



**wildsight**  **CPAWS**  
CANADIAN PARKS AND WILDERNESS SOCIETY  
BRITISH COLUMBIA CHAPTER

**Conservation Northwest**  
*Keeping the Northwest Wild*

THE VALHALLA

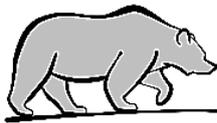


WILDERNESS SOCIETY



**WILDERNESS  
COMMITTEE**

**GREENPEACE**



**Yellowstone to Yukon  
Conservation Initiative**

  
**Harmony**  
FOUNDATION

**CONSERVATION  
NORTH**



**Wolf Awareness**  
Research • Education • Conservation

**April 24, 2018**

Honourable Catherine McKenna  
Minister of Environment and Climate Change

Honourable George Heyman  
Minister of Environment and Climate Change Strategy

Honourable Doug Donaldson  
Minister of Forests, Lands, Natural Resource Operations & Rural Development

On behalf of: Ancient Forest Alliance, BC Nature (Federation of BC Naturalists), Canadian Parks and Wilderness Society BC Chapter, Conservation North, Conservation Northwest, Greenpeace, Harmony Foundation, Valhalla Wilderness Society, Wilderness Committee, Wildsight, Wolf Awareness, Yellowstone to Yukon Conservation Initiative.

**RE: Immediate Moratorium on Destruction of Caribou Habitat in B.C.**

Dear Minister McKenna, Minister Heyman and Minister Donaldson:

While we continue to work in good faith with your officials, we are deeply concerned and frustrated by the glacial pace of action to protect caribou habitat in B.C. As a result, we feel compelled to request immediate action from your governments. We request an immediate moratorium on activities that cause further degradation and disturbance of habitat in caribou ranges, or that displace caribou from critical habitat. This includes, but is not limited to, logging, mining, oil and gas activities, badly placed wind farms, and threats from recreational activities such as ATVs, snowmobiles, and heli-skiing.

After decades of caribou population decline and the clear failure of both jurisdictions to implement effective recovery actions, the time to act is now. We now have witnessed the continued decline of the South Selkirk herd down to three individuals, rendering them functionally extinct. This is a tragedy and a black eye for B.C. and Canada. Moreover it is a clear warning signal that caribou in B.C. are on the brink. Caribou can only recover if sufficient habitat of adequate quality is protected to support self-sustaining populations.

The science is clear. The continued disturbance and loss of critical habitat has had a devastating effect on caribou populations across B.C., which are greatly diminished and continue to decline as ranges are increasingly fragmented and herds are isolated. Some populations, such as the Burnt Pine and now (functionally) the South Selkirk, have been extirpated. This has also had significant negative impacts on the rights, cultures and traditional livelihoods of First Nations in B.C., and is a violation of Treaty 8 in northeast B.C.

Both B.C. and Canada have long had sufficient information needed to take effective recovery action. And yet, since release of the 2014 Mountain Caribou Recovery Strategy, both governments have failed to put sufficient protection on caribou habitat, the most obvious need for recovery. As the situation worsens, it has become even more of an emergency. Action must be taken immediately, before we lose more habitat and as a result, more caribou herds.

The 2017 joint B.C.-Canada Critical Habitat Protection Assessment under section 64 of SARA found that thresholds of disturbance have been exceeded for both low and high elevation habitat for caribou herds of the Central Group, and this is undoubtedly the case throughout B.C. This clearly illustrates the ineffectiveness of the current approach. B.C. has failed to protect sufficient critical habitat to even maintain caribou, never mind recover them. Canada has failed in its responsibility under the federal Species at Risk Act to intervene when provincial recovery measures are insufficient. Under SARA section 80, “the competent minister **must** make the recommendation if he or she is of the opinion that the species faces imminent threats to its survival or recovery.” Surely, the functional extinction of the South Selkirk herd, and the drop of the entire population of Southern Mountain Caribou from 4500 in 2017 to 3800 in 2018 (affidavit of Blair Hammond, Canadian Wildlife Service) is a sufficient signal that the species faces imminent threats to its survival and recovery. Under the circumstances, we must ask why the federal SARA emergency order has not yet been used. Three emergency order requests have already been filed, all without a reply. The incredibly slow time scale at which the federal government is working does not work for caribou. We need answers and we need action.

**We reiterate our request for an immediate moratorium on activities that cause further degradation and disturbance of habitat in caribou ranges, or that displace caribou from critical habitat. This includes, but is not limited to, logging, mining, oil and gas activities, wind farms, and threats from recreation.**

Although B.C. was required to have an action plan for boreal caribou in place by October 2017, this deadline was missed. B.C. has recently announced that more time is needed for further recovery planning for herds across the province. A moratorium on activities within all caribou ranges will allow the government time to more effectively create plans and engage stakeholders, and also will ensure that we do not lose more caribou habitat in the meantime.

We expect recovery planning to be done in partnership with First Nations. You can count on continued input from our groups and members to ensure effective plans are implemented.

**If B.C. fails to put an immediate moratorium on activities that degrade caribou habitat and displace caribou herds we ask Minister McKenna to fulfill her duty to use the powers under section 61(4) of SARA to immediately protect from loss or degradation all critical habitat identified in the 2014 Federal Recovery Strategy and in any other known or updated critical habitat mapping based on best available information, as is in her power.**

This order should remain in place as the federal government works with B.C. and First Nations to implement on the ground action plans that include permanent protection of critical habitat—including core habitat and federally identified class 1 matrix habitat—and large landscape habitat protection throughout core caribou range.

All of BC's caribou demand urgent action. Mountain caribou live nowhere else on the planet, and we welcome the leadership of First Nations, Canada, and B.C. in ensuring these magnificent animals thrive for future generations.

We look forward to your earliest response. Thank you.

Sincerely,



Candace Batycki  
BC & Yukon Program Director  
Yellowstone to Yukon Conservation Initiative



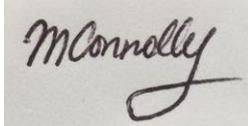
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Sadie Parr  
Executive Director  
Wolf Awareness



Anne Sherrod  
Chairperson  
Valhalla Wilderness Society



Eduardo Sousa  
Senior Forest Campaigner  
Greenpeace Canada



Joe Scott  
International Programs Director  
Conservation Northwest



Reference: 238760

June 21, 2018

**VIA EMAIL: [tim@y2y.net](mailto:tim@y2y.net)**

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Yellowstone to Yukon Conservation Initiative

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Anne Sherrod, Chair  
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Eduardo Sousa, Senior Forest Campaigner  
Greenpeace Canada

Joe Scott, International Programs Director  
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Dear Petitioners:

I appreciate your email expressing concerns about caribou in British Columbia. I am responding on behalf of the province.

The Province of British Columbia is taking caribou recovery seriously. As you are likely aware, the province recently invested \$27 million into the Provincial Caribou Recovery Program and launched an engagement process with Indigenous communities, key stakeholders, and the public on this program.

We recognize that the long-term success of caribou recovery relies on an adequate supply of functioning caribou habitat. The province has used the *Park Act, Forest and Range Practices Act (FRPA)*, and the *Oil and Gas Activities Act* to protect millions of hectares of caribou habitat from industrial disturbance. Over eight million hectares have been designated as Ungulate Winter Range or Wildlife Habitat Area under FRPA. In addition, more than one million hectares of caribou habitat has been closed to recreational snowmobile use to reduce the risk of disturbance and displacement.

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We recognize that more needs to be done to protect and restore caribou habitat. Further habitat protection will need to be strategic in nature and developed through the Herd Planning process informed by the Structure Decision Making tool under development. This approach allows for consideration of all the interests in a given landscape and the local requirements of caribou. To compliment future habitat protection efforts, the province recently partnered with the Habitat Conservation Trust Foundation, providing a \$2 million grant to support caribou habitat restoration projects.

We also know that recovery does not depend solely on habitat management. Stopping all industrial activity immediately would not recover caribou. Measures have been taken to control the adverse effects of predators:

- Direct predator removal is being undertaken in four herd areas.
- Two pilot projects involve reducing influential prey by hunting moose in an effort to reduce wolf density.
- Maternity pens (to protect vulnerable calves) have been in place for five years in two herd areas. In fact, we are seeing some marked success in the Klinsa Za herd where the application of a maternity pen and wolf control has enabled a 61 percent increase in the herd.

BC and the Government of Canada have entered into a draft caribou conservation agreement to clearly set out our joint effort to reverse the decline of southern mountain caribou and to work towards self-sustaining populations.

Since receiving your letter, federal Minister of Environment and Climate Change, the Honourable Catherine McKenna, has issued a recommendation of imminent threat for ten caribou herds. BC acknowledges and respects Minister McKenna's position and the processes that Canada is leading under the federal *Species at Risk Act*. BC has been working collaboratively with Canada on recent caribou recovery planning efforts. As such, Canada has been forthright in sharing their assessment work with BC, so the assessment did not come as a surprise. In working together, Canada has been made aware of BC's thoughts on the assessment; and, over the coming months, we expect to send them details of actions that BC plans to take to respond to the threats that Canada has identified. In fact, we have already initiated some of the measures necessary for improving our management (e.g. conversations with the Office of the Chief Forester on regulation and policy change, and conducting predator removal).

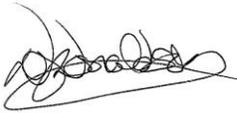
The impacts are potentially very significant if Canada places a Protection Order prohibiting certain types of land disturbance, such as forestry, within caribou habitat. In order to minimize this risk, the province is planning an approach with the deep engagement of those most directly affected to help seek solutions to balance caribou recovery with the livelihoods of our rural communities.

Petitioners

BC will continue to manage this species at risk using a collaborative approach that includes meaningful engagement with First Nations, industry and the public. We need to be realistic about the finite amount of resources available to address the imminent threat problem and the likelihood of success. As well, we are considering other caribou herds that must receive management if they are to avoid a designation of imminent threat. We also need to balance the needs of caribou, with those of other species at risk, as well as the social, treaty and economic objectives of the province.

Finally, you may be aware that BC is currently working to enact endangered species legislation, which will further reinforce government's commitment to protecting species at risk such as caribou. This legislation is intended to transfer responsibility for recovery of species at risk to the province.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Donaldson', written over a horizontal line.

Doug Donaldson  
Minister

pc: The Honourable Catherine McKenna, Minister of Environment and Climate Change  
Honourable George Heyman, Minister of Environment and Climate Change Strategy