

November 4, 2019

Mr. Darcy Peel
Director, BC Caribou Recovery Program
P.O. Box 9513
Stn Prov Govt
Victoria BC
V8W 9C2

Cc: Hon. John Horgan, Premier of BC; Hon. Doug Donaldson, Minister of Forests, Lands and Natural Resource Operations and Rural Development; Hon. Catherine McKenna, Minister of Environment and Climate Change; Blair Hammond, Director, Pacific Region, Canadian Wildlife Service, Environment and Climate Change; Valhalla Wilderness Society

Dear Mr. Peel,

Three days before the deadline for input, a letter detailing government plans to cull over 80% of the wolves in the areas inhabited by the Tweedsmuir-Entiako, Hart Ranges, and Itcha-Ilgachuz caribou herds was sent to Conservation North by a trapper. This letter was released to “targeted stakeholders” only on August 22, 2019. We would begin by pointing out that consultation is meaningless if it is only addressed to the stakeholders most likely to agree with you.

We would like to provide you with feedback from some of the many stakeholders who were excluded from the process.

The plans proposed in the *Predator Reduction for Caribou Recovery* letter are cruel, ineffective, and expensive. It is well established that the root cause of caribou decline is habitat loss, mostly due to industrial development. The science is clear: what caribou require first and foremost for any chance at recovery is meaningful habitat protection. Killing wolves while logging critical habitat is destined to fail as a conservation measure. Yet Minister Donaldson recently announced that there will be no more habitat protection for mountain caribou other than in the Peace Region (Nelson Star, 18 September 2019). Incredibly, the government plans to do exactly the opposite: in the Hart Ranges habitat alone the Province has approved 78 new cutblocks and a pipeline. Over a five month period, the government approved 16,000 ha of new cutblocks within core caribou habitat.

In the *Predator Reduction for Caribou Recovery* letter, you claim that the wolf cull is necessary because habitat protection takes too long. Actually, deferring or cancelling permits for new industrial development can be done immediately. Further, given how long we have known about the decline of caribou

populations, why has the Province not already taken action to conserve habitat? Government performance on this issue over the last several decades shows that caribou conservation has failed because of your unwillingness to stand up to the special interest groups whose extractive land use threatens caribou.

Not only will the wholesale slaughter of wolves not solve the caribou problem, these ineffective culls will also have unintended negative impacts on other species and natural processes; apex predators are an integral part of the larger ecosystem. At a cost of up to \$3 million, this band aid solution (if it can be called a solution at all) is not worth our tax dollars. This money would be better spent designing conservation areas, helping the forestry sector transition to second-growth harvesting, and investing in value-added wood products.

Regarding the recent announcement of several million dollars to “restore caribou habitat” by “planting trees” and “spreading coarse woody debris” (FLNRORD Information Bulletin October 16 2019), it is not possible to restore in any meaningful timeframe the old growth forest habitat on which caribou rely. Industrial harvesting of the 250 years-old-plus forests that Hart Ranges caribou need destroys their complex structure and composition. It takes centuries for a plantation to achieve the structure natural old growth forests have – there is no getting around this.

If the Province is not going to get serious about habitat conservation, please save the public the expense, the lies, and the unnecessary deaths that will result from this cull and acknowledge that you are going to extirpate caribou from large areas of our province. We are outraged that exterminating entire wolf packs and planting trees are considered valid ways of managing for an old growth species at risk of extinction.

We request a response to this letter.

Sincerely,



Keaton Freel
Youth Representative, Conservation North



Jenn Matthews
Outreach Coordinator, Conservation North



Kate Logan
Science Coordinator, Conservation North



Michelle Connolly
Director, Conservation North