



Wildlife Conservation Society comments: JPAC public review of the first 20 years of NAFTA and the North American Agreement on Environmental Cooperation

August 27, 2013

To Whom it May Concern:

The Wildlife Conservation Society (WCS) is pleased to submit comments and focus our input on a desire to see the Commission for Environmental Cooperation (CEC) place a stronger emphasis on the development and support of mechanisms to conserve transboundary wildlife over the next 10 years. WCS's mission is to save wildlife and wild places worldwide. We do this through science, conservation action, education and inspiring people to value nature. WCS is one of a few conservation organizations that works on-the-ground in Canada, the United States, and Mexico. We have number of science-based efforts that are transboundary between these countries, and ultimately to be successful will require entities in the three countries to work together to conserve wildlife and the places on which they depend. The transboundary areas in which we are currently working include:

- Arctic Beringia (Arctic Alaska through Arctic Yukon), where we focus on migratory bird and marine mammal conservation in addition to other efforts;
- Northern Boreal Mountains (mid-Alaska through southern Yukon), where we seek to protect still large and intact landscapes for species like caribou and wolverines;
- Crown of the Continent (southeastern British Columbia, northwestern Montana and southwestern Alberta), where we have identified core area and corridor refugia for species given climate change;
- Northern Appalachians (northern New York, Vermont, New Hampshire, Maine, southern Québec, New Brunswick, Nova Scotia, and Prince Edward Island) where we are promoting conservation of a network of protected areas that can be robust in response climate change; and,
- Sky Island Mountains (Sonora, Chihuahua, New Mexico, and Arizona) where our work suggests that the maintenance and restoration of core areas and connectivity is essential for the survival of species like jaguars and migratory bats.

Wildlife do not acknowledge borders. Functioning ecosystems require robust populations of wildlife to provide an array of free services ranging from filtered water and water storage to checks on vectors such as lyme disease, carbon storage and much more. One priority CEC should address more squarely is species conservation under disparate laws and lack of any mechanism to compel coordination across borders. As such, in order to conserve these ecosystems and wildlife that utilize multiple countries as part of their range, federal governments who share wildlife populations should engage in three ways:

- 1) Acknowledge that the conservation of particular wildlife in various countries often requires addressing species management across multiple countries, particularly in the face of climate change impacts.
- 2) Agree on coordinated wildlife conservation management plans for populations at risk of disappearing or being impaired in one or more countries.
- 3) Implement a coordinated management plan across these multiple boundaries for such species.

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Our experience around the world indicates that this coordination must happen both bottom-up (locally) and top-down (federally) to maximize success. In looking around the globe, transboundary efforts lacking either bottom-up or top-down mechanisms were more likely to fail (Hilty et al. 2012). Further, because of a changing climate, ensuring that we work across boundaries and enable species to be able to move to follow increasingly shifting resources is essential (Hilty et al. 2012). This challenge of conserving transboundary populations is exemplified by Bison, Lynx, Wolverine, Atlantic salmon, Bull trout, and several other species that WCS works with closely. Except for the efforts of individuals who coordinate across boundaries to assist in working to develop informal transboundary collaborations, conservation of these species is stymied by lack of federal government coordination and formal agreements or treaties.

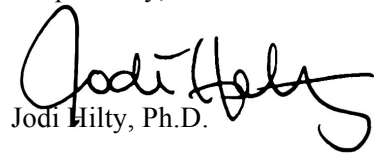
As such, we strongly request that CEC place a stronger emphasis on the development and support of mechanisms to conserve transboundary lands and wildlife populations in the next 10 years. This includes encouraging the related collaborations and agreements that are needed at multiple scales. These would enable us collectively as North American society to conserve wildlife across boundaries such that no individual country loses a key natural resources or population of a species deemed important to the country because of actions of another country. The ad hoc actions to work to conserve the natural values including wildlife of the Flathead watershed between British Columbia and Montana serve as an example of where a stronger treaty would provide a framework to address such issues in a more systematic way.

Specifically, CEC should continue to encourage transboundary communities to meet and agree upon mutual land-use and shared wildlife priorities. An example of this is the Blackfeet and First Nation people who are relatives and are seeking a larger landscape conservation vision across the boundaries of the two countries. CEC also should strengthen discussions and agreements at federal levels to support these local transboundary efforts in more formalized approaches. This effort is fully aligned with the purpose of CEC, which is “to support cooperation among the NAFTA partners to address environmental issues of continental concern.”

Finally, border issues can affect conservation of wildlife that reside well beyond international boundaries. Specifically poaching and illegal trade of wildlife poses substantial threats to some species. **As such we also recommend that CEC collaborate on efforts to combat wildlife trafficking at ports of entry and border crossings in recognition of the connection to global conservation, security, health, and economic development and in alignment with President Obama’s July 1, 2013 Executive Order “Combating Wildlife Trafficking.”**

We would greatly appreciate CEC’s increased attention to the challenge of conserving transboundary wildlife populations and illegal wildlife trafficking, and would be happy to assist in such efforts.

Respectfully,



Jodi Hilty, Ph.D.

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* referenced: Hilty, J.A., C.C. Chester, and M.S. Cross (eds). 2012. **Climate and Conservation: Landscape and Seascape Science, Planning, and Action.** Island Press, Washington, DC.