



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

August 30, 2017

Ms. Lisa Wardley
Chair, Northwest Species at Risk Committee (NWSAR)
and Deputy Reeve, Mackenzie County

RE: NW Species at Risk Committee Caribou Report

Dear Northwest Species at Risk Committee:

Alberta Wilderness Association (AWA) appreciates this opportunity to provide stakeholder comments on NWSAR's caribou range planning report. We also appreciated that Conservation Specialist Carolyn Campbell was able to give a presentation and discuss caribou recovery at NWSAR open houses in High Level on August 22 and Manning on August 23.

Alberta Wilderness Association was founded in 1965 by Albertans from many backgrounds – hunters, hikers, urban, rural, scientists, outfitters, energy industry – to be a strong voice for Alberta's wild lands and waters. We work throughout Alberta towards the completion of a wilderness protected areas network, and for good stewardship of all lands that are the source of our clean water, clean air and wildlife habitat. With over 7,000 members and supporters across Alberta and Canada, AWA helps Albertans learn more about wilderness and watersheds, and participate in opportunities to conserve them as a legacy for future generations.

Working Together to Optimize Habitat Restoration and Protection across Caribou Ranges

The best available science is that caribou require at least 65% undisturbed habitat in their range to have even a 60% chance of achieving a self-sustaining local population. Project-by-project guidelines have failed in the past to reduce cumulative land disturbance. We support communities in and near caribou ranges choosing optimal socio-economic actions that assure caribou range intactness requirements of at least 65% undisturbed habitat are achieved. We urge northwest communities to accept this goal, and to work with indigenous communities, the provincial government and all other stakeholders to best achieve it. Surface disturbance across the ranges, both inside and outside protected areas, needs to be reduced and carefully managed through clear regulations.

Discussions at the August open houses included these key ways to best achieve caribou habitat goals:

- Clustering energy industry footprint on defined corridors, separated by areas that are restored
- Using the best re-vegetation information to prioritize areas for restoration work; we hope the forestry industry will share its vegetation inventory data, which is not publicly available now

- Planning range access with indigenous communities, hunters and trappers that is compatible with caribou recovery, for traditional land uses, and to help reduce populations of alternate prey that have been stimulated by human activity

Central Importance of Protected Areas to Meet Disturbance Targets in Critical Habitat

NWSAR's report correctly points out that under the *Species at Risk Act (SARA)*, the federal Environment Minister "has a responsibility to correct any deficiencies in critical habitat protection on federal and non-federal lands." (NWSAR report draft 2, p. 2)

In AWA's view, core protected areas on each caribou range, with active habitat restoration programs, are essential to achieve the significant progress needed to meet SARA caribou habitat protection requirements. Unlike other public lands, protected areas can be assured to have no new industrial forestry impacts, and to have an energy industry surface footprint that is limited to existing tenures with a planned phase out of activity. With restoration provided by local workers, protected areas lands will be on a steady path to move from industrial impacts towards intactness. Multiple other sensitive wildlife species that rely on intact forests and wetlands, including arctic grayling and migratory birds, will also benefit.

Establishing Wildland Provincial Parks in FMUs F10, F20 and P8, as recommended by mediator Denhoff's 2016 report, will achieve the most protection of caribou range for the least socio-economic cost to northwest communities. This is because, according to Forestry division information, they do not have long-term forest tenures or quota holders. (At the August 23 open house, some participants noted that there were forestry operations in these FMUs, and we look forward to receiving details on the scope of existing activity). Supporting these low-economic-impact protected areas as a part of caribou recovery is an excellent way for northwest municipalities to avoid federal emergency protection orders.

Consideration of UNESCO Biosphere Reserve

AWA supports Mackenzie County and County of Northern Lights investigating UNESCO Biosphere Reserve status. Biosphere Reserves are ecologically significant regions with core protected areas. They promote sustainability and conservation by engaging all community stakeholders and supporting research and monitoring. To be consistent with Biosphere Reserve philosophy, AWA believes that the NWSAR report should be clear on two issues: commit to reducing surface disturbance in caribou ranges to recover the populations (as supported by 40 years of Alberta caribou research and monitoring), and recognize the value of the proposed low-economic-impact protected areas in caribou recovery.

As you know, Beaver Hills is Alberta's newest Biosphere Reserve, led by Strathcona, Beaver, Leduc, Camrose, and Lamont municipalities and Parks Canada. Their Biosphere Reserve is anchored by Elk Island National Park, Miquelon Lake Provincial Park, a Provincial Recreation Area with low impact recreation and hunting, and six Natural Areas. AWA actively supported their concept of private and public land management which fit into an overall ecological framework, with impacts of activities being researched and monitored. Mackenzie County and County of Northern Lights would be very highly praised for foresight and leadership if they made decisions supporting Biosphere Reserve designation.

Please consider these points and those in the attached backgrounder in your ongoing caribou range planning participation. We would welcome further discussion.

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: Crystal McAteer, Town of High Level, NWSAR Committee Vice-Chair
Terry Ungarian, County of Northern Lights, NWSAR Committee member
Byron Peters, NWSAR Admin. Lead
Hayley Gavin, NWSAR Admin. Support
Ronda Goulden, Alberta Environment & Parks, Assistant Deputy Minister of Policy
Scott Milligan, Alberta Environment & Parks, Executive Director of Planning
Brian Makowecki, Alberta Environment & Parks, North Planning Director



Caribou Recovery in Northwest Alberta



Photo Credit: © Wayne Lynch

Caribou Belong

Woodland caribou are beautiful creatures, amazingly adapted to Alberta's boreal and foothills forests. With their large hooves, they 'crater' through snow for their winter diet of lichen, and move over wetlands and snowpack that other animals cannot easily cross. They live at low densities within old growth forests and peat wetland areas, which other prey species such as deer and moose avoid. That's allowed caribou to minimize encounters with their natural predators such as wolves and bears, with whom they have been able to co-exist for thousands of years.

Caribou are North America's best land-based sustainability teachers. They need areas of largely intact older forests and wetlands to avoid predators. In that way, they challenge us to learn to manage our cumulative impacts on our public lands, so that we and many other species can thrive. It's taken scarcely a century of land use changes in Alberta for scientists to predict they will die out in just a very few decades - unless we protect and restore their habitat now.

Right behind our declining caribou, other Alberta wildlife are in difficulty: arctic grayling fish populations, and migratory birds that rely on intact old growth forests and wetlands. They are showing us that we are not sustainably managing the forests and waters that we are passing on to our children. Caribou are the sentinels of our old growth forests and wetlands. We don't have the right, as an adaptable, prosperous society, to wipe out these amazing creatures in our lifetime.





Drivers of Alberta Caribou Decline and Recovery – Decades of Knowledge

For forty years, we have known from Alberta scientists' research that our caribou populations would fall significantly if we failed to limit total surface disturbance in caribou home ranges.

Government, forestry and energy industries have all known this for decades: every few years since the early 1990s, high profile multi-sector caribou committees have reviewed evidence that logging, energy and access impacts on Alberta caribou must be carefully limited and large habitat areas must be protected. For 40 years Alberta governments have stated their support for caribou recovery and done the opposite, allowing extensive new surface disturbance in their home ranges.

Caribou need core protected areas and strict surface disturbance limits both inside and outside protected areas. The current best available evidence is that their home ranges must be managed to recover to at least 65% undisturbed. **If our grandchildren are ever to see wild Alberta caribou, we must support strong actions to protect their habitat now.**

Communities and Caribou Recovery

Caribou planning and actions need meaningful local participation from indigenous peoples and local communities that assists the urgent basic task of protecting existing habitat and restoring degraded habitat.

These elements of caribou recovery are not 'business as usual', but fair to northwest communities:

- Linear disturbance, both inside and outside protected areas, needs to be reduced and carefully managed through clear regulations.
- Core protected areas, free of mines, oilsands and industrial forestry, are needed in part of each caribou range. The three proposed new northwest protected areas (in Forest Management Units E10, F20 and P8) do not overlap with existing forestry. They will achieve the most protection of caribou range for the least socio-economic cost to northwest communities.
- These new Wildland Parks should be managed with indigenous and local participation to cluster and phase-out oil and gas, following Hay-Zama Wildland Park's successful example. The Parks should have fire suppression and forest restoration, and manage access for hunting and trapping compatible with caribou recovery.
- Outside protected areas, there can be substantial energy extraction on current and new leases, but from a greatly reduced surface footprint e.g., through restoring legacy disturbance, longer distance directional drilling, pooled leases and shared infrastructure.
- There are substantial jobs from extensive forest habitat restoration programs across and adjacent to ranges.
- Regional timber supply allocation and management need to be reformed, to support sustainable forestry compatible with recovery of caribou and other sentinel wildlife species.

Caribou Myth Busters

Three proposed protected areas recommended by mediator Denhoff's 2016 report will "shut down" northwest communities

Actually, the three proposed new northwest protected areas (in Forest Management Units E10, F20 and P8) do not overlap with existing forestry. Unlike other public lands, protected areas can be assured to have no new industrial forestry impacts, and to have an energy industry surface footprint that is limited to existing tenures and then phased out. The proposed protected areas will achieve the most protection of caribou range for the least socio-economic cost to northwest communities.

It's good enough for companies to follow 'best practice' operating guidelines

Alberta caribou populations are declining almost everywhere that operating guidelines are in place, including in the Bistcho, Chinchaga, Caribou Mountains and Red Earth ranges in northwest Alberta. The Alberta government's own 2010 caribou status report stated that current project-level industrial guidelines are





inadequate as a sole tool in Alberta, as demonstrated in 1999 boreal research, and confirmed in 2008 and 2009 Alberta Caribou Committee research.

We need a lot more caribou research in each range before we act

It's true that local communities and all Albertans deserve good consultation and information about managing the important public lands that support our caribou. Local communities should participate in choosing optimal socio-economic actions that assure that caribou range requirements of at least 65% undisturbed habitat are achieved. But decades of conservation delays and ongoing habitat loss have made it very urgent to act, before we lose even more caribou habitat. We know caribou need large intact older forests and wetlands: let's get moving together on that without further delay. Let's get going on planning range access with indigenous communities, industry, hunters and trappers that is compatible with caribou recovery.

It's not habitat, the problem is too many wolves and other predators

The root cause of excessive caribou predation by wolves and other predators is fragmented and degraded habitat in caribou ranges. Cutblocks and poorly reclaimed seismic lines and well pads stimulate deer, moose and wolf populations, and create easy access to caribou by predators. This robs the caribou of their ability to avoid overlap with predators that they've co-existed with for thousands of years. In the most disturbed ranges, the dire measure of predator culls may be needed, but the only way this can possibly be justified is along-side very strong habitat protection and restoration, as an exceptional temporary measure while habitat regrows.

It's not human disturbance, the problem is fire

In most Alberta ranges industrial disturbance far outweighs fire, but yes, in a few, fire is the main source of habitat loss. It makes it even more important for us to minimize human disturbance in those ranges. And there should be fire suppression in caribou protected areas.

If Caribou Mountains caribou are declining even in Caribou Mountains Wildland Provincial Park, it's hopeless

Actually, the habitat disturbance levels of the overall Caribou Mountains range explain the declines. As of 2011, fire disturbance affected 44% of the range, and human-caused disturbance affected 23%, for a total of 57% disturbed. Best available evidence suggests caribou need at least 65% undisturbed habitat to have even a 60% chance of being self-sustaining. For the Caribou Mountains population, it's important to: avoid new human disturbance in their range, suppress fires, carefully manage access, and support jobs to properly reclaim as much legacy human-caused disturbance as possible, such as reclaiming old seismic lines that won't unduly affect trapping and hunting.

If caribou can't even make it in pristine Banff and Jasper national parks, it's hopeless

Actually, the basic habitat issues are the same, and caribou in the national parks were likely also harmed by the parks' elk-wolf polices. Unlike boreal woodland caribou of northern Alberta, these are mountain caribou who need to migrate from mountains (in summer) to foothills (in winter). During the 20th century, their foothills winter grounds outside the parks were blocked and fragmented by roads and industrial development. Inside the parks, artificially high elk populations together with roads and trails into some key caribou areas made caribou predation far easier when wolves were allowed to rebound.

Alberta grizzlies have recovered on 'working landscapes', so can caribou

Boreal caribou need relatively undisturbed old growth forests and wetland complexes in their home ranges, to minimize overlap with predators. Grizzlies are wide-ranging omnivores that adapt to many vegetated land covers, and greatly benefit if direct human conflicts are reduced. Caribou habitat recovery won't hinder grizzly populations, but grizzly recovery requirements aren't enough for caribou.

