



## THE DEFEND THEM ALL FOUNDATION

December 8, 2020

To: The Honorable John Horgan<[premier@gov.bc.ca](mailto:premier@gov.bc.ca)>; Minister John Allan, FLNR FLNR:EX <[FLNR.Minister@gov.bc.ca](mailto:FLNR.Minister@gov.bc.ca)>; Johnsrude, Allan N FLNR:EX <[Allan.Johnsrude@gov.bc.ca](mailto:Allan.Johnsrude@gov.bc.ca)>; Barrett, Scott FLNR:EX <[Scott.Barrett@gov.bc.ca](mailto:Scott.Barrett@gov.bc.ca)>; Dunkley, Jim R EMPR:EX <[Jim.Dunkley@gov.bc.ca](mailto:Jim.Dunkley@gov.bc.ca)>; Malt, Joshua FLNR:EX <[Joshua.Malt@gov.bc.ca](mailto:Joshua.Malt@gov.bc.ca)>; Gillis, Joel FLNR:EX <[Joel.Gillis@gov.bc.ca](mailto:Joel.Gillis@gov.bc.ca)> Minister Forests, Lands, Natural Resource Operations and Rural Development

RE: Mountainside Quarries Application (Mine 0700412) and critical nesting habitat

We write to express our adamant opposition to the proposal to destroy critical nesting habitat of the Peregrine Falcon and other important species at the Quadling Quarries in Abbotsford, BC. The site has a high ecological value that should be preserved for future generations.

The Defend Them All Foundation is a nonprofit organization dedicated to securing a better future for animals and their habitats. In furtherance of this aim, the Defend Them All Foundation works directly with advocates in target localities, including Canada. The organization is independent and non-partisan. It receives no money, either directly or indirectly, from any government. It is headquartered in Portland, Oregon, United States.

As an international organization focused on implementing environmentally sound practices particularly within the mining sector, our Canadian partners recently informed us of a situation in which a Quarry located near Abbotsford, British Columbia, has been permitted to reopen subject to obtaining approval to destroy an existing Peregrine Falcon (*Falco peregrinus anatum*) nesting site. Given the regional status of the Peregrine Falcon as a red-listed species, and the fact that destruction of their nesting sites is prohibited under the B.C. Wildlife Act, learning that an application to destroy the nesting site has been submitted and is being considered by Provincial decision-makers comes as a surprise to say the least.

Further investigation revealed that the similarly red-listed Phantom Orchid (*Cephalanthera austiniæ*) is also associated with the site, as well as a colony of Cliff Swallows, another North American bird species of concern due to a recent sharp decline in numbers. Critical habitat for both of these species, as well as the Peregrine Falcon, would be destroyed if this permit is approved.

Given that the Province provides for buffer zones around Peregrine nesting sites and Phantom Orchids, as well as for nesting birds in season, it would seem that these high-value ecological attributes could be maintained by limiting on-site operations to those periods when nesting is not



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ongoing, and to those areas not protected by regulatory buffers around the Peregrine nesting site and the Orchid. This approach would still allow some level of quarry operation, while providing key critical habitat for the red-listed species.

Frankly, we were shocked to learn that destruction of critical habitat for two red-listed species is even being considered, especially given British Columbia's world-renowned reputation for sustainability and strong environmental stewardship. Given that we work with Canadian partners, we would appreciate a description of the basis for such a decision to help guide our work in the future.

Importantly, please note that we are opposed to any activities at the site that would adversely affect species of concern. Indeed, given the presence of three species of concern in a small area, we were wondering if the site's true value might be captured by turning it into some form of nature reserve. Clearly this option would require some additional groundwork but would provide the current owners with compensation as well as preserving the site's existing attributes for the future, ultimately achieving a resolution consistent with the objectives.

Respectfully submitted,

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