

What Matters in Our Valley's Submission to the B.C. Environmental Assessment Office

Re: Telkwa Coal Ltd.'s Environmental Assessment Application as it pertains to Telkwa Caribou Recovery

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Telkwa Caribou are part of the northern ecotype as per B.C. classification. Telkwa Caribou are part of the Southern Mountain National Ecological Area, listed as threatened by COSEWIC in 2000 and reaffirmed in 2002, and listed under schedule 1 of SARA in 2003.

On May 4, 2018, Catherine McKenna, Federal Minister of Environment and Climate Change, declares the Telkwa Caribou herd, along with nine other Southern Mountain caribou herds (Central Kootenay, Southwest Kootenay, Southeast Kootenay, Kinbasket, South Monashee, Quintette, Narraway, Jasper-Banff, Redrock / Prairie Creek) as **facing imminent threats to recovery** (i.e. facing imminent threat of extirpation based on a thorough threat assessment).

<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/related-information/responds-imminent-threats-recovery-caribou-sm.html>

The latest count in March of 2021 is 30 caribou, of which is more or less holding in the past few years, a notable decline from the July, 2006 count of 114 caribou (which was approx. a 15%/yr. recruitment since recovery efforts started in 1998). Recovering caribou is a very difficult exercise, and not without a lot of effort and expense, along with personal sacrifice of recreational opportunities and down-scaling or prohibiting commercial and industrial operations. Timber harvesting in the Telkwa Caribou Recovery Area (WHA 6-333) has been largely scaled back, with the ESSF biogeoclimatic zone off-limits to forest development. A Recovery Plan for the Telkwa Caribou for purposes of SARA has yet to be developed, although the WHA partially serves the purpose for the time being.

It is important to note that a April 30, 2019 letter to WMIOV from the Canadian Wildlife Service, Environment & Climate Change Canada stated the following:

- *Current spatial disturbance levels in the Telkwa local population unit already exceed the federal recovery strategy's management objectives for all caribou herd ranges.*
- *ECCC is currently working with B.C., the project proponent, and Indigenous groups in the EA pre-application phase to ensure the best available technical and recovery planning information is provided as part of the process. This work will include analyses to understand the risk of displacement of caribou associated with sensory disturbance from the project.*

This brings up two important considerations that seem to be over-looked in Telkwa Coal's EA application, despite previous concerns raised by WMIOV in public open house, dAIR and AIR submitted comments:

- 1) **Given current exceedance of spatial disturbance levels (i.e. minimum suitable caribou habitat is currently not met), a project the size of Telkwa Coal will have a proportionally greater cumulative impact to caribou recovery success. There is no mention of this in the**

cumulative impact statements in Telkwa Coal's EA application. This matter needs attention before assurances can be made with respect to achieving success for Telkwa Caribou recovery. Telkwa Caribou have experienced a full array of hardships, from over-hunting in the past, recreational use displacement, loss of habitat, loss of habitat connectivity and habitat fragmentation due to Kemano project dam flooding, logging, rural & urban development, and recently pipeline corridor development (Coastal Gas Link). The proposed road (Tenas access corridor), from the mine site to the railroad load-out will displace caribou from surrounding habitat, even for a recovered population, since caribou preferentially select habitat for avoidance.

- 2) The post-calving congregation area, known as the Camel Humps, are 7 km line of sight from the proposed Tenas coal pit, and has a vertical separation of 700 m. Although Telkwa Coal's Wildlife Management Plan commits to implementing blasting techniques to reduce noise and vibration, there is no evidence provided that this post-calving congregation area will not be abandoned or re-occupied as the herd builds up caribou numbers. **Acoustic testing needs to be conducted;** this is not a difficult exercise and local biologists Laurence Turney or Sean Sharpe are familiar with such techniques. Caribou preferentially select habitat for avoidance, so **any disturbance impact radius should be identified and considered to become unoccupied by caribou.**

Throughout the EA process from dAIR to EA application, the proponent and EA Office continues to highlight three potential effects, but perceptually in the wrong context:

- (i) alteration and/or loss of habitat;
- (ii) change in mortality;
- (iii) change in movement patterns.

Alteration and loss of habitat described in Telkwa Coal's EA application is not placed in the context of achieving ECCA's acceptable spatial disturbance level, or is there any mention of removal of forest stands, associated with mine and road development, that are beginning to acquire arboreal lichens that support wintering caribou when alpine/sub-alpine conditions are not conducive to caribou cratering for terrestrial lichens.

Telkwa Caribou commonly used the Goathorn Creek corridor to the Telkwa River in the past, notably when their population was greater than it is today. As the population dropped, caribou cows that were seeking early spring herbaceous emergent vegetation prior to calving, experienced sufficient predation mortality that has now resulted in an absence of habitat utilization of the mid to lower Goathorn area, at least what we are aware of via telemetry and on-the-ground observations. Given the present low Telkwa Caribou population, one could agree that there is minimal risk to mortality and current movement patterns within and in proximity to the mine tenure area since the caribou are presently avoiding the area. However, Telkwa Coal operations will definitely influence caribou recruitment, mortality and movement patterns as recovery efforts attempt to increase caribou population numbers ... as the population builds, then expansion of habitat occupancy increases. This reality of caribou recovery is absent in Telkwa Coal's EA application. Telkwa Caribou recovery planning is predicated on restoring the herd to a healthy level of some 150 caribou, not maintaining a population of 30+ animals that remain in a state of imminent threat of extirpation. **Telkwa Coal's EA application should be focused on potential impact to Telkwa Caribou based on historic habitat use when the population was greater than 100 caribou, and use this approach to assess hinderances to population recovery.**

In summary, Telkwa Coal's EA application falls short in identifying its potential impact to the success of the Telkwa Caribou recovery program's objective of restoring the herd to a healthy population.



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