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RE: EBR Registry Number: 011-2303

Dear Jennifer,

I am a life-long resident of Northern Ontario and am taking this opportunity to identify my concerns over the Ministry of Natural Resources' proposal to allow an exemption to industries operating in the habitat of the threatened woodland caribou. As a trained biologist, I am committed to ecological sustainability. As a development professional, I strongly support sustainable socio-economic development in Northern Ontario. Jennifer, you and I have previously discussed species-at-risk issues in the Thunder Bay district, and I offer the following comments on the woodland caribou situation.

I fully understand that the Province is pressured by demands for economic growth through mining, forestry, and energy industry opportunities in Northern Ontario. The dilemma: how can this be balanced with the protection of woodland caribou habitat? I do not agree with the proposed answer, which is exemptions to the Endangered Species Act (ESA) for certain industrial sectors operating within woodland caribou habitat. All of these - forestry, mining, mineral exploration, and hydro transmission activities - will introduce unacceptable cumulative habitat effects on woodland caribou and on the bio-diverse forests they rely on for survival.

Neither industry nor government has provided a reasonable legal rationale for this exemption. The industry claims that the Act imposes unnecessary red tape, and that it is already doing a good job of protecting endangered species. This is clearly not the case for the threatened woodland caribou, whose population appears to be declining by about 11 percent a year. As logging moves northward in Ontario, woodland caribou are also being driven northward, at a rate of about 34 kilometres per decade. Research has shown that caribou have not returned to areas that have been logged. Yet the government continues to approve forestry plans that cut further and further into the last remaining caribou habitat.

It seems overly complicated to designate different zones for development, with some zones requiring permits under the Endangered Species Act, and others do not. In the "protection zones",

mining, for example, will be required to obtain permits to operate. Given the current flurry of mineral exploration in Northern Ontario, we can expect unprecedented demands for access to areas of high mineral value. Permits will likely be issued to support this development, and it won't be long before there is fragmentation of the so-called "protection zone". Similarly, fragmentation of the so-called "conservation zone" can also be anticipated. These zones are managed under separate approaches, overseen by separate Ministries, and completely missing the opportunity to manage based on the science of sustainable levels of cumulative habitat effects for boreal caribou.

The proposed approach will neither protect caribou nor sustain long-term jobs in Northern Ontario. This compromised approach, which is supposed to convey balance, will instead lead to a lose-lose scenario. History tells us that the boom of industrial development, based on easy, under-regulated resource extraction, will inevitably result in economic bust and environmental degradation.

My recommendation is that the entire caribou range should be subject to regulations under the Endangered Species Act, requiring permitting for activities within caribou habitat. I am confident that the Ontario government can do so in a streamlined fashion that does not overly burden industry with red tape. If activities are actually deemed to damage and destroy caribou habitat at the range level, and the Province chooses to permit this development, then at least the decision-making process will be transparent and consistent across Northern Ontario.

Protection of habitat must be a core component of any government action in the boreal forest of Northern Ontario. Habitat loss and degradation are the primary threat to forest dwelling caribou. Their survival and recovery require strong, precautionary measures to protect and restore increasingly rare mature boreal forest ecosystems.

Unless the Province stands firm on a commitment to sustainable development, which includes strong and specific habitat maintenance and restoration measures, it is unlikely that caribou and other boreal at-risk species can recover. It is essential to understand and acknowledge the cumulative effects of industrial development in Northern Ontario on caribou survival. We know that caribou avoid areas of industrial activity and are particularly impacted by roads, geophysical exploration lines, pipelines, electrical transmission line rights-of-way, and cutblocks. It has been demonstrated that roadways act as partial barriers to caribou movements. Should it be no surprise, therefore, that forestry, mining, and electrical transmission lobby efforts have focused on eliminating inconvenient requirements under the Ontario's Species-at-Risk Act? They do not wish to expend extra effort and investment on participating in caribou recovery efforts by compromising on development plans. I can't help but observe, that, this appears to be a situation of business and economic growth at any expense.

The Ontario government has an opportunity, here, to take a leadership role in developing a model of business, government, and community-based partnership which will acknowledge and embrace the need to include sustainable development principles in a resource extraction economy. There are many scientific and sustainable business experts that can contribute to helping meet this goal.

I also wish to note, that, in passing the Species-at-Risk Act, the government was acknowledging that the existing planning and development system was failing to adequately protect Ontario's biodiversity - greater weight was needed to be given to species when making decisions about development. This is as true for forestry as it is for other industries, such as mining, power generation, and power transmission.

Due to their broad distribution, sensitivity to disturbance, wide-ranging habits, dependence on old forests, and loss of former range, caribou present a formidable conservation challenge. Caribou are rarely seen, their declines are hard to detect, and they succumb to habitat loss only over decades. Unfortunately, these biological attributes make it tempting for decision-makers to delay, or avoid, legislating habitat protection.

Scale of protected area is at the heart of this issue. Maintaining current caribou herds and allowing recovery of the species requires far-sighted vision. It needs to match the unique habitat needs of caribou and must span entire landscapes for many decades. While caribou may be regarded as an obstacle to short-term wealth creation, they also represent a valuable opportunity. This indicator species is a sentinel of forest connectivity, as well as, an umbrella species that enhances the conservation of a biodiversity of other species.

Canada's northern boreal region is one of the three largest intact forests remaining on the planet. The boreal forest of Ontario and Manitoba forms the heart of this great northern forest, but it is threatened. Until recently, Ontario's more northerly boreal forest has remained largely free from large-scale industrial activities and roads. Now, industrial activity is starting to move into this sensitive landscape. The frontier of development is quickly shifting north, and could bring with it extinction for plants and animals at risk and the devastation of songbird habitat. There are already 4,400 mineral claims staked in the north, and plans exist for roads, hydro transmission lines, more logging, and open pit mines.

Not that long ago, Premier McGuinty made a commendable promise to protect Ontario's boreal forest. He said he would carefully plan so that the values and benefits of the northern boreal region are protected before decisions are made about where and how to develop. Mr. McGuinty has a tremendous, and unique, opportunity to demonstrate that his government truly is "green". Protecting the boreal forest would also position the government and the province of Ontario as leaders in defending against the consequences to a signature species-at-risk such as caribou.

I am reminded of warnings from the Senate Subcommittee on the Boreal Forest (1999) about "competing realities": maintaining resource conservation, maintaining community lifestyles and values, and the extraction of economic wealth. Caribou are apparently regarded as an obstacle to short-term economic gains. There is a false belief that society must choose between the economy and the environment. In reality, bowing to industry supporters who are forcing the issue of "jobs versus the environment", leads us into a trap of short-term gain, rather than long-term sustained prosperity. Truly sustainable development hinges upon maintaining a healthy boreal ecosystem. The survival of woodland caribou is incumbent upon wise management choices.

In summary, Jennifer, I urge your ministry to withdraw this proposed exemption and instead use the considerable powers under the Endangered Species Act (ESA) to protect the caribou and its habitat.

The Province needs to:

- Protect woodland caribou, in all of its habitat, through the current legislated powers of the Endangered Species Act;
- Withdraw the proposal to exempt forestry, mining, and hydro industries who wish to operate in caribou habitat from the ESA; and
- Base caribou recovery on the guiding principles of (1) habitat thresholds and (2) the precautionary principle.

Sincerely,



Heidi Strobl

cc. Gord Miller, Ontario Environmental Commissioner
Julee Boan, Boreal Program Manager, Ontario Nature
Brian McLaren, President, Thunder Bay Field Naturalists
Scott Harris, Vice President, Environment North