qualified participation. Please let me know what the outline of the entire process is and what timeline has been set forward. Please also inform me as to what changes have been made based on comments received.

In the meantime, the "draft" has come into effect in many ways and hundreds of wolves are being wrongfully persecuted, leading to: social chaos which will exacerbate conflicts with humans, disrupting the ecological role of the wolf pack as a top predator and



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keystone species, temporarily putting mountain caribou on life support while more of their habitat continues to be destroyed and fragmented; nullifying our chance of maintaining predator-prey systems and rich biodiversity and disqualifying the province from the benefits of ecotourism.

Below are the main issues I have with the draft proposal, and I know these are shared with many of my fellow peers and supporters of large carnivore conservation as a means to preserve biodiversity.

- There is no plan for establishing areas for large carnivore conservation that would ensure wolf viability in perpetuity
- Wolf populations cannot be controlled by hunting/trapping as this can cause - among other things- an increase in breeding (as stated on pg 13 of the draft management plan) as well as increase conflicts with humans
- Contemporary science has shown us that the wolf family, or pack, should be viewed and treated as an evolutionary unit. This is essential for wolves fulfilling their ecological role. Any plan MUST consider the social stability of wolf families in order to ensure the conservation ecological functioning of this species (1)
- Cumulative impacts were not considered, rather each separated and cited as "non-detrimental"
- Currently approximately 30% of BC is leased for grazing cattle. This is public land capable of supporting high ecosystem values. The Conservation Officer Service should not be setting traps for wolves on public lands. Furthermore, the livestock industry is in desperate need of information on preventative husbandry methods and the CO service is not qualified nor knowledgeable in providing this (as told to me by an anonymous but reliable CO). The draft plan claims otherwise when this is simply not the case.
- Ecotourism would benefit our economy far more than trophy hunting ever could, as research has shown and Yellowstone National Park is a great example, bringing in millions of dollars each year to the surrounding area from visitors who want to experience wilderness and wolves
- Ethically, a species should not be considered to need to "serve a human purpose" such as recreation. Wolves are highly intelligent and sensitive and their intrinsic value and ecological role are worthy of preservation.



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- Regarding Caribou, the recommendation to kill wolves in southern BC where caribou herds are small and fragmented would have to be continued indefinitely to keep these isolated caribou populations alive, and I do not believe that that this is ethically nor ecologically sound. Disrupting the social structure of wolf packs can cause trophic cascades that may be irreversible.
 - New logging has started in Caribou habitat
 - There is no idea as to how commercial recreation rules are being followed as there is no 3rd party oversight
 - There is no idea about how many mineral roads or drill sites have been created in caribou habitat. There may be none but no-one is tracking this.

Unfortunately, the draft failed to recognize the unique gene pool of Coastal wolves; recommended by biologists to be classified as a unique evolutionary unit. I see this as an opportunity to create an everlasting future legacy of stewardship. Please help to ensure that the chance to improve the lives these sentient animals, as well as benefit the intricate web of life, is not missed. Please help me and others concerned to ensure that large predators are treated with respect and managed using the most contemporary science that includes morals.

Thank you for your time and help in addressing these concerns. I look forward to learning more about the process of defining this management plan and hope that the changes made to it will be significant before being released.

Most Sincerely,

Sadie Parr

Reference: 1. Wallach AD, Ritchie EG, Read J, O'Neill AJ (2009) More than Mere Numbers: The Impact of Lethal Control on the Social Stability of a Top-Order Predator. PLoS ONE 4(9): e6861. doi:10.1371/journal.pone.0006861