



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

May 4th 2022

Hon. Nate Horner
Minister of Agriculture, Forestry and Rural Economic Development
Government of Alberta
By e-mail: AFRED.minister@gov.ab.ca

Statement of Concern: Request for Proposals Commercial Timber Permit in FMU W01 and W02

Dear Minister Horner:

Alberta Wilderness Association (AWA) is writing to request that Alberta Forestry not proceed with assigning harvest allocations per the Request for Proposals for Commercial Timber Permit in Forest Management Units W01 and W02 (RFP). AWA requests that there first be a transparent, independent cumulative effects assessment of ecological and reforestation prospects in these forest ecosystem oases, and that at a minimum, Alberta Forestry exclude the forests extending northwest of Chip Lake from any Commercial Timber Permit.

As you may know, AWA is an Alberta-based conservation group with over 7,500 members and supporters in Canada and around the world. Founded in 1965, AWA seeks the completion of a protected areas network and good stewardship of Alberta's public lands, waters, and biodiversity for all Canadians.

As per the preamble in the *Forests Amendment Act* (2020), the Alberta government recognizes that "Alberta's vast and abundant forests are an important part of the province's diverse ecosystem that contribute to biodiversity and clean air and water for the benefit of current and future generations of Albertans, including Indigenous peoples". AWA has long advocated for sustainable, ecosystem-based management of Alberta's forests to preserve the many ecosystem values that Albertans enjoy and rely upon. AWA is very concerned that the government of Alberta's policy to greatly increase clearcut-based harvest allocations disregards cumulative effects of multiple land-use and climate change pressures on our forest ecosystems. In Forest Management Units (FMUs) W01 and W02, it is inappropriate to initiate commercial harvest when many long-term harmful impacts could result.

The new Commercial Timber Permit in FMUs W01 and W02 would take intact forests and convert them to disturbed forests that may not recover to pre-disturbance mixed woods. In particular, the forests northwest of Chip Lake are an important regional habitat stronghold for wildlife species such as lynx, wolverine, marten, fisher, wolves, bears, and a tremendous variety of bird life including many species of owls and raptors. In addition, they support elk, mule deer, white tailed deer, and provide important moose wintering habitat. We are concerned that clearcuts in the uplands and slopes northwest of Chip Lake would also reduce the drought and fire resilience of surrounding forests, increase peak water flows

and sediment runoff, and risk the quality of the lake ecosystem which is rich in aquatic vegetation. The islands in the west end of Chip Lake are important moose calving locations and support herons, shorebirds, waterfowl, and falcons.

AWA believes that the short-term economic gains of timber harvest from these lands would be minimal compared to the costs of reduced wildlife habitat and opportunities for recreation and sustainable hunting and trapping. Several Albertans have businesses that rely on these forests, and would be detrimentally affected by the proposed logging. These directly affected stakeholders and rights holders, as well as the public, should have had an opportunity to discuss potential impacts and concerns from commercial harvest. This consultation should have taken place prior to the preparation of the RFP, to determine if logging in this area is in the best interest of Albertans.

Among AWA's concerns in the RFP area are reforestation. Although a reforestation strategy is required as part of the harvest plan for any Commercial Timber Permit, AWA is concerned that there is no requirement to consider how overlapping grazing leases may affect reforestation. Given that a large portion of the lands covered by this RFP are included in grazing reserves, AWA wonders how successful reforestation of these forests might be. Reforestation is essential to returning the harvest areas to forest cover, and is likely to be impacted by the activity of cattle on regenerating cutblocks.

Although there are requirements outlined in the RFP for landscape-level retention, the stand level harvest retention outlined in *Blue Ridge Lumber Inc. Timber harvest planning and operating ground rules* is 3% minimum. This is well below a level that best available evidence, including Alberta forest research, suggests is necessary for maintaining biodiversity within merchantable timber stands. AWA would like to see stronger science-based commitments for in-stand retention that will protect Alberta's valued biodiversity. At a minimum, stand-level retention should be no less than 10%.

As far as AWA knows, there has been no cumulative effects assessment prior to allocating timber harvest in this area. This landscape already experiences extensive pressures from other activities including recreation, industry, grazing, and clearing of forests on private lands without intention to reforest. A cumulative effects assessment must be completed to ensure that commercial harvest does not compromise important remaining landscape values such as water quality, natural flood and drought mitigation, forest wildlife habitat, and biodiversity. There is a strong likelihood that linear disturbances from logging will exceed ecological thresholds and will remain as an enduring feature, further compromising landscape integrity.

It is disturbing that single sector initiatives take precedence over broader public values. This should have been accommodated in regional and sub-regional planning where a transparent process would have been available to allow the public to fully engage and provide input on these type of activities.

At the very least, AWA requests that the forests northwest of Chip Lake not be included in any Commercial Timber Permit due to their importance for regional waters, wildlife habitat and biodiversity. Please let us know how our concerns about consultation, reforestation, structure retention, and cumulative effects will be addressed.

We look forward to your timely response.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'Devon Earl', written in a cursive style.

Devon Earl
Conservation Specialist

Cc: Daniel Lux, ADM, Forestry Division
Ken Greenway, Acting ED, Forest Stewardship and Trade Branch
Seena Handel, Tenure System Specialist, Forest Stewardship and Trade Branch