



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

January 12, 2018

Hon. Shannon Phillips
Minister of Alberta Environment and Parks
#208 Legislature Building
10800 – 97 Avenue NW
Edmonton, AB T5K 2B6
By E-mail: AEP.Minister@gov.ab.ca

Dear Minister Phillips:

Re: Draft Provincial Woodland Caribou Range Plan

Alberta Wilderness Association (AWA) appreciates this opportunity to provide comments on the draft provincial woodland caribou range plan.

As you know, AWA, founded in 1965, is an Alberta-based conservation group with 7,000 members and supporters in Alberta and around the world. AWA seeks the completion of a protected areas network and good stewardship of Alberta's public lands, waters and biodiversity to ensure future generations enjoy the abundant benefits they provide.

AWA feels strongly that Alberta's draft provincial range plan ("draft plan") does more to increase the risk of caribou extinction for the foreseeable future by allowing more critical habitat in caribou home ranges to be destroyed than it does to work towards recovering thriving caribou populations.

Our comments on the draft range plan are organized into the following sections:

- Overall intent and commitment to achieve minimum required habitat
- Other definitions and goals
- Range Access Management Plans are needed to guide restoration plans
- Social and Economic Assessment
- Management of Industries, Natural Disturbance, Conservation Areas
- Legislative Habitat Protection
- Population Management

Note: Alberta's caribou are described herein as 'endangered' because Alberta's species at risk scientific advisory committee assessed them as 'endangered' in 2010. The government at the time refused to change the listing.

Overall intent and commitment

As written, Alberta's draft plan will increase the risk of caribou extinction for the foreseeable future, by allowing more critical habitat in caribou home ranges to be destroyed. The habitat restoration outlined in the plan is needed, but it takes decades to regrow trees over old seismic lines and other industrial disturbances. Meanwhile, the significant new industrial disturbances enabled in this plan will worsen the extinction risk for Alberta's endangered caribou and prolong our already excessive reliance on band-aid measures such as the horrific mass wolf culls. The draft plan sets back the goal of self-sustaining caribou that successive Alberta governments have committed to, it violates the federal *Species at Risk Act's* requirement to protect the critical habitat of species at risk, and it lets down most Albertans, who want to responsibly steward our forests and wildlife for future generations.

Instead, in order for Alberta caribou to survive and thrive, Alberta's provincial caribou range plan must commit to achieve a minimum of 65% undisturbed habitat in caribou ranges in the next 50 to 70 years. The plan must also recognize that Albertans are highly capable of adapting to build resilient local economies and communities that respect this goal, and it must facilitate and provide concrete opportunities for them to do so. Within the draft plan, there are tools and useful insights from pilot projects to enable greatly reduced habitat disturbance in our lifetime. Solutions are within reach to achieve caribou habitat requirements, and the plan must commit to these.

Commit to Achieve Minimum Required Habitat to Save Caribou from Extinction

The draft plan mistakenly suggests that endangered caribou can manage indefinitely with only small changes to the status quo, and these 'same old' approaches are a sure path to caribou extinction. For example: "Alberta is committed to achieving caribou conservation and recovery in landscapes where human activities are well managed and coordinated, supporting various land use activities and balanced outcomes. Recognizing that caribou represent one set of values, the integration of the Range Plan into Government of Alberta plans and frameworks (for example, regional plans and biodiversity management frameworks) will ensure the province addresses desired environmental, economic and social outcomes." (p. 12 para. 3)

Instead, the plan must commit to achieve habitat conditions that meet the stated goal of self-sustaining caribou, and recognize the substantial benefits of doing so. Recommended alternate phrasing is: "Alberta is committed to maintaining and restoring caribou habitat in caribou home ranges in the next 50 to 70 years to enable their survival and recovery, and to managing human activities to respect these requirements. Recognizing that caribou are a sentinel species for older, relatively intact boreal and foothills forests and wetlands – landscapes that store significant water and carbon, and which many other wildlife species rely upon – the integration of the Range Plan into Government of Alberta plans and frameworks will be a major advance in achieving Alberta's longstanding commitment to maintain biodiversity and achieve sustainable forest management and responsible energy development."

In many places, the draft plan objectives are too weak. Merely to work "towards" 65% undisturbed habitat (e.g., p. 16, s.1.3 and p. 17, para. 1) is not good enough. Instead, the draft plan must consistently aim to achieve a minimum of 65% undisturbed habitat in each caribou range. The best available evidence documented in the federal boreal woodland caribou recovery strategy is that 65% undisturbed habitat gives a caribou population a 60% chance of being self-sustaining.

It is completely unacceptable that the draft plan indefinitely delays achieving safe habitat conditions for endangered caribou, as in this phrase: "In working towards achieving the target of 65% undisturbed

habitat **over the next 50 to 100 years or more** [emphasis added], the amount of disturbance currently present in caribou ranges will need to be reduced and future disturbances will need to be both managed and minimized.” (p. 29 para. 1) It is unacceptable that the plan allows substantial new disturbances while attempting to restore legacy disturbances in ranges that are far below 65% undisturbed. A credible plan must commit to achieve the target of a minimum of 65% undisturbed habitat in caribou ranges over the next 50 to 70 years, and to build resilient local economies and communities that respect these requirements.

Other Definitions and Goals

The draft plan should not be described as intending to address the goals and objectives of Alberta’s 2005 Woodland Caribou Recovery Plan (Executive Summary, p. 7, para. 1 and s. 2.2.1, p.20). The 2005 plan was an abject failure for caribou conservation, resulting in extensive loss of caribou habitat and significantly greater risk of caribou extinction.

The draft plan’s population goals of a minimum of 100 animals per population should be stronger (p. 20, s. 2.2.1.d). The minimum 100 animal population size identified in the boreal federal recovery strategy is a threshold necessary to reduce “quasi-extinction” risk (Boreal Federal Recovery Strategy, 2012, s. 5.6). Scientific literature reports that “more than 300 boreal caribou are needed for self-sustaining populations” (Boreal Federal Recovery Strategy, 2012, s. 3.2.2). Some Alberta populations are greater than 100 animals. The goals for all populations should be to stabilize and recover to at least 300.

Range Access Management plans are needed to guide restoration plans

One key focus of the draft plan is to restore old seismic lines and other industrial disturbances so they are on a path to return to undisturbed forest. This is definitely needed. However, there is substantial risk that restoration efforts will be wasted by subsequent new access nearby, as has happened time and again in Alberta. New disturbance even appears to be built into one of the principles of candidate restoration sites: “Sites that are not scheduled for timber harvesting over the next 20 years or needed for re-use by energy industry within five years” (p. 31, bullet 9)

Instead of a vague intention to move towards optimized long-term access plans (p. 44), the Provincial Range plan must commit to get approved Range Access Management Plans (RAMPs) in place by a defined deadline. RAMPs must identify and map 5-year phases of access and restoration goals and mechanisms to achieve at least 65% undisturbed habitat in 50-70 years. The Little Smoky 4-township RAMP pilot shows great potential, from 28% undisturbed ‘status quo’ to 66% undisturbed habitat with 3.2 km directional drill distances (p. 43). Steadily aggregating energy footprint over defined time periods, plus extensive habitat restoration, is the kind of economic activity that can respect caribou survival and recovery needs. We request that the government commit to lead robust RAMP processes, including indigenous communities and stakeholders, as soon as possible.

Social and Economic Assessment

The intended economic cost-benefit analysis must:

- take into account foreseeable changes to the status quo, such as the imminent falloff in annual allowable cut (AAC) as mountain pine beetle surge cuts end, or the current phase of cyclical US-Canada timber disputes;
- assess optimized scenarios that achieve caribou habitat goals while minimizing economic impacts, including:

- sharing timber allocations that are outside caribou ranges but within the regions, to minimize impacts to mills, to enable either the cessation or the long-term deferral of in-range harvests;
- economic activity from an optimized energy footprint over phased-in periods; and
- economic activity of 150,000 km of legacy seismic lines requiring some habitat restoration treatment.

With agriculture and forestry together employing 4.3% of the local labour force of nearby communities, solutions are within reach to defer in-range logging, create restoration jobs, support clustered energy development on a reduced footprint, and build resilient local economies and communities that respect caribou habitat requirements.

Management of Industries, Natural Disturbance, Conservation Areas

3.2.4 Geophysical Exploration standards

We are concerned that disturbances less than 4 metres in width will still not be adequately avoided. Linear features narrower than 4 metres provide browse for other ungulates and facilitate predator travel. Geophysical exploration should be required to adhere to overall agreed phased reduction of range habitat disturbance in approved Range Access Management Plans. Otherwise, there is no effective limit on new lines, including lines near areas that have received restoration treatments.

3.2.5 Management of Pipelines standards

It is positive to require pipelines to use existing linear corridors. They should also be required to adhere to overall agreed phased reduction of range habitat disturbance in approved Range Access Management Plans. It is positive to require revegetation on top of active underground pipelines to a maximum residual corridor width of 4 metres, and to require additional human and predator access barriers as vegetation regrows.

3.3.4 Access Management Requirement standards

Current: “1) Long-term access in the caribou range will be the lowest area of footprint possible, in consideration of access needed for energy and forestry resource development, as well as public or municipal access needed (where applicable). Industrial roads will be shared.” Revise to respect caribou thresholds, for example: “Long-term access in and adjacent to the caribou range will be a phased reduction from current levels to achieve a minimum of 65% undisturbed range habitat in 50-70 years, within which energy, forestry, public and municipal access will be managed.”

Current: 1a) “Forestry and energy industry will develop long-term road access plans for each caribou range or portion thereof, and submit to AEP [Alberta Environment and Parks] for approval. As needed, AEP or a third party will facilitate approval of the plan.” Revise to integrate in RAMP, for example: “AEP will lead RAMP processes to create shared road systems in and adjacent to caribou ranges to achieve a phased reduction from current disturbance levels to a minimum of 65% undisturbed in 50-70 years.”

Current: 1b) “All road approvals by regulators (Alberta Energy Regulator, Forestry Division of Agriculture and Forestry, and AEP Operations) will be consistent with the approved long-term road access plan for the caribou range.” Add: “Alberta Energy tenure auctions, AUC decisions and AB Transportation operations must also conform to these plans.”

1c) Revise to reflect that amendments to RAMPs/long-term road access plans cannot delay achievement of a minimum of 65% undisturbed range habitat, otherwise there is no effective limit to new roads.

8) Appended Energy Development It is positive to require all new oil and gas activity to be appended to the long-term road access network, and positive that 'Appended Development' is defined in the Glossary as "Development that occurs immediately adjacent (within 200 m) to the centerline of a road that is recognized in a regional access management plan." (p. 10) However, given the size of multi-well pads and other infrastructure, standard 8a) actually allows development well beyond this. Current 8a): "Development activity will occur within 200 metres of roads identified in the approved long-term access plan. A well pad may extend beyond 200 metres, however the access point into the pad site must be within 200 metres." There should be increased incentive for companies to locate pads significantly closer to a road. Total energy infrastructure should also be required to adhere to overall agreed phased reduction of range habitat disturbance in approved Range Access Management Plans, otherwise there is no effective limit on energy infrastructure disturbance.

3.4.1 Sales of New Energy Leases

It is positive that new energy lease sale restrictions will continue until further range-specific analysis is completed. Alberta Energy should commit to manage tenure lease sales and associated exploration footprint within a framework of achieving a minimum of 65% undisturbed range habitat in 50-70 years.

3.4.2 Energy Development Requirements standards

It is positive to require oil and gas development to align to range-specific rulesets in a), but this seems to be undermined in b), which states: "Companies with multiple lease holdings inside caribou ranges will be required to prioritize development where multi-sector development is planned (described below). Once developed and active operations cease, reclamation activities must be initiated prior to development of remaining leases." Allowing new disturbance after restoration is initiated increases risk to caribou while the habitat regrows. It may be beneficial for high value leaseholders to arrange compensation and joint venture agreements with other operators and other industries to achieve the highest value economic gains within overall prescribed disturbance limits. The overall requirement should be to manage energy development within a framework of achieving a minimum of 65% undisturbed range habitat in 50-70 years.

3.5.1 Forestry Requirements standards

The draft plan's gravest failure is to allow significant continued industrial logging in already excessively disturbed caribou critical habitat. This will significantly increase caribou extinction risk. To minimize impacts to mills and communities, regional timber allocations should be shared, to enable either the cessation or the long-term deferral of harvest within caribou ranges. This is feasible given corporate inter-connections amongst many FMA and quota holders, and the considerable wood fibre trade that already occurs in many regions. Current unsustainable pine beetle surge clearcuts should end entirely.

Alberta has committed to maintain and restore biodiversity in the 1990 Wildlife Policy for Canada, 1995 Canadian Biodiversity Strategy and 1999 policy 'Alberta's Commitment to Sustainable Resource and Environmental Management'. Caribou range planning is an opportunity for a major step towards sustainable forest management to achieve these commitments. As noted in the draft plan's subsequent section on the Alberta Forest Act: "FMA [Forest Management Agreement] holders in woodland caribou ranges are required to prepare Spatial Harvest Sequences within their Forest Management Plans (FMPs) to meet caribou habitat requirements" (s. 4.3, p. 63). To date, no FMPs prohibit the destruction of caribou critical habitat or provide effective protection of caribou critical habitat. The plan should commit

to revise FMAs and Forest Management Unit (FMU) quota agreements and FMPs to enable a minimum of 65% undisturbed habitat in each caribou range in 50-70 years. The plan should also commit to retire any FMAs/quotas or portions thereof in caribou ranges that are offered for sale due to market conditions (for example, due to company restructuring or cyclical downturns).

3.6-3.8 Coal, Metallic and Industrial Minerals, Sand, Gravel and Peat standards

The current language for existing leases is too permissive. It is positive that s. 3.6 and 3.7 standards place some limits on new dispositions, and that s. 3.8 will end new peat dispositions in caribou ranges. However, the overall requirements should be to manage both existing and new industrial leases within a framework of achieving a minimum of 65% undisturbed range habitat in 50-70 years, otherwise there is no effective limit to new industrial disturbance. It may be beneficial for high value leaseholders to arrange compensation of other operators across industries to achieve the highest value economic gains within overall prescribed disturbance limits.

3.9 Management of Transmission Line standards

It is positive to require revegetation below transmission lines, and to require additional human and predator access barriers as vegetation regrows.

3.10 Management of Natural Disturbance

Woodland caribou have co-existed with insect and wildfire disturbance for thousands of years. Current unsustainable pine beetle surge clearcuts should end entirely, rather than the draft plan statement to approve "as necessary" (p. 54), and should be replaced by risk-based Level 1 (single tree) treatments. We support proposed wildfire suppression in caribou ranges owing to the excessive industrial disturbance and fragmentation of Alberta forests within and outside caribou ranges, which has left caribou no other viable habitat outside their current diminished home range areas. We reject that industrial clearcut logging emulates natural disturbance, which is suggested in s. 3.5 (page 50, para. 1) and may be implied in the s. 3.10 item 4 standard. Salvage logging should expressly not be allowed if wildfire occurs in caribou ranges. If wildfire causes a disturbance of 5% or more of a range, anthropogenic disturbance should specifically be reduced further (not merely "adjusted"), so as not to increase risk to caribou.

3.11 Conservation Areas

Significant protected areas must be established in part of every Alberta caribou range. The International Boreal Conservation Science panel noted in its July 2011 report on boreal caribou conservation: "Protected areas provide insurance against unfavourable outcomes as well as a template for evaluating the effectiveness of management prescriptions beyond protected areas' boundaries." Designations of caribou protected areas should convey a strong ecological priority and footprint restriction, such as ecological reserves, wilderness areas, or wildland provincial parks. Wildland provincial parks are compatible with hunting and trapping access to support indigenous rights as well as wildlife management goals of alternate prey species. We are concerned that Public Land Use Zones (PLUZs) and Provincial Recreation Areas are not strong enough designations, as they could be easily re-zoned to allow extensive new disturbance.

Northwest The Alberta government must act on its major June 2016 commitment to create three wildland provincial parks to protect 1.8 million hectares of caribou habitat in FMUs F10, F20 and P8. These FMUs do not have forestry tenures, will not adversely affect existing energy leases and will achieve the most protection of caribou range for the least socio-economic cost to nearby communities. The strong caribou conservation opportunity in FMU F23 should also be pursued.

West Central Table 5 should clarify that there is almost no protection of foothills winter ranges of the A La Peche and Redrock-Prairie Creek mountain caribou populations. We support the identified extension to Kakwa Wildland Park. Additional core protected areas are needed for the Narraway, the A La Peche winter range and the Little Smoky.

Northeast Since August 2012, Lower Athabasca Regional Plan (LARP) candidate conservation areas have had protective notations and have been managed as proposed in LARP. For Clyde River to be suitable for a caribou conservation area, it should re-classified as a wildland provincial park instead of the LARP intention of a provincial recreation area. It is important to officially proclaim these parks by ministerial order as soon as possible. However, the government cannot consider these as sufficient. The LARP has been roundly criticized by indigenous communities and an independent review panel as having inadequate indigenous participation and environmental protection. One opportunity is the Cold Lake Air Weapons Range, which is provincially owned land leased to the federal government. Alberta should follow Saskatchewan's lead and establish Ecological Reserves on large intact areas, compatible with continued military use. Saskatchewan led a process in the late 1990s that included indigenous communities and the federal government to establish 160,000 ha of reserves. Core protected areas are also needed for West side of Athabasca, East side of Athabasca, Nipisi and Slave Lake populations.

Legislative Habitat Protection

The draft plan states that its implementation will be supported by the *Alberta Land Stewardship Act* (ALSA) and specific regional plan regulations. Further, the draft plan states that regional plans are binding legislative instruments. The draft plan when completed will be approved as a sub-regional plan under ALSA. However, subsections 13(1), (2) and (2.1) of ALSA clarify that only those sections of a regional plan specifically identified as regulations are enforceable as law. The 2012 LARP specifically states that LARP Strategic Plan provisions are only policy statements and are not intended to have binding legal effect, other than those portions specifically identified as provisions in the LARP Regulatory Details Plan (LARP 2012, pp. 8-9).

Therefore, the final Provincial Range Plan and any range-specific plans cannot be considered effective legal protection of caribou habitat until they are specifically included or referenced in the Regulatory Details Plan of an approved regional or sub-regional plan or under another statutory instrument.

4.1 Caribou Conservation Areas

The draft plan states that conservation areas will be established in the existing regional plan and interim regional planning documents to support management of caribou habitat. The Government of Alberta has not yet given any legal status to the proposed conservation areas identified in LARP or the 2016 Mediator's Report. Further, LARP states that all agreements issued under the *Mines and Minerals Act* and all dispositions under the *Public Lands Act* will continue and may be renewed in new and existing conservation areas, even if inconsistent with or non-compliant with the regional plan (2012 LARP, p. 43).

Therefore, the legal designation of conservation areas alone will not ensure the protection of caribou habitat. Only when these areas are legally designated as wilderness areas, ecological reserves or wildland provincial parks, with the appropriate phase out of existing dispositions and the prohibition of new dispositions, will they provide effective protection of caribou habitat.

4.2 Integrated Land Management (ILM)

The draft plan states that requirements to follow ILM practices will be established in an amended LARP and interim regional planning documents. As noted above, the requirements to follow ILM must be in

the Regulatory Details Plan of the LARP or in other statutory provisions in order to provide effective protection of caribou habitat.

4.3 Forests Act

The draft plan states that FMA holders in woodland caribou ranges are required to prepare harvest sequences within their forest management plans to meet caribou habitat requirements. While some FMA holders have made efforts to set harvest sequences and patterns that reduce negative impacts on caribou habitat, the draft plan indicates that forest harvesting is already responsible for as much as 46% of the disturbed area within caribou ranges.

Under the FMAs, the Minister maintains the right to maintain and enhance fish and wildlife resources on the forest management area, provided that the FMA holder's right to establish, grow, harvest, and remove timber is not significantly impaired. Therefore, the Minister has few legal tools under the *Forest Act* to provide legal protection for caribou habitat.

4.4 Mines and Minerals Act

The draft plan indicates that under the *Responsible Energy Development Act*, the Alberta Energy Regulator (AER) is given the authority to regulate geophysical exploration activities under part 8 of the *Mines and Minerals Act*, and related regulations and directives. However, the *Mines and Minerals Act* does not contain any conditions or prohibitions that would protect caribou habitat.

4.5 Public Lands Act

The draft plan states that the *Public Lands Administration Regulation* under the *Public Lands Act* identifies the types of dispositions available to authorize land uses that are likely to destroy critical habitat for woodland caribou. An AEP policy document indicates that Caribou Protection Plans (CPPs) are required for all new exploration and construction activities that fall within caribou zones as shown on the provincially-approved caribou land-use referral map.¹

On April 28, 2017, the AER implemented a new public lands formal disposition application process for licences of occupation (roads), mineral surface leases, and pipeline agreements; applicants are no longer required to submit a CPP for those applications. Instead they must complete a Landscape Analysis Tool (LAT) report. Based on the location and type of disposition requested, the LAT automatically generates a standard set of conditions. The *Master Schedule of Standards and Conditions* indicates that the following possible conditions may be set on dispositions in caribou ranges:

- prohibiting site preparation and construction activities between February 15th and July 15th;
- permitting access on Class V (frozen, temporary) roads only;
- installing access control;
- designing access routes as dead-ends;
- requiring rollback of surface materials on the easement;
- requiring construction of plant sites, campsites and remote sumps within 100 metres of an existing all-weather permanent access;

¹ Alberta Environment and Parks, "Caribou Protection Plan", (accessed 15 September 2017), online: <http://aep.alberta.ca/fish-wildlife/wildlife-management/caribou-management/caribou-protection-plans/default.aspx>.

- prohibiting the use of legumes in re-vegetation.²

While some of these conditions may limit disturbance within caribou habitat, none of the possible conditions prevents vegetation removal or the destruction of critical habitat on well or facility sites.

4.6 Provincial Parks Act

The draft plan raises the possibility of designating new wildland provincial parks or other conservation areas to protect caribou habitat. However, as noted above, the proposed new wildland provincial parks have not yet been officially designated. While wildland provincial parks offer the potential to protect critical caribou habitat if existing dispositions are not renewed, the current Government of Alberta policy, as laid out in Alberta Energy Information Letter 2003-25, is to honour existing surface dispositions within wildland provincial parks, including renewing surface dispositions and granting new dispositions where there is an existing mineral tenure. Therefore, new wildland provincial parks are unlikely to provide protection of caribou habitat unless existing surface dispositions are phased out and new dispositions are prohibited.

4.7 Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act

The draft plan indicates that natural areas and ecological reserves designated under the *Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act* (“Wilderness Areas Act”) may protect caribou ranges. However, the Minister maintains the discretion to continue existing petroleum and natural gas dispositions under the *Mines and Minerals Act* and to continue or renew dispositions under the *Public Lands Act* and the *Forests Act* within an ecological reserve.³ Dispositions under the *Public Lands Act* for petroleum and natural gas purposes and dispositions under the *Forests Act* are permitted in natural areas.⁴ Further, natural areas and ecological reserves cover very limited portions of the Alberta caribou ranges. Therefore, existing natural areas and ecological reserves offer very limited protection for caribou habitat.

4.8 Environmental Protection and Enhancement Act

The draft plan states that a number of activities likely to destroy caribou critical habitat require an environmental assessment and/or approvals under the *Environmental Protection and Enhancement Act* (EPEA). However, even where an environmental assessment under EPEA identified that a project would have adverse and irreversible effects on caribou habitat, the project was approved and allowed to proceed.⁵ Therefore, EPEA does not provide any mandatory prohibition against the destruction of caribou critical habitat.

Population Management

Alberta’s woodland caribou have relied for thousands of years on intact forests and wetlands to minimize overlap with predators. Top predator species such as wolves play a valuable ecological role in

² Government of Alberta, *Master Schedule of Standards and Conditions*, (28 June 2017), online: <http://aep.alberta.ca/forms-maps-services/industry-online-services/public-lands-dispositions/step-one-pre-application/documents/MasterSchedStandardsConditions-Jun28-2017.pdf>, at 63-64.

³ *Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act*, RSA 2000, c W-9, s 6(2), (3).

⁴ *Ibid*, s 7.1.

⁵ Joint Review Panel for the Shell Jackpine Expansion Report, *Report of the Joint Review Panel Established by the Federal Minister of the Environment and the Energy Resources Conservation Board: Decision 2013 ABAAER 011: Shell Canada Energy, Jackpine Mine Expansion Project, Application to Amend Approval 9756, Fort McMurray Area* (Ottawa: Canadian Environment Assessment Agency, 2013), at para 8.

healthy foothills and boreal forest ecosystems. Predator culls are only acceptable as a temporary, last resort measure combined with strong habitat protection and restoration. By allowing more critical habitat destruction, the draft plan will prolong Alberta's already excessive reliance on band-aid measures such as the horrific mass wolf culls.

Building fenced caribou zoo-like enclosures is a backwards step towards domesticating an endangered species. It is an expensive distraction that risks further distancing caribou from viable habitat. Because the draft plan proposes to release yearlings from a pilot Little Smoky enclosure into even more fragmented habitat, reliance upon the ongoing massive wolf kill in this region will be prolonged. It is high time that the caribou zoo proposal be replaced by effective critical habitat protection and recovery statutory provisions, as outlined above, to achieve self-sustaining caribou as soon as possible.

Thank you for considering these comments. We look forward to your response.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is written in a cursive style and is underlined with a single horizontal line.

Carolyn Campbell
Conservation Specialist

cc: Andre Corbould, Alberta Environment and Parks Deputy Minister
Ronda Goulden, Alberta Environment and Parks Policy Assistant Deputy Minister
Hon. Catherine McKenna, Minister of Environment and Climate Change Canada
Sue Milburn-Hopwood, Assistant Deputy Minister, Canadian Wildlife Service, Environment and Climate Change Canada
David Ingstrup, Regional Director, Prairie and Northern Region, Canadian Wildlife Service, Environment and Climate Change Canada