

PROPOSAL FOR THE PROTECTION OF THE ARGENTA FACE

To include the significant remaining low-mid elevation old growth forest and lakefront habitat of the Argenta Face in the Purcell Wilderness Conservancy Provincial Park, with connectivity habitat for Deep-Snow Mountain Caribou, Grizzly Bears and other Species at Risk.



Submission to the Governments of British Columbia and Canada

April 2024

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and
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THE ARGENTA FACE

A proposal to uphold provincial & federal conservation targets and support British Columbia overcoming multiple challenges including:

1

Climate & Biodiversity Crisis

Through protection of biodiverse ecosystems and a watershed deemed 70-80% intact by the Old Growth Technical Advisory Panel, the proposal will help mitigate species loss in the region and create landscape resilience in the face of increasing wildfires, floods and drought.

2

Old Growth Forest

The proposal contains significant tracts of remaining old growth forest of Engelmann Spruce-Subalpine Fir and Interior Cedar-Hemlock capable of supporting old growth-dependent species like Red-listed Deep-Snow Mountain Caribou.



3

Inter-park Ecological Connectivity

The proposal provides a unique opportunity to include a low-mid elevation wildlife linkage corridor on the boundary of a major Provincial Park (Purcell Wilderness Conservancy). The proposal area is used as connectivity habitat for large species moving between mountain ranges and provincial parks.



4

Rural Economy

By showcasing the region's stunning natural beauty and monumental views, the park inclusion will bolster the rural economy through the cultivation of a thriving eco-tourism industry.





Table of Contents

- 2 Primary ecological values of the proposal
- 4 History and support
- 5 Old growth forest in the proposal by forest type and age class
- 6 Deep-Snow Mountain Caribou refuge and recovery habitat
- 7 Wildlife corridors and park connectivity values
- 8 Species at Risk in the proposal and Federally-designated Critical Habitat for Mountain Caribou, Whitebark Pine and adjacent White Sturgeon critical spawning habitat
- 9 Socio-economic values of the proposed protected area
- 10 BC Parks Goals and the Purcell Wilderness Conservancy Provincial Park Master Plan
- 11 APPENDIX A – Provincially or COSEWIC-Listed Animal Species Confirmed or that May Occur in the Proposal Area
- 14 APPENDIX B – Provincially-Listed Ecological Communities Confirmed or that May Occur in the Proposal Area
- 15 APPENDIX C – Provincially or COSEWIC-Listed Plant and Lichen Species Confirmed or that May Occur in the Proposal Area
- 16 APPENDIX D – Commercial Recreation Tenures in the Range of Deep-Snow Mountain Caribou
- 17 References
- 19 Mission statement

Protecting the Argenta Face as a 6,306 hectare Purcell Wilderness Conservancy Provincial Park inclusion would contribute significant ecological value to the largest protected area in southeastern British Columbia.

“The Purcell Wilderness Conservancy Park is one of the most significant wilderness areas in southern British Columbia, recognized for its scenery and wilderness recreation opportunities. Its special status emphasizes the significance of it being the largest remaining block of wilderness in southeast B.C. It was created to preserve natural features and ecosystems and provide for wilderness recreation.”¹ ~ Purcell Wilderness Conservancy Provincial Park Master Plan



Left: Looking east across Kootenay Lake toward the Argenta Face of Mt. Willet - the missing piece of the Purcell Wilderness Conservancy Provincial Park. Right: Mature forest provides unmechanized habitat for numerous Species at Risk including Deep-Snow Mountain Caribou.



Primary values of the proposed 6,306 hectare Conservancy inclusion:

- 3,077 hectares of old growth (Age Class 7+) forest of Interior Cedar-Hemlock and Engleman Spruce-Subalpine Fir. Very old Western and Alpine Larch
- Unmechanized Critical Habitat and potential recovery habitat for Red-listed Deep-Snow Mountain Caribou
- Biodiversity hot spot: Habitat for up to 180 known plant, animal and lichen Species at Risk including Mountain Goat and Wolverine. Critical Habitat for Whitebark Pine
- Up to eight known Red and Blue-listed ecological communities that include rare rainforest plants
- Connectivity between the Purcell and Selkirk Mountains for Grizzly Bears and other wide-ranging species
- North-South connectivity to improve Climate Resilience of the ecosystems along Kootenay Lake
- Travertine flows, caves and karst that may support rare and specialized species



THE ARGENTA FACE IS LONG OVERDUE FOR PROTECTION.

At the north end of Kootenay Lake in British Columbia's West Kootenay region, this virtually intact wilderness reaches from lakeshore to mountain peaks. It is bordered on three sides by the Purcell Wilderness Conservancy Provincial Park. Mount Willet (2740m), the highest mountain on Kootenay Lake, presides over this west-facing slope, from the historic Earl Grey Pass Trail in the north to the spectacular Fry Creek Canyon Trail in the south. In the forming of the Conservancy in 1974 and boundary revision in 1995, this slope known locally as the Argenta-Johnsons Landing Face (a.k.a. the AJL Face or Argenta Face) was not included.



Mount Willet is home to a significant level of biodiversity including Species at Risk. The proposed park inclusion would protect one of the few wilderness areas in the region that is not disturbed by motorized recreation, and would greatly enhance the connectivity between existing protected areas and wildlife reserves. [Photos: Gary Diers and Zan Mautner]

“The Purcell Wilderness Conservancy Provincial Park is one of the largest remaining intact ecosystems in southeastern BC. Because the proposed park inclusion encompasses almost the entire lakefront face of the adjacent protected area, it will continue to provide important high elevation to lakeshore connectivity habitat for wildlife if left intact. Logging of [the proposal] could irreparably damage the ecosystems of the conservancy. This small park inclusion would secure a valuable corridor that would contribute to maintaining the complete ecosystem integrity of the Purcell Wilderness Conservancy Provincial Park into the future...

For these reasons we believe the Purcell Wilderness Conservancy Provincial Park should be expanded to include the AJL Face of Kootenay Lake.”

~ Valhalla Wilderness Society letter to Environment Minister George Heyman



Left to right: subalpine parkland, ancient trees and karst mineral deposits are some of the features the Argenta Face proposal would protect. These habitats and habitat features are known to host rare and at-risk species of plants, wildlife, invertebrates and other organisms. They are also highly valued by protected area visitors. [Photos: Gary Diers and Zan Mautner]

HISTORY & SUPPORT:

Protection of the Argenta Face has been a focus of surrounding communities since the inception of the Purcell Wilderness Conservancy Provincial Park (PWCPP) in 1974. At that time, local residents pushed for the Conservancy to include the lakefront corridor of the Argenta Face, which would have substantially increased the connectivity of the Conservancy's ecosystems from mountain top to valley bottom.



Local residents with Argenta Face in the background.

► In the 1990s, residents of the communities of Argenta and Johnsons Landing participated in the BC government-led CORE process (Commission on Resources and Environment) which designated the Argenta Face as a Special Management Area in the West Kootenay-Boundary Land Use Plan (WKBLUP) that was adopted by the province in 1995.²

The entire Argenta Face was identified as a Special Management Area because of values including:

- Low elevation winter range forest for deer, elk, grizzly bear, wolverine and mountain goat
- Domestic use watersheds
- Significant downstream fisheries values for bull, rainbow and cutthroat trout and kokanee
- Some of the best examples of old growth cedar-hemlock forests remaining
- High visual quality values
- Rare karst landforms and associated species
- Outstanding recreational values

► In 1997 the subsequent WKBLUP Implementation Strategy excluded the Argenta Face from Special Management designation.³

► At the turn of the century the Purcell Alliance for Wilderness (PAW) was formed to promote the full protection of the Argenta Face within the Purcell Wilderness Conservancy Provincial Park.

► In 2008 a survey by the Regional District of Central Kootenay found that 90% of citizens in local communities agreed with the statement: "Additional Crown Land should be allocated for wilderness park status", including 73% who strongly agreed.⁴ A recent Mount Willet Wilderness Forever petition calling for the inclusion of the Argenta Face within the PWCPP reflects a similar percentage.

► In 2012 a catastrophic landslide caused fatalities in Johnsons Landing, increasing conflict between the communities and Ministry of Forests regarding the logging of domestic watersheds and further logging of the now-proven unstable slopes in the proposal area.⁵ It was established that the hillside composition is continuous between and beyond the communities of Argenta and Johnsons Landing, respectively situated near the northern and southern ends of the proposal. In a talk later given by Peter Jordan, Geomorphologist, titled "Geological Hazards on the Argenta-Johnsons Landing Mountainside," he recommended that the residents "be vigilant" regarding further disturbance of the Argenta Face.

► In 2014, a draft proposal under the Kootenay Lake Timber Supply Review aimed to designate some of the forest on the Argenta Face for only partial retention during harvest.⁶ A high level of public concern led the Selkirk Resource District Manager to instead retain the highest possible standard of Visual Quality Objectives for part of the proposal under a Government Actions Regulation Order.

► Public support to expand the Conservancy has only increased as awareness of the socio-economic and ecological values of the proposal, and knowledge of the risk of logging has increased.

► In 2016, in response to proposed logging, residents formed Mount Willet Wilderness Forever and in 2017 submitted a park proposal to the Government of British Columbia advocating for the inclusion of the Argenta Face in the PWCPP.

► In 2019 Mountain Caribou from an unknown herd were confirmed in the proposal area⁷, further amplifying public support for protection of the Face which has continued to this day and led to major community demonstrations in 2019 and 2022.

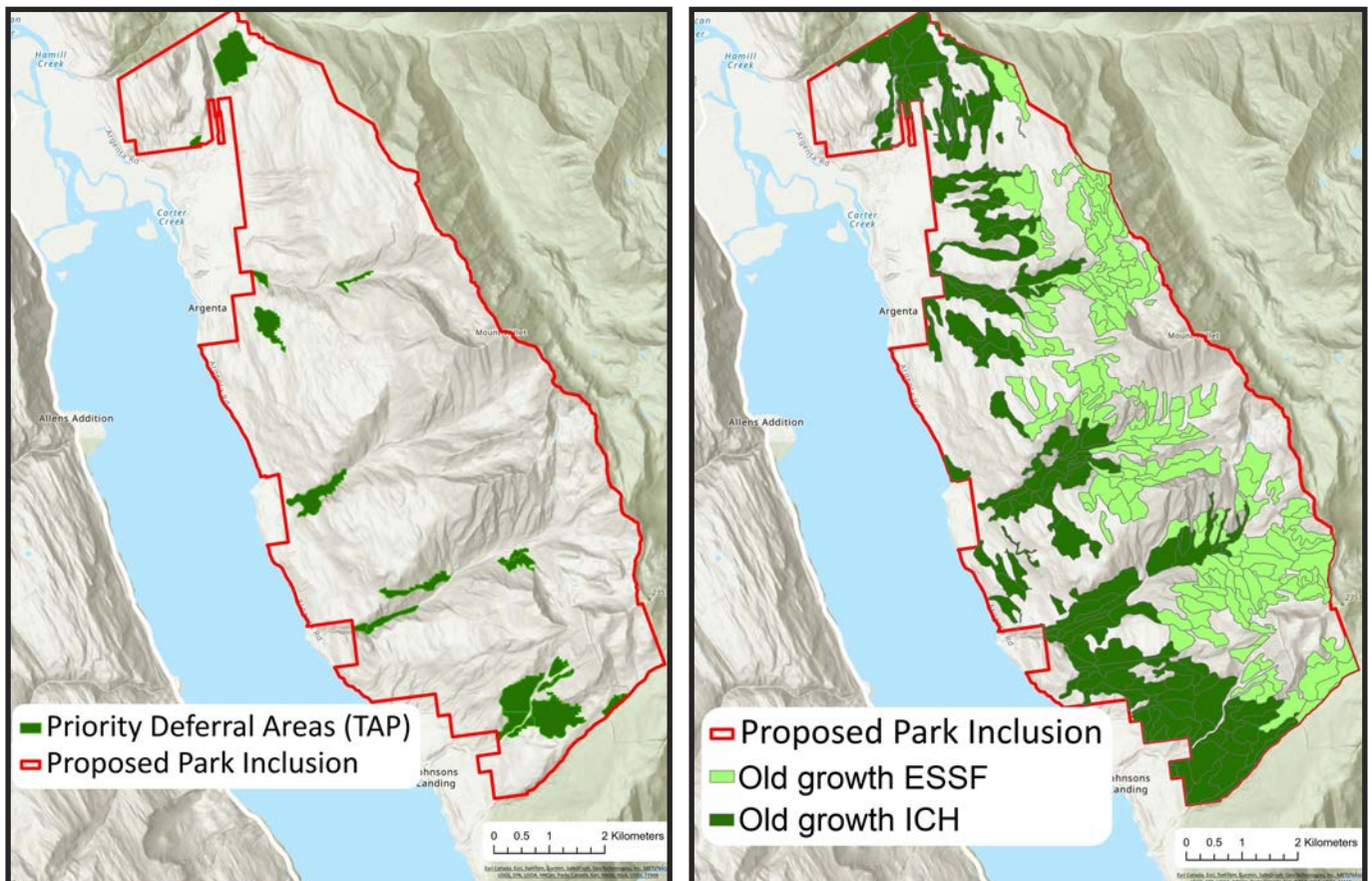
► Although Conservancy boundary expansions occurred in both 1974 and 2022, the Argenta Face still remains unprotected except for a small (606 hectare) area partially protected under a federal Critical Caribou Habitat and provincial Caribou Ungulate Winter Range designation. **The proposal is a primary focus of local communities for the region's next protected area.**

AN OPPORTUNITY TO ADD REMAINING LOW-MID ELEVATION CONTIGUOUS OLD GROWTH FOREST TO THE PURCELL WILDERNESS CONSERVANCY PROVINCIAL PARK

From an ecological perspective, old growth supports biodiversity, provides a variety of ecosystem services, mitigates the climate crisis and helps us adapt to the changing climate.

- Old Growth Technical Advisory Panel

The Old Growth Technical Advisory Panel (TAP) identified 254 hectares of forest in the proposal as of high priority for immediate logging deferral⁸. Map 1 below highlights big-treed old growth, remnant old ecosystems and ancient forests considered at high near-term risk and at high priority for deferral. Map 2 shows that a large portion of the proposal area (3,077 ha) still contains old growth forest of age class 7 or higher (120 years or older). This includes 1,457 hectares of Englemann Spruce-Subalpine Fir (ESSF) forest in the mid-high elevation portion of the proposal bordering the Conservancy, and 1,620 hectares of Interior Cedar-Hemlock (ICH) forest in mid-low elevation portion of the proposal extending down to Kootenay Lake.



The proposal area boundary (red) is shown here to exclude private land parcels on the shoreline of Kootenay Lake. The map on the left (Map 1) shows priority deferral areas identified by the Old Growth Technical Advisory Panel. The map on the right (Map 2) shows all old growth ICH and ESSF forest of age class 7 or higher. Maps by Cody Peters.

ICH Forest Age Class	Area (ha)	% of proposal
7	885.1	13.6
8	735.0	11.7
9	0	0
TOTAL	1,620.1	25.3

ESSF Forest Age Class	Area (ha)	% of proposal
7	574.2	9.1
8	849.5	13.5
9	33.4	0.5
TOTAL	1,457.1	23.1

**Both of these forest types, especially when contiguous, are necessary for the survival of Canada’s Critically Endangered Deep-Snow Mountain Caribou and a significant number of other Species at Risk.⁹

THE VALUE OF UNMECHANIZED OLD GROWTH TO DEEP-SNOW MOUNTAIN CARIBOU

Historic records show use of the Argenta Face by Red-listed, Endangered Deep-Snow Mountain Caribou; the rare ecotype of caribou found only in the Interior Wetbelt of BC. With significant remaining undisturbed and mature forest from high to low elevation, and little roading, the proposal includes particularly favourable habitat for the iconic species. However, the Central Purcell herd of Deep-Snow Mountain Caribou, whose known range overlapped the proposal, has been extirpated since 2008. It's neighbouring herd to the South was declared extirpated in 2019 and on the West side of Kootenay Lake, the Central Selkirk herd is now at around 30 animals.



Jim Lawrence

UNDOCUMENTED MOUNTAIN CARIBOU FOUND ON MT. WILLET

In 2019 Biologist Brenda Herbison confirmed tracks of an estimated three caribou in the proposal area following the declared extirpation of the South Purcell herd⁷. The animals were not identified by government radio telemetry collars. It is therefore not known which herd they came from, but there is evidence that the caribou may travel east to west across the Duncan River at the North end of Kootenay Lake⁷, or even swim across the lake.¹⁰ Therefore it is possible these caribou are unaccounted for individuals from the extirpated Purcell herds, or that they are from the Central Selkirk herd, where a major driver of caribou displacement and decline is intensive motorized recreation including snowmobiling and heli-skiing^{11,12}. The extent of our mechanized recreation impact on caribou is becoming clear:

A study by Gill et al. (2023) found that a pause in heli-skiing operations during the first year of the covid-19 pandemic led some endangered caribou populations in BC to expand their home-ranges by 80-120%.¹²

Given the vast extent of motorized recreation operations in the range of the Deep-Snow Caribou (See Appendix D on Page 14), the Argenta Face may represent **some of the last, largely unmechanized habitat in the region**, and could provide remaining caribou with a critical refuge from human disturbance.

“Parts of the proposal area are highly suitable in terms of winter food availability, crown cover, surrounding intact habitat, gentle sloping terrain and low human disturbance. This area should have been included in the Purcell Wilderness Conservancy Provincial Park, especially because of its connectivity to Kootenay Lake.” - Biologist Amber Peters¹⁰

606.4 hectares of the proposal is already recognized by the federal and provincial governments as critical habitat (See critical habitat map on page 8). However, the most recent caribou activity was recorded outside of the recognized critical habitat.



Jim Lawrence

The remaining mature, intact low-mid elevation forest of the interior wetbelt is of critical importance for the world's only Deep-Snow Mountain Caribou. It takes at least 120 years (age class 7) for these forests to accumulate the density of arboreal hair lichen to support Mountain Caribou through winter months when other food sources are not available.¹⁴ Given the extent and rate of decline of these rare caribou, these forests will not grow back in time to reverse the species' decline if lost. In fact, because of the unlikeliness of this forest type to grow back due to climate change, **these forests are now considered irreplaceable.**

THE SPECIES AT RISK ACT REQUIRES GOVERNMENTS TO RECOVER CARIBOU TO THEIR CRITICAL HABITAT¹³.

The Deep-Snow Mountain Caribou are now estimated at about 1,200 animals and are considered Critically Imperiled¹⁵. Because these rare caribou are highly dependent on mature forest, local recovery will require the preservation of remaining old growth (age class 7+).

TO PRESERVE BIODIVERSITY THE BC PARKS SYSTEM MUST BE EXPANDED TO INCREASE CONNECTIVITY BETWEEN EXISTING PROTECTED AREAS

The 2010 BC Auditor General's report on the Conservation of Ecological Integrity in BC Parks and Protected Areas¹⁶ states that:

Despite its declared intentions and clear vision to conserve the ecological integrity in British Columbia's parks and protected areas, the Ministry of Environment is not successfully meeting this goal. Specifically,

- programme plans are incomplete and lack adequate performance measures;
- conservation policies are not being consistently upheld;
- **the parks and protected area system has not been designed to ensure ecological integrity;**
- management plans are dated and incomplete;
- **little action has been taken to ensure the conservation of ecological integrity**

Ecological integrity can only be achieved if migratory species and species with large ranges, like **Grizzly Bears** and **Mountain Caribou**, can move between existing protected areas. This is becoming increasingly important as landscape changes and disturbances increase.

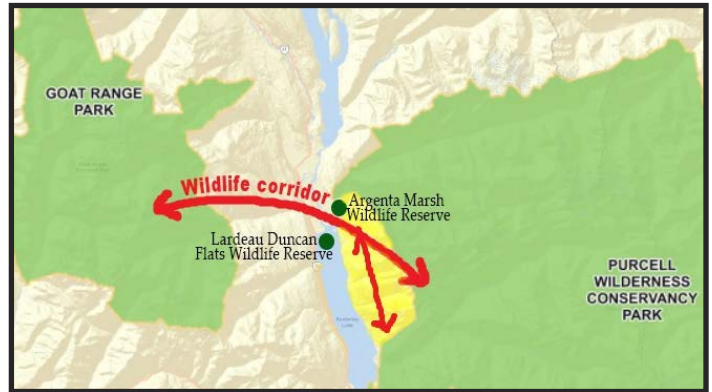
Protecting the Argenta Face will:

- Protect an active wildlife corridor between parks.
- Add over 5 km of invaluable Kootenay Lake shoreline to the PWCPP (only 5.2% of the Kootenay Lake shoreline is currently protected).
- Establish a link from the height of land to the valley bottom and lake within the PWCPP.

Research by the Trans-border Grizzly Bear Project identified high quality habitat patches within the Argenta Face proposal that would provide habitat-based linkage for Grizzly Bears between the PWCPP and the Goat Range Provincial Park in the Selkirk Mountains.^{17,18}



Jim Lawrence



The value of existing wildlife reserves and parks will be enhanced by protecting the Argenta Face corridor habitat.

The Auditor General recommended: "that government develop a plan to address current gaps in the parks and protected areas system," and confirmed that "the size of many parks and most ecological reserves is too small"

To date, many *plans* have been made to address BC's 1,800+ Species at Risk, but very little has been done on the ground to address the inadequacies of the Park system.

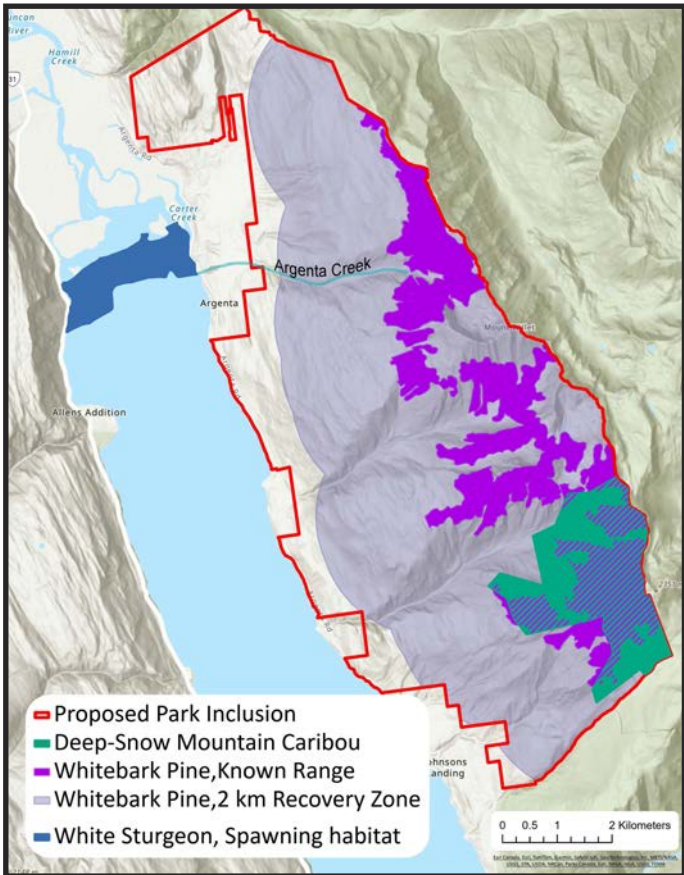
Parks offer the highest level of protection for our ecosystems. Our park legacy must now expand to address the climate and biodiversity crises we face.



Map adapted from Proctor et al. 2015, provided by Dr. Michael Proctor, grizzly bear research scientist, 25 years, Trans-border Grizzly Bear Project.

The proposal area contains Federally-designated Critical Habitat for two listed Species at Risk. Critical Habitat for White Sturgeon spawning on Kootenay Lake is adjacent to the proposal

The map below shows Federally-designated Critical Habitat for *Deep-Snow Mountain Caribou* (Red-listed, Endangered) and *Whitebark Pine* (Blue-listed, Endangered) in the proposal area, and the adjacent Kootenay Lake Critical Habitat spawning area for *White Sturgeon* (Red-listed, Endangered). Most of the proposal is also designated as a Whitebark Pine Regeneration and Recovery Zone.¹⁹



Data derived from the Federal Critical Habitat of Species at Risk dataset.¹⁹ Map by Cody Peters.

A 2022 terrain stability report in relation to proposed logging cited a Moderate risk of a debris slide, avalanche or sediment reaching or affecting Argenta Creek, which enters the Lake directly below the White Sturgeon spawning Critical Habitat.²⁰ The Recovery Strategy for White Sturgeon lists loss of habitat quality and quantity, including due to changes associated with flow regulation and upland development, as a High risk to the Kootenay population.²¹

Based on the B.C. Conservation Data Centre's (CDC) spatial range data, 180 known plant, animal and lichen Species at Risk could be found in the proposal area.²²

Appendix A lists 155 Provincially or COSEWIC-listed animal Species at Risk (SAR) known to or that could occur in the proposal area.

Based on Biologist Brenda Herbison's report, some confirmed, listed animal species include "*Wolverine* associated with ICH-ESSF transition and ESSF forests, high elevation basins and creek drainages; *Great Blue Heron* that roost in winter in tall conifers on lower to mid slopes near Kootenay Lake; *Northern Goshawk* that nest and reside year-round on mid slopes and *Western Toad* that can be found at all elevations in suitable sites. SAR using habitats at high elevations above timberline include *Collared Pika* and *Mountain Goat*. A list of over a dozen bird species transient in the area are now classed as SAR, as are two bat species: *Little Brown Myotis* and *Northern Myotis*."⁷

The report states that "*Mule deer*, a species of regional concern due to population declines, are critically dependent on winter ranges at mid and low elevations on the hillsides along with *white-tailed deer*, *elk*, *cougars*, *bobcat* and many other species that cannot survive high-elevation winters." Extensive evidence of large mammal north-south travel across the proposal area was also cited.

Appendix B lists 8 Provincially-listed ecological communities at risk that are known to or that could occur in the proposal. Appendix C lists 25 Provincially or COSEWIC-listed plant and lichen Species at Risk known to or that could occur in the proposal area. It is not known how many species of macrofungi and slime moulds may inhabit the proposal as data on these taxa are very limited.



Gary Diers

Mountain Goats (Blue-listed) are known to use the Argenta Face, especially in the area of Tooth Ridge.

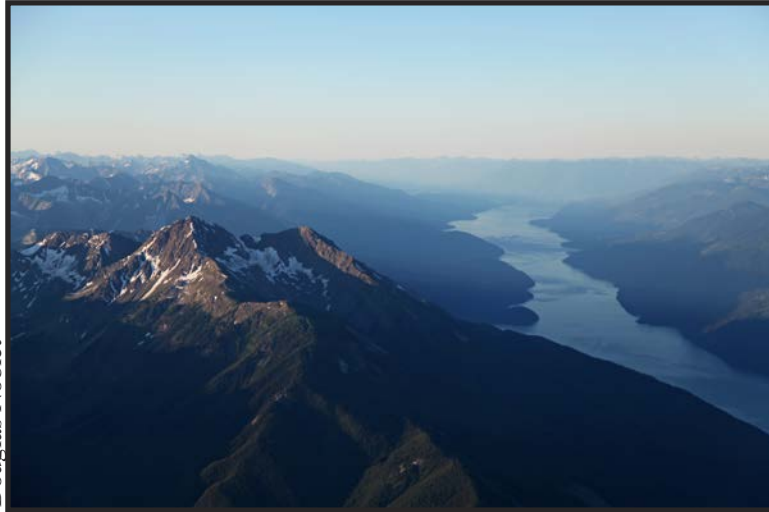
SOCIO-ECONOMIC VALUES OF THE PROPOSED PROTECTED AREA

Protection of the Argenta Face will preserve the significant, spectacular forested mountain landscape within full view from Hwy 31 and two popular Provincial Park campgrounds.

- It will protect the viewscape of the well-attended Kootenay Lake Provincial Park campgrounds at Davis Creek and Lost Ledge on the west side of the lake. These campgrounds deliver those promised, Super Natural B.C, million dollar views. The stunning peaks and lakeside slopes of Mts. Willet, Comb, Sawtooth and Kootenay Joe can be seen all the way from Balfour to Meadow Creek. A good example of how impressive the preservation of lakeshore to mountain peaks can be is the Valhalla Provincial Park in the Slocan Valley, visible from Hwy 6. **The province is seriously lacking in this type of complete ecosystem protection in our park system.**²³

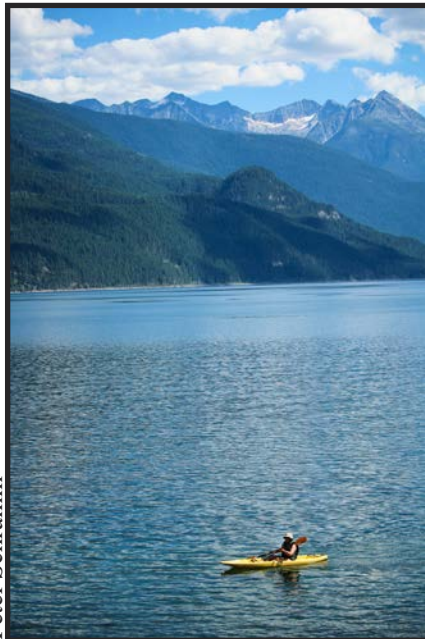
- It will protect existing recreational opportunities such as exploring the **limestone caves**, and access to **alpine lakes**. It will bring three already established trails to the park: A cairned route between Kootenay Joe Ridge and Mt. Willet, one to Heart Lake and Mt. Willet and one to the top of Mt. Willet from Argenta.

- It will support the rapidly growing eco-tourism industry at the north end of Kootenay Lake that relies on the natural beauty of the area. The annual run of the Gerrard rainbow trout draws many visitors every May; it has become a Mother's Day destination. The grizzly bears and eagles feasting on spawning Kokanee along the Lardeau River are a huge attraction in the fall. The scenery is world class: spectacular peaks, intact forest, huge old trees and clear blue waters. This is destination tourism at its finest.



Douglas Noblet

Mt. Willet is the tallest mountain on Kootenay Lake. As a connectivity corridor to the Purcell Wilderness Conservancy Provincial Park, the unprotected lakefront mountain face includes multiple scenic access routes into the Conservancy.



Peter Schramm

- It will end a very long-standing, contentious issue between the local communities and Ministry of Forests regarding the potential risks of logging in domestic watersheds on unstable slopes.

In 2010, BC Parks worked with the Canadian Parks Council to measure the economic benefits of parks.²⁴

The report on the Economic Impact of Canada's National, Provincial and Territorial Parks in 2009 found:

- ▶ Every 1 dollar invested in protected areas generates \$8.42 in visitor spending on goods and services.

- ▶ Spending related to provincial parks generated over \$28 million in tax revenues, returning 60% of BC Parks' capital and operating expenditures.

- ▶ The combined economic impact of this spending is a \$392 million boost to Gross Domestic Product (GDP) and over 5,200 full-time jobs.

- ▶ Spending associated with Provincial, National and Territorial Parks added a **total of \$4.6 billion to Canada's GDP**, generated \$2.9 billion in labour income (the equivalent of over 64,000 full-time jobs); and provided \$337.1 million in tax revenue to governments in 2009 alone!

Parks visitation is increasing rapidly²⁵

In 2022, the BC Parks reservation system saw a 26.5% increase in bookings since 2019. This increased demand, paired with increasing pressures of environmental change on our parks system, calls for **a significant expansion of our fully protected lands** in British Columbia and Canada. The primary focus should be on Species at Risk habitats and linkage corridors between existing protected areas.

Protecting the Argenta Face will Support the Goals Set for Long-Term Preservation of the Purcell Wilderness Conservancy Provincial Park and the BC Parks System.

Gary Diers



A very old larch tree on Mount Willet. These veteran trees provide food, shelter and nesting habitat for a number of wildlife species including Species at Risk.

A primary Conservation Objective of the Purcell Wilderness Conservancy Provincial Park, as identified in its Master Plan, was to “allow progression of natural systems to evolve with minimum human interference and alteration, subject to the **priorities of protecting special ecological features and maintaining the representative characteristics of the regional landscape.**”¹ Considering that:

- Mount Willet is the highest mountain on Kootenay Lake, contributing a spectacular view to the north end of the lake and to the only International Scenic Route in North America (The Selkirk Loop),
- The proposal has rare features and ecosystems that connect the PWCPP to the lakeshore and other wildlife habitats, and
- Some of these ecosystems and features, especially low-mid elevation old growth, are underrepresented in the PWCPP and total parks system,

It is clear that preservation of the Argenta Face will significantly enhance the parks system and *will support the long-term persistence of the values of the Purcell Wilderness Conservancy Provincial Park.*

The BC Parks Future Strategy states that existing parks must be managed as part of a broad, resilient ecosystem that can confront and control the impact of climate change.

On today’s rapidly-changing landscape, scientists have overwhelmingly agreed that:

- ▶ More of the landbase needs protection to mitigate worsening climate change.^{26,27}
- ▶ Preserving intact old growth ecosystems is key to maintaining landscape resiliency.^{26,28}
- ▶ Governments can mitigate climate-related disasters like flooding, droughts, fires and heatwaves by protecting and restoring intact forests.^{26,27}

It was over three decades ago that B.C. Ministry of Forests released their Old Growth Strategy for British Columbia report, which stated that:

“opportunities to reserve representative samples of old growth are dwindling rapidly”²⁹

The more recent Old Growth Strategic Review Panel acknowledged in 2020 that if the recommendations of that strategy had been fully implemented, it is unlikely we would be experiencing such a high risk to loss of biodiversity as well as economic loss.³⁰

Of the opportunities that still remain, the Argenta Face is a prime candidate. It is well known and loved as a stunning landscape of some of the region’s still-intact old forest that towers over Kootenay Lake from its highest mountain. It is an opportunity to contribute an ecological gem to the parks system that should have been included in the Purcell Wilderness Conservancy Provincial Park many decades ago. **It is time that governments secured the “missing piece” by protecting the Argenta Face for its high ecological value for future generations.**

Gary Diers



APPENDIX A – PROVINCIAL OR COSEWIC-LISTED ANIMAL SPECIES CONFIRMED OR THAT MAY OCCUR IN THE PROPOSAL AREA

The following table was compiled through the BC Species and Ecosystem Explorer using a custom polygon encompassing the Argenta Face proposal area. Search Criteria: Animals; Vertebrates & Invertebrates AND BC Blue or **Red-listed** OR COSEWIC listed as Extirpated (XT), Endangered (E), Threatened (T), or Special Concern (SC) (B.C. Conservation Data Centre 2024). Note that some BC-listed species that are Data Deficient (DD) or Not at Risk (NAR) under COSEWIC are also listed.

Table 1: Provincially or COSEWIC-listed animal species confirmed or that may occur in the proposal area.

Scientific Name	English Name	BC List	COSEWIC
<i>Accipiter gentilis atricapillus</i>	Northern Goshawk, <i>atricapillus</i> subspecies	Blue	NAR
<i>Acipenser transmontanus</i>	White Sturgeon	No Status	E/T
<i>Acipenser transmontanus</i> pop. 1	White Sturgeon (Upper Kootenay River Population)	Red	E
<i>Acipenser transmontanus</i> pop. 2	White Sturgeon (Upper Columbia River Population)	Red	E
<i>Aechmophorus clarkii</i>	Clark's Grebe	Red	
<i>Aechmophorus occidentalis</i>	Western Grebe	Red	SC
<i>Aeronautes saxatalis</i>	White-throated Swift	Blue	
<i>Aeshna constricta</i>	Lance-tipped Darner	Blue	
<i>Ambystoma mavortium</i>	Western Tiger Salamander	Red	E
<i>Anaxyrus boreas</i>	Western Toad	Yellow	SC
<i>Anguispira kochi</i>	Banded Tigersnail	Blue	NAR
<i>Aplodontia rufa</i>	Mountain Beaver	Yellow	SC
<i>Apodemia mormo</i>	Mormon Metalmark	Red	E
<i>Ardea herodias herodias</i>	Great Blue Heron, <i>herodias</i> subspecies	Blue	
<i>Argia vivida</i>	Vivid Dancer	Blue	SC
<i>Ascaphus montanus</i>	Rocky Mountain Tailed Frog	Blue	T
<i>Asio flammeus</i>	Short-eared Owl	Blue	T
<i>Bartramia longicauda</i>	Upland Sandpiper	Red	
<i>Boloria alberta</i>	Albert's Fritillary	Blue	
<i>Botaurus lentiginosus</i>	American Bittern	Blue	
<i>Buteo lagopus</i>	Rough-legged Hawk	Blue	NAR
<i>Buteo swainsoni</i>	Swainson's Hawk	Red	
<i>Butorides virescens</i>	Green Heron	Blue	
<i>Callophrys affinis</i>	Immaculate Green Hairstreak	Blue	
<i>Catherpes mexicanus</i>	Canyon Wren	Blue	NAR
<i>Charina bottae</i>	Northern Rubber Boa	Yellow	SC
<i>Chlosyne hoffmanni</i>	Hoffman's Checkerspot	Red	
<i>Chondestes grammacus</i>	Lark Sparrow	Blue	
<i>Chordeiles minor</i>	Common Nighthawk	Blue	SC
<i>Chrysemys picta</i>	Painted Turtle	No Status	T/SC
<i>Chrysemys picta</i> pop. 2	Painted Turtle - Intermountain -Rocky Mtn Popn	Blue	SC
<i>Cicindela hirticollis</i>	Hairy-necked Tiger Beetle	Blue	
<i>Coccythraustes vespertinus</i>	Evening Grosbeak	Yellow	SC
<i>Coccyzus americanus</i>	Yellow-billed Cuckoo	Red	
<i>Colias meadii</i>	Mead's Sulphur	Blue	
<i>Coluber constrictor</i>	North American Racer	Blue	T
<i>Contopus cooperi</i>	Olive-sided Flycatcher	Yellow	SC

Table 1 continued

<i>Copablepharon absidum</i>	Columbia Dune Moth	Red	DD
<i>Corynorhinus townsendii</i>	Townsend's Big-eared Bat	Blue	
<i>Cottus confusus</i>	Shorthead Sculpin	Blue	SC
<i>Cottus hubbsi</i>	Columbia Sculpin	Blue	SC
<i>Cottus</i> sp. 9	Rocky Mountain Sculpin	Red	SC
<i>Cryptomastix mullani</i>	Coeur d'Alene Oregonian	Blue	
<i>Cupido comyntas</i>	Eastern Tailed Blue	Blue	
<i>Cygnus columbianus</i>	Tundra Swan	Blue	
<i>Cypseloides niger</i>	Black Swift	Blue	E
<i>Danaus plexippus</i>	Monarch	Red	E
<i>Dolichonyx oryzivorus</i>	Bobolink	Red	SC
<i>Dryobates albolarvatus</i>	White-headed Woodpecker	Red	E
<i>Enallagma clausum</i>	Alkali Bluet	Blue	
<i>Epargyreus clarus clarus</i>	Silver-spotted Skipper, <i>clarus</i> subspecies	Blue	
<i>Eremobates scaber</i>		Red	
<i>Eremobates</i> sp. 1		Red	
<i>Eremobates</i> sp. 2		Red	
<i>Eremophila alpestris merrilli</i>	Horned Lark, <i>merrilli</i> subspecies	Red	
<i>Euphagus carolinus</i>	Rusty Blackbird	Blue	SC
<i>Euphydryas gillettii</i>	Gillette's Checkerspot	Blue	
<i>Euptoieta claudia</i>	Variegated Fritillary	Blue	
<i>Falco mexicanus</i>	Prairie Falcon	Red	NAR
<i>Falco peregrinus</i>	Peregrine Falcon	No Status	SC
<i>Falco rusticolus</i>	Gyrfalcon	Blue	NAR
<i>Fisherola nuttalli</i>	Shortface Lanx	Red	E
<i>Flumicola fuscus</i>	Ashy Pebblesnail	Red	
<i>Galba bulimoides</i>	Prairie Fossaria	Blue	
<i>Galba dalli</i>	Dusky Fossaria	Blue	
<i>Galba obrussa</i>	Golden Fossaria	Blue	
<i>Galba truncatula</i>	Attenuate Fossaria	Blue	
<i>Gulo gulo</i>	Wolverine	No Status	SC
<i>Gulo gulo luscus</i>	Wolverine, <i>luscus</i> subspecies	Blue	SC
<i>Gyraulus crista</i>	Star Gyro	Blue	
<i>Hemerotrecha</i> sp. 1		Red	
<i>Hemphillia camelus</i>	Pale Jumping-slug	Blue	
<i>Hesperia nevada</i>	Nevada Skipper	Blue	
<i>Hirundo rustica</i>	Barn Swallow	Yellow	SC
<i>Hydroprogne caspia</i>	Caspian Tern	Blue	NAR
<i>Icteria virens</i>	Yellow-breasted Chat	Red	E
<i>Kootenaia burkei</i>	Pygmy Slug	Blue	SC
<i>Larus californicus</i>	California Gull	Red	
<i>Lasiurus cinereus</i>	Hoary Bat	Blue	E
<i>Lepus townsendii</i>	White-tailed Jackrabbit	Red	
<i>Limenitis archippus</i>	Viceroy	Red	
<i>Limnodromus griseus</i>	Short-billed Dowitcher	Red	
<i>Lithobates pipiens</i>	Northern Leopard Frog	Red	E
<i>Lota lota</i> pop. 1	Burbot (Lower Kootenay Population)	Red	
<i>Lycaena dione</i>	Dione Copper	Red	
<i>Lycaena hyllus</i>	Bronze Copper	Blue	
<i>Lycaena nivalis</i>	Lilac-bordered Copper	Blue	

Table 1 continued

<i>Magnipelta mycophaga</i>	Magnum Mantleslug	Blue	SC
<i>Megascops kennicottii</i>	Western Screech-Owl	No Status	T
<i>Megascops kennicottii macfarlanei</i>	Western Screech-Owl, <i>macfarlanei</i> subspecies	Blue	T
<i>Melanerpes lewis</i>	Lewis's Woodpecker	Blue	T
<i>Melanitta perspicillata</i>	Surf Scoter	Blue	
<i>Musculium partumeium</i>	Swamp Fingernailclam	Blue	
<i>Musculium transversum</i>	Long Fingernailclam	Blue	
<i>Myodes gapperi galei</i>	Southern Red-backed Vole, <i>galei</i> subspecies	Blue	
<i>Myotis lucifugus</i>	Little Brown Myotis	Blue	E
<i>Myotis septentrionalis</i>	Northern Myotis	Blue	E
<i>Myotis yumanensis</i>	Yuma Myotis	Blue	
<i>Nannopterum auritum</i>	Double-crested Cormorant	Blue	NAR
<i>Neotamias minimus oreocetes</i>	Least Chipmunk, <i>oreocetes</i> subspecies	Blue	
<i>Neotamias minimus selkirki</i>	Least Chipmunk, <i>selkirki</i> subspecies	Red	
<i>Neotamias ruficaudus ruficaudus</i>	Red-tailed Chipmunk, <i>ruficaudus</i> subspecies	Red	
<i>Neotamias ruficaudus simulans</i>	Red-tailed Chipmunk, <i>simulans</i> subspecies	Blue	
<i>Numenius americanus</i>	Long-billed Curlew	Yellow	SC
<i>Nycticorax nycticorax</i>	Black-crowned Night-Heron	Red	
<i>Oeneis jutta chermocki</i>	Jutta Arctic, <i>chermocki</i> subspecies	Blue	
<i>Oncorhynchus clarkii clarkii</i>	Cutthroat Trout, <i>clarkii</i> subspecies	Blue	
<i>Oncorhynchus clarkii lewisi</i>	Cutthroat Trout, <i>lewisi</i> subspecies	Blue	SC
<i>Ophiogomphus occidentis</i>	Sinuous Snaketail	Blue	
<i>Oreamnos americanus</i>	Mountain Goat	Blue	
<i>Oreohelix subrudis</i>	Subalpine Mountainsnail	Blue	
<i>Oreoscoptes montanus</i>	Sage Thrasher	Red	E
<i>Ovis canadensis</i>	Bighorn Sheep	Blue	
<i>Patagioenas fasciata</i>	Band-tailed Pigeon	Blue	SC
<i>Pelecanus erythrorhynchos</i>	American White Pelican	Red	NAR
<i>Phalaropus lobatus</i>	Red-necked Phalarope	Blue	SC
<i>Pholisora catullus</i>	Common Sootywing	Blue	
<i>Physella columbiana</i>	Rotund Physa	Red	
<i>Plestiodon skiltonianus</i>	Western Skink	Blue	SC
<i>Plethodon idahoensis</i>	Coeur d'Alene Salamander	Blue	SC
<i>Pluvialis dominica</i>	American Golden-Plover	Blue	
<i>Podiceps nigricollis</i>	Eared Grebe	Blue	
<i>Polites sabuleti</i>	Sandhill Skipper	Red	
<i>Polites sonora</i>	Sonora Skipper	Blue	NAR
<i>Polites themistocles themistocles</i>	Tawny-edged Skipper, <i>themistocles</i> subspecies	Blue	
<i>Pristiloma arcticum</i>	Northern Tightcoil	Blue	
<i>Progne subis</i>	Purple Martin	Blue	
<i>Pyrgus communis</i>	Checkered Skipper	Blue	
<i>Rangifer tarandus pop. 1</i>	Caribou (Southern Mountain Population)	Red	E
<i>Recurvirostra americana</i>	American Avocet	Blue	
<i>Rhinichthys umatilla</i>	Umatilla Dace	Red	T
<i>Salvelinus confluentus</i>	Bull Trout	Blue	SC
<i>Satyrium behrii</i>	Behr's Hairstreak	Red	E
<i>Satyrium californica</i>	California Hairstreak	Blue	
<i>Satyrium semiluna</i>	Half-moon Hairstreak	Red	E
<i>Setophaga castanea</i>	Bay-breasted Warbler	Red	
<i>Setophaga virens</i>	Black-throated Green Warbler	Blue	
<i>Somatochlora forcipata</i>	Forcipate Emerald	Blue	

Table 1 continued

<i>Speyeria aphrodite manitoba</i>	Aphrodite Fritillary, <i>manitoba</i> subspecies	Blue	
<i>Speyeria mormonia erinna</i>	Mormon Fritillary, <i>erinna</i> subspecies	Red	
<i>Sphaerium occidentale</i>	Herrington Fingernailclam	Blue	
<i>Sphaerium striatinum</i>	Striated Fingernailclam	Blue	
<i>Sphyrapicus thyroideus</i>	Williamson's Sapsucker	Blue	E
<i>Stagnicola caperata</i>	Wrinkled Marshsnail	Blue	
<i>Stagnicola traski</i>	Widelip Pondsnaill	Blue	
<i>Sterna forsteri</i>	Forster's Tern	Red	DD
<i>Synaptomys borealis artemisiae</i>	Northern Bog Lemming, <i>artemisiae</i> subspecies	Blue	
<i>Taxidea taxus</i>	American Badger	Red	E
<i>Thomomys talpoides segregatus</i>	Northern Pocket Gopher, <i>segregatus</i> subspecies	Red	
<i>Tyto alba</i>	Barn Owl	Blue	T
<i>Ursus arctos</i>	Grizzly Bear	Blue	SC
<i>Valvata humeralis</i>	Glossy Valvata	Red	
<i>Valvata tricarinata</i>	Threeridge Valvata	Red	
<i>Vertigo ventricosa</i>	Tapered Vertigo	Red	
<i>Zacoleus idahoensis</i>	Sheathed Slug	Blue	SC

APPENDIX B – PROVINCIALY-LISTED ECOLOGICAL COMMUNITIES CONFIRMED OR THAT MAY OCCUR IN THE PROPOSAL

The following table was compiled through the BC Species and Ecosystem Explorer using a custom polygon encompassing the Argenta Face proposal area. Search Criteria: Ecological Communities AND BC Blue or **Red-listed** OR COSEWIC listed as Extirpated (XT), Endangered (E), Threatened (T), or Special Concern (SC) (B.C. Conservation Data Centre 2024).

Table 2: Provincially or COSEWIC-listed ecological communities confirmed or that may occur in the Argenta Face proposal area.

Scientific Name	English Name	BC List	COSEWIC
<i>Amelanchier alnifolia</i> - <i>Shepherdia canadensis</i> - <i>Juniperus communis</i>	saskatoon - soopolallie - common juniper	Blue	N/A
<i>Danthonia intermedia</i> - <i>Vaccinium scoparium</i> - <i>Eremogone capillaris</i> - <i>Selaginella densa</i>	timber oatgrass - grouseberry - thread-leaved sandwort - compact selaginella	Red	N/A
<i>Festuca campestris</i> - <i>Eriogonum umbellatum</i> - <i>Eremogone capillaris</i>	rough fescue - sulphur buckwheat - thread-leaved sandwort	Red	N/A
<i>Festuca idahoensis</i> - <i>Eriogonum umbellatum</i> - <i>Eremogone capillaris</i>	Idaho fescue - sulphur buckwheat - thread-leaved sandwort	Red	N/A
<i>Populus trichocarpa</i> / <i>Symphoricarpos albus</i> - <i>Rosa spp.</i>	black cottonwood / common snowberry - roses	Red	N/A
<i>Pseudotsuga menziesii</i> / <i>Mahonia aquifolium</i> / <i>Cryptogramma acrostichoides</i>	Douglas-fir / tall Oregon-grape / parsley fern	Red	N/A
<i>Salix sitchensis</i> - <i>Salix lasiandra</i> var. <i>lasiandra</i> / <i>Lysichiton americanus</i>	Sitka willow - Pacific willow / skunk cabbage	Blue	N/A
<i>Thuja plicata</i> - <i>Tsuga heterophylla</i> / <i>Equisetum arvense</i>	western redcedar - western hemlock / common horsetail	Blue	N/A

APPENDIX C – PROVINCIAL OR COSEWIC-LISTED PLANT AND LICHEN SPECIES CONFIRMED OR THAT MAY OCCUR IN THE PROPOSAL AREA

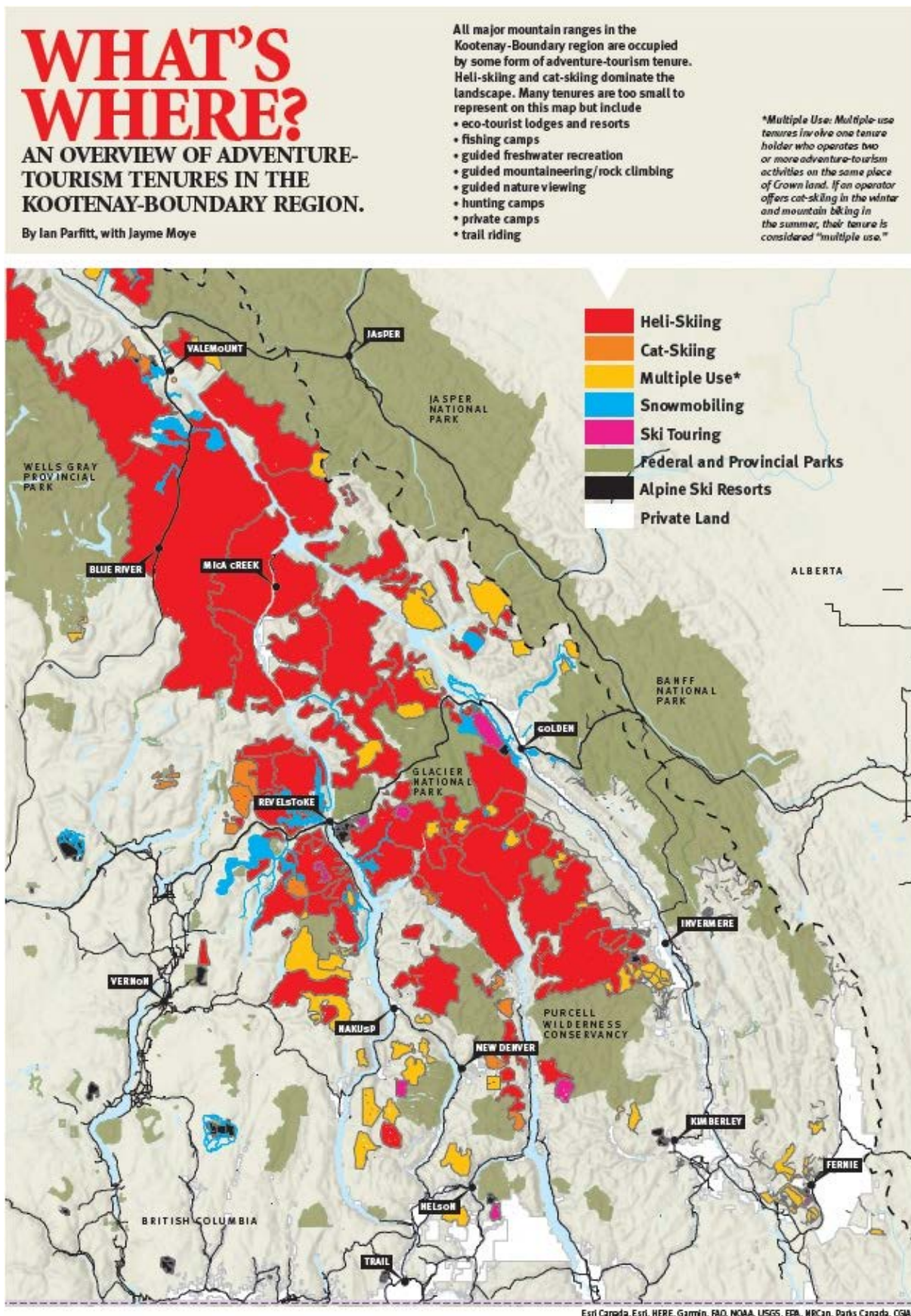
The following table was compiled through the BC Species and Ecosystem Explorer using a custom polygon encompassing the Argenta Face proposal area. Search Criteria: Plants & Lichens AND BC Blue or Red-listed OR COSEWIC listed as Extirpated (XT), Endangered (E), Threatened (T), or Special Concern (SC) (B.C. Conservation Data Centre 2024).

Table 3: Provincially or COSEWIC-listed plant and lichen species confirmed or that may occur in the Argenta Face proposal area.

Scientific Name	English Name	BC List	COSEWIC
<i>Anemone piperi</i>	Piper's anemone	Red	
<i>Arctoparmelia subcentrifuga</i>	abrading ring	Blue	
<i>Bartramia halleriana</i>	Haller's apple moss	Red	T
<i>Botrychium michiganense</i>	Michigan moonwort	Blue	
<i>Botrychium montanum</i>	mountain moonwort	Blue	
<i>Botrychium paradoxum</i>	two-spiked moonwort	Blue	
<i>Carex pedunculata</i>	peduncled sedge	Blue	
<i>Cladonia cyanipes</i>	blue-footed pixie	Blue	
<i>Cladonia luteoalba</i>	lemon pixie	Blue	
<i>Claytonia cordifolia</i>	heart-leaved springbeauty	Blue	
<i>Collema bachmanianum</i>	Caesar's tarpaper	Blue	
<i>Entosthodon fascicularis</i>	banded cord-moss	Blue	SC
<i>Evernia divaricata</i>	mountain oakmoss	Blue	
<i>Glycyrrhiza lepidota</i>	wild licorice	Blue	
<i>Leptogium cyanescens</i>	blue-blue vinyl	Red	
<i>Nephroma isidiosum</i>	pebbled paw	Blue	
<i>Pinus albicaulis</i>	whitebark pine	Blue	E
<i>Pinus flexilis</i>	limber pine	Blue	E
<i>Polemonium californicum</i>	California Jacob's ladder	Red	
	leafless wintergreen	Blue	
<i>Scouleria marginata</i>	marginated streamside moss	Red	E
<i>Sisyrinchium idahoense</i> var. <i>occidentale</i>	Idaho blue-eyed grass	Red	
<i>Thalictrum dasycarpum</i>	purple meadowrue	Blue	
<i>Utricularia ochroleuca</i>	ochroleucous bladderwort	Blue	

APPENDIX D – COMMERCIAL RECREATION TENURES IN THE RANGE OF DEEP-SNOW MOUNTAIN CARIBOU. Map from Kootenay Mountain Culture Magazine.³¹

***Note the Argenta Face proposal area is not tenured.*



References

- 1 Ministry of Parks. 1991. Master Plan for Purcell Wilderness Conservancy. <https://www.for.gov.bc.ca/hfd/library/documents/bib86260.pdf>
- 2 CORE. 1994. West Kootenay-Boundary Land Use Plan.
- 3 Kootenay Inter-Agency Management Committee. 1997. Kootenay/Boundary Land Use Plan Implementation Strategy. https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/land-water-use/crown-land/land-use-plans-and-objectives/kootenay-boundary-region/kootenayboundary-rlup/kootenayboundary_rlup_implementation_strategy.pdf
- 4 Regional District of Central Kootenay. 2008. Electoral Area D – North Kootenay Lake. April 2008 survey results report.
- 5 The Tyee. 2012. What Happened in Johnsons Landing? <https://thetyee.ca/News/2012/07/27/Johnsons-Landing-Landslide/>
- 6 MoF. 2014. Visual GAR Order, March 7. Map showing “Established Visual Quality Objectives – Kootenay Lake TSA” (February 12, 2014).
- 7 Brenda Herbison. 2020. Proposed Cutting Permit 405 on the Salisbury Face, east side of Kootenay Lake: Assessment of habitat and risks for mountain caribou and other wildlife. Report to Cooper Creek Cedar.
- 8 Old Growth Technical Advisory Panel Priority Deferral Areas Dataset. Retrieved from: <https://catalogue.data.gov.bc.ca/dataset/old-growth-technical-advisory-panel-tap-priority-deferral-areas>
- 9 Old Growth Inland Rainforest. 2022. Parks Canada webpage on Glacier National Park. Retrieved from <https://parks.canada.ca/pn-np/bc/glacier/nature/naturelle-natural/pluviale-rainforest>
- 10 Amber Peters pers. comm. 2024.
- 11 Seip, D.R. et al. 2007. Displacement of Mountain Caribou From Winter Habitat by Snowmobiles. *The Journal of Wildlife Management*, 71: 1539-1544. <https://doi.org/10.2193/2006-387>
- 12 Gill, R. et al. 2024. Movement ecology of endangered caribou during a COVID-19 mediated pause in winter recreation. *Anim. Conserv..* <https://doi.org/10.1111/acv.12912>
- 13 Parks Canada. 2017. Species at Risk Act. Retrieved from: <https://www.pc.gc.ca/en/nature/science/especes-species/itm1>
- 14 Lavoie, J. 2021. Immediate action needed as habitat loss, not wolves, drive caribou to extinction. <https://www.focusonvictoria.ca/reporting/52/>
- 15 Goward, T. et al. 2022. Stand openness predicts hair lichen (*Bryoria*) abundance in the lower canopy, with implications for the conservation of Canada’s critically imperiled Deep-Snow Mountain Caribou (*Rangifer tarandus caribou*). *Forest Ecology and Management*. 520. 120416. [10.1016/j.foreco.2022.120416](https://doi.org/10.1016/j.foreco.2022.120416).
- 16 Auditor General of British Columbia. 2010. Conservation of Ecological Integrity in BC Parks and Protected Areas. Retrieved from: https://www.bcauditor.com/sites/default/files/publications/2010/report_3/report/OAGBC_Parks%20Report_OUT2.pdf
- 17 Proctor, M.F. et al. 2012. Population Fragmentation and Inter-Ecosystem Movements of Grizzly Bears in Western Canada and the Northern United States. *Wildlife Monographs* 180:1-46.
- 18 Proctor, M.F., S.E. Nielsen, W.F. Kasworm, C. Servheen, T.G. Radandt, A.G. MacHutchon, and M.S. Boyce. 2015. Grizzly bear connectivity mapping in the Canada-US trans-border region. *Journal of Wildlife Management* 79:544-555.
- 19 Government of Canada. 2023. Critical Habitat of Species at Risk dataset. Retrieved from: <https://open.canada.ca/data/en/dataset/db177a8c-5d7d-49eb-8290-31e6a45d786c>
- 20 Halleran P. W. 2022. Detailed Terrain Stability/Karst Field Review Proposed Harvesting and Road Construction in the Argenta Face Area CP 416 blocks 1 – 9; 12- 14: Bulmer Main Line and Spurs for Cooper Creek Cedar Ltd.

References continued

- 21 Fisheries and Oceans Canada. 2014. Recovery strategy for White Sturgeon (*Acipenser transmontanus*) in Canada [Final]. In Species at Risk Act Recovery Strategy Series. Ottawa: Fisheries and Oceans Canada.
- 22 B.C. Conservation Data Centre. 2024. BC Species and Ecosystems Explorer. B.C. Minist. of Environ. Victoria, B.C. Available: <https://a100.gov.bc.ca/pub/eswp/> (accessed Jan 11, 2024 with a custom shapefile of the proposal area).
- 23 BC Parks. 2024. Anarchist Protected Area. <https://bcparks.ca/anarchist-protected-area/>
- 24 Canadian Parks Council. 2010. The Economic Impact of Canada's National, Provincial & Territorial Parks in 2009/ <https://www.cppcl.ca/wp-content/uploads/2020/02/CPC-Economic-impact-of-canadais-national-provincial-and-territorial-parks-in-2009.pdf>
- 25 CTV News. 2023. BC Parks prepares to roll out campsite reservations in 4-month window <https://bc.ctvnews.ca/bc-parks-prepares-to-roll-out-campsite-reservations-in-4-month-window-1.6214993>
- 26 Watson, J. E. M. 2018. The exceptional value of intact forest ecosystems. *Nature Ecology & Evolution*. DOI: 10.1038/s41559-018-0490-x
- 27 Wood, P. 2021. Intact forests, safe communities: Reducing community climate risks through forest protection and a paradigm shift in forest management. Report for Sierra Club, BC. <https://sierraclub.bc.ca/wp-content/uploads/2021-Forest-Climate-Risk-Assessment-Report-final-February.pdf>
- 28 Thom, D. The climate sensitivity of carbon, timber, and species richness covaries with forest age in boreal–temperate North America. *Global Change Biology*, 2019; DOI: 10.1111/gcb.14656
- 29 B.C. Ministry of Forests. 1992. An Old Growth Strategy for British Columbia. Old Growth Strategy Project. <https://www.for.gov.bc.ca/hfd/library/documents/Bib1569.pdf>
- 30 Old Growth Review Panel. 2020. A New Future for Old Forests: A Strategic Review of How British Columbia Manages for Old Forests Within its Ancient Ecosystems. <https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/strategic-review-20200430.pdf>
- 31 Kootenay Mountain Culture Magazine. 2022. Map of Commercial Recreation Tenures. <https://kootenaymountainculture.com/tenure-in-the-kootenays-british-columbia/>

Our Mission Statement:

Our goal is the legislated inclusion of the Argenta-Johnsons Landing Face, from mountain top to lakeshore, (excluding private land) within the Purcell Wilderness Conservancy Provincial Park. This will permanently protect a disappearing essential wilderness and enhance the viability of the PWCPP. We seek public and political support for this inclusion proposal.

We acknowledge that this proposal is within Ktunaxa, Secwepemc, Sinixt and Sylix territories and we welcome their support.

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Please follow us on Facebook – <https://www.facebook.com/Mt.WilletWildernessForever>

Please feel free to circulate and/or copy this document in support of our goal.

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Friends of the Lardeau River, Friends of West Kootenay Parks, West Kootenay EcoSociety,
Wildsight, The Wilderness Committee, The Northwest Wilderness Society,
Valhalla Wilderness Society and Yellowstone to Yukon Conservation Initiative



Louis Bockner