



## Open letter from the Mountain Caribou Project February 11, 2008

On October 16, 2007 the BC government announced its recovery implementation plan for mountain caribou. The announcement was publicly supported by the Mountain Caribou Project, a coalition of 10 ENGO partners that have worked towards the recovery of mountain caribou for many years, either through earlier processes such as the Recovery Implementation/Action Groups, through Higher Level Plan processes, or through public and marketplace campaigning. We decided to support the plan because it commits government to:

1. Protect substantial amounts of currently unprotected habitat, which is of course central to recovery success. Where identified by herd experts the new protection will include low elevation habitat.
2. Manage the rapidly expanding human recreational footprint in caribou habitat.
3. Manage predator populations *only where they are preventing recovery of mountain caribou*. Elevated predation rates are explicitly recognized as a secondary effect of habitat loss and fragmentation; the plan requires that predation management be supported by publicly reviewed scientific rationales.
4. Augment smaller herds (between 10 and 50 animals).

Based on extensive consultations with herd scientists and our own analyses, we believe that the plan, if effectively and completely implemented, will give mountain caribou a much better chance at full recovery than current management. Significant amounts of forested habitat, mostly old-growth forests, will be protected. Protecting these forests will also protect habitat for at least 21 other endangered species, including grizzly bears, wolverine and bull trout. That said, much more old-growth forest needs to be protected in the Inland Rainforest, and our organizations will continue to work towards that goal.

The October announcement represented a set of government commitments. There will certainly be resistance to full plan implementation from various sectors. It is critical that all those who are concerned about mountain caribou and the Inland Rainforest remain vigilant and focus their energy on ensuring the plan is fully implemented as announced.

Below we outline the commitments made by government on October 16, 2007 and our view of the current status of progress on those commitments.

### Habitat

#### Government commitments:

- New caribou habitat protections of between 77,000 and 115,000 ha of the Timber Harvesting Land Base (THLB) and approximately 300,000 ha of habitat currently outside of the THLB.

These lands are commonly referred to as the non-timber harvesting landbase, or NTHLB<sup>1</sup> and are also critical to caribou.

- New habitat protections will encompass 100% of the best habitat (High Suitability Habitat) in most caribou recovery areas or Planning Units. In two of the eight Planning Units (North Thompson and Revelstoke-Shuswap) the protection of the best habitat will be less than 90%, a government decision attributed to concerns about economic consequences in those regions.
- No mills will be made non-viable by caribou habitat protections in the short term (five years – pending a mill viability analysis).
- Areas removed from the THLB will be accounted for in future determinations of the Annual Allowable Cut, putting downward pressure on the allowable volumes.
- The Integrated Land Management Bureau will work with the Ministry of Energy, Mines and Petroleum Resources to enact No Registration or Conditional Registration Reserves over the new protected areas, essentially limiting mining in caribou reserves.

### **Process and Status**

Habitat maps and rationales have been released for most areas and a public comment period ended January 31. The maps and rationale for the Central Selkirks unit are still under development as of this writing. The Mountain Caribou Project submitted detailed comments that we will provide upon request.

### **Concerns and Issues**

Some in the environmental community have raised concerns of media reports of “no net loss to industry” and capped habitat protection at 1% of the Timber Harvesting Land Base (THLB). We share those concerns. Additionally we are concerned that due to an analysis error the habitat budget allocated to the Cariboo-Chilcotin planning unit was too small to protect all the High Suitability Habitat, and should have been 23,000 ha larger.

### **Response**

There were no commitments to “no net loss” in the October announcement; rather the commitment is that in the short term no mills will be made non-viable by habitat protection announcements. Mill viability analysis is underway and will be reviewed in detail by the Mountain Caribou Project once released. There are many factors influencing the current forestry downturn, which has resulted in many mill closures, and any credible viability analysis must take all relevant factors into account.

The 1% THLB cap was not revealed by government until after the announcement, which is deeply troubling. However, we based our support of the habitat conservation aspects of the plan on extensive individual consultations with science team members across the recovery plan area as to the adequacy of proposed protected areas. According to the Species at Risk Coordination Office (SARCO) the 1% cap on THLB impacts is based on the THLB within the gross planning unit areas: an area much greater than the actual current caribou range. All THLB habitat protection will occur within the caribou range; therefore on a caribou range scale the conservation of habitat within the THLB is significantly greater than 1%. Also note that the 1% cap applies only to THLB; 100% of caribou habitat not within the THLB (the aforementioned NTHLB) will be protected from future industrial forest and mining development. This is very significant because industry has been steadily advancing into these areas.

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<sup>1</sup> The name NTHLB is somewhat misleading as these lands are not legally off limits to logging, but they experience less logging pressure largely due to economic conditions. Without the commitment to the additional 300,000 ha of protection, lands in the NTHLB are still vulnerable to logging and other development.

We have expressed our concern about the habitat budget shortfall in the Cariboo-Chilcotin to SARCO; our position is that there is ample room within the 115,000 ha cap to ensure the commitment to 100% high suitability habitat protection and self-sustaining recovery status for this area can be achieved.

## **Recreation**

### **Government Commitment**

Government will work with snowmobile clubs to develop Stewardship Management Agreements (SMAs) for each of their riding areas. The Mountain Caribou Science Team will review the proposed SMAs, and "... (i) f the Science Team demonstrates through sound rationales, based on the best available science, that the SMA will have a negative impact on a planning unit reaching its population target these areas will be legally closed." It was further committed that by January 31, areas without agreements would be sent to government for decision based upon science team recommendations. In terms of heli-skiing, government committed "to work with users to manage their activities in a manner that does not displace mountain caribou" and to "reduce impacts on mountain caribou through training, best practices, monitoring, and information sharing."

### **Process and Status**

Herd biologists are currently identifying and mapping areas within caribou habitat that are critical for recreation management.

### **Concerns and Issues**

The Mountain Caribou Project has voiced concern to SARCO that the SMA process is not meeting its timelines. No agreements with snowmobile clubs have been reached yet and it is unclear whether government will legalize necessary closures. We remain very engaged in this process but managing inappropriate recreation must be a community effort and vigilance is required. We are similarly concerned at the lack of progress on managing helicopter recreation.

### **Response**

The position of the Mountain Caribou Project is that all of high suitability mountain caribou habitat should be closed to motorized recreation unless specific areas are opened via SMAs that are agreed to by herd scientists. It is also our position that so-called Best Management Practices do not provide a sufficiently low-risk approach to allow heli-skiing or other intrusive recreation in high suitability caribou habitat. In particular we are strongly opposed to glading (opening ski runs through high-elevation logging) in any of the mapped habitat areas. Glading in caribou habitat equates to habitat destruction and increases the human footprint in caribou habitat contrary to the recovery objectives.

## **Predation**

The scientific consensus is that while habitat loss and fragmentation is the underlying cause of caribou declines some herds are at high risk of extirpation due to high predation rates. Wolves and cougars were identified by herd experts as two predator species of specific concern. Predators such as grizzly bears, wolverines, lynx and golden eagles are not subject to predator control measures under the implementation plan.

### **Government Commitment**

That predator management must be part of a comprehensive mountain caribou recovery strategy where predation is shown to be effectively hindering herd recovery objectives.

## **Concerns and Issues**

That government will feel pressured to use predator controls as a surrogate for necessary habitat protections and that predator controls will be applied too liberally and for extended periods of time. That government will move ahead with lethal actions before a strategy has been peer-reviewed, and habitat protections legalized.

## **Response**

The Mountain Caribou Project has been consistent in its position that predator management must be targeted and scientifically defensible. We do not support the killing of any predators until effective habitat protection measures are legalized and scientific research has shown that specific predator packs or animals are preventing caribou recovery. We have requested that the Ministry of Environment release its draft strategy for predator-prey management and that the strategy be peer reviewed. We support the extensive data gathering currently underway by the MoE with respect to predator and prey species that broadly share habitat with mountain caribou.

## **Augmentation**

The two southern-most caribou herds number between 15 and 50 animals. Augmenting these populations with cows from other populations in conjunction with the use of maternity pens in release areas holds the promise of quickly increasing the sizes of these populations. In subsequent years the transplanted mature animals - and their offspring - will provide these herds with a greater ability to grow. The South Selkirks herd has shown growth in each of the last four counts (since 2002) and is expected to further move toward the set population targets with the addition of pregnant cows.

## **Government Commitment**

To augment smaller herds until population targets are reached and to fund implementation of this management tool; to continue to work with both source and recipient First Nations to advance translocations. Funding has been secured to construct maternity pens.

## **Process and Status**

Consultations with First Nations in animal donor regions are ongoing as are donor animal population censuses. As yet it is unclear how robust caribou donor populations are and when transplants will occur.

## **Concerns and Issues**

It is critical that augmentation occur next winter. Further delays will increase the probability of herd extirpation in the southern Kootenay planning units.

## **Response**

We are continuing to pressure to SARCO to move forward with mountain caribou transplants as soon as census work is complete.

## **Conclusion**

The Mountain Caribou Project remains supportive of the framework for mountain caribou recovery in British Columbia and believes the plan offers a good foundation to accomplish its stated objective, which is: "*Halt the decline of mountain caribou within seven years for each Planning Unit and recover mountain caribou to 1995 population levels (2500 animals) across the mountain caribou range within 20 years in those Planning Units with greater than 10 animals.*" While we acknowledge that the plan has shortcomings we remain committed to ensuring that it is implemented consistent with government commitments, specifically to

protect adequate habitat to meet individual herd recovery objectives and minimize predator controls, and manage recreation so that it does not impair recovery objectives. We remain equally committed to the legalization of caribou recovery and habitat protection mechanisms.

**Mountain Caribou Project member organizations and their contacts:**

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