

May 12, 2017

The Honourable Catherine McKenna P.C., M.P.  
Minister of Environment and Climate Change  
200 Sacré-Coeur Boulevard  
Gatineau QC K1A 0H3  
[ec.ministre-minister.ec@canada.ca](mailto:ec.ministre-minister.ec@canada.ca)

**Re: Critical habitat protection for southern mountain caribou on non-federal lands**

Dear Ms. McKenna:

We are writing to request that you act without delay in exercising your duty to implement the *Species at Risk Act* in order to seriously address the rapid decline of mountain caribou populations in British Columbia. If Canada fails to address the current political and economic challenges associated with caribou protection, the extirpation of mountain caribou will be recognised as an iconic conservation failure in the future.

There are few better examples in Canada of the reasons why the *Species at Risk Act* is needed than the status of the mountain ecotype of woodland caribou at present. It is clear that extensive changes to habitat caused by industrial development – including valley bottom conversion to hydroelectric reservoirs, commercial forestry and mining operations, oil and gas exploration and extraction, urban development, and recreational travel – are having a cumulative adverse effect on mountain caribou populations. This is due to direct habitat loss as well as changes in predator/prey dynamics also caused by habitat loss. The added stressors on mountain ecosystems associated with climate change further lower the threshold of resilience. Our inability to predict ecosystem changes due to climate shifts further underscores the need for strong action and the unwavering application of the precautionary principle.

The *Canada-British Columbia Southern Mountain Caribou (Central Group) Protection Study* (February 2017), makes it clear that critical habitat is not adequately protected for most, and perhaps all, remaining Central Group herds. Although formal assessment and documentation are still forthcoming, it is certain that other populations of southern mountain caribou in BC are also in serious trouble, also due to historic -- and in some cases ongoing -- cumulative impacts.

The situation is complex, and it is not necessarily easy to point to one or two major culprits to single out in any one region. However, it is the responsibility of our federal and provincial governments to understand the extent and condition of available habitat and to act if it is determined to be insufficient. We must remember that the threshold of 65% critical habitat protection for mountain caribou in some types of habitat (e.g. low elevation winter range and type 1 matrix habitat for the Northern and Central groups) is considered to be the minimum for sustainable populations. It is by no means guaranteed that even protection of this portion of habitat will be enough, and we would be well served by protecting all remaining critical habitat.

## Protection of Southern Mountain Caribou on Non-Federal Lands

Intensive effort is being made to increase calf survival using experimental maternal penning. This may help in the short term to stabilize a couple of populations. However, it is well recognized by those involved that this is far from a solution. It is also understood that other radical measures such as directly decreasing predators (wolf, cougar) and alternate prey (moose, white-tailed deer) cannot on their own provide a long-term solution in the face of increasing habitat loss, degradation and disturbance. It remains doubtful whether these efforts will even provide adequate short-term protection.

Habitat recovery for mountain caribou in already degraded areas will take a very long time. It is inevitable that the scale of industrial development and other human incursions on sensitive mountain habitats will have to be scaled back if we are to have any hope of protecting species such as mountain caribou. Rather than allowing all of these activities to increase – decisions not easily reversed – now is the time to start making some difficult decisions.

When it is determined that critical habitat is not effectively protected, as is the case now, *SARA* requires that the Minister recommend to the Governor in Council that a protection order be made to bring the *SARA* subsection 61(1) prohibition against the destruction of critical habitat into force for the unprotected portions. Although the provinces are taking some steps towards mountain caribou recovery, the effort actually required is much greater, urgent and challenging than provincial politics is currently able to acknowledge. Comprehensive, landscape-scale solutions, including expanded habitat protections, must be developed and implemented with expedience.

We trust that you will take a strong and courageous leadership position on this issue to assist the people of British Columbia and Canada in the conservation of mountain caribou and their habitat for the future. We look forward to your response.

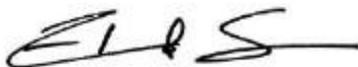
Sincerely,



Candace Batycki, BC and Yukon Program Director  
Yellowstone to Yukon Conservation Initiative

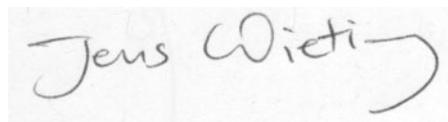


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Protection of Southern Mountain Caribou on Non-Federal Lands



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