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Re: Consultation on Species at Risk Act (SARA) Section 11 Conservation Agreement for the Conservation of Southern Mountain Caribou

The BC Council of Forest Industries (COFI) is pleased to submit comments regarding the draft Section 11 Conservation Agreement for Southern Mountain Caribou.

By way of background, COFI is a forest industry association that represents the majority of forest companies operating in the B.C. interior. The forest industry has long been the cornerstone of the provincial economy and one of the largest employers in the province. Our sector generates 140,000 jobs, and we are a primary employer in many communities throughout the province with 140 communities dependent on the sector. Our members take great pride in our commitment to being a world leader in sustainable forestry and recognize that healthy forests are part of the ecological and natural heritage of our land base.

COFI members are committed to sustainable forestry practices and have been engaged in caribou management for many years. Our members have supported the provincial government in the development and implementation of the Mountain Caribou Recovery Implementation Plan (MCRIP) and the Peace Northern Caribou Plan. In addition, our member companies have incorporated caribou management and values into forestry plans and day to day forest activities. For example, we have invested in caribou research; undertaken caribou inventories; contributed to maternal penning projects; modified and deferred harvest plans; and undertaken many other activities designed to conserve caribou herds.

COFI recognizes the complexity of caribou management and wishes to acknowledge both B.C. and Canada for initiating talks aimed at a Section 11 Conservation Agreement for Southern Mountain Caribou. We believe a conservation agreement between the two parties represents the right direction; however, we stress the importance of striking a

balance between all interests and values on the landscape, especially given that this agreement could form a template for the remaining Southern Mountain Caribou herds and agreements for other species across the country. As a result, we have highlighted our concerns and comments, along with recommendations to improve the draft Agreement below. We appreciate the opportunity to provide this input.

An Effective Plan Must Consider More than Habitat Preservation

Of primary concern is the 2014 Recovery Strategy upon which the draft agreement is based. Specifically, we find its definition of critical habitat and the call to protect 100% of the critical habitat and associated matrix habitat of concern. This focus on 100% protection for critical and matrix habitat **does not consider the impacts of climate change and associated natural events which are occurring much more frequently and with greater intensity**. These concerns are magnified for high elevation winter and summer habitat which are particularly vulnerable to climate change. Many forecasts predict these habitats will be significantly altered in the future.

A further concern with focusing primarily on habitat preservation is **that the retention and protection approach that tends to dominate much of our forest management and land use policy has resulted in over-mature, unhealthy forests with excessive fuel loading**. This approach has caused conditions that are ripe for catastrophic events such as pest outbreaks and wildfires, as witnessed by the devastating wildfires of last summer.

Our view is that we must manage our forests with a view to sustaining healthy forests for multiple values. Focusing solely on forest preservation does not provide adequate focus on forest health. Therefore, **we recommend a critical habitat definition based on predictable and verifiable old growth attributes**. Critical habitat should not be based on old seral stage timber as defined by age nor by the current distribution of old growth timber.

Furthermore, the adoption of the 65% undisturbed threshold as defined for boreal caribou is of concern. Our understanding is that this habitat definition was applied to the mountainous terrain of B.C. where Southern Mountain Caribou reside without specific study or analysis of this particular region.

A Multi-Species Approach Should be Pursued

The single species focus of the Recovery Strategy is also of concern. A single-species approach does not consider the many overlapping values that exist on the landscape nor reflect the balancing of values and objectives that professionals work to achieve in order to meet society's social, environmental and economic values.

Further, a single-species approach does not reflect the range of situations and/or issues that may be encountered. As climate change evolves across the landscape, we can expect ungulates moving into traditional caribou territory. Predators will follow, resulting in increased interactions with caribou.

Some level of discretion and flexibility is needed to allow decision makers to use professional judgement to account for, and address, unexpected events or issues as they occur. Caribou habitat cannot be managed in isolation of other values or objectives. As a result, **we recommend the adoption of a science based, multi-species or ecosystem approach both in the Recovery Strategy and as the foundation for this Conservation Agreement.**

Socio-Economic Impacts Must Be Considered

The protection of 100% of the critical habitat would have significant impacts on the forest industry. It would likely result in substantial reductions to the provincial Allowable Annual Cut which would lead to sawmill closures. This could have devastating impacts and repercussions on the many forest dependent rural communities throughout the B.C. interior.

Protecting additional critical habitat would also adversely impact First Nations economic development. First Nations have been expanding their economic activities in forestry and becoming more reliant on the forest industry for employment and business opportunities. First Nations have acquired their own forest tenures, entered into joint ventures and developed business relationships with existing forest companies. These economic initiatives stand to be impacted.

Of note is that the 2014 Recovery Strategy had not adequately considered existing First Nation Treaties, or the absence of reconciliation agreements with First Nations throughout B.C. First Nations' right to hunt and the need for reconciliation with First Nations must be incorporated in the Agreement.

Caribou Recovery is Complex

To date, no jurisdiction in Canada has been able to demonstrate sustained success recovering caribou herds. However, we do know past practices of simply preserving habitat have not been successful, as witnessed in Jasper and Banff National Parks and Wells Gray Provincial Parks. As a result, we know that **successful recovery is predicated on much more than preserving habitat.**

Recovery strategies will require a comprehensive approach including the application of a suite of tools consisting of predator control, predator-prey dynamics and management, herd augmentation, habitat restoration, managing human interaction and adaptive management. Given that 37% of BC is already subject to a conservation designation we

recommend less emphasis on preservation and more effort, study and resources devoted to the other recovery factors as identified above.

Summary

In summary, we support British Columbia's and Canada's efforts to develop a Section 11 Conservation Agreement for Southern Mountain Caribou. We stress the need for science based decisions that account for multi-species habitat and all values across the landscape. We also stress the need to analyze socio-economic impacts of pending decisions as well as the application of realistic/practical tests to population objectives and targets for caribou.

We look forward to working with both governments to create a plan that enhances caribou populations across BC while maintaining a thriving provincial economy.

Thank you for the opportunity to provide comments.

Yours truly,



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BC Council of Forest Industries