



June 10, 2013

Heather MacRae
FrontCounterBC
Forests, Lands and Natural Resources Operations
Province of British Columbia

By email to: Heather.MacRae@gov.bc.ca

Dear Ms. MacRae:

Re: **File No: 7408074**
Location: Morkill River area south of Kakwa Provincial Park.

BC Nature (the Federation of BC Naturalists) is deeply concerned about the application of Rocky Mountain Adventures to develop three hunting camps in the Morkill River and Fraser River watersheds near McBride, and recommends the rejection of this application.

As a province-wide federation of naturalists' clubs, representing about 5000 individual naturalists, BC Nature's primary interest is the conservation and sound management of the province's ecosystems and their component species. The Morkill River watershed is distinctive for lying within B.C.'s Inland Rainforest, the only inland rainforest in the world. It is extremely important habitat for the blue-listed grizzly bear, and in addition is the only Rocky Mountains watershed where grizzly bears are known to feed on Pacific salmon – a feature which makes the bears particularly vulnerable to hunters with easy access from camps. It also provides important habitat for the endangered mountain caribou, and is distinctive in that it is the only watershed where the three federally-recognized at-risk woodland caribou ecotypes (Southern Mountain, Northern, and Alberta Mountain ecotypes) are known to occur.

The area on both sides of the Morkill River resides within the mountain caribou protection plan, and hunting access is non-motorized only. These measures speak to the recognition by management agencies of the sensitivity of the area.

We did not support the proposal for hunt camps by the same company (Rocky Mountain Guide Outfitters Ltd.) in 2008, and our position has not changed with regard to hunting camps in this unique area. Hunting has been occurring for many years in this terrain by previous local guide outfitters without the need of cabins. The ability to stock these cabins in advance of closures to motorized access, in our opinion, goes against the spirit of the non-motorized

regulation and will facilitate higher kill rates of species with competing values (eg. hunting vs. tourism). Currently there are interests working towards attaining park status in the area of the Walker headwaters as well as other tourism tenure interests that are not compatible with increased hunting.

With the dearth of conservation officers, we are concerned that the company's activities cannot be adequately monitored. The charges laid against the previous operator are cause for great concern that this critically important area is not being given the level of protection required.

British Columbia's world-renowned wildlife are under increasing threat from industrial development, human disturbance and climate change. These factors increase the responsibility of government to manage vulnerable species and their habitat with particular care, including stringent management of hunting. In our view, the number of guided hunting camps should **not** be expanded, and access for hunting should remain non-motorized year round.

Regards,



John Neville, President
Federation of BC Naturalists (BC Nature)