

Waiting for Alberta to Finish its First Two Caribou Sub-regional Land-Use Plans

By Carolyn Campbell, AWA Conservation Director



Deadlines for important caribou range plans are approaching. Alberta has committed to adopt enforceable land-use plans, plans detailing how we will pursue economic and social priorities within important wildlife habitat thresholds. The province promised that, by the end of 2021, it will finalize its first two such land-use plans covering the Bistcho caribou range in the northwest, and Cold Lake-Christina caribou ranges in the northeast (see maps).

For the first time, decisions by all land users will be integrated across a significant area of Alberta public lands to reduce human-caused land disturbance. The benefits could be profound for our vital forest and wetland ecosystems and the multiple wildlife species that depend on them. Here's a brief round-up of what has already happened and what we're looking for.

The Goals

Two aspects of 'critical habitat' must be managed in each range for caribou to recover to naturally self-sustaining levels. First, Alberta must achieve and maintain a minimum 65% area of 'undisturbed habitat' in each range, within 50-100 years. Today only 6% of Bistcho and 8% of Cold Lake caribou range is undisturbed. Industry, not wildfire, is responsible for most of that disturbance. The second part is that Alberta must maintain enough good quality older forest and wetlands habitat ('biophysical' habitat) for caribou life cycle needs while disturbed habitat recovers. Thirty-nine percent of Bistcho and 46% of Cold Lake is now considered biophysical habitat.

Alberta only agreed to manage ranges to

meet these evidence-based caribou 'critical habitat' requirements when it signed the October 2020 Caribou Conservation Agreement with the federal government. In turn, AWA believes that the 2019 lawsuit Ecojustice filed on behalf of AWA, Athabasca Chipewyan First Nation, Mikisew Cree First Nation, and David Suzuki Foundation motivated Alberta to sign this Agreement. That lawsuit sought a habitat protection order under SARA for northeastern Alberta boreal caribou. We discontinued the lawsuit on Oct. 22, 2020, after receiving word that the Minister of Environment and Climate Change had recommended that Cabinet approve such an order. A day later the federal government indicated that, for the time being, it would pursue the new collaborative agreement with Alberta instead of an order under the *Species at Risk Act*.

The Canada-Alberta Agreement specifies deadlines for Alberta to finalize enforceable range plans, with Bistcho and Cold Lake-Christina due by the end of 2021.

The Approach

Alberta has committed to create enforceable land-use plans for sub-regions that are larger than caribou ranges. In November 2019 it launched three task forces composed of rights holders and stakeholders to make recommendations for three sub-regions: Bistcho Lake, Cold Lake and the Upper Smoky. The Upper Smoky plan is due in 2022. AWA was a member of all these task forces.

Operating on a consensus model, the task forces provided recommendations to support sub-regional plan development. The Cold Lake task force met until April 2020 and pro-

vided 41 recommendations, of which 39 had consensus. The Bistcho Lake task force also met until April 2020 and all 29 of its recommendations achieved consensus.

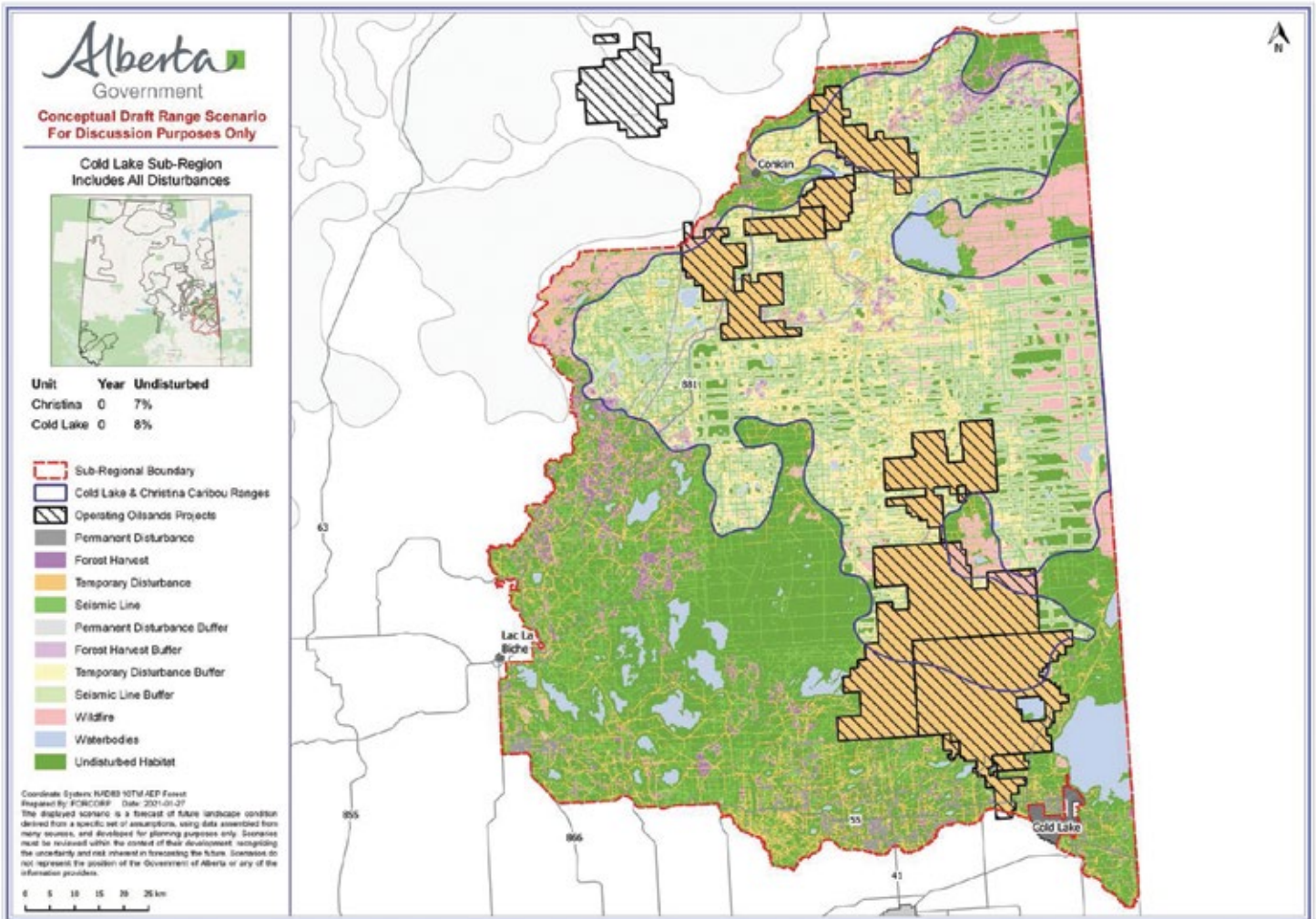
Both Bistcho Lake and Cold Lake draft sub-regional plans were released in March 2021 for public, stakeholder and Indigenous engagement. At that time the Bistcho Lake and Cold Lake task force recommendations became public. As of November 2021, the government had not released final plans.

The draft plans

AWA commented on the draft plans to government and encouraged our members and the general public to provide comments too.

On the positive side, both draft plans reflect a landmark shift towards compulsory integrated land management by all land users to minimize cumulative land disturbance. This management focus covers infrastructure, cut-blocks, and all forms of access. Active pipeline corridors and transmission lines will be revegetated to much narrower widths by operators. The plans intend to restore thousands of kilometres of wide seismic lines that have not recovered to conform to the surrounding native vegetation. AWA supports the draft Cold Lake Plan's concept of setting specific wetland disturbance limits in each planning unit to advance biodiversity goals; we were disappointed that Bistcho didn't do this.

AWA believes that three big flaws of the draft plans must be corrected. First, there must be a much stronger commitment to a process of collaborating with Indigenous communities to support their land use goals. To align with consensus statements by both task forces, both plans must commit to a



Only 8% of Cold Lake caribou ranges are considered undisturbed caribou habitat. A year-end deadline is approaching for Alberta to adopt enforceable plans for these ranges that, for the first time, will integrate land-use decisions across significant areas of public lands to maintain and recover wildlife habitat. CREDIT: GOVERNMENT OF ALBERTA, 2021.

process to identify opportunities to establish conservation areas important for Indigenous people. In the Bistcho Lake area, AWA strongly believes that this process should produce an Indigenous protected and conserved area (IPCA).

Second, in the crucial first decade, neither plan addresses urgently enough the need to restore seismic and temporary roads. If actions are taken over the next ten years to restore significant amounts of seismic and other low value legacy features it will set these features on a trajectory to reach 'undisturbed' status some 40 years from now. Deadlines for removing oil and gas infrastructure and short-term roads are also missing. Comprehensive mandatory actions and funding arrangements are urgently needed in the next five years to set this course. Instead, the plans vaguely assume the work will be done over 40 years. As well, forestry impacts grow rath-

er than shrink in the first decades. Too many hard decisions still seem very far off.

Related to the above problems, the map of Bistcho Lake's draft Access Management Plan seems to anticipate building new roads in all of the many planning units, including in areas that are largely intact now and provide important wildlife habitat connectivity. Not a single planning unit is dedicated to long-term legal protection and roadless areas. The permafrost soils and extensive interconnected peat wetlands of this northern boreal landscape are highly sensitive to disturbance and difficult to restore. The Bistcho plan should recognize the need to preserve large intact landscapes.

Third, the plans assume zero new wildfire, in sub-regions that experience frequent natural fire disturbance. Today both Bistcho and Cold Lake ranges are about 20% disturbed by wildfire. Without considering wildfire the

plans assume that the undisturbed habitat thresholds can be met sooner than is likely to be the case. When only industrial and road disturbance is considered, the Bistcho caribou range is projected to reach roughly 80% undisturbed status in eight decades. Without considering the inevitability of wildfire, the Cold Lake-Christina range will reach the 65% undisturbed threshold in 100 years. This severely over-estimates future caribou habitat availability. While the draft documents are upfront about this assumption, it's still unacceptable. Anticipated wildfire should be included and anthropogenic disturbance must be managed accordingly.

As we anticipate the release of these finalized sub-regional plans, AWA will continue to hold Alberta and Canada to their commitments to ensure caribou ranges are at last responsibly managed. 🐾