



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

June 11, 2021

Honourable Jason Nixon
Minister of Environment and Parks
Government of Alberta
aep.minister@gov.ab.ca

Draft Alberta Bull Trout Recovery Plan

Dear Minister Nixon,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide feedback on the draft *Alberta Bull Trout Recovery Plan* – developed to protect and support the recovery of bull trout in Alberta. AWA 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 Saskatchewan – Nelson River populations of bull trout are classified provincially as Threatened under Alberta's *Wildlife Act*. They are listed as Threatened at the federal level by both the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), and the *Species at Risk Act* (SARA). Species listed as threatened on Schedule 1 of SARA (on non-federal lands) fall under the primary jurisdiction of the respective provincial or territorial government, and the draft *Alberta Bull Trout Recovery Plan* (hereafter referred to as the Recovery Plan) seeks to satisfy this jurisdictional obligation by the Government of Alberta and the Ministry of Environment and Parks (AEP).

AWA appreciates the release of the draft Recovery Plan for bull trout as there is great urgency to act in order to halt the decline and recover this imperiled species. Bull trout, Alberta's provincial fish, are keystone species in ecosystems where they are found. They are an indicator for healthy, intact, cold-water aquatic ecosystems, therefore protection is important not only for the species itself, but for the conservation of the ecosystems in which they exist. Upon reading and understanding the Recovery Plan, we believe it falls short in many areas crucial for the protection and recovery of bull trout populations in Alberta.

The following section contains AWA's detailed comments on the Recovery Plan:

Section 3.4 - A New Approach to Assessing Threats:

AWA supports the cumulative effects approach to biodiversity conservation and management and we appreciate AEP's recognition that the lack of bull trout recovery has likely been a consequence of cumulative impacts of both anthropogenic (i.e., industrial and recreational activities) and natural factors (i.e., competition from introduced species). AWA supports the list of threats included within the Recovery Strategy which includes direct mortality, fragmentation, water quality, water quantity, competition, hybridization, flow flashiness, disease, and stream temperature. However, AWA would like

to highlight some key threats to bull trout recovery which this Recovery Plan omits and demand inclusion in the final document.

With regards to water quality, AEP acknowledges in the Recovery Plan that human-caused sediment is a widespread threat in every basin within the bull trout recovery area. The Recovery Plan states that human-caused sediment results from run-off from land uses that disturb terrestrial vegetation. These land uses include forestry, oil & gas development, erosion from road crossings, off-highway vehicle use, as well as utilities infrastructure (Section 6.3.1). AWA would like to highlight AEP's omission of coal mining and heavy metals runoff (i.e., selenium) as threats to bull trout recovery within the Recovery Plan. Proposed coal mining operations seeking regulatory approval such as the Grassy Mountain Coal Project and the Tent Mountain Mine Redevelopment Project overlap with bull trout habitats in Alberta's southern Eastern Slopes. If the Recovery Plan hopes to develop strategies that reduce sedimentation, then coal mining operations should be prohibited within the bull trout recovery area. This should be acknowledged within the Recovery Plan.

Section 4.2 – Assessing Recovery Potential and Recovery Objectives:

AWA would note that, by only choosing watersheds deemed suitable for recovery, AEP is subsequently relegating other watersheds to permanent extirpation. With the limited population of bull trout remaining in Alberta, the government cannot afford to write off any bull trout populations just because they don't fall into a priority watershed. We recognize that prioritization is necessary to identify areas with the greatest chances of success, but as a SARA listed species, all bull trout have a legal right to protection, conservation, and recovery.

In the Recovery Plan, Objective 1 is to maintain or improve the current population of bull trout in the Core, Potential Core, and Support populations over a 10-year period. AWA is disappointed with this objective as we feel that it is not ambitious enough, especially over 10 years. For example, a population of bull trout with a Fish Sustainability Index (FSI) score of 3 would be considered at a moderate risk of extirpation. Yet, based on how this objective is worded, AEP could perceive their efforts to be successful if this population remained at a moderate risk of extirpation after 10 years. We recognize it is crucial to ensure these populations are maintained, but that should be the bare minimum. AWA would be more supportive of this objective if it were stated that all populations (Core, Potential Core, and Support) should improve over 10 years.

Objective 2 is listed as improving the adult and immature FSI score for bull trout, by a minimum of one FSI score level, in at least one watershed within the Core, Potential Core, or Support populations within each of the six major river basins. The indicator used for assessing Objective 2 states that six restoration projects (one per recovery basin) should be completed by the end of year five, and AWA is concerned that this objective and indicator are inadequate with respect to ensuring bull trout recovery. One restoration project per watershed is too few, and AWA recommends increasing the number of restoration projects in the hopes that more restoration projects might improve the odds of success, even if some projects fail. The bar set by these objectives – completing six restoration projects over five years, is too low. It doesn't set an ambitious conservation objective but instead reflects insufficient financial and personnel commitment from AEP. In addition, the completion of restoration projects is an inappropriate metric for assessing species recovery. Project completion alone does not ensure that bull trout populations or their distributions have increased. AEP needs to develop better metrics, ones that measure real population recovery and not just efforts at recovery.

With regards to the restoration projects referred to throughout this Recovery Plan, there are no clearly defined examples of what these restoration projects will encompass and entail. Without a better understanding of these projects and their specifics in each watershed, AWA cannot comment on whether the projects are adequate for achieving bull trout recovery. The Recovery Plan should include descriptions of sample restoration projects (at a minimum), or specific project outlines for each watershed they are planned for.

Section 5.0 – Habitat Needed to Support Recovery:

Fisheries and Oceans Canada (DFO) has identified critical habitat for bull trout; this habitat includes the riparian area 30 metres from the high water mark on both stream banks and shorelines of lakes and reservoirs. Section 5.0 of the Recovery Plan recognizes that many of the biophysical features of bull trout habitat interact with processes outside of the aquatic habitat. But, it only states that some part of the adjacent terrestrial environment should be considered as important habitat for freshwater fish, without explicitly acknowledging the 30-metre zone identified by DFO. AWA believes the Recovery Plan should explicitly recognize and include DFO's identification of bull trout critical habitat, including the 30-metre zone extending from the high water mark at a minimum.

DFO establishes legal protections for critical habitat of SARA listed species, including spawning grounds which are crucial to population recovery efforts. AWA feels that Section 5.0 of the Recovery Plan should identify spawning habitat for bull trout including primary spawning streams, as well as specific, actionable measures that will be taken to ensure their protection.

6.3.3 – Reduce Incidental Angling Mortality and Poaching:

The Recovery Plan acknowledges that incidental angling mortality is a major contributing factor to the decline of bull trout populations and is an ongoing challenge to bull trout conservation in all six watershed basins occupied by this species. If AEP acknowledges this statement to be true, then AWA recommends that AEP implement watershed-specific moratoriums on recreational angling (including catch and release angling), and studying the effect that a moratorium could have on population recovery in those areas. Moratoriums are a tool used for fisheries management elsewhere to mitigate population declines, therefore AWA encourages AEP to recognize the potential benefit of a moratorium on bull trout angling within this Recovery Plan. A watershed-specific moratorium could be implemented as one of the restoration projects outlined in Section 4.2.

Section 6.5 – Emerging Issues and Knowledge Gaps:

AWA supports the Recovery Plan's recognition of climate change as an emerging issue which may have a significant impact on the recovery of bull trout populations in the recovery area. Climate change has the potential to impact any/all recovery activities by increasing water temperature, reducing stream flows, and influencing population distributions. To prepare for any potential climate change impacts, AEP should conduct investigations to identify habitats within the recovery area that could act as thermal refuge for bull trout populations, as done in other jurisdictions.

As water temperature is a significant limiting factor to the recovery of bull trout populations, AWA recommends that AEP implement restoration projects that will seek to maintain or reduce stream temperatures in bull trout habitats – and these projects should be included as part of the Recovery Plan. Measures that could maintain or reduce stream temperature include the prohibition of timber logging in

and around bull trout habitats to minimize soil erosion – helping ensure that more groundwater can be stored to buffer against temperature increases later in the season. Well forested watersheds store more water, for longer periods, allowing cooler water to seep back into streams as temperatures rise.

Other General Comments:

One major concern arising from our review of the Recovery Plan was the exclusion of any mention of fish population biology – specifically as it relates to low abundances or severely depleted populations. Populations that are greatly reduced relative to historical abundances are known to have difficulty recovering, even in examples where fishing moratoria have been implemented to aid recovery such as Atlantic cod (*Gadus morhua*) in Atlantic Canada (see Hutchings & Reynolds, 2004). Bull trout populations within the recovery area face similar circumstances combined with habitat loss and degradation, and the Recovery Plan should acknowledge how recovery efforts will address this issue.

Regarding the entire recovery process as a whole, AWA is interested in learning more details about the relationship between the federal strategy and Alberta’s provincial recovery plan and how responsibilities will be shared. This process seems to remove DFO’s responsibility for a large portion of the design of the bull trout recovery program by offloading it onto the Government of Alberta, which appears – in this context, like an attempt to avoid DFO’s legal responsibility for the recovery program and the protection of this species. Unlike DFO, Alberta has limited legal accountability under SARA or another other legislation, since there is no stewardship agreement between Alberta and Canada to recover any SARA listed species.

This Recovery Plan is intended to serve as a strategic framework for bull trout recovery and is the first step in the recovery process. Throughout the Recovery Plan, there are mentions of an Action Plan, which is the next step in the recovery process. However, no specific timelines or milestones are established to provide any guidance for when that Action Plan should be expected. Target dates or timelines for the Action Plan should be explicitly stated within the Recovery Plan to help guide the next phase of the recovery process and to ensure that bull trout conservation and recovery is prioritized and pursued in a timely manner. This is paramount for the survival of this iconic Alberta species.

AWA is disappointed with the decision to split bull trout recovery measures across two separate planning documents – the Recovery Plan and the Action Plan – since specific, actionable tasks could have been included within this Recovery Plan. Waiting for the creation of an Action Plan to outline next steps will only prolong an already overdue recovery process for threatened bull trout in Alberta.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION



Phillip Meintzer
Conservation Specialist

cc. Pat Fargey, Provincial Species at Risk Specialist, Species at Risk and Stewardship, Alberta Environment and Parks

References:

Hutchings JA, Reynolds JD. Marine Fish Population Collapses: Consequences for Recovery and Extinction Risk. *BioScience*. 2004;54(4):297.