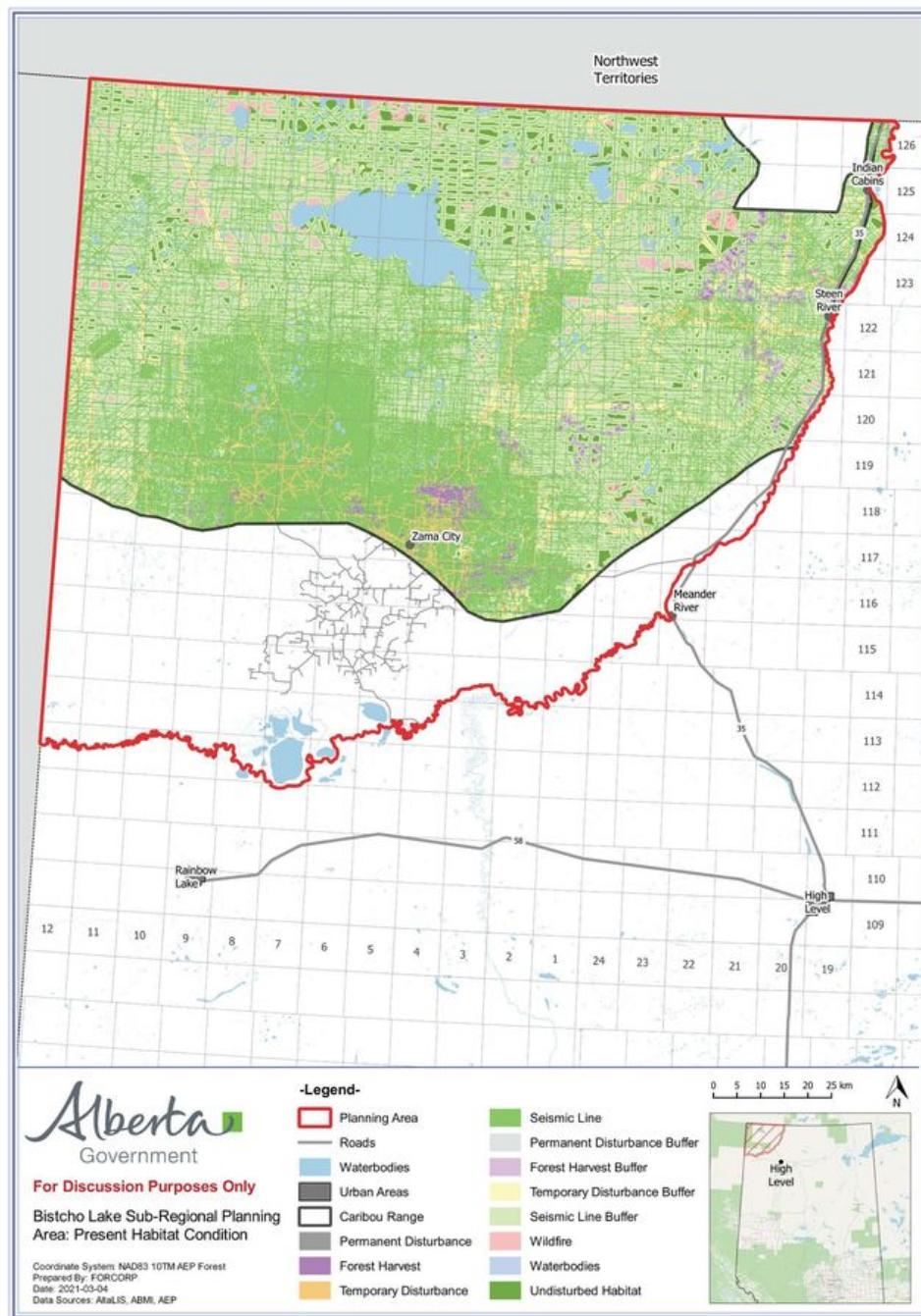


Help Bistcho Lake Caribou in NW Alberta

May 21, 2021



Alberta has agreed to establish a minimum of 65% undisturbed habitat in Bistcho caribou range. Only 6% is undisturbed now (the bits of dark green). Map: Government of Alberta, March 2021.

Alberta Wilderness Association really needs your help to improve the outcomes for caribou and the Dene Tha' First Nation in the Bistcho Lake area of northwest Alberta.

Until May 29th, the Alberta government is seeking public comments on its Draft Bistcho Lake Subregional Plan. AWA believes that the main focus of the plan must be to protect caribou in order to comply with federal law. Right now, economic development remains the cornerstone of the draft plan.

You have two ways to help:

1. send an email (suggestion below)
2. fill out the government's survey (suggestions below — be as lengthy or brief as you want)

Please take a few minutes to send strong messages to our government to support caribou conservation and the right and aspirations of the Dene Tha' to protect their traditional territory. Thank you for speaking up for caribou in this important land-use plan!

- Carolyn Campbell

Suggested Email – send to: aep.northsrp@gov.ab.ca and copy ccampbell@abwild.ca

Dear Planners:

I am providing these comments to help Alberta improve the Draft Bistcho Subregional Plan that is available for public review now.

This plan is long overdue. It does provide hope that we can start improving the habitat that Bistcho caribou need. I am encouraged the plan recognizes the importance of restoring human footprint and of Indigenous-led initiatives. While these steps are welcome, the draft plan could stand improvements.

I am concerned that the plan and tools for plan implementation are focused too much on unsustainable forms of economic development and not enough on sustainability, protection for caribou, and the rights and aspirations of the Dene Tha' First Nation.

I am particularly concerned about the lack of an Indigenous protected and conserved area in the Bistcho Lake area, a key landscape for the Dene Tha' First Nation and for woodland caribou.

There seems to be an overemphasis on a potential access/road network in every planning unit and no commitment to large roadless areas with long-term legal protection inside this important caribou range.

An access management plan must be developed that recognizes the need for large intact landscapes free of motorized access, concentrated industrial access outside of caribou use areas, and clear, mandatory timelines to restore legacy footprint.

Thank you for considering my views.

Sincerely,

BISTCHO SUBREGIONAL PLAN SURVEY – click [here](#)

Comments in red are suggestions for filling out the survey — feel free to add your own or modify these suggestions. Brief summaries and fact sheet links are within the survey; detailed Alberta government documents are [here](#)

SECTION 1 – Introduction

The draft Bistcho Lake Sub-regional Plan is intended to help government manage land-use activities so we can maintain a working landscape and the economy, while also supporting caribou and other species, recreational activities, and Indigenous traditional land use.

The Strategic Management Outcomes for the Bistcho Lake sub-region are:

- Support economic opportunities that provide benefits to local municipalities, Indigenous Peoples, and the rest of Alberta.
- Consolidate development over time to support landscape intactness, and naturally self-sustaining plant and wildlife populations, with a focus on species at risk.
- Support recreational, cultural and traditional land uses in the sub-region for the benefit of local peoples and all Albertans.

1. If there are additional outcomes you think we should consider for the sub-regional plan, please describe them here

Suggestion for Response:

A process to identify opportunities for legislated protected areas, especially an Indigenous protected and conserved area (IPCA) in the Bistcho Lake area.

Outcome 2 should add ‘restore industrial footprint’ and emphasize “timely” and “caribou”, to read: *“Consolidate development and restore industrial footprint in a timely manner to support landscape intactness and naturally self-sustaining plant and wildlife populations, with a focus on caribou.”*

SECTION 2 – Supporting caribou and other species

The draft Bistcho Lake Sub-regional Plan is intended to support self-sustaining plant and wildlife populations, including caribou, by proposing actions and approaches that will reduce the total amount of disturbed habitat in the sub-region, while continuing to support economic opportunities.

Sections of the draft plan propose management approaches and changes in technical requirements for specific sectors.

Find out more about how the draft plan would support caribou and other wildlife:

- [Fact Sheet: Supporting Caribou and Other Species - Bistcho Lake](#) (PDF, 2.1 MB)

2. In your opinion, how effective would this plan be at supporting caribou and other wildlife?

1 Very effective

2 Somewhat effective

3 Neither effective nor ineffective

4 Somewhat ineffective

5 Very ineffective

6 I don't know

3. Please provide detail to your answer above.

Suggestion for Response:

There is a possibility for success here, but unfortunately it seems the emphasis is on economic development, not on protection.

4. If you have other comments about supporting caribou and other species in the sub-region, add them here.

Suggestion for Response:

An Indigenous protected and conserved area (IPCA) in the Bistcho Lake area would signal a much stronger commitment on the caribou protection side and would be more respectful of Dene Tha' interests and aspirations.

The access management plan should recognize the need for large intact landscapes free of motorized use. It must also include clear mandatory timelines to restore legacy footprint. As drafted, its focus seems to be: how to put potential roads into every planning unit. While it is good to see maximum thresholds for disturbed habitat that comply with federal law, there are still too many landscape units focused on economic activities and road development, and none dedicated to long-term legal protection and roadless areas.

SECTION 3 – Supporting Economic Opportunities

Alberta's landscapes are the backbone of our economy, providing natural resources that support the social and economic well-being of communities across the province and the country. The revenue generated from industrial activities helps fund schools, hospitals and other services that Albertans rely on. Maintaining these social benefits requires long-term economic opportunities and a healthy landscape.

To find out more about how the plan would help support economic activities in the regions, see:

- [Fact Sheet: Supporting Economic Activities](#) (PDF, 563 KB)

5. In your opinion, how effective would this plan be at supporting economic activities in the region?

- 1 Very effective
- 2 Somewhat effective
- 3 Neither effective nor ineffective
- 4 Somewhat ineffective
- 5 Very ineffective
- 6 I don't know

6. Please provide detail to your answer above.

Suggestion for Response:

The plan's current focus is on economic activities while trying to recover caribou, however a lot of the tools focus on unsustainable forms of economic development.

7. If you have other comments about supporting economic opportunities in the sub-region, add them here.

Suggestion for Response:

Needs more commitment to a forward-looking restoration and protection economy, with diverse sustainable economic opportunities.

SECTION 4 – Supporting Recreational Opportunities

The draft Bistcho Lake sub-regional plan would support outdoor recreation opportunities by identifying high-value recreation areas and by careful consideration of future developments in and around these areas. The plan would also support recreation through a commitment to create a network of recreational areas, connected by trails that will support outdoor recreation and tourism needs.

For more information on how the draft plan supports recreation opportunities, see:

- [Fact Sheet: Supporting Recreational Opportunities - Bistcho Lake](#) (PDF, 500 KB)

8. In your opinion, how effective would this plan be at supporting recreational opportunities in the region?

- 1 Very effective
- 2 Somewhat effective
- 3 Neither effective nor ineffective
- 4 Somewhat ineffective
- 5 Very ineffective
- 6 I don't know

9. Please provide detail to your answer above.

Suggestion for Response:

An Indigenous protected and conserved area (IPCA) would provide more certainty for sustainable recreation activities in the area.

10. If you have other comments about supporting recreational opportunities in the sub-region, add them here

Suggestion for Response:

Access for recreation must be included in the access management plan with mandatory targets for achieving footprint reductions that support self-sustaining herds of caribou.

SECTION 5 – Supporting Indigenous Land Use

Healthy landscapes and ecosystems are integral to the exercise of Treaty rights, and to the practice of Indigenous land uses. The draft Bistcho Lake Sub-regional Plan would support Indigenous land use by minimizing habitat loss and landscape fragmentation, which will result in a more intact landscape. The plan would also support Indigenous partnerships in economic opportunities, as well as continued Indigenous engagement in land use planning and natural resource management.

Find out how the draft plan would support Indigenous land use, see:

- [Fact Sheet: Supporting Indigenous Traditional Uses \(PDF, 7.8 MB\)](#)

11. In your opinion, how effective would this plan be at supporting Indigenous land use in the region?

- 1 Very effective
- 2 Somewhat effective
- 3 Neither effective nor ineffective
- 4 Somewhat ineffective
- 5 **Very ineffective**
- 6 I don't know

12. Please provide detail to your answer above.

Suggestion for Response:

It is helpful that the plan recognizes the need to maintain long-term opportunities for Indigenous traditional activities, and that it supports Indigenous-led initiatives, Indigenous participation in land-use planning, and identifying opportunities for Indigenous involvement in plan implementation. Unfortunately, the lack of a process towards an Indigenous protected and conserved area (IPCA) in the Bistcho Lake area is a glaring omission. This must be addressed if Dene Tha' rights and interests are to be more fully respected.

13. If you have other comments about supporting Indigenous land use in the sub-region, add them here.

Suggestion for Response:

An IPCA would allow the Dene Tha' to assist with caribou conservation while pursuing their interests in landscape level conservation, traditional uses, and sustainable economic activities.

(Ends with several demographic questions)



Alberta caribou. Photo © G. Gruenenwald.



Dedicated to the conservation of wilderness and completion of a protected areas network, AWA inspires communities to care for Alberta's wild spaces through awareness and action.

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