



June 15, 2018

RE: BC NATURE COMMENTS FOR THE DRAFT PROVINCIAL CARIBOU RECOVERY PROGRAM

BC Nature (Federation of BC Naturalists) consists of approximately 6500 members in over fifty clubs across British Columbia. We are grateful for the opportunity to provide comments for the Provincial Caribou Recovery Program. Our responses are in letter format and forwarded to your email: caribou.recovery@gov.bc.ca .

BC Nature considers the Recovery Program to be good in principle, with the Central Southern Mountain Caribou having been selected to receive the major attention and protection at this time. However, it does not provide the planning needed immediately to recover the drastically declined and endangered caribou in the small southern herds, including the Kootenays and Columbia region. These desperate herds, considered to be on the verge of extinction, cannot be protected without powerful habitat measures put in place immediately. These mountain caribou may be forever lost in their rare and irreplaceable British Columbia interior temperate rain forest. BC Nature is also deeply concerned about the ongoing declines in the larger caribou herds, such as those in the Wells Gray and Northern areas, which could stand a chance of survival if immediate action is taken.

BC Nature is opposed to the predator wolf cull process as an effective management of caribou populations. The presence of predators in high elevation forest caribou habit is primarily the result of a loss of historic habitat due to logging activities, motorized recreation, skiing, heli-skiing, and other human activities that disturb caribou and provide easy trail and road access for wolf travel. In addition, migration to lower elevations for mountain caribou can be expected during late winter. This lower elevation (matrix) habit commonly involves active logging activities, road construction and recreation activities that increase access for predators. This habitat degradation is not adequately addressed in the current planning document.

Instead of active wolf culls, to protect caribou it would be more reasonable to make predator travel more difficult by blocking access on trails and roads. Furthermore the use of restoration ecology to correct long-term landscape scars should also be activated immediately to begin rebuilding damaged and destroyed habitat. We definitely approve of maternal penning for caribou cows and newborn calves that is included in the Central

Southern Mountain Caribou plan, but the penning program should be expanded to apply to the small endangered southern herds.

It is BC Nature's position that the Provincial Caribou Program for the Recovery of the Southern Mountain Caribou must be bolder and more assertive in order to make a real difference in the future of the mountain caribou in this Province. We strongly believe this should include greater measures to protect and restore habitat, prevent direct (e.g., ground and air-based motorized recreation, logging, mining, oil and gas activities), and indirect (e.g., noise) human disturbances in caribou range, and broaden efforts to include much needed protection and conservation actions for the Southern Group of Mountain Caribou. Since the data show that extensive logging is still occurring in much of the mountain caribou habitat, we believe that the many already heavily-impacted caribou landscapes require an immediate moratorium of logging permits in all caribou habitat until the government's Caribou Recovery Program is approved.

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