

May 31, 2019

URGENT: VIA EMAIL

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Re: Support for Intergovernmental Partnership Agreement with First Nations

Dear Honourable Ministers,

This letter is to convey our strong support for the *Intergovernmental Partnership Agreement for the Conservation of the Central Group of the Southern Mountain Caribou* (hereafter, "Partnership Agreement").

We provide this feedback in our collective capacity as caribou scientists and advisers to the federal and provincial governments. Particularly germane to this matter, we have both been members and co-chairs 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 of all 11 extant caribou DUs (from 2014-2017), including mountain caribou in 2014. We have, therefore, followed closely and documented the declining status of Southern Mountain Caribou populations over the past decade or so. We also commented

together in detail on the Provincial Caribou Recovery Program Discussion paper that was issued at about this time last year.

As caribou experts, we are compelled to submit this letter of support for the habitat protection and other recovery measures set out in the Partnership Agreement between BC, Canada, Sauteau, and West Moberly First Nations. Based on our familiarity with other conservation agreements that have been, or are in the process of, being forged between governments in support of caribou conservation and recovery under section 11 of the *Species At Risk Act* – including the draft Conservation Agreement between the federal government and BC -- this Partnership Agreement is the only one we are aware of that has a real chance of success for recovering caribou populations in its purview (in this case, the Pine, Quintette and Narraway caribou ranges in the “Central Mountain Group” of Southern Mountain Caribou¹).

We highlight the following key elements of the Partnership Agreement that serve as the basis for our support:

- The agreement outlines a holistic and coordinated approach that combines intensive management of caribou with aggressive habitat restoration and coordinated management and control of resource development – the only way that the maternal penning exercise currently underway may enjoy long-term success;
- The establishment of a “moratorium” “prohibiting provincial statutory decision makers from adjudicating applications for all resource development activities” recognizes the necessity of curtailing continued removal of extremely limited vital habitat to allow a viable chance for recovery of these populations;
- By the same token, measures to “review and potentially adjust the Annual Allowable Cut for forestry” will better enable management of cumulative disturbance at the range scale;
- Zones that are well-defined and mapped, along with commitments defined to these areas, brings much-needed clarity to the proposed recovery framework;
- The provision to ensure conservation measures “that are to be applied in any Zone will not be offset by an increase in activities that are detrimental to caribou in other areas of caribou habitat within the Pine, Quintette or Narraway LPU” is an important addition that should help ensure that gains made through intensive management are not undermined by continued habitat disturbance and loss in those caribou ranges;
- The Partnership Agreement commits to co-management and pledges to provide adequate resources to implement this;
- The agreement references provincial and federal commitments to honour both the United Nations Declaration on the Rights of Indigenous Peoples and the Calls to Action from the Truth and Reconciliation Commission of Canada, “including through the review and amendment of policies, programs and legislation; and
- The agreement clearly recognizes that “significant financial investment is required in the short, medium, and long-term” for this agreement to succeed.

¹ These three ranges belong to the Central Mountain Caribou Designatable Unit, as assessed by COSEWIC in 2014, but are not listed as such under SARA, as of this writing.

This Partnership Agreement should serve as a model not only for other agreements with indigenous governments to recover caribou in any designatable unit, but for any Conservation Agreement that is pursued under s. 11 of SARA. The contrast of this agreement with the draft bi-lateral Conservation Agreement between the BC and the federal governments, is noteworthy in our opinion. Whereas the former outlines a coordinated, strategic approach that commits to a number of necessary measures, including control of resource development and habitat restoration, the latter only takes modest and tentative steps.

Either or both of us are happy to elaborate further on any of these remarks.

Yours sincerely,



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