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Ministry of Forests, Lands, Natural Resource Operations and Rural Development

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Sent by email: caribou.recovery@gov.bc.ca

To whom it may concern:

Thank you for the opportunity to comment on the Provincial Caribou Recovery Program Discussion paper (hereafter referred to as the 'discussion paper'). We provide this feedback in our collective capacity as caribou scientists and advisers to the federal and provincial governments. For example, over the past decade we have both advised the scientific exercise of assessing and identifying critical habitat, which formed the scientific foundation for the federal *Recovery Strategy for the Woodland Caribou, Boreal Population, in Canada* (2012), as well as the current *Boreal Caribou Enhanced Analysis Project*, led by Environment & Climate Change Canada. We have both been members and co-chairs¹ since 2009 of COSEWIC's terrestrial mammals subcommittee, which was responsible for both revising the designatable unit structure of caribou in Canada (2011) and assessing the status assessments of all 11 extant caribou DUs (from 2014-2017). We have both conducted primary research and have authored numerous peer-reviewed publications and reports on caribou, with an emphasis on boreal and mountain "ecotypes".

We are writing this letter to convey our profound concerns with the contents of this discussion paper, given its potential use as a framework for the recovery of boreal and mountain caribou in the province. As we explain herein, the "new" and "made in BC approach" celebrated by the discussion paper adds little if anything to the efficacy or probability of recovery for caribou in BC and is not consistent with BC's obligation to protect critical habitat under the federal *Species At Risk Act* (SARA). This is because it spells out a direction that is more appropriately characterized as status quo than "new" and ignores key tenets of clear and consistent scientific findings regarding caribou declines that suggest strongly that a "made in BC approach" is both unreasonable and unnecessary.

In this vein, we describe several fundamental problems with the Discussion Paper organized by theme.

Lack of acknowledgement of the problem

The discussion paper avoids a frank acknowledgement of the scientifically-demonstrated risks to persistence facing caribou in BC and elsewhere. It does so by undertaking the discussion of "challenges faced by caribou" in a tentative manner, often relying on vague, jargon-laden language. Most critically, the first statements in the document emphasize climate change above other factors (p. 4). And when the most well-accepted factors explaining decline are later discussed in some detail (p. 8), predation that is "out of balance from the natural cycle" receives the primary emphasis. Well down the list is the primary driver of decline, "human activity", surpassed in apparent importance by "natural events". To our knowledge, very few caribou biologists involved in the recovery of caribou across Canada are concerned about the impacts of "natural events" over "human activity".

¹ JCR served as co-chair from 2009-2017 and CJJ was a member from 2010 and began as co-chair in January 2018.

Although the text eventually gets at some of the ultimate factors causing caribou decline, it is not before the paper has set a tone that clearly avoids the key issues faced by caribou in BC, namely multiple decades of cumulative clearing of habitat, mostly for commercial purposes. Indeed, the term “cumulative effects” receives not a single mention in this discussion paper.

Lack of acknowledgement of accumulated body of research

In presenting the case for how caribou in BC are faring and the stressors they face, the discussion paper seems to ignore well-founded tenets of caribou research. In the case of boreal caribou, the reasons for the declines are complex, yet despite that complexity and the broad geographic range of the species, scientific research has yielded clear and consistent results across the country.

In short, the accumulated body of evidence from several decades of caribou research has revealed that increases in habitat disturbance result in a greater likelihood of population decline and local extinction (extirpation) of caribou. Similarly, the science focused on populations of mountain caribou across disturbed landscapes in BC, Alberta and Québec demonstrate that human-caused habitat change is the underlying mechanism of altered predator-prey dynamics and the decline of caribou populations. This pattern even holds for populations of mountain caribou that exist within protected areas (e.g., Jasper National Park, Gaspésie National Park). What is also clear is that the costs and challenges associated with recovery increase as populations decline. For example, captive breeding facilities to repopulate the mountain parks of Alberta will be extremely expensive, if not impractical.

Overemphasis of recovery actions to date

In addition to a misleading representation of the problem for BC caribou, the discussion paper overstates the “significant efforts” that have been made to date by the BC and federal governments to protect them. Given the deteriorating state of caribou in the province, which *is* made clear in the discussion paper (“herd numbers keep dwindling, while threats to caribou and caribou habitat keep growing”) it appears disingenuous to suggest that there has been much progress through applications of SARA and “policies and targeted management plans”. In fact, other than the publication of recovery strategies for the boreal and mountain caribou, there has been no substantive progress on those fronts.

As a glaring and irrefutable example, the province has not established range plans for boreal caribou, despite a generous 5-year window and firm scientific guidance in the Boreal Caribou Recovery Strategy. The discussion paper is absent in providing any form of introspection relative to past and ongoing failures to meet requirements under existing law. It raises the question for us why should British Columbians trust the vague statements and claims within the discussion paper, when there has been so little movement on legally-required actions?

Lack of effective solutions that will be required to achieve caribou recovery in BC

We are aware of no research results that point to an alternative pathway from managing human-caused disturbance as the best insurance against caribou population decline and extirpation. Although limiting disturbance across caribou ranges and critical habitat is prominent in both the federal boreal and southern mountain recovery strategies, there is no acknowledgement of this imperative in the discussion paper, and “cumulative effects” go unmentioned altogether. We are concerned that this departure from the well-accepted and legally-required approach for recovery serves as the foundation for “A New Approach: Made in BC”. The mitigation strategies (i.e., “caribou-friendly approaches” like

best management practices) emphasized in the discussion paper will appeal to industry, but these short cuts will not be effective without limiting the extent of habitat change across landscapes.

The Habitat Protection Legislation section (5.3) is refreshing for its acknowledgement of the lack of protection in existing BC legislation and policy, but skirts the issue of managing cumulative disturbance. We find it striking that the document does not even mention the cumulative effects framework² that the BC government recently put in place. And while this instrument would not be sufficient, given the lack of direct pathways to influence or force decisions (as opposed to merely “informing” them), it is at least a very useful starting point for the kind of approach that would be required for yielding meaningful results for caribou.

The overall approach taken by the discussion paper is similar to those that have failed in the past, namely the provision of a basket of disaggregated and site-specific best management practices for industry and intensive population management (e.g., maternal penning). This contrasts with a relatively costly, but much-needed focus on how the collective set of activities will be managed in an integrated fashion at appropriate scales (the scale of the population range). Moreover, it is notable that in the habitat management section (6), only forestry and recreation are discussed, and oil and gas (the dominant agent of land use change for all boreal and some mountain herds) and mining (e.g., coal mining in Central Mountain caribou ranges) are not even mentioned. To illustrate our point, the BC government is continuing to entertain discussions about building several open-pit coal mines in prime caribou habitat within several Central Mountain ranges, where every single herd is in decline.

Habitat and population management are discussed in separate sections of the discussion paper, as if these are sets of alternative tactics. With the exception of health monitoring, the document fails to mention that the population management approaches appearing in the paper should only be considered for those populations that are nearing extirpation (i.e., numbering < 100 individuals and declining). Moreover, in cases where they are applied, this must be in tandem with habitat restoration and management of cumulative disturbance, otherwise it will be an endless, expensive, and unethical process of intensive management activities. Where wolf control might be working for the time being (e.g., Quintette population), it is essential to provide an off ramp. This is only possible if there is coordinated landscape-scale restoration and future footprint reduction; killing 100-150 wolves each year for an indefinite period of time does not provide license to continue development activities.

The document almost seems to promote intensive management approaches, naming a pen experiment in Alberta “innovative”, while they should be thought of as desperate measures that should be avoided through proactive interventions. The document also overstates the results of some strategies, without providing evidence of success. In fact, we are aware of no evidence that suggests that supplemental feeding, maternal penning and management of primary prey have had a substantive long-term influence on the recovery of the few populations where these approaches have been attempted. Again, the federal recovery strategies require the province to address the disturbance and restoration of habitat, not implement expensive, risky (e.g., capturing adult females for pens) and likely ineffective recovery techniques. Section 6 of the discussion paper suggests that the province is doing good work to recover caribou, when in fact this is more sleight of hand for public consumption.

² <https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/cumulative-effects-framework>

Inconsistent with the stated mission, goals and objectives

The stated mission of the Caribou Recovery Program is to “transform caribou management”. In order to achieve this and the goals and objectives as they pertain to caribou herds and their habitat (p. 10), it will be necessary to “mainstream”³ caribou considerations into relevant programs and policies that affect them. Throughout the text, however, we find statements that appear meant to put economic interests at ease, relative to the implications of future efforts to conserve caribou. There is no question that the needs and aspirations of those other interests may conflict with necessary efforts to simply maintain caribou across the remaining portions of its range in BC. We do not deny the necessity of “partnerships”, but there will be tough decisions and real consequences for BC’s rural and resource-dependent communities and perhaps even the needs and aspirations of First Nations (e.g., reducing moose to conserve caribou).

Government will need to be clear on the objectives for caribou recovery, and make transparent choices where trade-offs are evident. The set of goals and objectives as displayed in the discussion paper include many that compete with one another. In moving forward, is the focus recovery or pursuing the path of some form of integrated resource management that is meant to ‘balance’ a conflicting set of values? As noted in the discussion paper, 14 populations in BC have fewer than 25 animals. Thanks to nearly two decades of inaction for both boreal and mountain caribou, there is now very little room for negotiating with stakeholders.

In spite of the stated openness to “significant changes in regulations, leadership, program design and measurement, data management and accessibility”, the discussion paper demonstrates little indication that any future program will be anything other than business as usual. One of the most obvious places for such a discussion would be in section 4, “Management and decision making”. The pledge to engage in “structured decision making” sounds promising, until it becomes clear that there is no formal path to inform land use decisions. Such language suggests new directions and progress in caribou conservation, but has no real substance relative to changing activities on the ground.

Inadequate attention to BC’s obligation to protect Critical Habitat (SARA)

Although the discussion paper mentions the “authority” of SARA, the alignment and coordination of work with SARA’s goals and objectives, and the “expectation” that BC will effectively protect critical habitat, it does so in a tone that is almost dismissive as to the relevance of this to what BC should be doing for caribou. Yet, for boreal caribou at least, the framework provided by the federal recovery strategy for prescribing limits to disturbance at the range scale (“management threshold”), has a solid scientific basis and should not be ignored. Instead of considering this to be a largely unrelated task, we have argued here that BC’s caribou strategy should work from the robust foundation of the federal strategies instead of trying to invent something new. There is simply no time to fiddle with a new approach, and moreover, such fiddling appears unnecessary.

It does not help that the discussion paper’s references to SARA and its processes tend to be unclear, inconsistent or outdated. Designatable Units (DU) provide one example, whereby the “Southern

³ *Sensu* Strategic Goal A (“Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society”) of the Aichi Biodiversity Targets (*Strategic Plan for Biodiversity 2011-2020*, Convention on Biological Diversity)

Mountain” caribou recovery strategy (and associated critical habitat) is not the same as the “Southern Mountain caribou” DU depicted in the map. We have sympathy for this, given the lengthy delay between most recent mountain and boreal caribou COSEWIC status assessments (2014) that deployed the new structure and listing decisions, but the discussion paper should in any case reconcile these differences. For example, the text refers at one point to “Central Mountain Group of Southern Mountain Caribou”, which does not relate to the map, and will cause confusion. Another issue is that the paper refers to one federal recovery strategy, when there are two with identified critical habitat (The “Boreal” and “Southern Mountain” populations of Woodland Caribou).

Importantly, the document makes no reference to the fact that the Central Mountain and Southern Mountain DUs were assessed by COSEWIC as Endangered in 2014. This needs to be reconciled with the claim in the discussion paper that those herds are Threatened (P.5; although, because of federal delays they remain listed as Threatened under Schedule 1 of SARA). Furthermore, other important and recent federal documents that inform the imperative and actions for BC caribou or speak to the lack of meaningful progress by the provincial government are conspicuously not mentioned in the discussion paper. This includes the Action Plan (boreal)⁴, the report on Implementation of the Recovery Strategy (boreal)⁵ and the Canada-BC Protection Study (mountain)⁶, all of which were issued in 2017 and prior to the release of this discussion paper. Finally, the discussion paper ignores “range plans”, mandated in both federal recovery strategies as vehicles for managing cumulative disturbance. Instead, it speaks of “herd plans”, but, as described, are merely a process to document change rather than a decision-making tool.

Lack of transparency regarding the implied intention to apply triage

In several places, the discussion paper alludes to the prioritization of recovery by herd. For example:

- “Reverse the decline and achieve stable, increasing populations of *identified* woodland caribou herds”
- “Prepare recovery plans for all herds that are supported by stakeholders”
- “Recovering all B.C.’s caribou herds may not be feasible, without unlimited funding and control over land use. We will need to prioritize our decisions for all 54 herds.”

We understand the argument and perhaps necessity of a triage approach; however, it must be said that this is a significant departure from the current strategy for boreal and mountain caribou in BC and across other Canadian jurisdictions. Such an approach was formally introduced in Québec for select herds and resulted in much public attention and push-back from environmental organisations and caribou scientists. Also, triage likely would contravene the current federal recovery strategies leading to difficulties in coordinating federal-provincial responsibilities.

If the province wants meaningful input on caribou recovery in BC, then more information is required. Recognising that this is an evolving process, we ask for a forthright representation of the government’s

⁴ http://www.registrelep-sararegistry.gc.ca/virtual_sara/files/plans/Ap-WoodlandCaribouBorealFederalActions-v00-2017Jul27-Eng1.pdf

⁵ http://registrelep-sararegistry.gc.ca/virtual_sara/files/Rs-ReportOnImplementationBorealCaribou-v00-2017Oct31-Eng.pdf

⁶ https://www.registrelep-sararegistry.gc.ca/virtual_sara/files/ProtectionStudy-Smc-central-v01-0217-Eng.pdf

objectives and strategies to achieve those objectives. Triage may be part of that mix, but please state so clearly and with the intent of a real dialogue and with clear criteria that avoid a situation whereby extirpation of herds is inadvertently incentivized.

Conclusions

Since the publication of this discussion paper in early April, ECCC issued a progress report on unprotected critical habitat for boreal caribou⁷ and an opinion statement that there are imminent threats to the recovery of the officially-designated (under SARA) “Southern Mountain Population”⁸, noting particular concern with 10 “population units” in BC. This state of affairs demands a transformation in how caribou recovery is conducted in the province.

Given BC government’s intention to bring in new species at risk legislation, we are profoundly concerned about the potential example that BC’s Provincial Caribou Recovery Program may provide if it follows the direction outlined in this discussion paper. It outlines a set of vague initiatives that aspire to be something “new”, but in fact look similar if not identical to the status quo that ignores legally mandated and scientifically supported recovery actions (e.g., development of range plans). We are further dismayed by the manner in which unusually strong body of evidence documenting the causes of decline, including the cumulative effects of industrial activities, is mostly ignored. We fear that intentions to develop a “made in BC” approach will amount to much wasted time, even as decisions are underway to degrade more prime caribou habitat.

In closing, we urge the provincial government to focus on the existing, scientifically-supported approaches for recovering caribou, as stated clearly in the relevant recovery strategies. The discussion paper is a departure from that path with hoped for efficiencies and reduced conflict. Unfortunately, there are no short-cuts for caribou recovery in BC. Persistence of the species will depend on hard decisions by government with obvious socioeconomic consequences. We hope that the next version of the strategy that is developed will openly recognise that reality.

Yours sincerely,



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⁷ <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/critical-habitat-reports/woodland-caribou-boreal-population-2018.html>

⁸ http://www.registrelp-sararegistry.gc.ca/document/default_e.cfm?documentID=3319