

December 14, 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. Jonathan Wilkinson, Minister of Environment and Climate Change; Blair Hammond, Director, Pacific Region, Canadian Wildlife Service, Environment and Climate Change; Valhalla Wilderness Society

Reference: 252105

Dear Mr. Peel,

Thank you for your response to our letter of [November 4](#).

In your response, you state that “identifying the need for and expanding habitat protections will continue to be a part of our approach for caribou recovery. This work will be a part of the herd planning process for each individual herd and is currently underway for several herds.”

This is utterly confusing since Forests Minister Doug Donaldson [announced](#) in September that there will be no new habitat protections for most caribou herds in BC. His office states that there are “enough habitat protection measures in place...”

You also write about the Provincial Caribou Recovery Program’s goal of taking a “collaborative and transparent approach” to caribou recovery. Given the Program’s stated aim of transparency, we would like to know why your response to our concerns about the inadequacy of wolf culls as a caribou recovery measure in these areas is so vague.

You say the Program is “only proposing to utilize this approach in places where [you] have identified the immediate need for emergency predator management in order to stop dramatic population declines.” Yet you fail to specify any plans to preserve habitat in these same places (i.e. the areas inhabited by the Tweedsmuir-Entiako, Hart Ranges, and Itcha-Ilgachuz caribou herds where the proposed wolf culls would take place).

We are also concerned with your strategic use of the phrase “while habitat is *restored or allowed to grow.*” Certainly, you must be familiar with the habitat requirements of the southern mountain caribou.

Southern mountain caribou (SMC) require old growth forests that provide the lichens they eat in the winter. Replanting clear-cut old growth forests according to free-to-grow guidelines means that they will never be restored. If they are allowed to regenerate naturally, it will take well over a century before they are of use to SMC again. While the forestry industry would like the public to believe that we can restore and regrow caribou habitat, the science is clear that, given the urgency of the situation, only immediate habitat *protection* can save the SMC.

Please inform us of what the Provincial Caribou Recovery Program’s plans are to protect habitat in the areas where the proposed wolf culls will take place. Without these plans, we trust you know the proposed wolf cull is destined to fail.

Sincerely,

Signatures of steering committee

Sincerely,



Keaton Freel  
Youth Representative, Conservation North



Jenn Matthews  
Outreach Coordinator, Conservation North



Kate Logan  
Science Coordinator, Conservation North



Michelle Connolly  
Director, Conservation North