

**Joint Submission to the Species at Risk Coordination Office
on the Draft Mountain Caribou Recovery Strategy**

November 30, 2006

Whereas:

1. The mountain caribou is a unique and valuable member of the world's biodiversity heritage. The governments of British Columbia, Canada and First Nations have a responsibility to the world to ensure its future existence.
2. The critical habitat of the mountain caribou is old-growth forest.
3. The vast majority of caribou science has recognized that habitat loss and fragmentation, as well as motorized winter recreation, are the chief reasons for the perilous decline of mountain caribou; and that they are also the cause of secondary effects upon the mountain caribou such as increased predation.
4. The mountain caribou is representative of hundreds of other species that depend upon intact ecosystems in the inland temperate rainforest. Its endangerment is also an indicator that there are many other species at risk in these ecosystems.
5. No scientific studies have shown predator control to be effective, short of heavy, prolonged, and geographically widespread killing.
6. Scientific studies show that top predators play a critical role in maintaining healthy ecosystems and healthy prey populations.
7. Recent research shows that the populations of endangered species go up when anti-poaching patrols go up. We note that the crash in caribou numbers was coincident with massive layoffs in the Ministry of Environment and the Wildlife Management Department.

We, the undersigned, assert that habitat protection and restoration are the critical elements of any effective recovery program for mountain caribou. We support the following measures and request that the government implement them immediately.

1. We support the Grassroots Environmental Declaration on the Inland Temperate Rainforest appended to this submission. Its principles form the general criteria for protecting mountain caribou. They include:
 - Full protection for all old-growth forest 140 years or older, including low- and mid-elevation Interior Cedar-Hemlock.
 - Habitat recovery zones for areas already logging - Critical for mountain caribou to survive, logged areas must have recovery techniques such as thinning of forest and brushing alongside roads. There should be no logging adjacent to critical caribou habitat until the forest recovers to natural early seral levels, to reduce alternate prey.

- Restrict Motorized Recreation — recreational use of ATVs, snowcats, snowmobiles and helicopters should be eliminated from critical habitat of high-elevation species at -risk such as mountain caribou, grizzly bears and wolverines.
2. The following measures set out specific ways that old-growth forest protection can be implemented right away, and the recovery program can make progress:
 - We demand immediate protection of all areas identified as critical habitat by the 2005 northern RIG, *as a first step* and a show of good-faith by the government to safeguard these important northern subpopulations.
 - In the central and southern planning area, the Mountain Caribou herd home ranges, as shown on the “SARCO Draft Mountain Caribou Recovery Strategy 2006,” are obviously critical habitat and should be designated and protected as such, as a *first step* towards recovering these herds.
 - Habitat protection must include cancellation of all Approved, Proposed and Category I cutblocks within the boundaries of all herds.
 - We expect SARCO’s recovery process for the mountain ecotype to include all caribou, of both mountain and northern ecotypes, living within the identified planning area. This includes the Upper McGregor and Upper Morkill Valleys.
 - Forest health, sanitation and salvage treatments must not be allowed in the no harvest zones of caribou habitat.
 - We urge the government to set up anti-poaching patrols in areas and seasons when hunters have access to the caribou.
 - By decommissioning road networks in critical caribou habitat, man-made predator travel lanes/routes, which are the direct cause of increased predator access into once remote critical caribou habitat, will be eliminated therefore addressing mortality/disturbance concerns far better than predator control.

The undersigned vigorously object to the following elements of the draft recovery strategy recently proposed by SARCO and its Science Team:

1. We object that after three years, with the recovery strategy almost due, the planning team has not provided a map identifying critical habitat for the central and southern planning units and showing proposals for new protection. We view this as being mandatory for an acceptable plan.
2. The degree of habitat protection suggested for the central and southern mountain caribou range in the document “Management Options and Related Actions for Mountain Caribou in British Columbia” is grossly insufficient.
3. We are opposed to killing predators as a means of increasing the numbers of mountain caribou.

Summary

The undersigned declare a state of emergency because mountain caribou populations are declining rapidly, the recovery process has almost run out of time, and the current draft Strategy is very far from meeting any of these criteria.

Previous to this point the recovery process has allowed caribou habitat to be logged while considerations were underway to protect it. We have therefore joined together to demand:

An immediate moratorium on all logging (including that under the guise of beetle management), and on issuance of new recreation tenures within any caribou habitat until the items in this submission have been considered in open public process and recovery plans based upon habitat protection and restoration are completed and implemented.

Signed:

Applied Ecological Stewardship Council of BC
BC Pathways
Conservation Biology Center
Friends of the Grove
Granby Wilderness Society
Kids for Caribou
Koordinationszentrum Natur und Umwelt
Perry Ridge Water Users
Purcell Alliance for Wilderness
Raincoast Conservation Society
Save the Cedar League
Selkirk Conservation Alliance
Slocan Valley Watershed Alliance
Valhalla Wilderness Society
Western Canada Wilderness Committee
Wild Earth
World Temperate Rainforest Network