

Valhalla Wilderness Society

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Honourable Barry Penner
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Re: RESPONSE TO THE GOVERNMENT'S REPLY TO THE PUBLIC ON KILLING WOLVES
TO SAVE MOUNTAIN CARIBOU

Dear Premier Campbell and Minister Penner:

Thank you for replying to public concerns about killing wolves and cougars to save the mountain caribou. We appreciate this opportunity to bring to your attention some important details concerning the protection of mountain caribou. Below we reply to your comments:

Minister Penner: "In 2007, the BC Government announced the Mountain Caribou Recovery Implementation Plan (MCRIP), which committed government to several management actions with the goal to halt the decline of mountain caribou within seven years and recover the population to pre-1995 levels (2,500 animals) within 20 years."

Valhalla Wilderness Society (VWS): To be precise, we believe the record will show that the recent public planning process to save mountain caribou began in 2003. Through a series of delays, no habitat was protected until about five years later, in December, 2008 .

Dr. Lee Harding, in "Southern Mountain Caribou," 2008, has pointed out that the BC Ministry of Environment had a draft recovery plan by a team of scientists by 1994. In 2002, the government appointed a new team of scientists to write a new plan. So 14 years lapsed between the first recovery plan that was never implemented and the most recent one. All the while the logging of critical habitat continued. In 1997 the BC government estimated there were 2,450 mountain caribou remaining; by 2002 there were only 1900. (Mountain Caribou Technical Advisory Committee, 2002). By 2006 there were only 1,600. Yet it was December, 2008 before the Government Action Regulation Orders to protect additional habitat were signed.

When the implementation phase of the planning was initiated on October 16, 2007, several biologists advised VWS that the goals of halting the decline within seven years and

recovering the population to pre-1995 levels within 20 years represented unrealistically rapid recovery, given the radical population crash that had occurred. VWS was warned that this was a set-up for killing predators. It is just such a crisis as we have before us today: these unrealistic goals of the planning process have not been reached, which is now being used as justification for eradicating wolves by chasing and shooting them from helicopters.

Minister Penner: “Under the Mountain Caribou Recovery Implementation Plan, the Ministry of Environment has protected approximately 2.2 million hectares of mountain caribou habitat from road building and logging.”

VWS: Despite this claim, the Recovery Plan will allow logging to continue on 99% of the Timber Harvesting Land Base (THLB) within mountain caribou habitat. For an animal dependent upon old-growth forest, that’s devastating. The THLB is where the mountain caribou have lost the most habitat, thus THLB logging is the primary cause of their decline. How is it possible keep over 99% of the THLB open to logging while “protecting” 2.2 million hectares of habitat? You will both be familiar with the terms of the Recovery Plan:

- Out of 2.2 million hectares said to be protected for mountain caribou, only 380,000 hectares were new protection. The rest was already protected (in many cases decades ago) in parks and designated wildlife habitat; or else it had no real protection, only “modified harvest zones” which incurred fragmentation from clearcuts and logging roads, despite lower harvest volumes.
- Of the 380,000 hectares of new protection, only 77,000 hectares was allowed to be located on the Timber Harvesting Land Base (THLB). By the government’s own figures, that amounts to 0.66% of the THLB over the mountain caribou range. The rest was to come from the “nonproductive” or “inoperable” forest – forest too high or too steep to profitably log.
- The THLB contains most of the low- and mid-elevation forest on gentle to moderate slopes. This is critical early winter and spring habitat of the mountain caribou needed as shelter from early winter storms and spring access to early plants crucial for the nutrition of pregnant cows. Over most of the mountain caribou range, this is cedar-hemlock forest. The non-THLB forest is mostly high elevation spruce-balsam, which is critical habitat for summer and winter.
- Notwithstanding the protection of 77,000 ha of Timber Harvesting Land Base, the government stipulated that the Recovery Plan must not reduce the allowable annual cut significantly for five years. An example of the effect of this is that in the Central Selkirks a substantial amount of clearcut or burned forest was included in the THLB “protection.”
- Government policy for the habitat protection was “no net loss” to the logging industry. Hon. Pat Bell (Minister of Agriculture and Lands) and the Hon. Rich Coleman (former Minister of Forests and Range) confirmed this in the media several times.

- Some areas identified as part of the “protection” package will in fact be only modified harvest zones that will continue to be fragmented by clearcutting up to 50% of the forest. This is not caribou protection at all. Scientists agree that fragmented forest will not support mountain caribou.

The Valhalla Wilderness Society has used the maps issued by the government to analyze the forest that was actually set aside:

- 82.9% of the caribou reserves are high or very high elevation spruce-balsam forest — caribou winter habitat.
- 12.8% of the reserves are low- to mid-elevation Interior Cedar-Hemlock forest (ICH) - spring and early winter caribou habitat.
- Only 6.9% of the total ICH in the Inland Rainforest Region is captured in the reserves.
- To the credit of the government habitat teams, there were locally significant gains in protection of Inland Temperate Rainforest in two of the eight planning units: West Cariboo Mountains and Central Selkirks. However, even in these planning units, logging of a large part of the remaining habitat will continue. For instance, in the West Caribou Mountains we have 25,000 hectares of new THLB protection, but nearly 22,000 hectares will continue to be logged by conventional means, and a little over 12,000 would be in modified harvest zones, subject to ongoing fragmentation.
- Further analysis is needed to determine how much of the ICH in these reserves is too steep to log and too steep for mountain caribou, and how much has been clearcut, burned or fragmented by roads. There are areas of extensive clearcutting in the new reserves. Mountain caribou need intact old-growth at least 140 years old and gentle to moderate slopes.

Furthermore the “protection” granted is riddled with holes. The areas are protected from logging and road building, but the regulations contain numerous exceptions that could allow logging and roads. They are not protected from mining, hydro or tourism development. If any of these industries, including logging companies, want to do more than what is allowed under the exceptions to these regulations allow, they can apply for an exemption and expect a decision by the Regional Manager of the Ministry of Environment within 14 days — no time even for careful consideration, much less public input.

Minister Penner: “The Ministry has protected approximately one million hectares of mountain caribou habitat from snowmobiling;”

VWS: In the Central Selkirks, in major caribou wintering areas, only part of the areas have been closed to snowmobiling. The government has given the gentle terrain to the snowmobilers, but gentle terrain is also best for mountain caribou. Instead, the caribou have been left the steeper, more rugged terrain. Snowmobiles continue to swarm over the best areas, packing down the snow, which allows easy travelling for wolves. We have

heard this complaint in other areas as well. We have also heard that the regulations banning snowmobiles are not being enforced.

Minister Penner: The BC Government has established a Section 16 Land Act Reserve, preventing the development of new heli-ski and cat-ski tenures throughout existing mountain caribou range.

VWS: Heli-ski and cat-ski tenures already covered a vast area of the mountain caribou range when the Recovery Plan was announced. There are provisions in the Government Action Regulations to allow continued glading (logging) of slopes for ski runs.

Minister Penner: The Ministry of Environment facilitated a workshop in the fall of 2009 with 14 experts on the Mountain Caribou Science Team As you know, the immediate aerial removal of wolves to protect mountain caribou herds with less than 50 animals is one of the recommendations highlighted in the Science Team's report.

VWS: Almost all government-employed biologists recommend killing the wolves. However, 51 scientists have signed a petition stating that there should be no more logging of old-growth forest in the caribou range, as well as non-lethal means of controlling predators, such as decommissioning roads and banning snowmobiles and heli-skiing.

What is noticeable is that, in all the arguments of the government scientists, there is not one case we have found in which they addressed the crucial functions of top predators in ecosystems.

One of those functions is to limit populations of prey species (moose, deer, elk) that browse on young trees and other vegetation. This plays a crucial role in forest renewal. The answer of the government scientists: shoot the prey species too. The government is in fact implementing a moose cull by allowing females and calves to be shot by hunters and if this doesn't work, the government is planning to do the job itself.

Minster Penner: Although habitat loss and fragmentation have been identified as the primary cause of mountain caribou declines, predation has been shown to limit the recovery of many small mountain caribou herds.

VWS: The smallest herds are small because they have lost habitat on a massive scale. The government has virtually written these herds off, by providing so little new habitat protection as to be meaningless. Even if we could kill all the predators, these herds could still be wiped out by incidents such as automobile accidents, avalanches, stress from snowmobiles and fluctuating winter conditions unfavourable to their survival. Three caribou from the tiny South Selkirk herd have been killed on the Creston-Salmo Highway where the government has been refusing to adequately lower the speed limit.

Minister Penner: “Much of the habitat alteration in the past has led to increases in moose and deer populations within the historical range of mountain caribou. Along with the increase of moose and deer comes an associated increase in predators (primarily cougars and wolves).”

VWS: Every additional clearcut and road allowed by the BC government is creating more wolf-moose habitat and less mountain caribou habitat. By continuing to allow logging and mining development, the government is inviting moose and wolves into the caribou range and seeks to solve the problem by shooting them.

Minister Penner: Historically, BC’s mountain caribou inhabited areas with very low wolf and cougar densities, and the relatively recent expansion of predators into their range means that predation, not habitat, is the limiting factor for many of these critically small herds (that is, those with less than 50 animals). Without immediate action to reverse population trends by reducing high predation losses, the Science Team advises some mountain caribou herds will be extirpated long before the benefits of additional habitat protection and restoration are realized.

VWS: How can you say that predation, not habitat, is the limiting factor on caribou populations when it is so well established that it’s changes to habitat (namely, clearcuts and roads) that are drawing the moose and predators? This argument is floating a very untrue story that mountain caribou do not need their habitat. Show us where there are animals requiring pristine habitat have survived in the wild after most of its habitat has been destroyed.

Minister Penner: To date, the available removal methods of hunting and trapping have not been successful at effectively reducing wolf densities. Wolves are extremely difficult to capture and trapping alone cannot achieve the wolf population reductions required for caribou recovery.

VWS: The government already knew that increased hunting and trapping would not work during the period it was dragging its feet on mountain caribou habitat protection and telling the public that the caribou could be saved by killing wolves and cougars. By 2001 there had been wolf control off and on in the Quesnel Highlands west of the Cariboo Mountains, on behalf of the caribou. A document entitled “Proposal to Temporarily Reduce Wolf Population Density in the Quesnel Highland -Cariboo Mountains, Cariboo Region,” dated November 22 2001, was at that time submitted to the Ministry of Water, Land and Air Protection. The document proposed, as an experiment, to kill 16-24 wolves and sterilize 8-12 wolves in 4-6 packs. The wolves to be killed were apparently to be put to sleep with darts fired from helicopters, and then shot on the ground.

A government power-point presentation entitled “Eastern Mountain Caribou Recovery Program – Cariboo Region,” was taken to First Nations by the Species at Risk Coordination Office. It showed that between 2001 and 2004, 30 wolves were killed and 16 were sterilized, nearly double what was intended. The government presentation, of which we have a paper copy, concludes:

“Remoteness of the study area makes gaining access to and capturing wolves difficult. Dense forest canopies does (sic) not allow for easy capture of wolves from the air. The most successful capture technique is ground trapping which is labour intensive.

“It was originally thought there was (sic) only 4 or 5 packs to deal within the study area. The new estimate is 11 packs which more than doubles the capture and removal efforts. Project costs to capture and remove wolves, to relocate collared caribou and wolves, and to inventory caribou are increasing annually ...

“The original objective of achieving a significant increase in the caribou population through wolf control in a 5-year period is not achievable. This is a result of higher than expected wolf numbers and increasing project costs.

“A decision needs to be made on the provincial importance of this caribou herd. Significant increases in population numbers should not be expected for several more years. A significant increase will only be observed with continual monitoring of both wolves and caribou. Without adequate funding and effort, program objectives will not be achieved. Intensive management (i.e., inventory, increased harvesting rates etc.) of the moose population in the study area must also occur to reduce the prey base for wolves.”

Instances such as this have led some biologists to believe that the whole attempt to save caribou by killing predators is futile, and is aimed at stalling on habitat protection long enough for the logging companies to log the remaining accessible old-growth until it's gone.

We believe the facts presented here reveal the government's position on this subject to be misleading and an endeavor to paper over the history we set forth with feel-good language that doesn't stand up to close scrutiny.

Close scrutiny will show that much of the Inland Rainforest Region has been severely clearcut and fragmented, to the point that a number of logging companies have gone bankrupt. Instead of trying to save something as a life raft for endangered species (which now include humanity), the government is busy laying off more Ministry of Forests staff and merging forest districts as a step towards privatization of our forests. The whole concern for species at risk is being turned against other animals, so that wolves, cougars, and perhaps someday soon, bears are made to suffer for what humans have done and continue to do.

VWS tried for many years to save the mountain caribou. We believe that an approach that can best be described as “save the species, wreck the ecosystem” is not only ecologically disastrous, but futile. Numerous scientists have assured us that the best approach is to protect and restore the natural ecosystem to give the mountain caribou the best possible chance to survive. If it doesn't work, there are innumerable other old-growth dependent species, many of them species at risk, that would benefit from the effort.

Instead there have been inferences that if the mountain caribou herds don't increase, their new protected habitat might be returned to the forest industry for logging. This would virtually ensure other extirpations and extinctions. At the same time, we would be liquidating an

invaluable asset in the fight against climate change – our old-growth forests which, here in the Inland Rainforest Region, store huge amounts of carbon.

At VWS we appreciate that, under the Mountain Caribou Recovery Plan, your government took some first steps in protecting old-growth Inland Temperate Rainforest. But in consideration of the importance of these forests to our climate and our dwindling biodiversity, much more needs to be done. The new mountain caribou reserves need to be fully protected. There needs to be much additional Inland Rainforest preserved to rescue hundreds of species of lichens, which protection would also maintain what little intactness we have left in these forests for mountain caribou and all other wildlife.

VWS is in the process of widespread communications with other environmental groups around the world on this matter. These, in turn, are using every public forum to which they have access to bring the public news of the widespread and increasingly intensive killing of wolves and cougars by the BC government. As a result, we would greatly appreciate a response to this letter, not only as to actions the government plans to take on predator control, but also to let us know about any improvements in habitat protection and snowmobile/heli-ski bans you plan to undertake.

Sincerely,
Anne Sherrod
Chair
Valhalla Wilderness Society