

# Valhalla Wilderness Society

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Review of an August 22, 2019 letter from the BC Caribou Recovery Program, describing plans to slaughter 80% of wolves in the ranges of the Itcha-Ilgachuz, Tweedsmuir Entiako and Hart-Mountains caribou.

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The above-cited document was sent to VWS as a letter to “selected stakeholders” that was leaked to BC environmental organizations only three days before the deadline for input. This is not the first time that BC has launched “consultation” processes for “selected stakeholders” only, and left the rest of the public in the dark. This makes the consultation process dishonest. Judging by how few environmental groups had seen this document before it was leaked, the group of “selected stakeholders” was notably not environmental groups. Thus it appears that a deliberately biased survey may have been intended. Yet all British Columbians have a stake in our wildlife heritage.

The letter to stakeholders is also dishonest. For instance, this letter leads readers to believe that habitat protection is not offered at this time because it takes too long. It infers that the province is planning to protect habitat for these herds sometime in the future, in another process for “herd plans”.

But in reality, Minister of Forests, Lands, Natural Resource Operations and Rural Development (FLNR-ORD), Hon. Doug Donaldson, just announced that there will be no more habitat protection for Mountain Caribou other than in the Peace Region. (Nelson Star, Sept. 18, 2019) None of the three herds in this predator kill plan are in the Peace Region. The Hart Ranges herd belongs to the Interior Wetbelt, an area specifically excluded from new habitat protection by Minister Donaldson. The other two herds are west Chilcotin herds and belong to the Northern Group of Mountain Caribou.

The consultation letter is heavily biased because it does not provide information on the percent of range disturbance for these herds — information that is already available to the province. The document keeps reviewers in the dark as to how much of the habitat has been clearcut and crisscrossed with roads or other linear development, and how much further development is currently planned.

Due to the work of environmental organizations and conservationists in the Interior Wetbelt, we happen to know this for the Hart Ranges herd: the government plans 78 new cutblocks and a pipeline in its range. We know that during a five-month period your government approved 314 new cutbacks within the habitat of endangered caribou herds, an area totalling 16,000 hectares.

The government knew the Hart Ranges herd was declining when it approved the cutblocks. What would have taken so long about *not* signing those permits — deferring them until a just determination that would include the needs of the caribou? And if protecting habitat takes a long time, why didn't the government start a couple of years ago when it became evident the herd was in trouble? The Hart South herd declined 40% from 2012 to 2016 (Serrouya, et al, PNAS, 2019), and yet 78 cutblocks and a pipeline are planned in the range of this herd?

This was highly publicized in the media, but the consultation letter doesn't give the “selected stakeholders” this information. There is no way that Valhalla Wilderness Society would endorse the government

slaughtering 80% of wolves for this area to cover up the habitat destruction it is planning, and to conceal the steady destruction of the caribou's means of survival.

The Itcha-Ilgachuz herd is said to have had a 42% decline in only two years, 2014-2016. Over four years 2012 to 2016, the herd went from 1,676 to 841 animals. If one goes back to 2002 there were 2,000 caribou in this herd (Seip, Cariboo-Chilcotin Land Use Plan, 2002). It is obviously necessary to have a sense of habitat disturbance in the area, and that planned in the future before we blame wolves and cougars. Yet this document presents only some data on the number of cougar predation mortalities.

We note that in 2014 the federal government's "Recovery Strategy for the Woodland Caribou, Southern Mountain Population" cite as threats to these herds, "expected expansion of roads due to logging and mountain pine beetle salvage logging, especially in Itcha Ilgachuz." The area was in fact stricken by massive mountain pine beetle tree mortalities in the pine forests where these west Chilcotin herds dig for ground lichens.

According to the federal strategy, in 2014 there was licensed hunting of the Itcha-Ilgachuz herd. And snowmobiling was listed as a "concern", saying "Increased levels of use are expected with an increased level of access created by industrial development, particularly mountain pine beetle salvage harvesting."

The material we researched indicates that the west Chilcotin is no different from the Interior Wetbelt, in that industrial development, displacement by motorized recreation and other human activities make caribou more vulnerable to predation. We have been dealing with the government's caribou recovery program for nearly 20 years, and we have seen no indication that the government intends to protect high quality winter habitat by controlling motorized recreation. Habitat overrun by motorized recreation is not intact, functional habitat for caribou.

The consultation letter states that "decreasing the number of wolves in caribou habitat is the quickest and most effective management tool to reverse population trends in the short term." Yet the federal government has said that long term solutions must be applied at the same time as short term ones. If habitat isn't protected from destruction and disturbance, eventually the herd will not have enough habitat left to sustain itself. At that point it will require ongoing extermination of large carnivores to maintain the herd at low levels until it expires of habitat loss. Large carnivore extermination is extremely damaging to ecosystems and to biodiversity, causing numerous other species to disappear from an area.

The government should be ashamed of itself for telling the public that habitat protection "takes too long", inferring that it can safely be deferred to some indeterminate time in the future. A 40-year running history shows that habitat protection takes too long because the government drags its feet and finds every pretense in the book to avoid doing it. While we wait, it is signing logging and road building permits. The trees that form the functional parts of the habitat for caribou are being hauled away. Once large amounts of the habitat have been clearcut, the government claims it would take too long to wait for the trees to grow back, so predators must be shot from helicopters. At least Minister Donaldson was honest: he told the public that only the Peace Region would receive new habitat protection. So what appears to be proposed here is massive, institutionalized, long-term extermination of wolves, and perhaps of cougars — with no review or consideration of the ecological damage that would ensue, let alone informing the public of the environmental impacts.

On behalf of VWS's 1,800 donors, members and supporters, we say no to these predator culls.

Sincerely,



Anne Sherrod  
Plan Reviewer