

Valhalla Wilderness Society

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SUBMISSION TO BC GOVERNMENT RE WOLF CULL FOR CENTRAL SELKIRK CARIBOU HERD

The following responds to a paper entitled “Predator Reduction for Caribou Recovery — Consultation” which has an email address attached but no other identification. Public releases by the provincial government usually have government letterhead and department identification, so this document seems very irregular.

The document says that First Nations and “targeted stakeholders” have received this notification. The Valhalla Wilderness Society has been working to protect the Central Selkirk herd for nearly 40 years, but apparently the government does not consider VWS a stakeholder, at least we did not receive the notification until some of our ngo colleagues sent it to us two days before the deadline, which was when they received it. This consultation process was not posted on the government engagement website. This is the second time this has happened — the first time being with consultation for predator culling for the Hart Ranges and Chilcotin herds. This is not fair or ethical public process, but appears to be managed to engage primarily people the government thinks will support the wolf cull, indicating that the wolf cull is *fait accompli* and that anyone against the wolf cull is being engaged in a futile effort.

The Valhalla Wilderness Society opposes the Central Selkirk wolf cull for the following reasons:

- 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 documentation on this herd was by cougars. VWS has not objected to targetted removal of cougars in the immediate vicinity of the herd.
- Very few wolves have been identified in the Central Selkirks. The last report we heard was 12-14 wolves (pers. comm. Aaron Reid).
- There are local reports that moose, deer and elk are not numerous in the region.
- It is **FALSE** that the government wants to protect caribou from wolves. It is currently allowing the logging of federally-designated Matrix habitat which is specifically needed to protect mountain caribou from wolves. Furthermore, some of the Matrix habitat is really Critical Habitat because caribou use it at certain times of the year. This logging is occurring only one or two kilometres from the location of caribou telemetry points. In reality the government is killing wolves to create an appearance of protecting caribou while it destroys the caribou’s habitat. The aim is to log the habitat before the *Species at Risk Act* can do anything about it.
- It is **FALSE** that the government wants to reduce moose, deer and elk, which draw wolves. If that were true, it would not have allowed the present and future logging around Trout Lake. This logging is actually making more habitat for moose, deer and elk, which will keep drawing wolves to their death.
- It is **FALSE** that habitat protection takes too long. All the government has to do to protect habitat is not sign logging permits, and that doesn’t take long at all. Standing forest protects caribou whether it

has a formal protective designation or not. But habitat destruction works immediately to damages caribou survival, starting with road building and displacement of the animals from disturbed habitat. When will the BC government and its biologists stop foisting this disgraceful, misleading rhetoric on the public that should be an embarrassment to all of its caribou biologists?

- It is **FALSE** that the government intends to protect more habitat some time in the future, with herd plans. The Minister of FLRORD has stated specifically in the newspaper that there will be no more habitat protection for the Central Selkirk herd.
- It is **FALSE** that herd planning takes too long. The herd plan has taken too long because the government has been dragging its feet. If it were true that herd planning takes a long time, why didn't the government start in 2018 when the federal Minister declared Imminent Threat to Recovery???
- It is **FALSE** that the government is aiming for a self-sustaining herd. The government knows very well that the 2018 Imminent Threat Assessment by the federal government makes clear that predator killing and maternity pens alone cannot create a self-sustaining herd. That requires habitat protection and the Central Selkirk herd has too little. The government is allowing BC Timber Sales to put the matrix habitat up for logging.
- It is **FALSE** that the government is trying to protect caribou at all. In reality the Allowable Annual Cut is driving the wolf culls, and the government and logging corporations don't care if they annihilate wolves throughout the region forever.

WHY IS PREDATORS EATING CARIBOU AN EMERGENCY REQUIRING IMMEDIATE ACTION WHEN LOGGING COMPANIES EATING CARIBOU HABITAT IS NOT CONSIDERED AN EMERGENCY REQUIRING IMMEDIATE ACTION?

Sincerely,

Anne Sherrod
Valhalla Wilderness Society