



Valhalla Wilderness Watch

P.O. Box 335, New Denver, British Columbia, Canada, V0G 1S0
Phone: 250-358-2610; wildernesswatch@netidea.com

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MOUNTAIN CARIBOU GREENWASH

A critique of the BC Government's Plan to Protect the Endangered Mountain Caribou



Mountain Caribou in low elevation, early winter habitat threatened by clearcut logging - Quesnel Lake, September 2005

The BC Government's New Extinction Plan for an Endangered Species

The BC government recently announced a new plan to protect mountain caribou. A coalition of environmental groups called the Mountain Caribou Project has signed an agreement with logging companies and other vested interests to support the plan. They are telling the world that the plan is a "big victory" for environmental protection. But the terms of this plan spell extinction for the mountain caribou. Scientists agree that habitat destruction, chiefly by logging, is the main factor that has driven mountain caribou to the edge of extinction. Yet the plan will allow no reduction in the allowable annual cut — the rate of logging on public forestland — for five years.

The government says the plan will protect 2.2 million hectares of mountain caribou habitat. But this figure includes parks that have been protected for years or decades and include huge areas of rock and ice. It also

includes forest patches left in between clearcuts in areas that have been substantially fragmented by clearcuts and roads. Worse, some of these areas will continue to be logged while reserving only 40% of the old-growth. These are conditions that scientists say cannot support mountain caribou.

The government says that no more than 1% of the Timber Harvesting Land Base can be protected for the mountain caribou. This plan will leave millions of hectares of low- and mid-elevation forest containing critical spring and early-winter habitat for mountain caribou to be logged: a recipe for extinction. The mountain caribou need a large public outcry condemning this plan. Do not be fooled by the fact that 10 environmental groups support it. Many other BC environmental groups as well as 50 scientists have called for far more protection than this.

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MOUNTAIN CARIBOU GREENWASH

I. INTRODUCTION

British Columbia has the only mountain caribou in the world. When the planning process to save it from extinction began, in 2003, the mountain caribou was “red-listed” in BC — the most extremely endangered status for a species at risk. At that time, there were 1,900 mountain caribou in existence; but three years later the 2006 census showed only 1,600 animals in 18 subpopulations, most of which were isolated by habitat fragmentation.

BC lost 300 mountain caribou, and undoubtedly a large amount of the animal’s critical habitat, while the BC government dragged its feet in a four-year talk-and-log planning process. The government was so lavish in its use of time as to wipe out two of three planning groups after they had done two years of work on plans for the southern half of the mountain caribou range. Two years after that, when public input for the draft recovery strategy had ended, the government started up yet *another* process, one of which very few people were aware: it required participants to sign confidentiality agreements and resulted in a negotiated political deal.

Finally, in October 2007, the government unveiled the results of this luxurious use of time: a new plan that postpones any logging cutbacks another five years, if indeed there will be any cutbacks at all. How will it do this? By shooting predators and competitive prey species, and by preserving mostly inoperable forest that is of little value to logging companies, or else patches of forest left in areas that have already been substantially logged.

Given that the mountain caribou is disappearing chiefly due to logging and logging roads, it follows that the chief problem is occurring on the “Timber Harvesting Land Base.” These are the lands that form the public commercial timber supply, and contribute to the logging company’s allowable annual cut (AAC - yearly rate of logging). They include the low- and mid-elevation forests that are critical spring and early winter habitat for the mountain caribou. It is here that BC’s excessive AAC has been killing them with clearcuts and roads that reduce their food supply, remove critical shelter from early winter storms, and expose them to predators. Yet it is these lands that have been 99% exempted from protection under a plan that we’re to believe will save the mountain caribou.

The parties that negotiated this plan have all failed to grasp the chief significance of the mountain caribou’s demise: our rate of logging is driving species to extinction; we either have to cut back drastically, or be honest and admit that we intend to go on wiping out species to maintain an extravagant and unsustainable rate of logging. The government’s plan has not adopted or adapted one iota of the recommendations of 50 scientists, mostly biologists, who submitted a petition calling for an end to logging all old-growth mountain caribou forest, and who stipulated that the new protection should include new parks as well as habitat recovery areas.

Valhalla Wilderness Watch and many other environmental groups and activists in BC believe this is the worst planning disaster in the whole history of BC’s public land use planning. This should not be considered *fait accompli*. Right now, as of the date on this report, the plan is not legislated yet; it is not even completed yet. Canadians can and should insist upon the procedure specified in the federal *Species at Risk Act*, which would allow 60 days of public input after the plan has been filed on the federal registry.

“Given that there is no evidence that within the range of arboreal lichen feeding caribou that timber harvesting (based on present rotation lengths and clearcutting) can take place without major long-term damage to caribou habitat, and given that the commercial value of these forests is high, what should be the provincial approach to protecting habitat? All regional efforts at habitat protection are in the final analysis merely stalling tactics, for in the end, all economic old-growth timber will be harvested unless it is removed from the AAC. An action that must be taken in Victoria.”

Ralph W. Ritcey, “Provincial Approach By Min. of Env. To Caribou Habitat Management,” BC Ministry of Environment

“For more than 20 years, however, forest harvesting has been recognized as the greatest management concern in mountain caribou ranges.”

Hatter, I. “Components of a Mountain Caribou Conservation Strategy for British Columbia,” Ministry of Environment, Lands and Parks, Proc. Biology and Mgmt. of Species and Habitats at Risk, Kamloops, BC, 15-19 Feb. 1999.

“Timber values are low in many of the high-elevation subalpine forests occupied by caribou; however, within many parts of the Engelmann Spruce-Subalpine Fir (ESSF) zone and particularly in the Interior Hemlock-Cedar (ICH) zone, conservation of caribou habitat may conflict severely with forest management objectives ...

“The requirement of caribou for old-growth forest in both early- and late-winter puts them in direct conflict with forest management.”

Simpson et al., “Critical habitats of caribou in the mountains of BC,” Ministry of Environment, Lands and Parks, Feb. 1987

II. THE IMPORTANCE OF MOUNTAIN CARIBOU FOREST

Along the spine of the Columbia and western Rocky Mountains in southeastern British Columbia, there is a great swath of humid, coniferous forests of immense importance to BC, Canada and the world. This 14.3-million hectare area is called the Interior Wetbelt, popularly known amongst conservationists as the "Inland Rainforest Region." This region is approximately equivalent to the range of the mountain caribou. British Columbia now has 9 million hectares of dry pine forests that are dead or dying because of the mountain pine beetle infestation that has been severe because of global warming. Many forests all over the world are imperilled by global warming, and their loss worsens global warming. In such a situation, BC's vast humid forests are increasingly important to maintaining the ecological health of the planet. The mountain caribou is a key indicator species of the health of these humid, temperate forest.

In these rugged, glaciated mountains, the forests at low and middle elevations have the highest biodiversity. They produce the biggest trees that are the most profitable to the logging industry, and so they are also the most critically endangered forests. But those same big trees store huge quantities of carbon to help mitigate global warming. And they provide spring and autumn/early winter habitat that is critical for the survival of the endangered mountain caribou. These forests are the missing link in mountain caribou survival. The loss of so many caribou is an indicator of the massive loss these low- and mid-elevation old-growth forests, and of irreparable ecosystem damage that is happening because of it.

Of these forests, the lush cedar-hemlock forests have the highest biodiversity. The northern two-thirds of these cedar-hemlock forests are rare Inland Temperate Rainforest found nowhere else in the world. The old-growth has giant cedar trees up to four metres in diameter and 1,800 years old. Scientists have recently discovered that these forests have hundreds of species of lichens, many of them dependent on old-growth rainforest. Many species means many linkages in the ecosystem, many functions in the web of life. Thirteen species new to science have so far been confirmed, but many more are expected.¹ Lichen scientists in BC have been pleading to stop logging these old-growth rainforests until they can be properly studied.

The Inland Rainforest Region has been clearcut at the rate of 47,679 hectares a year for the last 40 years.² Scientists say that small species such as lichens have undoubtedly already been wiped out by logging, and many more could be. Fragmentation has been worse in the southern part of the region than in the northern part. Only 20% of the southern part of the Inland Rainforest Region is intact old-growth forest, whereas about 28% in the northern part is intact old-growth.³ These humid forests used to have a high percentage of old-growth.

III. THE NEEDS OF THE MOUNTAIN CARIBOU

¹ Pers. comm., botanist Toby Spribille. For a copy of Spribille's reports and a press release about the new lichen species, see www.vws.org.

² From GIS analysis by Baden Cross of Applied Conservation GIS, 2002, commissioned by the Valhalla Wilderness Society.

³ From GIS analysis by Baden Cross of Applied Conservation GIS, 2002, commissioned by the Valhalla Wilderness Society.

"Said the loggers: 'Are we really expected to sacrifice thousands of jobs for a handful of birds?'"

Said the environmentalists: 'Must we deprive future generations of a race of birds for a few more years of timber yield?'"

"Overlooked in the clamor was the fate of an entire habitat, the old-growth coniferous forest, with thousands of other species of plants, animals and microorganisms, the great majority unstudied and unclassified.

"Patches of rainforest harbor tens of thousands of species, even after they have declined to a remnant of the original wilderness. But when the entire habitat is destroyed, almost all of the species are destroyed. Not just eagles and pandas disappear, but also the smallest, still uncensused invertebrates, algae, and fungi, the invisible players that make up the foundation of the ecosystem. Conservationists now ... place emphasis on the preservation of entire habitats and not only the charismatic species within them. They are uncomfortably aware that the last surviving herd of Javan rhinoceros cannot be saved if the remnant woodland in which they live is cleared, that harpy eagles require every scrap of rainforest around them that can be spared from the chainsaw.

"The relationship is reciprocal: when star species like rhinoceros and eagles are protected, they serve as umbrellas for all the life around them. And so to threatened and endangered species must be added a growing list of entire ecosystems, comprising masses of species."

Edward O. Wilson
The Diversity of Life

The government's and environmental groups' press releases impressed the media and the public by emphasizing gross numbers of hectares protected. But protection for an endangered species is also about quality of habitat and how it is protected. The following are some of the habitat characteristics that are needed:

1. **Old-growth forest** - trees must be 140 years or more to support adequate amounts of hair lichens, the caribou's winter food.
2. **Large intact - No clearcuts or roads.** The old forest must not only be "intact," but must also be large. Fragmented forest (old-growth forest patches in between clearcuts strung along logging roads) is deadly for mountain caribou. Not only can predators travel swiftly on logging roads, but the caribou are easily located when concentrated in the remaining forest patches, and brushy conditions on clearcuts and roads obstruct their flight.
3. **Gentle to moderate slopes** - Mountain caribou need slopes with less than 45% gradient.
4. **Valley bottom to alpine** - Most mountain caribou migrate up and down the mountains twice every year. Every part of the habitat is critical for their survival. The main conservation issue is that for many years the government has been protecting only the high-elevation habitat. The low- and mid-elevation is the missing link in their seasonal chain of habitat.
5. **Protection from disturbance** - recreationists, especially winter motorized recreationists using snowmobiles and helicopters, displace mountain caribou from their preferred winter feeding grounds at a time when their ability to survive is fragile. Caribou scientists consider snowmobiles and heli-skiing to be major contributing causes to the loss of mountain caribou.

IV. CRITIQUE OF THE PLANNING PROCESS

A. Canada's *Species at Risk Act*

A number of recent news reports might lead one to believe that the planning process for mountain caribou started with a boycott against interior logging companies. Reportedly, a group called ForestEthics persuaded paper buyers to boycott paper derived from mountain caribou habitat, forcing the government and the forest industry to come up with a conservation plan. That is certainly what the government and logging industry would like us to believe: that the environmental groups that have made an agreement to endorse this plan are the people who started the whole recovery process with their protests. If that were so, then there is no conflict left, everything has been resolved. The parties in conflict are now partners in agreement.

However, that is far from the truth. The recovery process was initiated in 2003 shortly before Canada's *Species at Risk Act* (SARA) was close to being enacted. This fact has been tossed out the window by all parties involved in the partnership agreement, but it is important for a number of reasons. Firstly, if it is forgotten, the mountain caribou will miss out on the small but important things that Canada's *Species at Risk Act* can do for them.

Secondly, environmental groups attempting to represent the interest of the mountain caribou in negotiated agreements have repeatedly been overly compromised or defeated in previous land use planning processes. As one famous person once observed, "Democracy has to be something more than two wolves and a sheep deciding what to have for dinner." The intent of the *Species at Risk Act* was

"Forest Practices are currently the greatest management concern, because mountain caribou require old-growth forests within the Engelmann Spruce-Subalpine Fir and Interior Cedar-Hemlock biogeoclimatic zones, which are being removed by logging (Simpson et al. 1997)." (Appendix 1, p 60.)

"A Strategy for the Recovery of Mountain Caribou in British Columbia," Mountain caribou Technical Advisory Committee, Ministry of Water, Land and Air Protection, September, 2002.

"...the British Columbia government is putting nearly 400,000 hectares of forest off-limits to logging and road building...."

"The move, announced by Agriculture and Lands Minister Pat Bell, comes after a campaign by ForestEthics and other environmental groups brought international attention to the plight of mountain caribou in Canada and led to market boycotts.

"Limited Brands, which spends \$100 million a year on paper and published the Victoria's Secret catalogue, last year heightened tensions when it announced it would no longer buy paper derived from caribou habitat in Canada."

Hume, M., "British Columbia Protects Forests to Save Caribou," *Globe & Mail* Oct. 17, 2007

to correct that imbalance, to empower conservation interests to protect the caribou. The *Act* does encourage citizen involvement and partnerships in recovering species at risk, but it's reasonable for Canadians to expect something more than a partnership in which 75% of the partners are the people whose activities have endangered the caribou and who have long resisted any substantial limitations on those activities: the case of the foxes guarding the chicken coop. This, once again, relegates the conservation side of the partnership to a weak and outvoted minority. Personal communication from some of the environmentalists who joined this agreement repeatedly expresses a sense of weakness and helplessness to achieve anything more than the government-imposed barbed wire fence around the logging companies' allowable annual cut would allow. Of what use, then, was ForestEthics' boycott?

In the opinion of Valhalla Wilderness Watch, something much more than this plan was pending and was expected by the logging industry as a result of the *Species at Risk Act*, and something a great deal less than what was expected became possible as a result of the agreement of ten environmental groups. Across the country the *Species at Risk Act* has been failing to protect endangered species; but in this case, it seems to be for no other reason than that the parties in this plan agreement "forgot" it and substituted media hype instead. One party to this agreement told the author that the *Species at Risk Act* and its requirements for filing plans on the Species at Risk registry were never mentioned. So let's recall some facts that have been buried during the last four years:

The southern mountain population of woodland caribou, which includes mountain caribou, was officially listed as Threatened when the *Species at Risk Act*⁴ was proclaimed in June 2003. As such, by law:

1. A proposed recovery strategy must be filed on the *Species at Risk Act* public registry by June 5, 2007.
2. The law prescribes what the recovery strategy must contain. One important item is identification of the species' critical habitat 41(1)(c), or else a prescription for studies needed to determine critical habitat.
3. After the draft recovery strategy has been filed, the public is entitled to 60 days for review and comment. Following that, the BC government has 30 days to consider public input, make whatever changes it considers appropriate, and file the final recovery strategy on the registry.
4. But then a draft action plan must also be filed on the registry. The action plan must show critical habitat and what parts of it have not been protected 49(1)(c). It too, must have 60 days public review.

Right now, under the SARA registry there is a note under "Woodland caribou, southern mountain population – justification for delayed posting," dated June 6, 2007⁵:

"The proposed recovery strategy for the woodland caribou (*Rangifer tarandus caribou*), Southern Mountain population, was due for posting on the SARA Public Registry by June 5, 2007 for a 60-day public comment period (SARA s.42 & 43). The recovery strategy for this species is in final stages of preparation. After it is completed, the Province of British Columbia will provide it to the Government of Canada for adoption and posting on the SARA Registry. Environment Canada will con-

"ForestEthics and a coalition of Canadian environmental groups announced an agreement with the British Columbia government to protect more than 5 million acres of their home habitat in British Columbia's forests.

"The victory came after a five-year campaign targeting corporations and the regional government ... The campaign had won a major boost when Limited Brands, which publishes the Victoria's Secret catalog, announced it would no longer buy paper derived from mountain caribou forests."

"Woo-hoo, Caribou"
Glenn Hurowitz
Grist, October 22, 2007

"For the purposes of mountain caribou recovery in the North Kootenays, we propose critical habitat be defined as: locations within the recovery area that support habitat attributes suitable to fulfill the basic seasonal (food/cover) and specific (breeding, calving, migration, etc.) life requisites of mountain caribou. Critical habitat includes currently suitable habitat as well as areas capable of providing suitable habitat in the foreseeable future."

"A Draft Recovery Action Plan for the North Kootenay Mountain Caribou Populations" Prepared for BC Ministry of Environment and North Kootenay Recovery Action Group
Dennis Hamilton, RPBio
Steven Wilson, RPBio
Chris Steeger, RPBio
Robert Serrouya, RPBio
Brenda Herbison, RPBio

⁴ The *Species at Risk Act*: www.canlii.org/ca/as/2002/c29/sec41.html

⁵ www.sararegistry.gc.ca/plans/showASCII_e.cfm?ocid=5035

tinue to work in cooperation with the Province of British Columbia to ensure a draft is completed and posted on the SARA Public Registry in a timely manner.”

Of course, that is no justification at all, but at least it shows that the federal and BC governments are aware of this legal requirement.

Although Canada’s *Species at Risk Act* is dreadfully weak, one good thing it does do for an endangered species is to require identification of critical habitat. When done according to proper procedure, this is a very useful conservation tool, and it is what activates the law to work for a species. According to the handbook of Canada’s Recovery of Nationally Endangered Wildlife (RENEW) Working Group, the procedure is to first identify all habitat within the range, and then decide what is critical to survival and legislate its “critical habitat” status. If a government has decided beforehand that it will only preserve 1% of the operable forest, that will prejudice the process. This process should be based upon available habitat, not just on areas that are currently occupied by the animals. Most BC government maps showing habitat are based upon tracking caribou with radio collars, and drawing lines around the areas where they are most often located by radio receivers. Telemetry has numerous limitations that can skew the picture of where caribou are living. But more importantly, caribou need to change their range over time. They will not survive confined to their currently occupied areas. We believe is quite likely that the filing on the Species at Risk registry is being avoided because the current habitat identification methods do not meet the standards of the *Species at Risk Act*.

B. The Mountain Caribou Recovery Action Groups

Given the time urgency to protect the mountain caribou, three Recovery Implementation Groups were set up even before the *Species at Risk Act* was passed. These public planning tables were for the South Kootenay, North Kootenay and Northern (Hart and Cariboo Mountains) herds. The participants were told that they were to help implement the *Species at Risk Act*, were given reading material about the *Act*, and were instructed on the basic requirements.

The Hart and Cariboo Ranges group did complete a proposed plan. At the North and South Kootenay planning tables, consulting scientists also worked on a credible plan. Their plans used a template for species at risk plans and a handbook of procedures provided by the Recovery of Nationally Endangered Wildlife (RENEW) Working Group. Unfortunately, the Recovery Action Groups were supposed to approve each element of the plan. The tables were stacked with vested interests from the logging and heli-ski interests, as well as snowmobilers. The process was aimed at achieving political compromise between all the sectors rather than producing a scientifically sound plan. After two years of going to meetings, the Valhalla Wilderness Society withdrew because the vested interests blocked progress while prime mountain caribou habitat was being logged.

C. The Species at Risk Coordination Office

In 2004 the government created the Species at Risk Coordination Office and placed it under the Ministry of Agriculture and Lands and its Integrated Land Management Bureau (rather than the Ministry of the Environment). This bureau is composed of all the government ministries including logging, mining and tourism.⁶ Thus, BC’s species at risk planning is not being done under an agency

“A National Recovery Plan for woodland caribou (which includes the lichen-feeding mountain caribou ecotype) is being developed according to the requirements of the new federal *Species at Risk Act (SARA)* National recovery plans for species designated as endangered, threatened or extirpated by COSEWIC consist of two parts: (1) a Recovery Strategy, and (2) a local Recovery Action Plan (RENEW 2003). Both the recovery strategy and action plan are to be evaluated every five (5) years...

“The purpose of a local recovery action plan (this document) is to identify the actions needed to achieve the goals and objectives outlined in the recovery strategy.”

“A draft Recovery Action Plan for the North Kootenay Mountain Caribou Populations” Prepared for BC Ministry of Environment and North Kootenay Recovery Action Group

“The work of the bureau helps provide acces to natural resources for six important sectors of our economy, which directly account for abuot 3 per cent of the province’s GDP — forestry, tourism, mining; oil, gas and energy extraction; and agriculture and aquaculture.”

2006/07-2008/09 Service Plan, Min. of Agriculture and Lands, Part B: Integrated Land Management Bureau.

⁶ 2006/07-2008/09 Service Plan, Min. of Agriculture and Lands, Part B: Integrated Land Management Bureau.

with an environmental protection mandate. Here, at the very roots of the BC process, is government-by-committee dominated by resource exploitation industries — the cards are stacked against the mountain caribou at every level.

The Species at Risk Coordination Office (SARCO) terminated the South and North Kootenay planning tables. Table members say they were close to completing their plans. SARCO said it wanted to speed up the process, and that it would complete a plan in 2005. Today the date we have been given for completion is March 2008. This astonishing foot-dragging by the government has been so glaring and prolonged as to appear deliberate. That was also the last we ever heard about the Species At Risk template provided by the federal government.

D. Public Input

The Species at Risk Coordination Office released several documents in which the major emphasis for recovery actions was on increased killing of predators and competitive species of the mountain caribou — nine species in total, two of them species at risk — rather than protecting habitat. By November the coordination office posted on its website a map called a draft Mountain Caribou Recovery Strategy. The major thrust of the public input was for habitat (old-growth forest) protection and against predator control:

- The Species at Risk Coordination Office received thousands of letters from the BC public supporting protection of the mountain caribou's habitat. Many expressed opposition to predator control.
- Seventeen environmental groups signed a joint submission to SARCO calling for an end to logging old-growth forest in mountain caribou habitat and for no predator control.⁷
- Fifty scientists signed a petition also calling for an end to logging old-growth caribou forest and recommending nonlethal methods of predator control.⁸
- Both documents called for permanent forest protection in new protected areas.

E. The Stakeholder Negotiations

When releasing the draft Strategy, the BC government issued a press release inviting the public to provide stakeholder's input in consultations on the draft strategy. The Valhalla Wilderness Society and other environmental groups then received individual invitations to an environmental stakeholder's meeting in Vancouver. Valhalla attended, presented a submission, and to our knowledge, the public input and stakeholder consultations ended February 28, 2007. Other environmental groups believed that too, and all waited to learn what would be posted on the Species at Risk registry. A draft recovery strategy has never been posted on the registry.

Seven and one-half months after the close of public input, in October, the authors of this analysis discovered that a new planning document existed, and it was the subject of private negotiations between the logging industry, snowmobile clubs, heli-ski industry and a coalition of environmental groups. Valhalla called

“The 2006 Draft Mountain Caribou Recovery Strategy by the B.C.'s Species at Risk Coordination Office (SARCO) is deficient. Firstly, it fails to reflect 30 years of scientific research demonstrating that fragmentation and loss of old-growth forest are the primary reasons for the demise of the mountain caribou. Secondly, it fails to address the implications of climate change on mountain caribou habitat including the increased risk of large, catastrophic wildfires. Thirdly, it places far too much emphasis on predator control including grizzly bear, wolverine and other species at risk as a course of action which, based on experience in other jurisdictions, is unlikely to maintain populations except in the very short term. Implementation of the current SARCO recovery plan options will not save the mountain caribou. Only one course of action will avert the loss over most or all of their current range: protected status for high-elevation and low-elevation old-growth forest.”

Petition regarding the November,
2006 draft recovery strategy
Signed by 50 scientists
www.vws.org

“several members of environmental organizations involved in the plan, and other stakeholders said they recently had to sign confidentiality agreements before gaining access to cabinet-level meetings on the plan.”

Orlando, A.
“BC Government unveils mountain caribou recovery plan,” Arrow
Lakes News
October 24, 2007

⁷ www.vws.org

⁸ ibid.

Mark Zacharias, head of the Species at Risk Coordination Office, and requested the document. According to Zacharias, the plan did exist, it had already been sent to Cabinet, it was classified as “Cabinet Secure,” but at the same time, it was still “under discussion” by groups that had signed a confidentiality agreement to obtain it. *The confidentiality agreements meant that all who signed, to gain access to the plan, were silenced; by the time the public found out about it, it would be fait accompli.*

On October 9, 2007, VWS informed the public about this in a press release and sent letters to government. A week later, on October 16, 2007 the Ministry of Agriculture and Lands issued a press release and backgrounder announcing “a unique collaboration”: a partnership between the BC government, several vested interests in mountain caribou habitat (logging companies and a heli-ski company), snowmobile clubs and a coalition of ten environmental groups⁹.

The coalition is the Mountain Caribou Project. The member groups are ForestEthics, Wildsight, Sierra Club of BC, Quesnel River Watershed Alliance, Fraser Headwaters Alliance, Conservation Northwest, Canadian Parks and Wilderness Society, Federation of BC Naturalists, North Columbia Environmental Society, and the Shuswap Environmental Action Society. FE works through private negotiations with logging companies and has announced several partnerships with logging companies. The Mountain Caribou Project and the other negotiating parties have made an agreement on the basic elements of a plan. However, a plan is not yet available and the government says it will not be finished until the spring of 2008.

Government consultations with stakeholders is not at all the same thing as negotiations between stakeholders to reach an agreement and form a partnership with the government. According to the government press release, the Mountain Caribou Project had been “deeply involved in building this collaborative solution” for three years. Any environmental group can have private meetings with government and industry; many do and Valhalla has done so. But if the government was going to facilitate a multi-sector agreement, it should have been open about that.

Some days after the announcement, some Terms of Reference¹¹ appeared on the Species at Risk Coordination Office website. The purpose of the Terms of Reference is to tell planners how to distribute the amount of forest to be protected under the plan agreement. The terms portray a shockingly different plan than what the press releases from the government and the environmental groups portrayed. The action plan is being presented as a “done deal” without filing it on the Species at Risk Registry. Where’s the 60-day public review and comment on the implementation plan?

Many people in the environmental community were outraged to learn about the confidentiality agreements. A number of environmentalists came forward at that time and revealed that BC governments have been requiring groups to sign these agreements for over ten years, in order to gain access to planning meetings. These agreements and secret meetings have made environmental-groups a party to many very painful losses and damaging changes in policies for our environment — such as the strategy to put lodges in our parks — and silenced

BC Forest Resources
Commission:

“High quality stewardship is possible only if it is kept arm’s length from the influence of short-term economic or political aspirations ... (The public) must be able to see for themselves through an open process, that their participation is having an impact.

“The planning process will be acceptable to the public only if it is open, and is seen to be open. All levels of the planning process must use procedures that are well understood and justifiable.”

Forest Commissioner Sandy Peel
Future of Our Forests
1991, pp 12, 16

“We recognize that signing confidentiality agreements is controversial; nonetheless they have always been something governments require from time to time. We wanted to see what was in the plan, so we signed a confidentiality agreement. We believe that this gave us the opportunity to work to strengthen the plan significantly before its release.”

Mountain Caribou Project
October 18, 2007

⁹ Government’s press release and backgrounder: <http://ilmbwww.gov.bc.ca/sarco/mc/index.html>.

¹⁰ “Mountain Caribou Briefing Paper,” Mountain Caribou Project.

¹¹ Habitat Terms of Reference, http://ilmbwww.gov.bc.ca/sarco/mc/habitat_tor.html.

them from being able to warn the public or their fellow environmentalists. By the time the public finds what has happened behind closed doors, it is not only *fait accompli*, but has the endorsement of some number of environmental groups who have been isolated from the support of the public and their colleagues. Any controversy will look like environmentalists fighting amongst themselves on matters of opinion within the environmental community. Valhalla Wilderness Watch believes this is a large reason why our environment has been so run over by government policies, unable to even raise a unified outcry against them.

There are grave concerns about this beyond the sheer amount of time lost conducting three layers planning process, each one making the previous one a futile waste of time. Conducting two layers of planning process — one that is open, offers freedom of information, and public participation on an equal basis; and another that is secret, offers documents only by signing a confidentiality agreement, and consists of stakeholders that negotiate an agreement for their own interests — is tantamount to keeping two sets of bookkeeping records. The up-front public process becomes a cover-up for how the real and important decisions are being made behind closed doors. Most environmental groups appreciate and want market campaigns to leverage logging companies and governments to protect the environment, but using them to leverage negotiating control while a public process is going on is another matter. These two practices by government and environmental groups have, over the years, lead to increasing withdrawal of planning decisions behind closed doors.

What are the significant results of this shift from public planning process to secret negotiations in the case of the mountain caribou? Valhalla Wilderness Watch believes that, under the cover of backroom meetings, 1) the government made maintenance of the allowable annual cut the top priority, 2) the combined vested interests that exploit mountain caribou habitat for profit or pleasure took control of both the plan and its future implementation, and 3) the agreement of the ten environmental groups enabled the plan to be foisted upon the public as a “done deal” supported by a facade of provincial public input, when in fact it was yet due to undergo national public review. This occurred in the following steps:

1. **A Stacked Table** - According to a ForestEthics press release (Jan. 23, 2007), a poll showed that 86% of British Columbians said they want the government to protect the mountain caribou’s habitat. Reportedly thousands of people sent a huge number of letters to the Species at Risk Coordination Office saying that very thing. At that time the forces for protecting habitat had a wide majority.

But with the interest-based negotiations, the partners included the Association of British Columbia Snowmobile Clubs, British Columbia Snowmobile Federation, Council of Forest Industries, Heli-Cat Canada, and the Interior Lumber Manufacturer’s Association. The ten collaborating environmental groups participated as one entity: the Mountain Caribou Project. It would appear that the Mountain Caribou Project, then, was up against the combined forces of the logging industry, the lumber manufacturing industry, the heli-ski and tourism industries, and the snowmobile clubs — all said by scientists to either destroy mountain caribou habitat by logging, or to displace caribou from their preferred winter feeding grounds. It appears that upwards of 75% of the participants were vested interests exploiting mountain caribou habitat for pleasure or profit.

It sounds impressive that ten environmental groups participated, but 17 environmental groups that signed a joint submission to SARCO calling for an end to logging all old-growth forest in mountain caribou range did not participate in the negotiations. Most believed that public input ended on February 28,

“As the BC government begins a public consultation process to find out what British Columbians want to do about the province’s endangered mountain caribou, a new poll has already answered the question: Eighty six per cent (86%) of British Columbians say they want the BC government to protect the animal’s habitat — that land needed for the species to survive — from logging and other industrial uses.

“The poll was conducted by Synovate and released today by ForestEthics, an international environmental organization with offices in Canada, the US and Chile.”

ForestEthics press release
Jan. 23, 2007

“Ensure that negotiated agreements are broadly supported within constituencies and by the general public by:

“- establishing clear lines of accountability with those they represent, with other representatives, and with the general public.

“-acting quickly to raise and resolve any concerns regarding the accountability of the process or any of the representatives.”

BC Commission on Resources and Environment, Code of Conduct:

2007.

2. **Confidentiality agreements prevented public scrutiny** - Over the last 15 years, there have been many interest-based negotiations in BC. However, the negotiations have been public. Their terms of reference and the balance of interests at the table were available for public scrutiny (before the process started). During the processes initiated by the Commission on Resources and Environment, representatives of public sectors were actually required to contact and organize a group of people they were to represent, and to maintain communication with them, in order to validate their position at the table. Representatives could be challenged to show who they represented and proof of their communication with their sector. The public could attend meetings and watch, or obtain minutes of the meetings. This offered much protection against any party manipulating outcomes with inappropriate pressure, or misinformation, or money, services or gifts changing hands. None of this public scrutiny was possible with the confidentiality agreements, which are an attack on the right to freedom of information.

3. **The endeavor to reach an agreement** - If the environmental groups just wanted access to the draft report, and a special opportunity to provide input on the upcoming plan, they could have done all of that without coming to an agreement or partnership with the vested interests. Many such negotiations in the province have ended without consensus agreement, and the government still took into account the input of all the participants. What were the incentives and motives that drove the parties to want to reach agreement? What do the confidentiality agreements say? These things, we may never know.

6. **Logging profits take priority over science and survival of endangered species** - The plan agreement contained mostly generalities, except for a few figures that represented the core content of the agreement: the number of hectares of existing, upgraded and new forest protection, and how much this would deduct from the logging industry's timber supply. These figures represent the major intent, result and impact of what happened behind closed doors.

What occurred is typical of BC's previous land use planning processes, but it is not at all appropriate for recovering an endangered species: before constructing a plan, a ceiling is first placed upon how much of the commercial timber supply can be protected. This is called "capping". The actual needs of the species at risk, or the science of how it can be protected, never come into this at all. It is an economic and political figure dictated by government and worked out with the logging companies as to how much compensation they would like to have. It represents the voluntary insistence of our pro-industry governments that it has to pay logging companies huge amounts of compensation for taking back public forest. The cap puts logging profits and compensation above everything else. This capping also occurred during the 1994 land use planning processes, which is why the mountain caribou is so threatened today. The fact that capping occurs *before* the process determines what is needed to protect the mountain caribou biases the whole process. It means that logging companies control all our land use processes behind a facade of public participation and democratic principles. It is likely that many environmental groups and activists would have loudly objected if they had known that this was going to happen in a species at risk recovery process.

7. **Vested interests gain control over implementation** — The *Species at Risk Act* requires a report on the progress of recovery actions every five years. The negotiated agreement includes a Progress Board for this purpose. The progress committee should have been composed of scientists and First Nations in order

"There are issues of mitigation and compensation that may come on the table but for now we're going to go in and make this all work. It'll be tough in some areas."

John Allan
 Council of Forest Industries
Arrow Lakes News, October 24,
 2007

"The (agreement) calls for the establishment of a "cross-sector Progress Board" made up of representatives from the various stakeholder groups in the plan to advise the government on the Recovery Implementation Plan. Minister Bell says that, 'all of these individuals will have representation on an ongoing basis to measure and communicate publicly the success of this plan.'"

"BC government unveils mountain caribou recovery plan," *Arrow Lakes News*, Oct. 24, 2007

to include aboriginal knowledge. However, the partners have negotiated themselves a seat on the board. When an advisory board is stacked with vested interests, the results are crippling. The board must make statements and reports as a collective entity, and it does so by voting. The vested-interest majority will have swift and sure control.

In the press, Minister of Agriculture and Lands Pat Bell stated that there will be more “stakeholder consultations” and open public participation in the future: “this new progress board that I’m talking about that will determine the long term recovery of the species will really work with the local stakeholders. We’re looking for a collaborative process here. We’re not looking at excluding any individuals.” (*Arrow Lakes News*, October 24, 2007.) And so, if anyone has any problems with logging, snowmobiling or heli-skiing in mountain caribou habitat and feels that the plan is not being properly implemented, they can tell the Progress Board, which will consist of:

“the Association of British Columbia Snowmobile Clubs, British Columbia Snowmobile Federation, Council of Forest Industries, Forest Ethics, Heli-Cat Canada, Interior Lumber Manufacturer’s Association, the Mountain Caribou Project and other stakeholders.”

V. CRITIQUE OF THE IMPLEMENTATION PLAN

The only thing we know about the plan agreement is what the government and the environmental groups put out in their press releases, and what several members of the Mountain Caribou Project have since told us. Later, the government released the Habitat Terms of Reference, the rules by which the “protected-for-est budget” will be distributed. One member of the Mountain Caribou Coalition has told the author that he did not know about the 1% cap on the protection of the Timber Harvesting Land Base. This whole subject of caps was omitted from the press releases and government backgrounder. However, messages posted by MCP members on environmental listservs make it very clear that the cap was known to at least some of them.

In addition, at the time of the announcement, the government set up a conference call between the parties to the agreement and the media. Several newspapers later printed quotes from that conference call, which included the John Allan, President of the Council of Forest Industries explaining that the plan will have little or no effect on the allowable annual cut, while Candace Batycki of ForestEthics said the agreement had “raised the bar for future forest protection across Canada.”

Most of the following information was taken from the Habitat Terms of Reference on the website of the Species at Risk Coordination Office. But in addition, a new round of stakeholder consultations — this time public ones — are starting up and have contributed a small amount of additional information:

1. The government promised 2.2 million hectares of existing, upgraded and new protection of mountain caribou habitat. Of that, 380,000 hectares will be new “protection.” Our calculations indicate that about two-thirds of that 380,000 hectares would be inoperable forest. An anonymous source involved in the planning has told VWS that the 2.2 million hectares includes all existing parks in mountain caribou range, even ones that are mostly rock and ice. GIS analysis commissioned by the Valhalla Wilderness Society shows that only 641,948 hectares of intact old-growth forest exists in the parks of the Inland Rainforest Region (4.5% of the region) today.

On the recovery plan:

“Will the forest industry be inconvenienced? The short answer is no ... the Minister said that there’ll be very little if any impact on harvesting levels...”

John Allen
President and CEO
Council of Forest Industries
Nelson Daily News,
October 23, 2007

“These new commitments ... have raised the bar for future forest protection across Canada. Today’s announcement is a victory ... for environmental organizations it’s never enough, but we think this is a giant leap forward ... for the mountain caribou I think this is going to do the job.”

Candace Batycki, ForestEthics
Arrow Lakes News
October 24, 2007

“The recent mountain caribou milestone is cause to uncork the bubbly.”

Sierra Club of BC
Newsletter, Issue #45
November, 2007

2. In addition, the government is counting the forest retained on “modified harvest zones” from past planning processes as “protected.” The overwhelming majority of these areas is high elevation. Many of these areas have already been clearcut; some have been “protected” only by upgrading them from 30% old-growth retention areas to 40%, or 60% to 70%. This means that some of these areas are not only fragmented, but the fragmentation can continue. The government has coined a euphemistic name for this: “incremental habitat protection”. Basically, many of our new protected areas are going to be leave patches between clearcuts. Mixed in with these cases, there will be some real gains in which sizeable patches of forest are designated for 100% retention.
3. Any reduction of the allowable annual cut (AAC) for the next 5 years is forbidden.
4. The percentage of Timber Harvesting Land Base (THLB) that can be newly protected throughout the whole mountain caribou range has been capped at 1%. According to the government’s Terms of Reference, this amounts to 115,000 hectares. But documents from the new implementation process reveal that that is an “upper limit”; the actual “budget” for boosting forest retention in modified harvest zones in the THLB is 76,904 hectares.
5. The remainder of the new protection would come from the inoperable forest, but the Terms of Reference state *only if it doesn’t impact the AAC for five years*. In steep, rugged mountains, there is a limit to how high on the slopes companies can log and still make a profit. This limit is called the operability line. There are other limits, especially steep or unstable terrain, that make logging unprofitable. The operability line excludes most of these areas because it would be too expensive to log them, or the wood is poor quality and unprofitable. The excluded areas are called “inoperable”. As a rule of thumb, late winter and summer habitat would be inoperable forest, and spring and early-winter habitat would be operable forest.

The operability line fluctuates because, in periods when timber prices are high, pockets of timber that were previously unprofitable to log become profitable. This forms the basis of the claim that protecting inoperable forest is an achievement, and even *that* has a cap on it, that it must not reduce the allowable annual cut.

6. Press releases from the government and the Mountain Caribou Project said that 95 percent of the high suitability winter habitat would be protected, making no distinction between early winter and late winter. When the Terms of Reference were released, they specified that “early- and late-winter habitat” would be protected. The scientists involved in distributing the “budget” for increased protection are, indeed, considering all elevations. But Valhalla was substantially correct, because spring and early winter habitat, comprising low- and mid-elevation, moderate to gentle slopes, is almost always within the operability line, i.e. in the Timber Harvesting Land Base, and only 1% of it can be protected, nor can it reduce the AAC. Any appreciable protection of low- and mid-elevation, operable forest would have to impact the AAC.

Most low- and mid-elevation forest that is protected will come from the inoperable forest. Inoperable forest at the lower elevations usually means steep slopes; yet mountain caribou have about the same limits for steep slopes as the logging industry does. This continues the long history of ways we have cheated the mountain caribou.

7. Press releases promised to protect 95% of high-suitability winter habitat. But the Terms of Reference add “within identified herd areas.” There is a huge

“The contribution from inoperable areas has generally been judged inadequate to meet the needs of caribou for many sub-populations.”

“Toward a Mtn. Caribou Mgmt Strategy for BC – Habitat Requirements and Sub-population Status,” Simpson, *et al.*, Nov. 1997, Ministry of Environment, Lands and Parks

“Mature and old stands on slopes less than 45% are most heavily used by caribou and therefore should have the highest priority for maintaining habitat value.”

Stevenson *et al.*, “Mountain Caribou in Managed Forests,” 2nd Ed., Ministry of Forests 2001

“Early winter, with deep, soft snow, provides the poorest mobility and food availability of any season. Extended, poor snow conditions may cause direct mortality of bulls, which enter winter in poor condition, or indirectly increase the post-natal mortality of calves by depressing the condition of pregnant cows. Caribou are easily accessible and vulnerable to predation and poaching in winter logging areas. Forest harvesting has often partially or wholly removed older forests on preferred early winter ranges.

Simpson, *et al.*, “Toward a Mtn. Caribou Mgmt Strategy for BC – Habitat Requirements and Sub-population Status,” Nov. 1997, Ministry of Environment, Lands and Parks.

“Caribou have shown very strong and consistent selection for mature and old growth forests. In two populations in central east British Columbia more than 89% of radio relocations were in forests >141 years of age; 42% of locations for one population were in forests >295 years of age (Terry *et al.* 1996).”

Horejsi, B., “The Status and Conservation of Woodland Caribou (Rangifer tarandus caribou) in southern British Columbia relative to the Province’s Forest Utilization Agenda.”

difference between protecting 95% of all available high-quality winter habitat, and 95% of high-quality winter habitat that is currently occupied. The difference in amount of forest would be huge. Preserving only “identified herd areas” is unacceptable. The *Species at Risk Act* concept of identifying all habitat, and then designating Critical Habitat for protection should be followed.

8. The Terms of Reference also say that 20% of the high suitability habitat can be replaced by low suitability habitat to allow logging of the high-suitability forest. Low-suitability habitat is 80-100 years old or younger. Yet habitat research has shown that their survival is associated with forest 140 years and over. This item makes double-talk of the claim to protect 95% of high-suitability habitat, and allows the logging industry to claw back even the small percentage of high-quality forest that might be available to mountain caribou under this plan.
9. SO FAR THERE IS NO INDICATION THAT ANY OF THE NEW PROTECTION IS REAL PROTECTION UNDER THE *PARK ACT*. The government has only committed to "incremental habitat protection." Some of this “protection” will be under current “guidelines” in existing land use plans. “Guidelines” are definitely NOT protection. Guidelines are discretionary and the BC government is notorious for not implementing guidelines. As stated earlier, much of the protected forest will be patches in modified harvest zones. In some cases, forest patches to be retained in these areas are “aspatial” – meaning that their location is not identified - the logging companies are left to decide which 40% or 60% they want to log. The plan agreement allows these areas to remain aspatial.
10. Caribou "protection" zones can be logged for beetle salvage. Yet one of the province's top lichen experts, Trevor Goward, says that trees killed by mountain pine beetle will grow large quantities of lichens, the mountain caribou's chief food supply.
11. A *Globe and Mail* news article reported that the new protected areas will be protected from road building. This is not the case in the Terms of Reference. For the purpose of salvaging beetle-killed forest, roads can be built through “protected” areas to reach salvage logging areas within or on the other side of the protected areas.¹⁰
12. A separate report will be issued to critique the Terms of Reference for winter recreation. What is immediately noticeable at this time is that the focus of the plan is on snowmobiling in caribou habitat in an educated manner, and paying snowmobile clubs money to educate and monitor themselves. We are told that there may have to be closures in the future if the scientific team so recommends. *But the scientific team has already recommended closures in the 2006 Options paper*, and somehow these are no longer mentioned as a result of the secret negotiations. Educating people riding the snowmobiles will do nothing to stop the machines from ploughing packed trails into mountain caribou habitat for wolves and cougars to follow.
13. Predator Control - According to the plan agreement, increased killing of other species to save the mountain caribou will now be limited to wolves, cougars, deer and moose. Killing of top predators does powerful damage to ecosystems, from the plants on up, and the killing must be massive and prolonged to work at all.
14. Adaptive Management - The plan's constant reference to “adaptive man-

“when forced to move downslope, caribou may take advantage of the short lifespan of lodgepole pine and its preponderance of dead lower branches to find windthrown pine snags or branches bearing *Bryoria*, in addition to gleaning lichen from the pine trunks....

“However, protected habitat has generally been concentrated in the upper ESSF, some caribou management plans specifically allow the harvest of lodgepole pine in otherwise protected zones (Abbott, 2005) ... We therefore recommend that any revisions to land-use plans include consideration for the key role that low-elevation habitat may play under low snowpack conditions, particularly in wetter ecosystems.”

Kinley, Goward, McLellan and Serouya, “The influence of variable snowpacks on habitat use by mountain caribou,” The 11th N. Am. Caribou Workshop 24-27 April 2006

“Caribou have been found to avoid linear corridors in forested areas, and to be at greater risk of predation when they are near them (James and Stuart-Smith 2000). Ploughed roads and packed trails increase the mobility of wolves and cougar. In some areas, wolves have used snowshoe and snowmobile trails to access caribou ranges ... This phenomenon has also been reported in the range of mountain caribou.”

Stevenson et al.
“Mountain Caribou in Managed Forests,” 2nd Ed., Ministry of Forests
2001

agement” means that what you think you are getting in the plan can change as time goes along. As the clearcutting of critical mountain caribou habitat goes on, the Progress Board, so stacked with vested interests, will make adjustments. We may be sure that these changes will fall heavily upon predators. Already, in the Robson Valley, the government has been encouraging the public to shoot all the wolves they want and take two cougars while they’re at it. In the Revelstoke area, bag limits on predators have been increased already.

15. The October 16 announcement stated that the BC government would provide one million dollars a year for three years to support “adaptive management plans.” Placed alongside \$2.506 *billion* dollars that the 2010 Olympics will cost — all for 10 days of sports while BC’s natural legacy is disappearing — this is a disgrace.
16. The plan makes no mention of recovery programs for mountain caribou habitat already damaged by logging. Scientists with whom Valhalla Wilderness Watch has consulted all point out that logging has already gone too far in large areas of mountain caribou habitat. However, there are many important, high value areas that are still considerably intact. Recovery techniques such as obliteration of logging roads and forest thinning are essential. But this will require money, and the government doesn’t want to pay it. And yet:
17. The plan includes \$136,000 in existing or future subsidies to snowmobiling interests:
 - \$75,000 to develop snowmobiling opportunities outside of mountain caribou herd areas;
 - \$50,000 already given to the Association of British Columbia Snowmobile Clubs and \$11,000 to the Association of BC Snowmobile Clubs to develop public education materials and for monitoring;
 - Further subsidies to come for monitoring;
 - Subsidies to the industrial or environmental partners, or payment for jobs, such as on the Progress Board, have yet to be revealed. The province should state how the whole \$3 million over 3 years will be spent.

VI. KEY ISSUES

A. Fragmentation

Twenty years ago, scientists were saying that loss of old-growth forest was one of the main causes of the decline of mountain caribou. But there has been a subtle change over the years. Today, scientists equally or more often refer to “fragmentation” of forest when listing the chief causes. This change reflects the understanding that, when a valley has a patchwork of clearcuts strung out along a system of logging roads, the old-growth forest that’s left standing has been seriously damaged in its ability to maintain ecological functions. It will no longer support mountain caribou and is in fact dangerous for them. For mountain caribou, a major part of their critical food supply is hair lichens growing on trees. Leaving only 40% of the old-growth means leaving only 40% of their food and their early winter shelter, and making them vulnerable to predators.

When the government includes the forest retained in “modified harvest zones” with no more than 30 or 40% retention as existing or future protected

“The absence of caribou from the intensive snowmobile area during most years could not be explained by differences in habitat quality. The RSF predicted that the intensive snowmobile area could support 53–96 caribou (95% CI). We conclude that intensive snowmobiling has displaced caribou from an area of suitable habitat. We recommend that snowmobile activity be restricted from all or most high-quality mountain caribou habitat as part of the recovery planning process.”

Seip *et al.*, “Displacement of Mountain Caribou from Winter Habitat by Snowmobiles,” *J. Wildlife Mgmt.*, Vol. 71, July 2007

“Mountain caribou, an ecotype of woodland caribou, are endangered due to the loss and fragmentation of old forests on which they depend.”

“Factors influencing the dispersion and fragmentation of endangered mountain caribou populations,” Apps and McLellan, *J. Biological Conservation*, 139 (2006)84-97

“The habitat requirements of mountain caribou, as they are understood today, are incompatible with most current forest management practices. To survive, mountain caribou need to be able to spread out over large areas of suitable habitat, where it is difficult for predators to find them. ... Forests managed under any silvicultural system that eventually eliminates, or substantially reduces, the number of large, old, lichen-bearing trees will not provide winter habitat for caribou.”

“At the stand level, the goal for management of caribou winter ranges is to maintain each stand continuously as suitable habitat. Clearcutting obviously does not meet this goal because the complete removal of trees also causes the complete removal of arboreal lichens.”

Stevenson *et al.*, “Mountain Caribou in Managed Forests,” 2nd Ed., Ministry of Forests 2001

areas, we are getting mountain caribou habitat that has already been ruined, or can be ruined in the future. Only when we feel the tragedy of how the forest remaining in these areas has been ruined for mountain caribou, is it possible to understand that the first priority should be to stop logging old-growth forest in mountain caribou range.

It has long been recognized in conservation biology that patches of old-growth forest left in between clearcuts and roads can no longer maintain all their species. For small species such as lichens, the issue may be humidity and temperature, as clearcuts open up forests to drying winds. For mountain caribou, one of the issues is food, and whether there is large enough tract of old-growth forest to maintain a safe distance from the deer, elk, moose, and their predators, the wolves and cougars, that favour young forest on clearcuts.

In cases where the new plan agreement would upgrade old-growth retention to 100%, that may or may not be a benefit, depending on the intactness and connectivity that remain. Valhalla Wilderness Watch feels that protecting some of these leave areas is very important. Saving fragmented forest is important for grizzly bears, fisheries, lichens, and many other species. And the caribou do use those patches and need them for travel. Valhalla struggled with this in designing the proposed Selkirk Mountain Caribou Park Proposal. What do you do when key places needed for connectivity have been logged?

The answer is habitat recovery programs on these fragmented areas. Unfortunately, the new implementation plan totally omits habitat recovery programs. These programs could generate many jobs in the woods for obliterating logging roads and brushing and thinning to simulate old-growth conditions. This crucial need is being ignored because neither government nor industry wants to pay for it.

Some environmentalists report that modified harvest zones have worked well to support mountain caribou in their areas. They have not worked well in the southern and central parts of mountain caribou range, perhaps because there has been far too little modified harvest area and far too little old-growth retention on them. But in addition, mountain caribou are very different from other caribou in the province. They evolved to live in the humid forests of the Interior, and particularly in the wet and very wet forests. This meant few fires, which meant a high proportion of old-growth. This obviously affected the development of this ecotype of caribou in many ways. For instance, it opened up a particular food source: the heavy lichen loads that grow only on trees 140 years or older.

It is time to seriously re-examine the use of modified harvest zones in relation to mountain caribou. At the beginning of the CORE land use planning processes of 1994, the ideal of mountain caribou conservation was to fully protect large, intact areas of core habitat. Then, around that core, to create buffer zones where only a little logging would be allowed. This is what actually happened:

1. CORE PROTECTED AREAS NOT PROVIDED OR INADEQUATE - Unfortunately, some areas in mountain caribou range, such as the Revelstoke area, received no protected areas. Today, the area occupied by the Revelstoke herds has been tragically fragmented. In the central and southern caribou range, between one-third and one-half of every park proposal was excluded from protection when the parks were created. The excluded areas were usually low- and mid-elevation forest. The government ignored pleas of environmentalists to save these forests. As a result, the profile of the parks in the central and southern parts of the range, as being mostly rock and ice, changed very little. Some of them are large, but they are not ecologically intact. As a

“Forest harvesting practices that produce a patchwork of different forest age classes, linked with a network of roads, may contain enough lichens to support a caribou population, but probably will not provide an environment where caribou can effectively avoid predators and poachers. A patchwork of early seral and mature forests may also put caribou in close proximity to predators by enhancing habitat for other prey species that prefer early seral forest (Seip 1992a). Concentrating caribou into small areas of suitable habitat may also make them easier for predators to locate (Seip 1991).”

“A Strategy for the Recovery of Mountain Caribou in British Columbia,” Mountain Caribou Technical Advisory Committee, Ministry of Water, Land and Air Protection, September, 2002

“On areas already clearcut, it will take a rotation or more before arboreal lichens are re-established with sufficient biomass to be useful to caribou. Efforts to rehabilitate caribou habitat after clearcutting have met with limited success. Even with techniques such as lichen inoculation and careful stand density control, clearcut areas would not provide even modest lichen-bearing habitat for many decades. Clearcutting fragments caribou habitat, making caribou more vulnerable to predation. Therefore, it is much better to use partial cutting and to maintain large, contiguous areas of caribou habitat rather than rely on clearcutting and restoration.

“The maximum level of removal in caribou habitat should not exceed 30% by volume, basal area, or area. This percentage applies to the harvestable area within a cutblock and excludes roads, landings, wildlife tree patches, and other reserves.”

Stevenson et al., “Mountain Caribou in Managed Forests,” 2nd Ed., Ministry of Forests 2001.

result, if one looks at caribou telemetry maps today, caribou are more often being located outside the boundaries of large existing parks such as the Goat Range and the Purcell Wilderness Conservancy.

2. INSUFFICIENT STANDARDS FOR MODIFIED HARVEST ZONES -

Forest that should have been fully protected in parks was then subjected to the “Modified Harvest Zone” approach. Researchers have said for many years that 65-70% retention of old-growth over a large area is necessary to support mountain caribou. But political compromise has dictated that environmental protection should never be given more than half of what is needed, so the Modified Harvest Zone with only 30-40% retention became common in some areas. But in addition, clearcutting is not compatible with mountain caribou. Some research is going on with very small clearcuts, but some scientists believe this will fail. A major government study (Stevenson, et al., 2001) recommended single tree selection logging to maintain mountain caribou, but the government and the forest industry have always refused to adopt it because it is “uneconomical.” So clearcutting became the standard.

3. DISHONEST APPLICATION OF MODIFIED HARVEST ZONES -

In a few places Modified Harvest Zones have been applied well. However, in most areas, this concept became a Robber’s Roost for bandits who have cheated mountain caribou, other wildlife, and the public. We have 100% retention zones or “Old-Growth Management Areas” (OGMAs) that can be moved when it becomes convenient to log them. How does one move an OGMA? Move the boundaries, cut down the trees where the old boundaries used to be, and haul them away. Companies are even allowed to log the old-growth and set aside younger forest as future OGMAs.

Modified Harvest Zones have been used deliberately to concentrate protected forest above the operability line, at high elevations and on steep slopes. The Valhalla Wilderness Society commissioned a computer analysis of 100% old-growth forest retention zones in mountain caribou range. Of 435,000 hectares designated for no-logging zones in the southern part of mountain caribou range, GIS analysis showed that these areas contained 94% spruce-balsam and only 2% low- to mid-elevation cedar-hemlock. Most of it was very high elevation. About 75% of it is above the operability line — too steep or too high elevation to be profitable to log. Nearly half is on slopes 40% or greater, mostly too steep for caribou habitat.

One of the very worst abuses of Modified Harvest Zones was to make the retention areas “aspatial”, meaning that which 40% or 60% of a forest to leave was not specified in the cutting licence. The logging company’s could choose what to leave, and so they took what was most profitable to them.

B. Seasonal Migration/Interior Cedar-Hemlock (ICH)

Within the Interior Wetbelt, wet and very wet forest 140 years or older, whether of cedar-hemlock or spruce-subalpine fir, is most favoured by mountain caribou. Interior Cedar-Hemlock forest of this description (also called “Inland Temperate Rainforest”) — when it is in mountains that go all the way up to the alpine — is one of the leading indicators of where the surviving herds are found today.

Historical accounts indisputably associate the mountain caribou with cedar-hemlock forests, especially in spring and early winter. The historical range of the mountain caribou in BC is roughly equivalent to the Interior Wetbelt,

“Research has shown that, for short periods in most years, low-elevation ranges in cedar-hemlock forests are essential to most caribou populations south of the Cariboo Mountains. In some years depending on snow conditions and feeding opportunities, caribou may remain in cedar-hemlock forest for extended periods. Habitat management programs should ensure that suitable, low-elevation habitats are available to caribou during periods and in areas where they are needed.”

Simpson, *et al.*, “Toward a Mtn. Caribou Mgmt. Strategy for BC – Habitat Requirements and Sub-population Status,” 1997

“In spring, most caribou descended into the cedar-hemlock forests where understory vegetation, natural openings and the cleared reservoir provided green vegetation. Caribou emerged from winter in poor condition and quality spring foods were believed important, particularly to pregnant cows ... Previous habitat management guidelines for caribou may be incomplete because the importance of early-winter and spring ranges was not considered.”

K. Simpson and G.P. Woods, “Movements and Habitats of Caribou in the Mountains of Southern British Columbia,” BC MOELP, 1987

“At the metapopulation level, the persistence of subpopulations relative to historic range was explained by the extent of wet and very wet climatic conditions, the distribution of both old (greater than 140 years old) forests, particularly of cedar and hemlock composition, and alpine areas. Other important factors were remoteness from human presence, low road density and little motorized access. At the subpopulation level, the relative intensity of caribou landscape occupancy within subpopulation bounds was explained by the distribution of old cedar/hemlock and spruce/subalpine fir forests and the lack of deciduous forests ...”

Apps and McLellan, “Factors influencing the dispersion and fragmentation of endangered mountain caribou populations,” *Bio. Cons.* 130 (2006)

which is roughly equivalent to the occurrence of the Interior Cedar-Hemlock (ICH) at low and/or mid elevations. Although Englemann Spruce-Subalpine Fir (ESSF) occurs at mid to high elevations, the range of the mountain caribou does not equate exactly to the range of ESSF, which is more widespread in the province than ICH; nor does it equate with a plenitude of subalpine or alpine range, which is abundant elsewhere without the ICH attached.

In recent years the same profit bias that has led to selective destruction of low-elevation Interior Cedar-Hemlock forests has also led to the disappearance of ICH in discussions about the mountain caribou. In many cases, the whole subject of low-mid-elevation forest disappears. Yet it is abundantly well recognized in science that mountain caribou migrate up and down the mountains twice a year, with some of them coming all the way down to the valley bottoms. And it is well known that both low- and high-elevation habitats have critical survival functions in the caribou's life cycle.

This issue has been complicated by the fact that, in the far northern reaches of their range, mountain caribou use low-elevation forest less than the central or southern herds. However, based upon several years of inquiry, including consultation with a number of scientists who do not wish to be identified, Valhalla Wilderness Watch believes that:

1. There is a difference between what some government scientists say about mountain caribou in planning meetings and what they write in scientific journals. Innumerable articles in scientific journals state the importance of Interior Cedar-Hemlock forest.
2. In the north, the degree to which northern caribou are said to remain at high elevations year round does not correlate with the many stories of sightings at lower elevations by knowledgeable people. A former Ministry of Environment official explained to the author that the caribou up north do spend more time in the subalpine, but they shift their range seasonally, and in so doing they use the valley-bottoms for travel. Room is not being made for the fact that travel is a critical survival function for wildlife, which are doomed if they become geographically isolated in small areas.
3. These higher-elevation mountain caribou are often said to extend south into the Cariboo Mountains. In reality, historical records show that mountain caribou made regular use of low-elevation cedar/hemlock in Wells Gray Park and near the town of Clearwater, just south of Wells Gray. This use of low-elevation forest was also recognized in the Cariboo-Chilcotin Land Use Plan.
4. It has become common to use a seasonal formula for mountain caribou elevational shifts, but in reality, some scientists have pointed out that the shifts are most closely related to snow depth and consistency. This has implications for the future because our climate is changing. The mountain caribou use high-elevation habitat in late winter because the snow is consolidated enough to support their weight. With extra-large snowshoe-like hooves, they can walk on top of the snow. This enables them to reach hair lichens — their *only* food at these elevations — growing in trees. The lichens do not grow below the snow. So when snow depth is low, either because it is too early in the year or because of abnormally low snowpacks in late winter, the caribou are not able to reach high enough in the trees to eat the lichens. Thus, even in late win-

“Generally, the southern caribou populations depend on low-elevation forests more than northern populations. Since forest lands are more productive in the south and low-elevation lands are more productive than high-elevation habitats, the forested habitats required by caribou in the southern part of their range have greater value to forestry.”

“Toward a Mtn. Caribou Mgmt. Strategy for BC – Habitat Requirements and Sub-population Status,” Simpson et al, Ministry of Environment, Lands and Parks, Nov. 1997

“Our results point more strongly than has previous habitat modeling ... to the potential need for low-elevation habitat in sustaining caribou for extended periods during some winters. The risk of having limited areas protected at low elevations includes the potential link of forage and the reduced separation from predators inhabiting valley bottoms....

“However, protected habitat has generally been concentrated in the upper ESSF, some caribou management plans specifically allow the harvest of lodgepole pine in otherwise protected zones (Abbott, 2005) ... We therefore recommend that any revisions to land-use plans include consideration for the key role that low-elevation habitat may play under low snowpack conditions, particularly in wetter ecosystems.”

Kinley, Goward, McLellan and Serouya, “The influence of variable snowpacks on habitat use by mountain caribou,” The 11th N. Am. Caribou Workshop 24-27 April 2006

“Early-winter habitat is critical (Russell et al. 1982, Simpson et al. 1985, Antifeau 1987) for caribou in the Selkirk Mountains (Scott and Servheen 1985) ... Caribou make extensive use of the economically important old-growth red cedar-western hemlock community during early winter ... It has been suggested that caribou do not require the cedar-hemlock community in south-eastern British Columbia ... We suggest that old-growth stands of cedar-hemlock may ameliorate the effects of major storms and movement by caribou into protective stands of cedar-hemlock may reduce energy deficits during severe early winters, particularly of younger animals.”

Rominger and Oldemeyer, “Early Winter Habitat of Woodland Caribou, Selkirk Mountains, BC”, *J. Wildlife Mgmt.*, 53(1):238-243.

ter mountain caribou have been observed to move as much as 600 metres lower in the mountains if snow depth is short by as much as 1.5 metres. Thus they may move into cedar-hemlock or lodgepole pine even in late winter (Kinley and Goward, 2006.). In the cedar-hemlock, caribou feed on windfall and branches blown down by the wind that are loaded with lichens.

This would mean that increasingly warm winters due to global warming may be a serious danger to mountain caribou that do not have sufficient low- and mid-elevation forest. In one recent winter in the West Kootenays, there was no snow accumulation at all at low elevations until about Christmas. A local biologist told the authors the mountain caribou were two months late ascending to the higher elevations that year.

5. Modern telemetry is not finding many caribou at low elevations or even mid-elevations in some areas where they used to be. Only a few scientific studies mention that logging may be the cause; almost none will tell us that the low- and mid-elevation forest has been “nuked” and that the caribou that used to go there are probably dead. They would lose their jobs if they said that. Nevertheless, several scientists over the years have suggested that the loss of old-growth Interior Cedar-Hemlock may be why the mountain caribou are declining. That forest type is now becoming rare. It is well-recognized as critical habitat for mountain caribou, and it is most certainly critical habitat for innumerable species of lichens.

C. Geographical Issues

Forest districts in the northern mountain caribou range appear to have been far more progressive in old-growth forest conservation than the central or southern districts. These districts, including the Robson Valley and the north Cariboo Mountains, have been setting aside forest for mountain caribou for 20 years. Amongst the more progressive elements, Old-growth Management Areas (OGMAs) are fully protected from logging (not from mining, recreation or development), legislated for 100 years, defined by location in the legislation, and quite a bit of forest has now been designated. Most importantly, some of them have been removed from the allowable annual cut. The overall cumulative result is that the northern caribou herds are the largest.

In great part all these happy differences may be due to the greater reliance of northern mountain caribou upon high-elevation forest. However, as the logging of mountain caribou habitat continues in these areas, it may be only a matter of time before those caribou begin to decline more rapidly. There are some serious deficiencies currently in the existing and proposed protection for these northern areas.

The government’s abolishment of the North Kootenay and South Kootenay Recovery Action Group tables, at a time when their plans were almost completed, was just another in a long history of steps that have allowed ongoing, heavy fragmentation by logging and roads. This has come at the cost of nearly annihilating mountain caribou over the southern two-thirds of their range in BC. The following are some key geographical issues from north to south:

1. Robson Valley - This area has the most intact ancient inland temperate rainforest in BC. Inland rainforest occurs nowhere in the world but in BC, and it is very rare. Botanical surveys have shown that this forest type has species yet unknown to science and has a biodiversity previously undreamt of in the

“Caribou do not concentrate their early winter use in small winter ranges or show strong preference for specific aspects or slopes as other ungulates do, but are dispersed at low densities (McLellan et al 1994). In other words, caribou not only use old and thus economically valuable cedar/hemlock stands, but use such stands over very large areas ... during early winter, the mature cedar/hemlock forests category alone covers only 13.4% of the study area and yet contained 60.1% of the caribou use.”

McLellan *et al.*, “Habitats used by mountain caribou in the North Columbia Mountains” 1993-94, Year 2,” BC Ministry of Forests, Canadian Park Service

“In most years snow patches on the MacGregor Plateau, Fraser Plateau and north Cariboo Mountains are absent or scarce by the first of August ... It is not until there is more than 50 cm of soft snow that most caribou seem to move to mature balsam or spruce-balsam forest at lower elevations. By late October, a portion of the population is down to 1200 metres. By the second or third week of November, occasional animals including both females with calves and adult bulls are seen along highway 16 at 700-800 metres. There are three locations between the Bowron River and McBride where there are frequent sightings in association with old-growth cedar-hemlock forest ... In much of the study area, however, caribou that descend to lower elevations use spruce-balsam types as nothing else exists ... Not all caribou move down in response to increasing amounts of snow.”

King, D., “The Distribution and Habitat of Caribou in the Mountains East of Prince George,” Ministry of Environment, Prince George

scientific world. There is a whole licence area devoted to logging Interior Cedar-Hemlock, which is all the wet or very wet type that has very high rainforest values. There are 40-60 approved cutblocks of ancient inland temperate rainforest that are scheduled to be logged. As this cutting license goes on and on over the years, it will eat the connectivity out of the protected OGMAs.

2. Quesnel Lake - During the CORE processes in 1994, two key river valleys at the head of Quesnel Lake were proposed for inclusion in the Cariboo Mountains Provincial Park. One was the Penfold, the other the Mitchell. Both contained prime, ancient Inland Temperate Rainforest, and in both the caribou were known to come down to the cedar-hemlock on the lower shores of the lake. One, the Mitchell, was protected, the other rejected and logging began immediately.

This year the Valhalla Wilderness Society sponsored an exploratory trip to the head of Quesnel Lake. Botanist Toby Spribille conducted the first lichen survey of this area and found the most spectacularly rich inland temperate rainforest known to exist anywhere. Spribille says he now considers this area to be the centre of the Inland Temperate Rainforest, the core refugium from which many species such as those found south in the Incomappleux River Valley and north in the Robson Valley radiate.

Although Western Forest Products is continuing to log prime mountain caribou habitat in the Penfold and on ridges above Quesnel Lake, these areas are still substantially intact. They contain more intact Inland Rainforest than what occurs anywhere to the south. The authors believe that it is not too late to rescue the Penfold for the mountain caribou, and that this area forms one of the most important, if not *the* most important area in need of immediate protection.

3. Central and southern herds - The Species at Risk Coordination Office's 2006 "Options" paper offered so little additional protection in these areas as to suggest that all central and southern caribou herds had already been "written off" by the government and the Science Team.
4. Selkirk Mountain Caribou Park Proposal - The Central Selkirk herd, with almost 90 animals, has a very defineable and limited core area. It is more endangered than herds to the north, but has a better chance of survival than those to the south, which have little habitat left to protect. The Central Selkirk herd does have old-growth forest left. Though there is hardly any truly "low" elevation old-growth intact over a large area, there is mid-elevation cedar-hemlock and high-quality spruce-hemlock that should be protected immediately. To our dismay, this Central Selkirk herd had amongst the least new protection proposed for all the herds in the SARCO Options paper.

In answer to this dilemma, the Valhalla Wilderness Society did much mapping and field work to put together a 251,016-hectare park proposal, the Selkirk Mountain Caribou Park Proposal. It contains mostly forest, with some rock, ice and tundra for wilderness integrity. Subsequent field work has shown that the extent of recent clearcuts and fires has been greater than thought and it is believed that the proposal will have to be pared down. VWS also identified moderately logged areas for habitat rehabilitation. This is the best caribou habitat protection package available south of Wells Gray Park.

Quesnel Lake:

"The caribou in the vicinity of CP 61-1 spend, on average, 22 percent of their time in low elevation habitat during early winter. Most studies of the caribou reveal that individuals have variable patterns of commitment to early winter habitat. Some individuals move predictably between summer and winter habitats, some reside in the same geographic area, and others wander with no obvious pattern. The occurrence of various behavioural types within a single population probably plays an important role in the survival of the population as a whole by allowing the caribou to adapt to changing conditions ... all the studies indicate the importance of low elevation winter habitats..."

Forest Practices Board,
"Management and Conservation of
Mountain Caribou Habitat in the
Cariboo Region," FPB/SIR/09,
March 2002

"Habitat protection efforts in southern British Columbia have been directed mainly to late-winter ranges of mountain caribou...In our area, low elevation, early-winter habitats have been reduced by logging and reservoir development and, in our opinion, are as important to caribou as late-winter ranges. To develop meaningful guidelines to protect caribou ranges, all potentially limiting habitats must be considered."

Simpson, *et al.*, "Toward a Mtn.
Caribou Mgmt Strategy for BC –
Habitat Requirements and Sub-population
Status," Nov. 1997, Ministry
of Environment, Lands and Parks.

D. Predator Control

Despite the reduced emphasis on predator control in the plan agreement, there remains a glaring contradiction between the conservation goals of the plan (to restore mountain caribou to 1995 population levels) and the economic goals (to have no significant reduction of the AAC.) This contradiction between goal and method will almost inevitably be solved by a gradual intensification of killing predators. Killing large carnivores not only eliminates the targeted species, but many balancing functions that these animals play. For more information on that, see the previous Valhalla Wilderness Watch report, "How the BC Government is Killing Mountain Caribou."

Already this is an issue under discussion in the Revelstoke area. A scientific report by Vadal indicated that 34,000 hectares of "incremental habitat" were needed to meet the goals of the plan to maintain the herd. But the scientists point out that only 10,000 hectares has been allocated to them in the new "budget" of protection. Some of the scientists argue that they could get by with that if there were sufficient predator control, ie, the more predator control, the less old-growth forest is needed to maintain the herd.

The basis for this view is a number of studies in which scientists concluded that food supply was not a limiting factor for mountain caribou at this point. They say that examination of dead caribou has not indicated that food is a problem for them. The theory is that the mountain caribou population has declined so much below its natural levels that food is ample for those individuals that are still alive. This has strained the credulity of other scientists as well as laypeople, because habitat loss has been massive, and the trees we've been cutting down and hauling away harbour the caribou's food supply

Part of the evidence that food is not a limiting factor is that, when scientists examine dead caribou, they break open a leg bone and check the bone marrow. Runny bone marrow indicates that the animals was starving. But scientists are not finding runny marrow, so the theory says that food is not limiting them. However, a very recent journal article (Brown *et al.* 2007) has strongly challenged a number of scientific theories that minimize the effects of habitat loss and shift the blame on predation. They say there are virtually no data or research on the effects of habitat destruction on caribou nutrition. The crude method used to determine whether food was a problem indicates only starvation; it says nothing about nutrition.

One fascinating possibility mentioned in this article is that the journey from the low-elevation to the high elevation in spring may be important to pregnant females because they can follow the line of melting snow upward; plants that spring from the newly exposed ground contain their highest level of nutrition. If this is so, pregnant females that didn't descend low enough in the downward migration may not traverse a sufficient range of elevation on the way back up to gain the nutrition they need for the unborn calf. In other words, it may not be the need for this or that elevational level that is the hidden key to what is killing mountain caribou, but the travel between them, and sheer range of elevation that counts.

Suggestions like this point to controlling factors in caribou survival that may be lying barely submerged beneath what we know today, undiscovered because of inadequate research. When they do emerge, we may find that people like Yorke Edwards, the biologist in Wells Gray Park who long ago came to the conclusion that Interior Cedar-Hemlock was the key, were right. And it may be too late. This is why Valhalla Wilderness Watch has been doing everything it can to put the focus on cedar-hemlock. People in our organization live in mountain

"Maternal nutrition in winter / spring may strongly affect survival at or near birthing by inducing low birth weight..."

"Mountain caribou typically ... move to lower elevations in spring to access newly emerging green vegetation, then return to higher elevations for the calving period and summer ... it is possible that the return to higher elevations during calving reflects the altitudinal gradient in plant emergence in relation to snowmelt.

"Femur marrow fat ... had no predictive power for moderate to high levels of nutritional condition (Cok *et al.* 2001a). Bone marrow fat is one of the last body stores of fat to be used, and low values of marrow fat tend to be representative of acute nutritional deprivation..."

"Even if predation holds a caribou population below the carrying capacity defined by food, the absolute availability of food may be less constraining to fitness than the quality of forest (Parker *et al.* 1999; Cook 2002)."

Brown, *et al.*, "Comment arising from a paper by Wittmer *et al.*: hypothesis testing for top-down and bottom-up effects in woodland caribou population dynamics, *Oecologia*, 2007

"Before the fire of 1926, lowland Columbia (Interior Cedar-Hemlock) Forest in the Clearwater drainage covered only 9 percent of the country used by caribou, while the poorly drained areas which seemed to be preferred were only 3 per cent of the total. Fire has reduced these percentages to 3 and one respectively. These small areas appear to be the key to caribou survival.

"When small areas of climax or near-climax vegetation are necessary to the survival of an animal species, any change in vegetation may doom the animal dependent upon it. In this case fire or clearcut logging completely eliminate caribou range, and the animals disappear as a result."

Edwards, Y., "Fire and the Decline of a Mountain Caribou Herd," *J. Wildlife Mgmt.*, Vol. 18, No.4, Oct. 1954

caribou habitat. Local residents up and down mountain caribou habitat have abundant anecdotal evidence about the animals that never shows up in scientific journals. The place names of where mountain caribou used to be seen tell the story of an animal that haunted our rivers and lakes and our lush lowland forests; a story that is being lost in time because the caribou are being lost.

VII. RECOMMENDATIONS

Valhalla Wilderness Watch recognizes that many areas in mountain caribou range do not have much old-growth or much unfragmented forest left. Government scientists have had a very bad, sellout agreement dropped on them, and they are now responsible for doing the best with it that they can do. Valhalla will be participating in that effort, but in the meantime, it is crucial for every possible environmental group and BC citizen to tell the federal and provincial governments what they think of this plan; those who belong to the groups in the Mountain Caribou Project may also need to communicate with the boards of those groups.

It is important to coalesce the largest support possible behind the recommendations of the 50 scientists that signed a petition to the Species at Risk Coordination Office. The main terms of that petition are:

- An immediate moratorium on all logging in old-growth caribou habitat.
- As a first priority, legislated full protection of all mountain caribou old-growth forest 140 years or older through new provincial and national parks, fully protected caribou old-growth management reserves, and wildlife sanctuaries.
- Habitat recovery for caribou range already logged.
- Retention of some beetle-killed pine forests as future lichen-feeding areas for caribou.
- Much more aggressive restrictions on motorized recreation in caribou habitat including snowmobiles, ATVs and helicopters.
- Restrictions on commercial recreation developments and activities in caribou habitat including lodges, ski hills and so on.
- Decommissioning of roads in caribou habitat to help reduce predator and human access.
- In addition we would add that the research recommended by Brown *et al.*, to evaluate the level of mountain caribou nutrition, be done immediately.

If this sounds radical to some, it's because cutting up the land use pie and giving the vast majority of it to the human appetite has been the status quo for so long that some of us are unable to grasp that there comes an end to how much of an animal's habitat can be "compromised" and still expect it to survive. The lower two-thirds of the mountain caribou range has been heavily logged for forty years. If we stop logging old-growth in these areas, it will take very little commercial quality forest away from the logging companies because little is left. And it will protect many other old-growth-dependent species, such as rare lichens and plants. In the northern third of caribou range, caribou conservation means stopping the fragmentation before it gets to the point where it is in the lower two-thirds, in which so many caribou have disappeared, in some cases wiped out forever.

"Mountain caribou depend upon large tracts of old-growth forest in the Interior Wet Belt ... Probably the most important management action is maintaining large tracts of habitat in a condition suitable for their needs. This means having parks or other no-logging zones, surrounded by areas in which some timber harvesting occurs but a high percentage of old-growth forest is retained."

Kinley, T., "Mountain Caribou," BC Ministry of Env., Lands and Parks, Feb. 1999

"Habitat protection efforts in southern British Columbia have been directed mainly to late-winter ranges of mountain caribou... In our area, low elevation, early-winter habitats have been reduced by logging and reservoir development and, in our opinion, are as important to caribou as late-winter ranges. To develop meaningful guidelines to protect caribou ranges, all potentially limiting habitats must be considered."

Simpson et al., "Critical habitats of caribou in the mountains of British Columbia," Ministry of Environment, Lands and Parks Feb. 1987

By way of trying to “make-do” with the pitiful amount of new protection allowed, it is simply critical that the exercise of allocating the protected-forest “budget” be focused upon studying our last remaining opportunities for preserving what little intactness and connectivity of old-growth habitat remain. This will mean expanding existing parks and wherever possible.

VIII. MANUFACTURING CONSENT

The question that hangs in the balance for the mountain caribou recovery plan is not so much whether it will save caribou. It definitely will not save caribou, if we’re to believe the science that has been put before us; but then, the most conscientious employment of the recommendations of this report may not save them either, because logging may have already gone too far. The question is whether the plan demonstrates even a sincere *effort* to save them; or have the partners in the plan agreement simply come up with a feel-good agreement as a dose of valium for a concerned public while the logging goes on and the mountain caribou kicks in the final throes of its existence on this planet. History shows that such an agreement will serve purposes the participants in negotiations never discuss: it will serve the government and logging companies as a facade of protection to put before the courts, so that people blocking the logging of some of the last remaining mountain caribou habitat can be arrested and sent to jail.

The common experience in democracy has always been that dark corners away from the public eye are dangerous for the public interest. About 17 years ago in BC, before the New Democrat Party came into power, transparent, open, public process for land use planning was seen as a shining ideal by a populace that was stinging from years of sellouts, betrayals, and corruption in the management of our forests. However, the endeavor to make that ideal a reality was way-laid by the belief that public participation meant “negotiations” — a system of political tradeoffs between the varied human interests. This brought a sense of cooperation, of rationality and fairness, of “peace in the woods.”

Unfortunately, an endangered species survives by the laws of nature, not politics, and science is the key tool that can tell us what will protect a species. The political tradeoff system means that, if 65-100% of the old-growth must be left intact over a large area for caribou to survive, the negotiating parties all agree that 30-40% will do. If the mountain caribou must have the full vertical range of elevations to survive, the negotiating parties agree to half that elevational relief. The logging companies take the bottom half and leave mountain caribou the top half. Or else, they give the mountain caribou valley-bottom patches in areas already heavily logged.

One of the members of the Mountain Caribou Project stated in an e-mail that the new protection is a good start, and we can keep building on it. No, it isn’t the start at all; the start happened fourteen years ago with the CORE regional land use planning processes. Those processes left us with a bundle of feel-good agreements that environmentalists later took to the courts to defend their drinking water and other resources, only to have the agreements shattered by realities that they had overlooked when they were feeling so good. Having lost 300 mountain caribou in the four years this planning process has gone on tells us we’ve run out of time to keep making that same mistake over and over again.

We should have learned that, when all the parties to the negotiations have finished putting their requirements on the table, there is something else that has to happen. A conscientious central decision-maker representing all the people has

“From the CORE process mapping, onward through the years we have drawn lines on maps. These lines allowed us to accommodate snowmobile use and the economic benefit to our community, these lines allowed for logging and the economic benefits to our community, these lines allowed for hydro development and the economic benefit to our community, these lines allowed for heli-skiing and the economic benefit to our community. In fact we allowed the so-called stakeholders at these meetings to draw lines on maps that accommodated everything but the caribou...”

“Now the enlightened ones want to kill a few predators (wolves) in a too late response to the demise of the few that are left. Wolves chuckle when they hear snowmobiles, it means another easy path into the strips of trees that hide the few caribou left. No more looking longingly at the mountainside and wishing for snowshoes, the 400 horsepower whine of the sled is their ticket to a low energy romp up the hill to a helicopter stressed, habitat and food starved, dam blocked, easy lunch.”

Wells, P, “Killing Wolves to Save Caribou Makes No Sense”
Revelstoke Times Review
20 June 2007

to make a decision that will serve the public interest. It is in the interest of the public to have a healthy environment. Massive species loss, which is going on as old-growth forests around the world are destroyed, is not in the public interest. And as for “balanced” land use, unsustainable logging has been the overwhelmingly the controlling reality for forty years. In BC’s Interior, we are talking about whether we are going to go ahead and log it all as long as a profit can be wrung from it, and regardless of what species go extinct.

Instead of making responsible decisions for the environment, governments have found it convenient to become subservient to what the “stakeholders” at the negotiating table will agree upon. It relieves them of having to make decisions that one side of a conflict doesn’t like; it takes away the threat of negative press, and of an aroused public that will vote them out of office. But is the government really subservient to the outcome of these negotiations, or does it manufacture the outcome it wants by setting up negotiating tables that stacked with interests that want to exploit resources for pleasure or profit, by placing limits on what can be protected, withholding details until after key decisions have been made, and using confidentiality agreements to hide what’s going on until it’s too late for the public to do anything about it?

The mountain caribou have been made to run the gauntlet of stacked committees. First there were the Recovery Implementation Groups stacked with industry, heli-skiing companies and snowmobile clubs. Then BC’s industry-stacked Integrated Land Management Bureau took over control of the Species at Risk Coordination Office. Then came the stacked back-room negotiations, and now the stacked Progress Board.

And why is land use in British Columbia increasingly characterized by private negotiations between ForestEthics (with a small group of allies) and logging companies? The Great Bear Rainforest and now the mountain caribou recovery process are examples.

On July 27, 2006, a representative of the Species at Risk Coordination Office (SARCO) attended a conference hosted by the Valhalla Wilderness Society. It was attended by 26 environmental activists and organizations interested in protecting Inland Temperate Rainforest. At that time he explained to the participants that SARCO was communicating to the environmental community through representatives of ForestEthics and Wildsight. Most of the participants had never previously heard this, had never had communications from SARCO through these representatives, and told him so. Many in the environmental community do not agree with the way ForestEthics works. Many of those at the conference told Mr. Field that ForestEthics and Wildsight cannot represent them. They vigorously objected to this approach and insisted that SARCO was as

capable as any other government agency of communicating with a list of individual participants. Nevertheless, the government continued dealing only with ForestEthics and Wildsight on behalf of the Mountain Caribou Project, and the flow of information to numerous other participants stopped for seven-and-a-half months.

What other environmental group besides ForestEthics could earn accolades from government, industry and media for organizing a market campaign against BC’s forest industry? ForestEthics is seen as the friendly giant that carries a big stick but is willing to sit down at the bargaining table and cooperate to resolve differences. But suppose underneath the feel-good cooperation and peace, we are still left with a resource tyranny by private interests that insist upon grasping 99% of all commercially valuable timber? What kind of a market campaign is unable to do anything about that? Corporate power is so overwhelmingly bent upon controlling public resources for itself that it cannot comprehend that it is destroying the conditions for life on the planet. Suppose this tyranny keeps society enslaved by dissolving people’s concern about environmental destruction in a stream of messages that they don’t need to worry because logging companies and environmentalists are working together to protect endangered species?

This is why some environmental groups are still fighting a particular kind of battle. This fighting is about persisting in telling the truth, and trying to have a voice that can get the truth through to the public. The truth is that it is going to cost the forest industry much more to save species endangered by overcutting. Many BC environmental groups are not at peace with calling a little a lot. Their struggle is about trying to use democratic principles as best we can to end government prejudice and gain equal opportunities, equal rights to public information. It is about Canadian citizens trying to make the democratic principles of our country work to protect life — the life of the mountain caribou, the life of our whole planet. How does process by confidentiality agreement help that to happen? Only 14 years ago keep resource matters secret from the public was viewed as deception. BC’s Commission on Resources and Environment set up and recommended legislation for rules that would keep such affairs open and transparent to the public.

Is peace and partnership a good thing when the mountain caribou is getting only 1% of the commercial quality forest, and yet there is no significant diversity of opinion between the logging sectors and the environmental sector in this partnership? The term “greenwash” is being heard more and more. It is the environmental form of “whitewashing,” an old word usage meaning, literally, to hide dirt instead of cleaning it up, by applying a thin, watery layer of white paint. In politics, whitewashing

means to cover up objectionable circumstances with a thin surface of sanitized appearances. When it is practiced by the government, greenwashing is dangerous to our rights and freedoms. Sooner or later a government arrives at distorting information and curtailing the public's freedom of access to information, in order to keep the cover on lies it has told and misleading impressions it has given. This is mind control. We believe we are free to have our own opinions, yet our opinions are being manipulated by controlling the information we need for formulate them.

In this case, greenwashing means that a BC government that has dismantled or degraded almost all our environmental laws — one that has virtually destroyed our Ministry of Environment and keeps the name active to hide the truth — is telling the world that it is going to “restore the mountain caribou population to the pre-1995 level of 2,500 animals.” Only later did we learn the details that reveal this promise to be hollow.

It is not only the province's scientists that are now employed spreading thin the small protected-forest “budget” the government has allowed. Ten environmental groups are also at work stretching the significance of this decision with the use of language — “big victory”, “uncork the bubbly”, “we've raised the bar.”

Greenwashing includes the fact that it has become profitable to corporations to make small sacrifices to environmental protection, in return for the endorsements of environmental groups, whose media work will then provide a veneer of gloss for the company's public image while it goes on to do major environmental damage elsewhere. In this case, while the corporate members of the Council of Forest Industries and the Interior Lumber Manufacturer's Association are being hailed in the press for their cooperation in saving the mountain caribou, they will be continuing to log millions of hectares of commercial forest that contain the mountain caribou's critical spring and early winter habitat: the critical nutrient source for its pregnant females and its food and shelter while waiting out poor snow conditions in the high country.

It is this that the plan agreement conceals behind a slick, green façade. Understandably, many people have mistaken the cheap surface for real content. Nor will it be the caribou alone who are endangered. Public process, democratic requirements, have been inverted, manipulated, and a temporarily dazzled public has cheered. But once the contrived surface is scraped away — as this

review endeavors to do — we think those concerned for the plight of endangered species will be, not simply disenchanted, but appalled. And those who value what's left of democratic process will be horrified that what was done got by.

Valhalla Wilderness Watch expects to publicize, in every available way, the misrepresentations and betrayals inherent in the plan agreement that handed to the logging industry essentially what it wanted at the expense of the survival of the caribou. Only protest in every possible forum by every concerned person may yet save the caribou; and with an enlightened resistance we may yet find our way back to actual democratic process.

Please write letters to, in order of importance:

Honourable John Baird
Minister of the Environment
Les Terrasses de la Chaudière
10 Wellington Street, 28th Floor
Gatineau, Quebec K1A 0H3
Fax: 819-953-0279
John.Baird@ec.gc.ca

Premier Gordon Campbell
Room 156
Parliament Buildings
Victoria, BC V8V 1X4
Fax: 250-387-0087
Phone: 250-387-1715
premier@gov.bc.ca

Honourable Pat Bell
Minister of Agriculture and Lands
Room 137
Parliament Bldgs
Victoria, BC
V8V 1X4
Phone: 250-387-1023
Fax: 250-387-1533
pat.bell.mla@leg.bc.ca

Recovery Secretariat
c/o Canadian Wildlife Service
Environment Canada
Ottawa, Ontario K1A 0H3
Fax: 819 994 3684
RENEW@ec.gc.ca