



File: 97350-20/2003-03

November 16, 2005

Mark Zacharias
Species at Risk Coordination Office
Integrated Land Management Bureau
Ministry of Agriculture and Lands
Box 9353, Stn Prov Govt
Victoria, BC V8W 9M1

Dear Mark Zacharias:

Re: Request for Input on Recovery Options for Mountain Caribou

The Forest Practices Board is pleased to respond to your request for input into the recovery options paper you circulated on October 18, 2005. Board members have reviewed the paper and met to discuss it on November 15, 2005.

First, the Board would like to acknowledge the work of SaRCO to date and the effort that has gone into the development of the options paper. In our September 2004 report, the Board identified the need for government to take action to address the decline in the mountain caribou population and we are pleased that government is moving forward in that regard. The options paper released by SaRCO provides some valuable background information and has initiated a much needed public discussion of this issue.

In our original report, the Board made a number of recommendations focusing on investment in recovery plan development and implementation, preserving all caribou herds and providing provincial leadership (see attached letter). While the establishment of SaRCO has provided provincial leadership on this issue, we are concerned that the key recommendations we made are not being implemented. In particular, the following recommendation was made:

Given the recovery effort inherent in federal and provincial species at risk legislation, defer the question of 'triage' for the most threatened mountain caribou populations and concentrate on implementing a full

recovery program. The 'triage' approach should only be considered if rigorously applied recovery efforts are found through the monitoring program to be ineffective.

The Board notes that the options paper invites a triage decision and we feel it is too early to make that decision. We believe there needs to be development of recovery plans for the herds, with the technical feasibility and the social and economic costs of implementing those plans carefully assessed. The plans should be implemented, and only if they are not successful, or if they are clearly infeasible or too costly, should government resort to a triage decision to abandon some herds.

The Board is concerned that the options paper does not provide any information on the likelihood of success of recovery efforts, nor the social or economic costs of implementing recovery efforts, particularly for the southernmost herds at greatest risk of extirpation. Without this information, it is not possible to make an informed decision on which option is preferred.

The Board also recommended a significant investment in the work of the recovery action groups, particularly for the most vulnerable caribou herds, to enable early, practical action on the ground. With the postponement of recovery action group work, the Board is very concerned that the grassroots support, necessary for any local recovery plans to be successfully implemented, will be lost or severely diminished.

Finally, as raised in the Board's report on implementation of the Code's Biodiversity Strategy, government does not have a clearly articulated provincial strategy for biodiversity conservation. Such a strategy would be very useful in providing some context for decisions about recovery of specific species-at-risk, such as mountain caribou. A strategy that includes concern for the ecosystems upon which threatened species rely would provide an overall purpose and rationale that would support decisions affecting individual species-at-risk.

In summary, the Board feels that, before any decision on these recovery options can be made, much more information is required on what individual recovery plans would involve, what their chances of success are, and what the social and economic costs of implementation would be. We also believe that involvement of the local recovery action groups in any recovery initiatives will be critical to their successful implementation.

Mark Zacharias
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Thank-you for the opportunity to comment. I would be pleased to meet with you, should you wish to discuss these comments further.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Bruce Fraser". The signature is written in a cursive, flowing style.

Bruce Fraser, PhD
Chair

Attachment

cc: Honourable Pat Bell, Minister of Agriculture and Lands
Larry Pedersen, Deputy Minister, Ministry of Agriculture and Lands
Honourable Barry Penner, Minister of Environment
Chris Trumpy, Deputy Minister, Ministry of Environment
Honourable Rich Coleman, Minister of Forests and Range
Doug Konkin, Deputy Minister, Ministry of Forests and Range
Bob Simpson, Forests and Range Critic, Official Opposition
Shane Simpson, Environment Critic, Official Opposition



Integrated Land Management Bureau

November 22, 2007

Geoff Battersby, A/Chair
Forest Practices Board
PO Box 9905, Stn Prov Gov't
Victoria BC V8W 9R1

Dear Mr. Battersby:

This letter is regarding government's October 16, 2007 announcement of the Mountain Caribou Recovery Implementation Plan (see the news release, details of the implementation plan and supporting documents at <http://ilmbwww.gov.bc.ca/sarco/mc/>). I would like to take this opportunity to convey my sincere appreciation for the valuable input you provided to government during the mountain caribou recovery consultation period.

On October 16, 2007, government announced the collaborative provincial implementation plan for Mountain Caribou Recovery. This plan represents years of work to reach agreement on how mountain caribou recovery management should proceed in order to balance socio-economic considerations while achieving successful recovery of the population.

The Implementation Plan was designed to achieve the goal of restoring the population to pre-1995 levels (2,500 animals) throughout their existing range in British Columbia and involves considerable provincial commitments toward mountain caribou recovery implementation.

On October 16, 2007, government committed to:

- Allocate \$1,000,000 per year for three years to support implementation;
- Protect 2.2 million ha, including 95% of high suitability mountain caribou habitat, from logging and road building;
- Manage recreation to reduce human disturbance in mountain caribou habitat;
- Manage predator and alternate prey populations to reduce predator densities in areas where predation is preventing mountain caribou recovery;
- Increase caribou subpopulations by transplanting animals from large to small herd areas; and,
- Ensure that all components of management proceed through a monitoring-based adaptive management framework.

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**Integrated Land
Management Bureau**
Ministry of
Agriculture and Lands

Regional Client Services Division
Southern Interior Region

Mailing/Location Address:
Floor 3
145 - 3rd Ave
Kamloops BC V2C 3M1

Facsimile: 250-377-7036
Web Address:
<http://www.al.gov.bc.ca>

To oversee implementation, a cross-sector progress board will be instituted in spring 2008 to monitor the effectiveness of recovery efforts.

Thank you for your time in contributing toward this collaborative effort. I would ask for your continued support and involvement in order to ensure the success of mountain caribou recovery implementation efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Lishman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Peter Lishman, Project Director