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May 20, 2008
Via Mail and E-Mail

Dear Dr. Festa-Bianchet:

Re: Reassessment of the status of the Little Smoky local population of the COSEWIC boreal population of Woodland Caribou

We are writing to you pursuant to our right of application (*Species At Risk Act*, s. 22) to request that COSEWIC assess the status of the Little Smoky local population of woodland caribou (*Rangifer tarandus caribou*) on an expedited basis.

Currently the Little Smoky population is considered an integral part of the larger “boreal population” of woodland caribou (COSEWIC 2002).¹ We understand that it is in COSEWIC’s current workplan to re-assess entire woodland caribou population in Canada in 2012.

It is our submission, however, that the Little Smoky local population is particularly imperiled relative to the wider boreal population of woodland caribou and both geographically and genetically distinct from the boreal population. As such, we believe the Little Smoky population should be treated as a distinct “wildlife species” (s. 2) and recognizing COSEWIC’s responsibilities that it should be the subject of a distinct and prioritized status assessment (s. 15).

1. Thomas, D.C., and D.R. Gray. 2002. Update COSEWIC status report on the woodland caribou *Rangifer tarandus caribou* in Canada, in COSEWIC assessment and update status report on the Woodland Caribou *Rangifer tarandus caribou* in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. 1-98 pp.

Particularly Imperiled

The Little Smoky caribou herd in west central Alberta has been declared as *'in immediate risk of extirpation'*² and its range "...*does not currently provide habitat conditions sufficient to maintain stable caribou population growth, as determined by the BCC [Boreal Caribou Committee] formula.*³

Clearly this herd is in a very precarious situation, but with a population of about 80 animals it could be recovered with proper management. Wolf control is already taking place, but there is still no habitat protection from industrial use.

In the two years the Alberta Government's multi-stakeholder West Central Caribou Landscape Planning Team has been in the process of planning for the recovery of this herd, and the best remaining areas for the herd have been identified (critical habitat) petroleum development has still been permitted in these areas and logging is being proposed within the next 5 years. See maps below.

Genetically Distinct

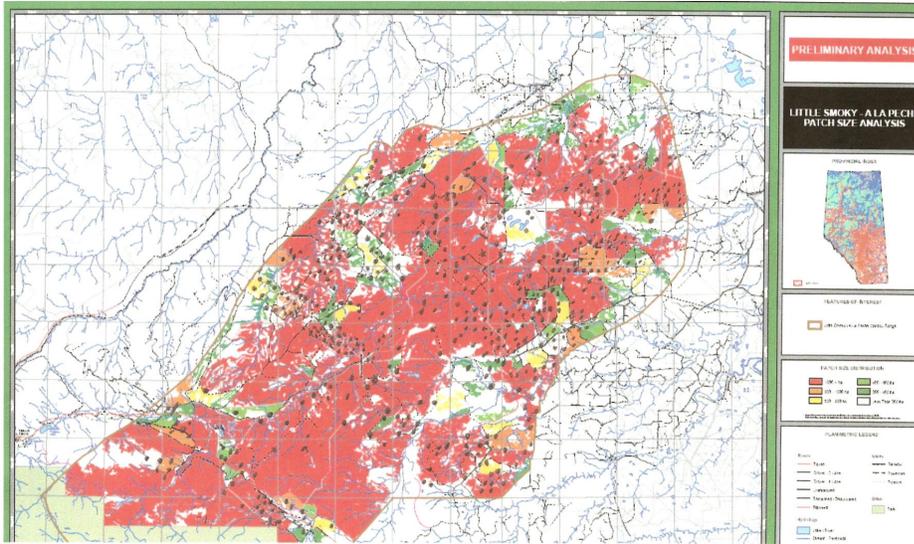
There is compelling evidence to indicate that the Little Smoky caribou herd is genetically distinct. It is an isolated population with boreal characteristics (non migratory) living in the Southern Mountain area where all other herds have mountain characteristics (migratory).

According to COSEWIC (2001) guidelines, as amended from 1994 guidelines, any group below the species level can be considered for designation when it meets the following criteria:

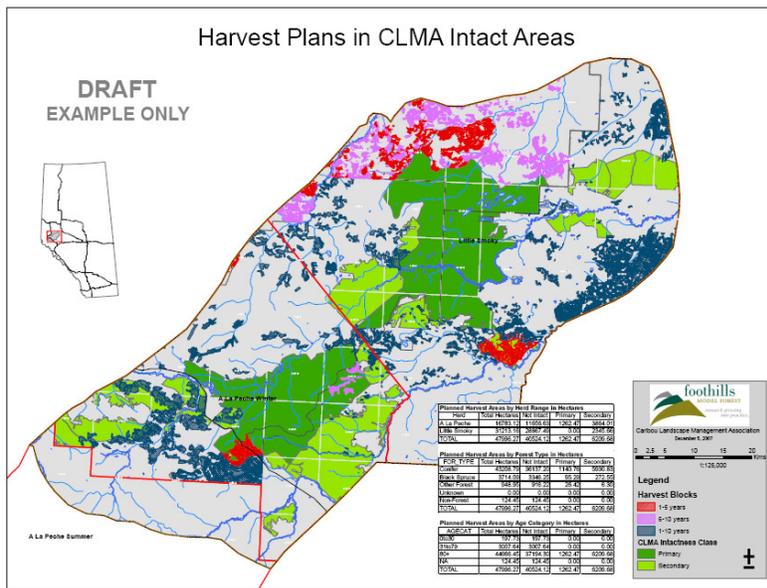
- 1. When a population is considered to be genetically distinct based on genetic analysis, taxonomic techniques, or other compelling evidence.*

The following information is from Thomas, D.C., and D.R. Gray. 2002. Update COSEWIC status report on the woodland caribou Rangifer tarandus caribou in Canada, in COSEWIC assessment and update status report on the Woodland Caribou Rangifer tarandus caribou in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. 1-98 pp.

- The term biologically distinct population is also arbitrary but provides some flexibility. We do not have sufficient information on the genetic status of many populations to ascertain if they are genetically distinct, however that is defined. On the other hand, all small local populations, which have been isolated for more than 100 years, are likely to be genetically distinct, based on analysis of microsatellite DNA (C. Strobeck pers. comm. 2000). P. 17*
2. Alberta Woodland Caribou Recovery Plan, 2004/05 – 2013/14 (Alberta Sustainable Resource Development). P. 36.
 3. ANC Timber, Canfor, Weldwood, Weyerhaeuser, Alberta Fish and Wildlife. 2004. Caribou Habitat Assessment in the Little Smoky/A La Peche Region, West Central Alberta. P. 3.



Map 1. Little Smoky Caribou Range critical habitat (intact areas) in red, orange, yellow and green with new petroleum well sites indicated by black dots. These well sites have been permitted by government in the last two years while a government established multi-stakeholder committee has been trying to develop a plan for the maintenance of the herd.



Map 2. Logging Plans for Little Smoky (upper right) and A La Pêche (lower left) caribou ranges. Intact areas are shown in Map 1. Red indicates logging within 5 years, purple logging 6-10 years, blue 1-10 years.

Five local populations in the Rocky Mountains and foothills of Alberta are included in the SMP [Southern Mountain Population] though they rely primarily on terrestrial lichens in winter (Edmonds and Bloomfield 1984, Thomas et al. 1996). They are equivalent in feeding behaviour to the "northern" ecotype in B.C. (Edmonds 1991). The three migratory local populations that summer in the Willmore Wilderness Park, northern Jasper National Park, and adjacent B.C. (Edmonds 1988, Brown and Hobson 1998) could be considered a metapopulation with populations that breed and winter in three separate areas in the foothills. They are considered to be distinct local populations

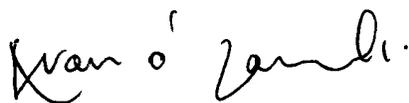
Geographically Distinct

The Government of Alberta has described the Little Smoky population as “separate/non-mixing” relative to other Alberta local populations of woodland caribou (Dzus 2001: 44)⁴.

- *with overlapping summer range, namely the Narraway (Belcourt in B.C.), Redrock/Prairie Creek, and A la Pêche (Brown and Hobson 1998, Dzus 2001). **One small population, Little Smoky, borders the SMP. It may be a relic from the southern clad and is considered a forest (boreal) population (Edmonds 1988). Local people detected a difference between two types of caribou that wintered near the Little Smoky River (Edmonds and Bloomfield 1984).** (bold added) P.27*
- *In summary, there are 30 local populations in the SMP, excluding the sedentary Little Smoky population. P. 27*
- *With the exception of the isolated and precarious Little Smoky local population in the south, the boreal ecotype of woodland caribou occurs north of 55° N in Alberta, (Edmonds 1998, Dzus 2001). P. 27*

Please keep us apprised of your deliberations on this matter.

Respectfully submitted,



Aran O'Carroll, LL.B.
Canadian Parks and Wilderness Society (CPAWS)
National Manager
Legal and Regulatory Affairs



Helene Walsh, M.Sc.
CPAWS – Northern Alberta
Boreal Campaign Director

Also for Alberta Wilderness Association, Federation of Alberta Naturalists, Athabasca Bioregional Society.

4. Dzus, Elston. 2001. Status of the Woodland Caribou (*Rangifer tarandus caribou*) in Alberta. Alberta Wildlife Status Report No. 30. Alberta Environment. 49 pp.

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