



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

March 26, 2017

Director
Canadian Wildlife Service, Pacific Region
Environment and Climate Change Canada
RR1, 5421 Robertson Road
Delta, BC V4K 3N2
Email: ec.ep.rpy-sar.pyr.ec@canada.ca

Dear Director:

RE: Canada-British Columbia Southern Mountain Caribou (Central Group) Protection Study

Alberta Wilderness Association appreciates this opportunity to respond to the *Canada-British Columbia Southern Mountain Caribou (Central Group) Protection Study*.

Alberta Wilderness Association (AWA), founded in 1965, works throughout Alberta towards more representative and connected protection of the landscapes that are the source of our clean water, clean air and vital habitat for wildlife in each of our six natural regions. We help Albertans learn more about the value of our wilderness and wildlife, and participate in opportunities to protect and care for the legacy that we will leave for future generations. With over 7,000 members and supporters in Alberta and across Canada, AWA remains committed to assuring protection of wildlife and wild places in Alberta for all Canadians.

Need for strict total surface disturbance limits

Because of the long time span needed to restore disturbed habitat, it is urgent to have clear, mandatory and effective total limits on surface disturbance across the caribou range.

Class A parks, ecological reserves and protected areas appear to offer a generally high degree of habitat protection. There should be limits to and reporting of the extent of road and pipeline/utility corridor fragmentation inside these areas. In addition, it is inappropriate for Blanket Salvage Permits to be issued, as they have been in Ecological Reserves. Salvage logging including roads increases habitat risk to caribou; bark beetle-affected older forests are still utilized.

On lands outside Class A parks, ecological reserves and protected areas, there is a patchwork of management land use designations, but still 41% of non-high elevation and 13% of high elevation in-range areas do not have these designations. Protective land use designations with strict total footprint limits and targets to reduce/aggregate disturbance should be in place across these caribou range.

Inside the protective land use designations that do exist, overall habitat disturbance has been and apparently will be permitted to increase. This is not effective critical habitat protection, especially in non-high elevation habitat of these caribou ranges, where disturbance significantly exceeds the maximum 35% threshold. Forestry-related measures outlined in s.3.2.5 to s. 3.2.8 do not appear to be coordinated with oil, gas, coal and other mineral measures in s. 3.2.10 to s.3.2.16. It is concerning to see significant cumulative forestry and oil-gas related authorizations inside 'no harvest' Ungulate Winter Ranges, for example. The BC Environmental Assessment Act project reviews that have authorized pipelines and coal mines to proceed since the 2014 recovery strategy are not adequately considering cumulative effects impacts or the risky time lag between destruction of more critical habitat and mitigation actions.

The Operating guidelines noted in s. 2.3.11 measures are vague, not mandatory and therefore very likely ineffective, as they will very likely facilitate destruction of critical habitat. Project level operating 'guidelines' have been in place for years in Alberta, during which time habitat disturbance levels have markedly increased.

Instead, mandatory strict surface disturbance limits should be in place. Appropriate goals would be 'no new surface disturbance' immediately, and substantial reduction/aggregation of existing industrial and recreational access routes and infrastructure in the near future. With this constraint, energy industry operators could identify the limited, priority corridors and nodes for continued development. A fixed constraint on surface disturbance would still allow significant energy extraction to continue in priority areas, because operators would be motivated to adopt innovative practices, such as pooling leases, sharing well pads and maximizing the extent of directional drilling.

Need for Mandatory Access Plan to Ensure Effective Restoration

Habitat restoration efforts are undermined by nearby new access. For example, habitat restoration work performed in a west central Alberta caribou range to offset an earlier pipeline project has been nullified by new leaseholders' disturbance in the same area. To avoid wasting restoration resources and increasing risk to caribou, a mandatory access plan is needed for caribou ranges that would outline acceptable, limited access corridors compatible with caribou recovery.

Avoid Offsets Driven by New In-Range Disturbance

The riskiness of 'mitigation' of habitat disturbance is not evaluated, and should be addressed in this report. New surface disturbance immediately increases habitat risk to caribou, whereas it takes many years, and likely several decades, before the goals of habitat restoration actions are achieved. Because of this time lag, habitat 'offsets' should not be reliant on permitting risky new surface disturbance inside caribou range. Instead, significant restoration should be triggered by operators who are benefitting from their existing in-range linear features and infrastructure, and by disturbance well outside caribou range, for example via a provincial wetland or biodiversity program. AWA does not support permitting of new disturbance inside endangered caribou ranges, but where disturbance is permitted, there should be high ratios of restoration required, preferably started well in advance of the disturbance.

Need for transparent review and rigour of socio-economic claims for action feasibility

AWA strongly supports the legal requirement that the Minister of Environment and Climate Change cannot consider socio-economic factors such as impacts on tenure holders and community interests, nor the benefits of any non-habitat related actions, in forming her opinion on critical habitat protection. We make the following comments because of the role that socio-economic assessment plays in other related and crucial aspects of caribou recovery.

BC has stated in section 2.3 that caribou habitat protection will result in unknown lost rent from resource development. Because the federal Cabinet does consider socio-economic factors in deciding whether to adopt a recommendation by the ECCC Minister for a habitat protection order, and because provinces themselves consider socio-economic factors in drafting their range and action plans, it is imperative that socio-economic impact claims are clear, rigorous, public, and are subject to careful scrutiny to avoid exaggeration. Too often in Alberta, inflated 'all or nothing' energy and forestry activity figures are cited as reasons that caribou habitat should not be protected. BC's mention of "potential" \$30-40 billion capital investment impacts appear to be a similar inappropriate 'all or nothing' figure.

It is misleading and irresponsible to claim that an energy play will be wholly undeveloped or that all regional forest-related jobs will be lost because of caribou habitat protection measures. This ignores: substantial energy extraction opportunities from a greatly reduced surface footprint; jobs from habitat restoration that can be financed by energy operators based on their existing footprint; jobs from optimizing timber supply allocation outside caribou ranges to support regional jobs and mills. It is imperative that BC and other provinces stating socio-economic concerns prepare a measured, well-documented assessment of impacts of increasing protected areas and applying strict cumulative footprint limit/reduction rules across its woodland caribou ranges, and that these be subject to public review before they are finalized.

Because of the urgency of improving woodland caribou survival and recovery prospects, AWA hopes you will carefully consider these comments and evaluate critical habitat protection based on best available scientific information and in light of the precautionary principle.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is written in a cursive style with a horizontal line underneath the name.

Carolyn Campbell
Conservation Specialist