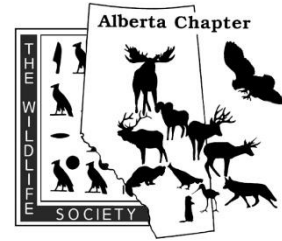




Alberta Wilderness
Association



Honourable Rebecca Schulz
Minister of Environment and Protected Areas

Sent via E-mail: epa.minister@gov.ab.ca

Dear Minister Schulz,

CPAWS Northern Alberta, Alberta Wilderness Association and The Alberta Chapter of the Wildlife Society are writing today to raise significant concerns regarding the impacts of the 2023 wildfire season on at-risk caribou recovery progress, and the significant gaps in sub regional planning it has highlighted.

According to ABMI's recent report, *Effects of 2023 Wildfires in Alberta*, the 2023 forest fires season was one of the most intense in recent history - 6.6 % of forested area burned across all ages and types of forests¹. Alarmingly, 2023 wildfires burned 5.2% of preferred woodland caribou habitat across the province, including 12.7% of preferred habitat in the Bistcho range, and 13.7% of preferred habitat in the Caribou Mountains range. This burn represents enormous habitat loss for herds that are already well below the minimum amount of undisturbed habitat necessary for their recovery. Our organizations are doubly concerned that the Bistcho sub-regional plan is not responsive enough to address the change in available habitat caused by wildfire.

Woodland caribou (boreal population) have been listed on Canada's Species At Risk Act (SARA) since 2003. Under this federal legislation, the province must provide effective habitat protections for woodland caribou. Unfortunately, after decades of increasing disturbance, caribou don't have the luxury of time or mistakes caused by further delays in action and planning. The success or failure of range plans will be determined by how aggressively they are implemented and enforced by Alberta in the next 10 years—and the 2023 fire season has highlighted limitations in the ability of the only two existing plans (Bistcho and Cold Lake) to adjust to disturbance caused by wildfire. The lack of inclusion of wildfire in the modeling scenarios for the plans is a criticism ENGOs have raised on numerous occasions throughout the development of the plans.

In an analysis of area burned in 2023 we found that more than 1% of caribou range was burned in 9 out of 12 Boreal Woodland caribou ranges.²

¹ Huggard, D., B. Allen, and D.R. Roberts. 2024. Effects of 2023 Wildfires in Alberta. ABMI Science Letters Issue 8: March, 2024. Available at: <https://abmi.ca/home/publications/601-650/642>.

² Alberta Government. (2023, November). FireMAP KMZ [Shapefile]. Retrieved from https://www.alberta.ca/system/files/custom_downloaded_images/fpt-accessing-wildfire-gis-data.pdf

LOCAL RANGE	Range Extent (ha)	Fire Extent (ha)	Percent Fire Affected
Bistcho	1,435,810	115,160	8.0
Caribou Mountains	2,065,873	425,104	20.6
Chinchaga	1,764,364	122,528	6.9
Cold Lake	672,586	5,388	0.8
East Side Athabasca	1,311,902	7,034	0.5
Little Smoky	308,380	16,942	5.5
Nipisi	210,436	6,524	3.1
Red Earth	2,470,203	152,060	6.2
Richardson	707,390	2,282	0.3
Slave Lake	151,623	5,557	3.7
West Side Athabasca	1,570,712	48,543	3.1
Yates	522,344	40,608	7.8

The Bistcho sub-regional plan, finalized in 2022 includes a 100-year blueprint to meet habitat objectives for caribou recovery, which includes achieving 65% undisturbed caribou habitat in each range by year 100. The plan calls for adaptive management and monitoring for natural disturbance, however a review of the entire plan is the only course of action if natural disturbances trigger the following scenarios:

18.0.1 If the annual total natural disturbance within the caribou range exceeds 1%.

18.0.2 If within eight years of the plan coming into force the cumulative new natural disturbance area exceeds 4% of all caribou range within the sub-region.

18.0.3 If within 10 years of the plan coming into force the cumulative new natural disturbance area exceeds 4% of the entire sub-region.

Now, one year after the plan was finalized, and before enabling regulations for the plan have been passed, a review has been triggered based on all three of those scenarios. Had subregional plans been in place with the same provisions for all caribou herds in the province, the 2023 wildfire season would have triggered a review for plans covering 9 caribou ranges. This is not an efficient way to respond to natural disturbance, nor is it expedient enough to be effective for caribou recovery.

Provisions must be included within the sub regional plans to account and adjust for wildfire disturbance, without requiring a full-scale review.

The boreal forest is a fire driven ecosystem, however the uncertainty in ability to predict wildfire in the boreal reinforces the need to apply precaution for caribou when planning restoration, disturbance, and

access within caribou ranges.³ Wildfire disturbance must be built into the plans to ensure that the inevitable disturbance by wildfire does not require a slow and cumbersome process of re-opening the plans. The 2023 wildfire season burned old and young forests alike, highlighting that forest harvest is not an appropriate replacement for fire, especially considering the precarity of caribou in Alberta.⁴ The lack of inclusion of wildfire in the plans creates an overly optimistic view of habitat recovery over the next 100 years and puts planned disturbance of already scarce habitat by industry at an advantage over caribou. CPAWS Northern Alberta, the Alberta Wilderness Association and the Alberta Chapter of the Wildlife Society support lower thresholds for habitat disturbance across all caribou ranges in the Government of Alberta's sub-regional plans to account for potential wildfire impact. Response to wildfire should be more thoughtfully integrated into access management and industrial disturbance planning. A more nimble response to wildfire is needed within all caribou subregional plans, and associated limitation on other disturbances.

More explicitly, the plans must include specific provisions for catastrophic habitat loss due to wildfire within that trigger a change in other allowable access and habitat disturbances from forest harvest, oil and gas, and other industrial uses, that is not dependent on plan review. This precautionary approach is even more prudent given the expected increases in wildfires resulting from climate change and uncertainties in wildfire prediction abilities.

The situation for caribou in Alberta was dire before the impacts of the 2023 wildfire season and action to protect and recover the species has been dismally slow. Caribou recovery actions are far outpaced by industrial development and the changing environment. The 2023 wildfire season should highlight the need for more proactive accounting for disturbance, natural and anthropogenic, in all future caribou sub regional plans. This catastrophic wildfire season should be taken into consideration within the, now imminently and urgently required, review of the Bistcho Sub-Regional plan.

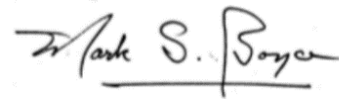
Sincerely,



Kecia Kerr, Executive Director
CPAWS Northern Alberta



Phillip Meintzer, Conservation
Specialist
Alberta Wilderness Association



Mark Boyce, Chair of the
Conservation Affairs Committee
Alberta Chapter of the Wildlife
Society

³ Beverly, J. (2024, April 4). (Rethinking) Fire risk and forest management [Webinar]. CPAWS Northern and Southern Alberta. <https://www.youtube.com/watch?v=DHpP9JUimms>

⁴ Huggard, D., B. Allen, and D.R. Roberts. 2024. Effects of 2023 Wildfires in Alberta. ABMI Science Letters Issue 8: March, 2024. Available at: <https://abmi.ca/home/publications/601-650/642>.

CC:

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