



Alberta Wilderness Association  
"Defending Wild Alberta through Awareness and Action"

May 29, 2021

Hon. Jason Nixon  
Minister of Alberta Environment and Parks  
#323 Legislature Building 10800 – 97 Avenue NW  
Edmonton, AB T5K 2B6  
By E-mail: [AEP.Minister@gov.ab.ca](mailto:AEP.Minister@gov.ab.ca)

Dear Minister Nixon:

### **Re: Draft Cold Lake Sub-regional Plan**

Alberta Wilderness Association (AWA) appreciates this opportunity to provide comments on the draft Cold Lake Sub-regional Plan and the associated Caribou Habitat Recovery Analysis.

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.

The Access Management Plan has real potential to restore and consolidate industrial infrastructure, an approach that is long overdue in northeast Alberta. However, there are still key gaps that must be closed to meet Alberta's commitment and legal obligation to achieve habitat requirements for naturally self-sustaining caribou.

#### Strategic Management Outcomes

Outcome 2 should add 'restore industrial footprint' and include '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 and other species at risk."*

#### Caribou and Multi-Species

It is good to see that a minimum 65% undisturbed habitat in the Cold Lake caribou range is recognized as one caribou critical habitat target to meet, to comply with the federal *Species at Risk Act (SARA)*. However, several major gaps in the draft Plan must be closed, or that target will not be reached.

In the Caribou Habitat Recovery Analysis document (Appendix A to the draft Plan), the maps assume that significant legacy seismic lines and older access roads are removed in the coming decades, but the draft Plan lacks specific requirements to do so. There must be clear mandatory timelines to recover disturbance such as legacy seismic lines, oilsands, oil and gas infrastructure, and short-term roads, or restoration will not happen.

As well, minimum undisturbed critical habitat requirements for Cold Lake caribou can and should be achieved sooner than 100 years from now. In as few decades as possible, we must replace the ongoing

horrific wolf kill in the Cold Lake range with enough connected boreal forest-peatland habitat for naturally self-sustaining caribou. Comprehensive mandatory actions are urgently needed in the next five years to set this course. Doing so will also bring great benefits to support boreal forest-peatland carbon sinks and boreal biodiversity.

There is also a major gap in ensuring adequate biophysical habitat, which is the second key element of protecting boreal caribou critical habitat. Biophysical habitat has attributes required by boreal caribou to carry out their life processes. In the Cold Lake sub-region, mature upland conifer forests, treed peat lands, and open peat lands are all important to caribou seasonal life processes. Treed stands must be at least 60 years old to be considered biophysical habitat (Appendix A, p. 5)

The draft Plan unrealistically assumes no new wildfire. As a result of this assumption, the draft Plan acknowledges that caribou biophysical habitat “is likely over-estimated” (Appendix A, p. 17). This is an unacceptable critical habitat protection gap in a sub-region highly influenced by fire disturbance, especially in the face of anthropogenic climate change. Instead, anticipated wildfire should be included and anthropogenic disturbance must be managed accordingly, so caribou and other species needing old forest habitat do not bear the fire risk on this landscape.

To fulfill Alberta’s commitment to adopt plans that consider ‘multi-species’ conservation, the needs of ‘mature and old mixedwood forest’ species like barred owl and Canada warbler should also be identified and met in this plan.

AWA supports the draft Plan’s concept of setting wetland disturbance limits in each planning unit to advance biodiversity goals. We are encouraged by the explicit disturbance limits identified in Table 1. To meet these limits, there must be clear mandatory timelines to recover disturbance such as legacy seismic lines, oilsands, oil and gas infrastructure, and short-term roads, or restoration will not happen.

#### Indigenous Land Uses

There must be a much stronger commitment to a process of collaborating with Indigenous communities to support their land use rights. The draft Plan avoids any commitment, instead giving only examples of what mapping and planning activities may occur.

The government-appointed Cold Lake Task Force achieved full consensus on Recommendation 10:

*Through the sub-region planning process, identify areas that are valuable to indigenous people for proposed conservation areas, that show commitments to conservation and support that practice of traditional uses [sic]*

That full consensus Recommendation should be honoured, including its first three Considerations:

- *GoA, in collaboration with First Nations and Métis groups, should pursue a process with the Government of Canada to evaluate conservation areas in CLAWR-AB [Cold Lake Air Weapons Range-Alberta], compatible with military use, reconciliation, caribou conservation, and economic potential.*
- *The selection of management tools and management frameworks should be driven by the objectives identified by the Indigenous communities, recognizing the wide spectrum of management options for conservation areas in the province.*
- *Pursuing establishment of conservation areas should include multi-stakeholder engagement process. [sic]*

### Access Management Plan and Economic Sectors

AWA supports the concepts in the Access Management Plan (AMP) that include:

- appropriate mandatory limits on road density and wetland disturbance in planning units;
- strict requirements to append any new development closely to a long-term road network that complies with caribou critical habitat requirements.

AWA also supports these sector-specific mandatory measures:

- limits on width of exploration and geophysical clearing
- timelines to restore oilsands evaluation and exploration disturbances
- limits on active surface material extraction sites with timelines to progressively restore sites
- timelines to revegetate pipeline and transmission line corridors
- no new grazing dispositions in caribou ranges

The social license for industry to operate will suffer unless similarly clear, mandatory timelines for limiting and restoring other forms of industrial disturbance are added to the draft Plan. AMP must include clear mandatory timelines to restore disturbance such as legacy seismic lines, oilsands, oil and gas infrastructure, and short-term roads, or restoration will not happen.

Mineral tenure sales by the Alberta government confer a right to explore for a resource. New mineral tenure sales should not resume until an access management system is in place with mandatory timelines to recover disturbance such as legacy seismic lines, oil and gas infrastructure, and short-term roads.

As well, Alberta must recognize that resuming government sales of new oilsands, oil and gas tenure is inconsistent with our climate obligations.

### Most Boreal Lakes and River Corridors must not be Priority Recreation and Tourism Areas

Far too many sensitive boreal lakes and river corridors are identified as priority recreation and tourism use areas in the draft Plan. These are vital biodiversity areas within an already heavily fragmented and industrialized landscape. Most boreal lakes and river corridors should be managed to support biodiversity and Indigenous land use priorities.

The draft Plan should honour this important, balanced Task Force consensus statement (Consideration 6 in tourism consensus Recommendation 34):

*Focus higher impact lake-based recreation infrastructure on a limited number of front country sites; manage mid-country and backcountry lake recreation access to maintain and restore biodiversity in the lakes and their shoreline buffer areas for conservation and indigenous traditional land use priorities.*

Specific inappropriate Tourism and Recreation Priority Areas that AWA will strenuously oppose include:

- southeast Pinehurst Lake, which is inside the ecological crown jewel of Lakeland Provincial Recreation Area; it should remain backcountry and non-commercialized.
- the Sand River corridor south of the CLAWR-AB boundary. The Sand River is the largest tributary of the Beaver River in the Cold Lake sub-region. Because of its very good water quality and sizeable flow level, it has a vital beneficial effect on water quality of the Beaver River downstream of the confluence with the Sand River. It should be managed for very low impact access compatible with maintaining water and wildlife values and supporting Indigenous rights.

### Monitoring, Evaluation and Performance Indicators

The draft Plan omits an important reporting commitment made by Alberta in the October 2020 Alberta-Canada “Agreement for the Conservation and Recovery of the Woodland Caribou in Alberta”, under SARA s. 11. That commitment should be clearly affirmed in this Plan:

“Annual reporting will be made publicly available, including woodland caribou local population and range habitat metrics (i.e., population size and growth; biophysical habitat attributes by type, area, and location; percent and location of range that is undisturbed or on a trajectory to undisturbed status).” – s. 12. 5 of the Oct. 2020 Alberta-Canada Woodland Caribou Agreement

Annual changes in biophysical habitat area and location will be sensitive to new anthropogenic disturbance. Annual caribou population indicators offer warnings or confirmation of management actions. Reporting on these metrics shows accountability by Alberta to undertake the necessary urgent actions in the next 5 years to restore and manage the Cold Lake caribou range to support a naturally self-sustaining caribou population.

Please address these concerns in the finalized Cold Lake Sub-regional Plan.

Sincerely,  
ALBERTA WILDERNESS ASSOCIATION



Carolyn Campbell  
Conservation Specialist

cc: Bev Yee, Deputy Minister, Alberta Environment and Parks  
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