



Honourable Steve Thomson, Minister of Forests Lands and Resource Operations
Honourable John Rustad, Minister of Aboriginal Relations and Reconciliation
Victoria, BC

2015/12/21

Dear Ministers Thomson and Rustad:

On behalf of the BC Wildlife Federation I would like to register our opposition to the Region 7B regulation proposal titled “Peace Moberly Tract — Moose Hunting Restrictions.”

Government has failed to represent the public interest and is instead taking a divisive approach to policy. This approach creates conflict between people who live in British Columbia, and fails to adequately protect and enhance biodiversity in British Columbia. First Nations and non-First Nations interests are in sync as it relates to wildlife conservation, but the BCWF finds it objectionable that such a precedence-setting proposal was derived through government to government consultations while shutting out other major stakeholders.

The Site C Joint Review Panel stated there would be no significant impact on non-Aboriginal Peoples. The Panel also stated the project would not cause significant effects on moose, elk, white-tailed deer and mule deer yet the Panel recommended a First Nations only area for hunting. The Panel's recommendations are not consistent with the message as it relates to biodiversity. The process is fundamentally flawed and fails to recognize the public interest.

The real issue in the Peace Moberly Tract is a declining moose population, which is the result of cumulative effects of past hydro development, a thriving oil and gas industry and forest practices that neglect impacts on wildlife. A decrease in moose from around 12,500 to 2,000 in the 1960's has been attributed to the creation of the Williston reservoir and related activities. During the 1970's and 80's, parts of the PMT were cited as having amongst the highest moose population densities of any habitat in the province, and then the oil and gas boom hit. The river breaks adjacent to the Moberly and Peace Rivers were the site of one of the first prescribed burns for wildlife in British Columbia — little has been done since to compensate for the disturbance on the landscape in this area. A flight over the eastern portion of the PMT will provide eye-opening evidence of the disturbance of the landscape, which has no doubt impacted moose populations. The eastern portion of the PMT will also be the location of a large camp to house thousands of Site C workers. The more western portion of the PMT has been impacted by oil and gas activities as well, but more significant is the impact of logging.

The PMT regulation proposal will not solve the problem of declining moose populations or a lack of investment in biodiversity. Instead, there needs to be an immediate implementation of a moose **recovery** program designed in consultation with all stakeholders. The BCWF sees such a recovery program containing the following essential components:

Collaboration: All key stakeholders must implement a moose recovery plan jointly.

Funding: As the PMT regulation proposal is attributed to recommendations by the Site C Joint Review Panel, government needs to require BC Hydro to provide immediate funding for a moose recovery program. It is not sufficient to wait for BC Hydro to formulate a wildlife compensation agreement. Further to funding from BC Hydro, government needs to petition the oil and gas and forestry industries to contribute financially to a moose recovery program.

Inventory: Comprehensive inventory work needs to be done in the PMT and adjacent areas so that moose management and the corresponding regulations are based on science. A target number for moose in the PMT needs to be established.

The BCWF supports the Joint Review Panel Recommendation 18: The Panel recommends that, if the Project proceeds, the Ministry of Forests, Lands and Natural Resource Operations must conduct bi-annual ungulate surveys in Wildlife Management Units overlapping with the LAA during Project construction and for a period of 5 years after. This information must be provided to the Proponent to confirm the effects of the Project and used by the Ministry to determine if mitigation is required (for direct or indirect effects).

Habitat: Habitat management in the PMT is undertaken with the goal of ensuring a steady supply of productive forage for moose. The BCWF also agrees with the Joint Review Panel recommendation 17: The Panel recommends that, if the Project proceeds, the Proponent must, in collaboration with the Province, determine whether additional lands owned by BC Hydro or Crown Lands could be maintained as winter range for ungulates.

Predator Management: A target population number for predators needs to be established. Predator management, including wolves and bears, is a critical component of a moose recovery plan. The BCWF recognizes that there is another regulation proposal for region 7B directed at predator management, but something more structured is needed to ensure that predators do not negate other facets of a moose recovery plan.



Hunting Seasons and Access Management: The current regulation proposal includes a shortening of the moose season for licensed hunters and access management in the form of restrictions around roads. A moose recovery plan needs to include appropriate hunting seasons and access management, but any related proposals need to be based on science and influenced by inventory and habitat recovery work.

Yours in conservation:

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