

## **NORTHWEST SPECIES AT RISK COMMITTEE**

**Town of High Level Office  
High Level, AB**

**Wednesday, March 28, 2018 at 5:30 p.m.**

### **AGENDA**

1. Call to Order
2. Adoption of the Agenda
3. Minutes Page 3
4. Terms of Reference Page 15
5. FCM Resolution
6. Next Steps
  - a) Inter-jurisdictional Strategy
  - b) Federal Strategy
  - c) Now that Parks are Tabled, Focus on Other Details and Funding (FRIAA, Industry, etc.), CAPP, FPAC, ACPA
  - d) Communications
  - e) Minister's Caribou Advisory Committee
7. Budget/Expenses (Handout)
8. Staffing/Roles
9. Associate Membership
10. Data – Economics, Science = Get Trappers, First Nations, etc.

- 11.RFP – ACP Grant Page 19
- 12.Minister’s Award (Handout)
- 13.Committee Review of Draft Provincial Woodland Caribou Range Plan Page 25
- 14.North American Caribou Workshop (Handout)
- 15.Committee Member Updates: (Short) Round Table Discussion
- 16.
- 17.
- 18. Next Meeting Date(s)
- 19. Adjournment

**Northwest Species at Risk Committee**

**Minutes**

**Town of High Level Office  
High Level, AB**

**Monday, January 29, 2018 at 4:00 p.m.**

<b>PRESENT:</b>	Lisa Wardley Crystal McAteer Terry Ungarian Eric Jorgensen Linda Halabisky Mike Morgan Miron Croy Jacquie Bateman Jessica Juneau	Chair, Deputy Reeve, Mackenzie County Vice Chair, Mayor, Town of High Level Reeve, County of Northern Lights Councillor, Mackenzie County Councillor, County of Northern Lights Councillor, Town of High Level Councillor, Clear Hills County Councillor, Mackenzie County Councillor, Town of Rainbow Lake
<b>REGRETS:</b>	Michelle Farris Chris Mitchell Brent Reese Jason Ruecker Keith Hutchinson Sunni-Jeanne Walker	Mayor, Town of Rainbow Lake Councillor, Town of Rainbow Lake Councillor, County of Northern Lights Reeve, Clear Hills County Councillor, Town of Manning Councillor, Town of Manning
<b>ADMINISTRATION:</b>	Byron Peters Dan Fletcher Laura Braun	Deputy CAO, Mackenzie County CAO, Town of High Level Administrative Assistant/ Recording Secretary, Mackenzie County
<b>ALSO PRESENT:</b>	Diana McQueen Keyra Hawley Yurchi	DMC Consulting (via teleconference) Atco Biologist

**MOTION**

**1. Call to Order**

Lisa Wardley called the meeting to order at 4:20 p.m.

**2. Adoption of the Agenda**

**18-01-001**

**MOVED** by Mike Morgan

That the agenda be adopted with the following additions and amendments:

- 11. d) Communication with Bernard Meneen
- e) NWT Communication
- f) Jason Kenney Visit

Move # 13. Delegation to # 5.

Move # 5. Committee Member Updates to # 16.

**CARRIED**

**3. Adoption of the Minutes**

**18-01-002**

**MOVED** by Terry Ungarian

That the minutes from the December 20, 2017 NWSAR Committee meeting be adopted as presented.

**CARRIED**

**4. Terms of Reference**

For information.

**5. Delegation: Keyra Hawley Yurchi**

Keyra Hawley Yurchi was very interested in the range management planning that the committee was doing. She thought that the NWSAR had done a good job with consultation which was something they were working on as well. They value their northern Alberta customers and would like to keep their business. When restoring right of ways, they need to be kept electrically safe according to requirements and regulations. Atco is not restoring right of ways with tall or overgrown vegetation. In the Draft Range Plans, there are actually no guidelines for maintenance on restoration.

Atco wants to know what will be done to protect the right of ways which are popular for recreation. They would like to partner with the communities in the Northwest Species at Risk region to figure out how to best deliver the amenities necessary for survival. They definitely don't want something like the eastern outage happening again.

Atco had assembled their own consultation group since they haven't been invited and allowed to give their own opinion. They have had good communication with forestry. They also have a document ready to respond to the draft range plans but it is just waiting on a few different things. This is will be a public document so the committee will be able to look at it once it is released.

They are very invested in these communities. Safe and reliable power is important to them. They are aware of the hard deadlines coming up.

They also try to use existing corridors when possible because they want to minimize their footprint but they also need to look at access and make sure that there is a way of getting in.

Lisa Wardley called a recess at 5:30 p.m. and reconvened at 5:46 p.m.

#### 6. Petition

At the open houses, many people were asking how they could actively join the cause through a petition. Committee discussed how to properly execute on this idea. The prayer must be understood by the constituents but also should be worded correctly for the provincial government to certify it. A timeline must also be set for when the petition is ready to be sent out to the different municipalities and when they need to be collected.

**MOVED** by Crystal McAteer

**18-01-003**

That Jacquie Bateman be responsible for the distribution and collection of the petition.

**CARRIED**

#### 7. Provincial Public Meetings & Grow the North

Committee decided on who was going where for the eight meetings that the provincial government is hosting throughout the province.

**18-01-004**

**MOVED** by Mike Morgan

That the Northwest Species at Risk book the chartered plane to fly to Fort McMurray for the Public Meeting.

**CARRIED**

Discussion on the committee's plans for the Grow the North booth and how to continually raise awareness for the region's endangered future.

**8. February 7<sup>th</sup> & 8<sup>th</sup>**

The province will be hosting bilateral meetings with First Nations, industries and non-government organizations. Committee members went over what might be shared at these meetings and the importance of attending.

**9. Legal Opinion**

Byron Peters gave an update on a meeting with Miller Thompson. Questions came up whether they should pursue a legal option or how they could approach this differently.

Lisa Wardley called a recess at 7:02 p.m. and reconvened at 7:12 p.m.

**10. Brucellosis in Caribou**

Lisa Wardley went over the brucellosis information sheet. General discussion followed regarding brucellosis in caribou.

**11. Communications**

**a) Danielle Smith Show**

Committee thought Danielle Smith did a good job with Byron Peters' interview for the shortage of natural gas in Mackenzie County. CBC North is also quite aware of the caribou situation. Committee will send their information to different media productions.

### **b) Video**

Committee watched the three minute video that Long Sleeve Production put together. Another fifteen minute video should be available in the near future. Other five minute videos could be pulled out after. They will need to be strategic as to where they send the video to get the desired response.

### **c) Other Media**

Committee would like if postcards could be designed along with paid postage for constituents to write a note and send to the provincial government.

### **d) Communication with Bernard Meneen**

Crystal McAteer will set a meeting with Bernard Meneen during the time that they are in Edmonton for the February 7<sup>th</sup> and 8<sup>th</sup> meetings.

### **e) NWT Communication**

Diana McQueen gave a report on the communication that she had with the Northwest Territories. The government is nearly done with their plan and the committee will receive a copy of it once it is released.

### **f) Jason Kenney Visit**

Jason Kenney is in Peace River February 15, 2018. Committee would like to have a meeting with Jason Kenney.

Requests to host another two open houses were received from Clear Hills County and Cameron Carter. Committee decided to host another one on February 5, 2018 in Fort Vermilion.

## **12. Global Restoration**

Global Restoration gave quotes on what it would take to restore two townships. This would be good information for the committee to have. Discussion on where the money would come from if they decide to go through with this and if there are any other options.

### **13. Associate Membership**

**18-01-005**

**MOVED** by Crystal McAteer

That the Northwest Species at Risk accept the Municipal District of Fairview as an Associate Member.

**CARRIED**

### **14. Six Week Action Plan**

- Petition
- Dave Larsen
- Communications (Video)
  - What do we want to accomplish from the video?  
Should we add the petition or added communication or is this our end game after this?
- Summary of what we heard
- Postcards (pricing)
- Meetings
- Order more business cards

### **15. Long Term Plans**

#### **a) Five Year Reviews**

The provincial government must complete a review every five years so there is still opportunity for an ongoing conversation even after the final plan is released.

#### **b) Northern Alberta Boreal Stewardship Society**

A discussion that came up if the committee would get more attention if they were called a stewardship society. It might make a difference if they would show up with CPAWS, etc.

### **16. Committee Member Updates: (Short) Round Table Discussion**

Keyra Hawley Yurchi: I appreciate the opportunity to have a seat at the table. I also appreciate the sharing of information.



Terry Ungarian: Could we get a charter bus for March 6, 2018 and see how much that'll cost from High Level, Manning, and Fairview?

Lisa Wardley: Yes, let's get the information.

Terry Ungarian: There was also a Eureka River attendee that wrote a letter and gave his permission for us to share it.

Dan Fletcher: We should have more clarity on filling the advertised position within the next week or two.

Eric Jorgensen: Tom Burton called. The issue was that AAMDC were required to provide an excel document but they don't have it. This could be an opportunity to put our information in the spreadsheet.

### **17. Adjournment**

**18-01-006**

**MOVED** by Linda Halabisky

That the Northwest Species at Risk Committee meeting be adjourned at 9:50 p.m.

**CARRIED**

These minutes were adopted this \_\_\_\_\_

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Lisa Wardley, Chair

**Northwest Species at Risk Committee**

**SUMMARY**

**Town of High Level Office  
High Level, AB**

**Tuesday, March 6, 2018 at 1:00 p.m.**

**PRESENT:** Lisa Wardley Chair, Deputy Reeve, Mackenzie County  
Crystal McAteer Vice Chair, Mayor, Town of High Level  
Terry Ungarian Reeve, County of Northern Lights  
Eric Jorgensen Councillor, Mackenzie County  
Linda Halabisky Councillor, County of Northern Lights  
Miron Croy Councillor, Clear Hills County  
Jacquie Bateman Councillor, Mackenzie County  
Chris Mitchell Councillor, Town of Rainbow Lake  
Hayley Gavin Town of High Level

**REGRETS:**

**ADMINISTRATION:** Byron Peters Deputy CAO, Mackenzie County  
Dan Fletcher CAO, Town of High Level  
Laura Braun Administrative Assistant/ Recording Secretary, Mackenzie County

**ALSO PRESENT:** Isaac Zacharias  
Ray Hilts Alberta Forest Alliance  
Jon Mcquinn Norbord  
Dave West Tolko  
Chris Montgomery CAPP  
Brian Boucher Boucher Brothers  
Kris Boucher Brothers  
Tanya Lindley Councillor, Town of Rainbow Lake  
Erin Donovan Atco Biologist  
Garret Tomlinson  
Greg Rycroft  
Keyra Hawley Yurchi Atco Biologist  
Peter Frixel  
James Barnhill Husky Energy

**1. Introductions**

Everyone introduced themselves, who they were and who they were with.

## **2. Discussion**

After Lisa Wardley went over what the committee was doing and a few of the things that they were aiming for, members of industry were asked what their goals were as well as if they'd be interested in joining a stewardship society as it could fund research that would mutually benefit everyone.

The conversation began with many voicing that they would like the definition of disturbance and socioeconomic to change. Others would like the definition of critical habitat to change. The province is not expected to go and look back on buffer zones and definitions. They've laid it out and it's not likely that they'll go back. The province needs reassurance that they're meeting their 65% undisturbed. It is also believed that the provincial government would move past finalizing the range plans and go straight to the range specific plans.

Since it has been mainly a political debate, it would have to be a grassroots movement from here on out which many agreed with.

It was asked how everyone wanted to move forward together. Would it be to push science? Science must be viewed from both sides. A middle ground must be found without sacrificing the communities. In order to find middle ground, the provincial government and municipalities will need to work together but at this point, there's no moving past changing the 65% undisturbed.

Bringing Indigenous groups in as part of the solution is important. There needs to be an understanding that there would be restricted access to trap lines along with limited resources nearby the trap lines since there would no longer be communities that would be able to survive without industry.

Even though it would be nice to get additional science or

partnerships to prove that there isn't as much disturbance as the federal government is saying, there have been companies like DMI that have shown them that there are other ways to approach the range planning but they don't have any interest in it. The way that the provincial government is approaching this, how some understood it, is that they know there isn't as much linear disturbance as the government is saying there is so in the next seven months, they'll be able to say that there's been improvement and that they're following up on their promises to the federal government even though there's many cutlines that have effectively been restored over the last fifteen years.

Some wondered what it would mean if they reopened the plan because of fires. Industry would have to make up for the fires even though there are municipalities that have many fires throughout the year.

An option that the group thought of was to talk to the government about what can be done and how to build credibility. Many liked the idea of starting to influence the government to make decisions by working together locally to push some issues. It would be instrumental for industry groups and municipalities to work together and start pushing in a different direction.

Eric Jorgenson suggested that putting cameras and listening devices out in the ranges would be beneficial but it would be something that municipalities would have to take on themselves to do.

It was also suggested that everyone move through this cycle of planning and to influence the influencer along with making this into a grassroots movement.

Tolko has been working on a project called Northwest Alberta Collaboration for the last three years. They would like to offer a session that showcases what the project is all about. Some of it includes what has been successful and what hasn't for municipalities and industry.

Everyone at the meeting was encouraged to voice their opinion at the public session happening later that day.

A member of industry's' biggest concern was that he was standing up for employees and contractors because any loss of tenure for their company meant loss of jobs.



## TERMS OF REFERENCE

### NORTHWEST SPECIES AT RISK COMMITTEE

#### **Background:**

The northwest region of Alberta encompasses high economic development value in a variety of natural resource sectors. Notwithstanding this, the region is requested to carry the highest burden of environmental protection of any other region within Alberta.

Current and proposed Provincial policy and strategies requires the Lower Peace Region to subsidize economic activity in other regions; to allow, both, the Federal and Provincial governments to achieve conservation targets for the natural environment. Cumulatively, multiple conservation initiatives and species at risk recovery strategies have the ability to negatively impact the rural communities of northwest Alberta.

We, the local tenants of this region have collaborated; in an attempt to secure smart economic growth, a sustained quality of life, and well-balanced environmental protection for our future generations. Through the use of optimal adaptive management, transparent stakeholder engagement, and effective environmental stewardship; we endeavour to achieve this purpose.

#### **Purpose:**

To collectively provide and share information, ideas and resources; relating to the continued and future prosperity of northwest Alberta. Instill effective regional adaptive management and transparency which allows all stakeholders to play a vital role in shaping our collective future. Develop tangible solutions founded upon an evidence-based approach, to ensure a balance of smart economic growth, a sustained quality of life, and an enhanced natural environment; for all of our businesses, communities and wildlife.

#### **Responsibilities:**

To ensure that any impending species recovery or conservation initiative, that has the ability to affect the smart growth of northwest Alberta; is prefaced with a thorough regional socio-economic impact analysis.

To proactively work with all other levels of government, including the First Nations; to create well-balanced working groups; with all key stakeholders relevant to impending conservation areas and species recovery.

Emphasizing that, northwest Alberta currently encompasses a vast amount of protected lands. Impending species recovery and conservation initiatives should aim to enhance the value of

these areas for species at risk recovery and biodiversity, rather than seeking to protect unjustifiable additional areas of land.

**Structure:**

Two councillors and/or Members at Large and an alternate appointed by each of the founding municipalities.

Alternates may attend all meetings.

Founding municipalities consist of:

- County of Northern Lights
- Mackenzie County
- Town of High Level
- Town of Rainbow Lake
- Clear Hills County
- Town of Manning

Associate membership is available to other municipalities. Associate member shall not have voting rights.

Mackenzie County is the administrative lead for the committee, with administrative support from each of the founding municipalities.

The administrative lead will prepare and provide the agenda for all meetings.

Meetings are open to the public as per Section 197 and Section 198 of the Municipal Government Act.

Meetings may, in part, be closed to the public if matters to be addressed are recognized under; Section 197(2) of the Municipal Government Act, and/or Division 2 – Part 1 of the Freedom of Information and Protection of Privacy Act.

The committee shall pursue grant opportunities to fund any larger projects, with Mackenzie County as the grant sponsor and/or lead.

**Quorum and Costs:**

Decisions shall be reached by consensus, consisting of two appointed members from each of the founding municipalities. Alternates shall not be considered for consensus unless standing in for an appointed member.



Meetings shall be hosted by the Town of High Level, at the Town of High Level Office, and meeting costs will be shared by the founding municipalities.

Each Municipality and other delegates are expected to cover the costs of their members. Additional costs, such as those derived from committee motions, will be subject to additional discussion and approval from each of the founding municipalities.

All decisions reached by consensus; which are within the scope of the Terms of Reference, are binding upon all municipalities.

Associate members shall pay a \$1000 Associate Membership fee.

**Communication:**

An electronic data sharing forum will be created and maintained, with access for all of the committee members, and meetings will be scheduled quarterly, or as required by the Chair.



Schedule "A"

**Request for Proposals**

**Cumulative Effects Assessment  
(CEA)**

**PROJECT OVERVIEW**

**AND DESCRIPTION OF**

**WORK**

1. **Overview of Project**

Project is funded under the Albert Community Partnership Grant Program with the objective to develop a Cumulative Effects Assessment (CEA) Inter-Municipal Plan in collaboration with the following 4 participating Municipalities with MacKenzie County as the Managing Partner:

- MacKenzie County
- County of Northern Lights
- Town of High Level and
- Town of Rainbow Lake

2. **Purpose of the Project**

The Cumulative Effects Assessment document will be considered an Inter-Municipal Plan that will provide the partnering Municipalities direction and a clear vision for environmental, social and economic area drivers within the jurisdictional borders that encompass the Northwest provincial boundaries.

The Project has been planned intentionally to have the municipalities build robust relationships by sharing of information and resources that addresses the area's vast resources in the most responsible manner possible.

3. **Objectives. Scope of the planning services and deliverables**

The consulting services that the County is seeking in developing the CEA document will include, but is not limited to, the following:

- consultative and advisory services;
- information assembly & processing;
- contract management;
- system modelling;
- technical review;
- facilitating meetings, Public Open Houses and Committee Workshops;
- project scheduling;
- formal presentations to the CEA Partnering Municipalities Committee

The Consultant will be accountable for all aspects of the Project including the administrative and management functions. It is expected that the Consultant will

manage all facets of the Project to include, however not limited, to the following knowledge, undertakings, responsibilities and work:

***The Consultant will be familiar with:***

- i. relevant municipal information and documents pertaining to this Project;
- ii. the Alberta Historical Resource Act and Municipal Government Act;
- iii. Historic Resources Impact Assessments;
- iv. Planning and Development policies and bylaws as they relate to Intermunicipal collaboration;
- v. the study areas and ensuring maximum values are achieved for the various the components of the project;
- vi. the Project requirements as they relate to the Alberta Community Partnership Regional Collaboration Program Guidelines;
- vii. providing analysis to determine existing conditions;
- viii. evaluating various alternatives & providing recommendations of preferred;
- ix. understanding the scope of activities and interests involved within the subject areas;
- x. ability to ensure maximum values are obtained that may require adjustments to the assessment therefore amending tradeoffs among the environmental, social and economic expected outcomes;
- xi. identifying spatially explicit and non-spatial models required to assess relevant indicators;
- xii. acquiring data required in development of models;
- xiii. development of the cumulative effects assessment models;

- xiv. provision of learnings and technology transfer.

**Consultant's responsibilities to also include:**

1. development of a Communications Plan that includes however not limited to the following communication aspects:
  - will include a public engagement program;
  - provide the methodology in engaging public;
  - preparation of all public information as needed;
  - communicating regular (weekly/monthly) Project progress reports;
  - formal presentations to the Committee;
- ii. compiling relevant information and evaluation of existing conditions from each Municipality;
- iii. initial start-up meeting to be facilitated by the Consultant and to be held immediately upon the Consultant's authorization to proceed with the Project;
- iv. facilitate all meetings including Public Open House, Committee Workshop sessions and formal Committee meetings;
- v. undertake the cumulative effects assessment collaboratively for the betterment of the four (4) Partner Municipalities;
- vi. development of a management system that addresses tradeoffs relative to balancing environmental, social and economic challenges;
- vii. Review all maps, aerial photography, and planning information related to the Project;
- viii. Preparation of drawings for discussion purpose;
- ix. Baseline data acquisition and analysis using various available data sources such as base mapping, GIS information, inventories and existing modelling achieved from previous analytical works;

- x. Determine all key natural resources relevant to the Project and how to best utilize the resources ensuring the preservation of environment while maintaining, and where possible, improving the quality of life for all residents and businesses;
- xi. Develop spatially explicit models and categorize the key Outcomes relative to the Indicators identified with respect to the following social, environmental and economic sensitive areas:
  - Sensitive ecology areas such as Riparian areas, wetlands, species at risk areas, Caribou range plans;
  - Habitats of various species inclusive of species at risk and species rich areas;
  - Natural vegetation patch sizes, landscaping patterns, slopes/erosion potential problem areas;
  - Cultural, historical, scenic areas;
  - Agricultural production including potential of loss of farmlands;
  - Public Infrastructure cost challenges both capital and operational aspects;
  - Regional economic diversity and sustainability providing present and future employment opportunities;
  - Water supply quality and quantity challenges as it relates to Water for Life provincial policies;
- vi. Providing a Final Cumulative Effects Assessment document and formally presenting the document to the Partner Municipalities Committee for formal approval.

#### **4. Project Management**

- i. initial meeting with County staff to review Project schedule, expectations and potential issues are discussed and addressed;
- ii. responsible in managing all the planning and technical aspects of the Project;
- iii. as part of the Communication Plan, to ensure regular meetings are held;
- iv. all Project meetings to be recorded and will include a Project Actions List or

some other method that captures project actions and status of each action;

- v. ensure that the Project is on schedule and costs are maintained within the approved budget;
- vi. Project milestones to be established and reported in a timely manner

**5. Municipalities through its Committee and Managing Partner will provide:**

- Relevant background information pertaining to the Project;
- Identifying regulatory, internal and external stakeholders;
- Internal resources such as access to GIS data information;
- Area reports, studies & plans;
- Resource information and material from previous assessments;
- Facilitate discussions with relevant contacts;
- Assist with identifying Key Indicators & Outcomes;
- Assist with Public Open House and Committee Workshops;
- Committee will provide the oversight on the Project that will include Administration, Contractor and Consultant reporting to the Committee.

***6. The Proposed Timeline (Project Schedule):***

Proposal to include proposed milestone dates, completion date, report delivery dates, presentation to Committee, Public Open House, Workshop, final report date, etc.



**NWSAR Committee Review of the Draft Provincial Woodland Caribou Range Plan**

This document aims to provide the Northwest Species at Risk Committee’s concerns with the Draft Provincial Woodland Caribou Range Plan, released on December 19, 2017. Below we highlight: the components that we believe should be struck; the components that we can accommodate; and the components that require revision to include our locally-developed recommendations for the benefit of both woodland caribou (boreal population) survival and recovery, and the benefit of future economic prosperity in Northwest Alberta.

Key:

Components that we believe should be struck are highlighted in red.

Components that we can accommodate are highlighted in blue.

Components that require editing are underlined and a revision/explanation is provided.

Documents that have been reviewed:

Draft Provincial Woodland Caribou Range Plan (2017)	Alberta	✓
Recovery Strategy for the Woodland Caribou ( <i>Rangifer tarandus caribou</i> ), Boreal population in Canada (2012)	Federal	✓
Action Plan for the Woodland Caribou ( <i>Rangifer tarandus caribou</i> ), Boreal population, in Canada (2017)	Federal	✓
Report on the Progress of Recovery Strategy Implementation for the Woodland Caribou ( <i>Rangifer tarandus caribou</i> ), Boreal population, in Canada for the Period 2012-2017 (2017)	Federal	✓
Restoration and Establishment Framework for Legacy Seismic Lines (2016)	Alberta	x
Alberta Land Stewardship Act (2009) **haven’t reviewed recently	Alberta	x
Land Use Framework	Alberta	✓

## Draft Provincial Woodland Caribou Range Plan:

### **Executive Summary**

**Page 8:** *Ensure assessments, monitoring and research occurs, as needed, to track Range Plan accomplishments.*

Many of the methods proposed in the Draft Range Plan are experimental in nature with no guarantee of success. Caribou ranges, particularly in the Northwest, have limited available data and research once compared to other ranges further south and to the east. Therefore, monitoring and research should be a priority, with adequate funding made available, to better understand the successes and shortcomings of some proposed methods [implemented] to recover the caribou in Northwest Alberta.

### **Range Plan Development Process**

**Page 19:** *In areas where transboundary local populations of caribou occur (i.e. caribou that Alberta shares with national parks or adjacent provinces and territories), communication and information sharing was, or will be, undertaken with neighbouring jurisdictions to ensure that: 1) the current information and learnings are shared, and 2) caribou recovery actions are harmonized.*

To date, these communications and information sharing have been non-existent in the public realm. Albertans have a right to fully understand the harmonized approach being implemented by multiple jurisdictions for “shared” caribou herds; the success of their survival and recovery hangs on the ability of multiple jurisdictional synchronizing recovery efforts.

For example, there is little sense in establishing large conservation areas or extensive, costly restoration efforts in one jurisdiction for caribou, who on their own volition, can cross into an adjacent jurisdiction where restoration efforts do not exist and/or human harvest of the same caribou is legal and unregulated. In line with *recommendation 10* of the NWSAR report, inter-jurisdictional harmonized planning efforts are required to be documented in this Range Plan.

### **Managing to 65% Undisturbed Habitat**

**Page 27:** *The federal proposed Action Plan for the Woodland Caribou, Boreal Population, in Canada (July, 2017) recognizes the need for continued research to better understand the influence of different types of disturbance on caribou, and the importance of incorporating the results into recovery planning and actions using an adaptive management approach.*

Is Alberta going to commit to funding for such research in Northwest Alberta? The NWSAR open houses shed light on the observed behavioural displays of caribou around different types of anthropogenic disturbances in Northwest Alberta. In line with *Recommendation 8* of the NWSAR report, the NWSAR is confident that a standardized approach for

observational/scientific monitoring of the influence of different types of anthropogenic disturbance on caribou will provide clear evidence that alternate methods (as opposed to buffering every disturbance by 500m) will be more applicable in northwestern caribou ranges.

## Integrated Land Management

### Page 30: *Integrated Land Management (ILM)*

In line with *Recommendation 1* of the NWSAR report, the NWSAR supports the Government of Alberta's selection of ILM to form the basis of a strategic, planned approach to restore, manage and reduce unnecessary human footprint on the landscape in caribou ranges.

Industry perspective:

- Describe the draft Range Plan with insufficient clarity regarding the implementation of ILM.
- Industries have had challenges in the past with coordinating the implementation of restoration measures along shared corridors.
- Communication between operating companies has been a challenge in the past where resources or access management needs to be coordinated by the land manager, sometimes this has led to legal challenges with liabilities and third party access agreements.
- A clear definition of ILM is required.
- How will the ILM plan adapt to change in circumstances and how will it be enforced?
- Clarity is required on leadership of roles and responsibilities between the GOA and industry on the delivery of ILM (i.e. industry stakeholders will deliver plans and GOA reviews/supports? The effort and costs to prepare plans needs to have a realized value to business, and solutions requires a cumulative effects solution of which ILM is just a contribution only).
- ILM is dependent on regional stakeholders working together.
- Concerns around who leads the process, what compromises will be required and what the discussion process will look like?
- This approach could create changes in liability and costs to different sectors that will need to be managed/appreciated.
- Greater provincial department coordination is required, and GOA needs to be cautious of the additional workload, permitting timelines and restrictions put on industries.

ENGO perspective:

- Integrated land (and sub-surface tenure) management is part of the solution to achieve the 65% undisturbed habitat threshold.
- Mandatory, regulated access management can reduce the proliferation of uncoordinated infrastructure in caribou habitat.
- ILM should introduce disturbance thresholds and uphold them; by having mandatory ILM we can effectively address cumulative impacts.

- To date, ILM has been voluntary and has led to the ineffectiveness of this approach; how will ILM be mandated in caribou ranges?
- Support the use of Regional Access Management Plans as a tool to enforce ILM, which has historically been unsuccessful.
- The GOA has been promising ILM for almost 20 years, it has been largely ineffective. How quickly will the GOA be able to develop mandatory and legally-binding shared access routes that will be enforced by AER or AEP?

Indigenous perspective:

- ILM, as practiced in Alberta, still reflects a Crown preference to maximize economic values, interests and practices, while mitigating the impacts of economic maximization on social, cultural, ecological and Indigenous values, interests and practices.
- If ILM was focused on optimization, in a manner that reflects the need to impose constraints on economic values, interests and practices, this would benefit caribou recovery.
- Land-use planning processes are biased and weigh heavily in favour of maintaining a status quo approach to supporting the expansion of resource-based economics and lassie-faire unrestricted public access to Crown land. This challenges the land-use planner's ability to constrain resource development in the interest of optimizing caribou recovery.

**Page 30:** [3.2.1 Restoration](#)

In line with *Recommendation 2* of the NWSAR report, the NWSAR supports the Government of Alberta's establishment of a Caribou Habitat Restoration Committee and subsequent regional sub-committees, with the *"minimum inclusion of regional forest and energy industry operators, Indigenous Peoples and municipalities"*. The NWSAR is also pleased to see that, *"a strong preference for local contracting of work and Indigenous participation would be criterion"* in review of habitat restoration proposals, and that *"restoration activities that have been voluntarily completed by industry will be recognized as contributions to the program – appropriate credit will be applied"*.

**Page 31:** [3.2.1 Restoration](#)

Most importantly in line with *Recommendation 2* of the NWSAR report, the NWSAR is very pleased to that *"the first step in any range will be understanding what lines need to be restored and the development of a plan. Within the first five years, sampling and inventory of current state of the lines will be completed, as part of range level restoration plans"*.

The NWSAR believes that this step will enable a true baseline for which planning can occur towards the required 65% undisturbed habitat trajectory (over space and time), meaningful public participation can be conducted (identifying disturbances for restoration that limit conflicts with Indigenous Peoples' and stakeholder values and interests), will help to identify areas of

most benefit for the caribou and thus reducing the risks associated with inappropriate allocation of habitat restoration funding and caribou survival and recovery.

Further, the NWSAR would like to see a commitment from the Government of Alberta to make the methodology of the process to be taken to complete range-specific inventories made publicly available for comment.

**Page 37:** *Below ground pipelines could be managed to reduce the ongoing surface footprint and associated impacts on caribou that are typically associated with pipeline infrastructure. By retaining vegetation and re-vegetating pipeline corridors throughout caribou ranges, pipelines can remain active and economically viable, while contributing to undisturbed caribou habitat over time.*

\*\*\* What is the NWSAR perspective on this?

Industry perspective:

- Tree clearing, line spacing and line width requirements are too prescriptive and will not allow for effective operations to occur in many areas (i.e. a restriction receiver line width of 200m and source line of 300m cannot be applied to shallow oil sands deposits).
- Hand cut lines create an increased safety risk and width restrictions of 0.75m prohibit extraction of injured workers.
- Restoration narrowing pipelines residual corridor to less than 4m risks pipeline integrity due to tree root growth; this could lead to severe environmental, health and safety impacts.
- Voluntary restoration is likely to be reduced until greater certainty is provided regarding the terms for receiving appropriate credit.

### **Management of Access**

**Page 39:** *In the context of caribou range planning, access planning will be at a regional scale, encompassing entire caribou ranges where appropriate, and in some cases extending beyond range boundaries to incorporate other values such as grizzly bears and watersheds.*

Although the NWSAR is encouraged to see the Government of Alberta including a multi-species approach to access management for caribou range planning, a thorough explanation is required here; determining to what extent (i.e. distance from caribou range boundaries) the values of other sensitive species and ecosystems will be considered.

### **Regional Access Management Plans**

**Page 41:** *Following the release of the Alberta's Provincial Woodland Caribou Range Plan, the energy and forest industries, with guidance from the Government of Alberta, will prepare Regional Access Management Plans, which are range-specific and considerate of the need to achieve caribou objectives.*

How will the guidance be delivered – through the use of a new directive? The NWSAR has heard numerous concerns from industrial representatives about the prescriptive nature of defined requirement standards in new directives, such as the *Government of Alberta's Restoration and Establishment Framework for Legacy Seismic Lines (May, 2016)* and dimension requirements under the ILM approach. Industrial operators require the ability to review such guidance prior to developing Regional Access Management Plans, to ensure they are able to comply and accommodate any prescriptive requirements.

**Page 41:** *Pipelines and power lines that do not share common corridors with approved access within the Regional Access Management Plan will be required to restore surface footprint to be on a trajectory to caribou habitat.*

Solutions-based discussion needs to occur with the applicable energy and transmission power-line stakeholders on the above statement. These sectors have on-going safety and environmental regulations, imposed by other statutes, to comply with. Restoring surface footprint on some lines with certain types of vegetation may conflict with the other mandatory regulations those industries must follow.

**Page 42:** *3.3.2 Regional Access Management Plan Pilot Project*

The NWSAR would like to see the document for this pilot project – no document can be found online.

**Page 46:** *Forestry and energy industries will develop long-term road access plans for each caribou range, or portion thereof, and submit to AEP for approval. As needed, AEP or a third party will facilitate development of the plan.*

\*\*\*What is the NWSAR perspective on this?

Industry perspective:

- Greater provincial department coordination is required, and GOA needs to be cautious of the additional workload, permitting timelines and restrictions put on industries.

**Page 47:** *Pipelines and power lines that do not follow corridors or roads approved within an access management plan are required to restore the surface footprint back to the natural state, including representative tree cover and density.*

Same comments as listed above for Pages 37 and 41.

### **Management of Energy Activity**

**Page 48:** *3.4.1 Sales of New Energy Leases: To support the management of future disturbance, the existing new tenure restriction will remain in place until an analysis of each range-specific plan will provide more details on potential paths to the resumption of sales.*

The message from the Government of Alberta during all stakeholder engagement has been that: “all moratoriums for future energy lease sales will be lifted once all Caribou Range Plans are in place”. The above statement appears to provide a different message; one which provides continued uncertainty to prospective investors in natural resources within all caribou ranges. Can the Government of Alberta provide clarity on this message?

### **Management of Forestry Activity**

**Page 50:** *Forest harvesting strategies within caribou ranges will be adjusted to put greater focus on caribou habitat management and restoration.*

**Page 52:** *Spatial harvest sequences in Forest Management Plans must specify the location, extent, period of entry, and rate of harvesting within caribou ranges in a manner (including spatial patterns and landscape scales) that is considerate of caribou goals and objectives. Also the spatial harvest sequence will be aligned with the sequence of undisturbed caribou habitat development found in the Range Plan with range-specific details.*

*c. Existing Forest Management Plans will be updated to align with the required sequence of undisturbed habitat development.*

*d. The areas available for harvesting will be limited to predetermined areas for any given decade.*

While the NWSAR agrees that caribou values, among others, should be incorporated into forestry management and spatial sequence harvesting practices, we would like to see flexibility built into timelines for forestry companies. Adjustments made to spatial sequence harvesting within caribou ranges will most likely affect the harvesting sequence within the rest of the Forestry Management Area (FMA), and thus affect the operations of other FMA partners.

This sector will need additional time to:

- 1) Allocate funds to redraft existing and new Master and Detailed Forestry Management Plans (DFMP);
- 2) Identify critical areas within the FMA of benefit to caribou;
- 3) Implement more detailed planning to account for multiple identified caribou values;
- 4) Implement more detailed planning to include how operators can complete harvesting their allotted allocation within a predetermined area for any given decade, in the unpredictable event that a wildfire should initiate timber harvesting elsewhere in the FMA, outside of the predetermined area for that decade; and
- 5) Facilitate solution-based discussions between all parties involved in the DFMP.

**Page 50:** *Aggregating harvest areas further reduces the amount of access required during any given timeframe and therefore reduces increases in disturbed habitat – with potential benefits of reducing construction and maintenance costs.*

**Page 52:** *d. The areas available for harvesting will be limited to predetermined areas for any given decade.*

The NWSAR has concerns about access and the usage of lands within predetermined harvesting areas for Indigenous Peoples, trappers and outfitters. Aggregated harvest patterns can create much larger, concentrated disturbance footprints on the landscape over longer periods of time.

In areas where these larger disturbances exist for multiple decades (while restorative or natural regrowth occurs), how will the Government of Alberta ensure that the potential impacts to Indigenous Peoples, individual trappers and outfitters, and the potential conflicts between the forestry sector and other land users will be mitigated? (i.e. potential inability to practice Indigenous traditional land-use activities; potential for a reduction in fur-bearing animal availability; and potential for a reduction in access, respectively).

Further to these concerns, aggregated harvest sequence (practiced as described in the draft Caribou Range Plan) could render harvesting operations within caribou ranges unsustainable. Many of Alberta's FMAs have multiple parties involved in forestry harvesting activities. If all parties with a timber harvest allocation within a caribou range are harvesting the same predetermined area in the same given decade, the harvest of substandard or younger timber stands (which are typically avoided and harvested when they become "of-age" or "over-age") could become unavoidable, in order for companies to achieve viable profit percentage yields.

How will the Government of Alberta enable forestry companies to continue sustainable forestry operations for decades to come? More clarity is required in the provincial Range Plan on how companies can avoid these circumstances and stay practicing sustainably.

### **Management of Sand and Gravel Activity**

**Page 53:** *Future development within caribou ranges will focus on extraction for within-range use only.*

\*\*Is this condition an issue for local sand and gravel operators?

### **Management of Transmission Lines**

**Page 53:** *Management of Transmission Lines*

Same comments as listed above for Page 41.

### **Management of Natural Disturbance**

**Page 54:** *Pine stands in certain ranges have been assessed as being from low to high susceptibility to damage from mountain pine beetle; the risk of pine mortality can be significant. Mountain Pine Beetle infestations and the resulting impacts to pine forests, damage*



hydrological function, ecosystem function, sensitive sites and wildlife habitat, as well as sustainable forest harvest levels.

A provincial or regional map would be useful here identifying the susceptibility rating of pine stands in all assessed caribou ranges; the changing climate could continue to see further spread of mountain pine beetle to northern caribou ranges. The negative impact to habitat beneficial for caribou could be significant.

**Page 54/55:** *Although the location of wildfires is not entirely predictable, incorporating caribou range values and outcomes into the wildfire risk planning process will aid wildfire managers in their ability to better protect caribou habitat values and support caribou range outcomes. The ability for Alberta wildfire management to effectively support caribou range planning is dependent on initiating long-term integrated disturbance planning, which is informed by risk management. This will allow wildfire managers to make informed decisions when implementing risk reduction strategies and managing emergency wildfires. Critical values **should** be prioritized within ranges, and provincially, as an input into wildfire management planning.*

The NWSAR is pleased to see caribou habitat values incorporated into the wildfire risk planning process and the reference to prioritizing areas of critical value to the caribou, should a wildfire event occur. However, the NWSAR would like to see a commitment from the Government of Alberta that such areas of critical value for the caribou will be prioritized in the event of a wildfire within caribou ranges, rather than reviewing the Range Plan after 5% or more of any caribou range has been further disturbed by wildfire.

**Page 55:** *Alberta will continue with its high state of readiness for wildfire response and suppression for all caribou ranges.*

What is the strategy for this “high state of readiness” and where is the definition for this statement? The NWSAR has concerns if this “high state of readiness” is the same state of readiness seen during the Bistcho caribou range wildfire in 2012.

\*\*\* Lisa, please provide details (when it was discovered, how long it burned before action was taken, etc.)

\*\*\* Insert: fire intensity rating and hectares burnt within range, as per GOA wildfire dataset.

The NWSAR would like to see the Government of Alberta provides more details in the Provincial Range Plan on their planned response to wildfire events within caribou ranges.

### **Management Intent and Land Uses in Caribou Conservation Areas**

**Page 57:** *Conservation areas used in support of caribou range planning will be managed to minimize or prevent new land disturbance. This means the land disturbance associated with*

energy, mining and forestry operations are not considered compatible with the management intent of conservation areas.

Both the Government of Canada and the Government of Alberta, talk about the concept of progressing all caribou ranges towards a trajectory of 65% undisturbed critical habitat “over space and time”. This concept operates on the notion that the eventual objective of achieving 65% undisturbed habitat in all ranges can be moved around the landscape to accommodate all approved industrial development operations, while always managing 65% undisturbed critical habitat.

The NWSAR would like to know how large conservation areas fit into this concept. Conservation areas are static land-use designations that protect the habitat that exists today; they cannot be moved around a working landscape. Using data provided from the Government of Alberta, the NWSAR’s report identifies up-to \$90 billion worth of future natural resource potential in the NWSAR region (inclusive of Clear Hills County, County of Northern Lights and Mackenzie County jurisdictional boundaries), should developing technology allow for full extraction.

The NWSAR recommends the Government of Alberta to refrain from establishing any new, large conservation areas in Northwest Alberta, and instead committing to:

- 1) Completing the biophysical inventories for each caribou range (through the new Caribou Habitat Restoration Committee), thus bringing all naturally-restored habitat back “online” (decreases the disturbance percentages);
- 2) The identification of critical habitat areas (biophysical attributes) for caribou within each range. *Appendix J* of the Federal Recovery Strategy (2012) identifies the entire geographic boundary of all caribou ranges “within which, critical habitat is located”. The NWSAR believes this to be an insufficient baseline for Alberta to plan from;
- 3) In line with *Recommendation 7* of the NWSAR report, strategic, planned restoration activities could then commence (all necessary pilot habitat restoration projects could commence prior to completing full inventories); and
- 4) To commence the discussion for a connected network of smaller conservation areas that will be of benefit to caribou, other plant and wildlife species during stakeholder engagement for the development of the Lower Peace Regional Plan, that mitigate any significant socio-economic impacts to the region.

The NWSAR believes that a site-specific biophysical inventory baseline is the best platform for stakeholders to identify from and plan for any long-term land-use designation changes.

ENGO perspective:

- Conservation areas are not defined under/within Alberta law, and therefore do not provide the accountability required to ensure critical habitat is being protected.
- Conservation areas are simpler to manage than complex ILM, access management and aggregated development plans - they also potentially lower compliance costs for industry on the remainder of the landscape.
- In the Northwest there are clear opportunities to protect significant areas of critical habitat for caribou through designated conservation areas, while minimizing impact to current development.
- PLUZ designation provides no security of habitat protection for caribou.
- Legislated protection areas offer the single strongest tool to ensure critical habitat for caribou is conserved and protected, so long as this tool is coupled with restoration.
- Range plans that include legislated protected areas that contribute to the 65% undisturbed habitat target will be most credible in achieving the requirements of the Federal recovery strategy.
- Co-management of conservation areas with local First Nations should be considered and Treaty Rights within conservation areas must be honoured.
- ENGOs will not support Provincial Recreation Areas or PLUZs as conservation areas, designated to protect caribou habitat.

Indigenous perspective:

- The provincial approach to exclude elements of critical caribou habitat from consideration as conservation areas because of existing tenures and other economic interests, will render conservation areas ineffective.

**Page 57:** *Motorized recreation will be managed to designated to off-highway vehicle trails and areas.*

In 2001, the Caribou Mountains Wildland Provincial Park was established. On the Government of Alberta's website: <https://www.albertaparks.ca/parks/northwest/caribou-mountains-wpp/> the activities list states that off-highway vehicle usage is permitted only on designated trails. Local stakeholder feedback informs us that no such trails exist. If new large conservation areas were established in caribou ranges, would designated trails be provided for off-highway vehicle recreational users?

### **International and National Biodiversity Targets**

**Page 58:** *Alberta Environment and Parks has committed to making progress on achieving all aspects of Canada's Target 1 and Aichi Target 11. Conservation areas designated as part of range planning or other regional planning initiatives, may also contribute to this progress.*

The NWSAR and many other stakeholders are concerned that Alberta Environment and Parks may be unfairly prioritizing the use of this commitment during caribou range planning. Alberta's *Land-use Framework* was released in 2008 with a commitment of developing regional land-use

plans for all seven regions by 2012; six years on and four of those plans are yet to commence regional stakeholder engagement. The NWSAR firmly believes that the development of regional land-use plans that shape the long-term protection, growth and development of regions is a much more appropriate tool to utilize when establishing permanent land-use designation changes on regional landscapes.

**Page 58:** *Independent work completed by other organizations has been used to provide some additional insight when looking at potential conservation areas. The Canadian Parks and Wilderness Society (CPAWS) of Northern Alberta modelled and analyzed areas for priority for caribou protection.*

The model and analysis conducted by CPAWS provides beneficial information that could be utilized for the identification of pilot habitat restoration projects in the immediate short-term. We reiterate that permanent land-use designation changes need to be discussed during the development of the appropriate regional land-use plan.

### **Candidate Conservation Areas**

**Page 61:** *Additional opportunities for conservation were identified during range planning activities. The Government of Alberta discussed the potential designation of conservation areas within F10, F20, P8 and a Kakwa Wildland Park expansion with stakeholders, industry, municipalities and Indigenous Peoples. During this process, the area identified in Denhoff's report in F20 was revised to reflect and incorporate additional social and economic values. Boundaries for FMUs F10 and P8 potential conservation areas are currently unchanged; however, conversations on boundaries and management intent will continue with stakeholders, municipalities and Indigenous Peoples as part of public engagement on the draft Range Plan.*

The NWSAR would like to know what percentage of each caribou range do the candidate conservation areas measure for Bistcho, Yates and Chinchaga. \*\*\* We can measure F10 and P8, but not F20 (we need a shapefile of the reduced boundary to be accurate).

**Page 62:** *To provide the necessary policy and legislative authority, the Range Plan, when completed, will be approved by Alberta as a sub-regional plan under the Alberta Land Stewardship Act and connections will be made with regional plans to support their implementation, and to provide authority. In other regions where a regional plan has not yet been developed, interim regional planning documents will be developed to incorporate the Range Plan while also meeting basic requirements for a regional plan under the Alberta Land Stewardship Act.*

Regional Land-use Plans are developed on the basic requirement that the Land-use Secretariat develops regional plans in conjunction government departments and Regional Advisory Councils (RACs).

The Land-use Governance section of Alberta's *Land-use Framework* (2008) states that: *"The Government of Alberta will create RACs for each region to provide advice and receive direction from Cabinet and provide advice to the Land-use Secretariat on the development of the regional plan. RACs will:*

- *Consist of members representing the range of perspectives and experience in the region and who are able to appreciate the broad interest of the region and its place in the province. Members will be appointed by the provincial government and will include provincial and municipal government interests, industry, non-government groups, aboriginal community representatives, and other relevant planning bodies;*
- *Have a mandate to advise on the development of regional plans;*
- *Provide advice on addressing trade-off decisions regarding land uses and on setting thresholds to address cumulative effects; and*
- *Advise and participate in public and stakeholder consultation for the planning process."*

The NWSAR would like to know where any of the above basic principles fit into "interim regional plans", developed for caribou range planning, that have no established RAC, have had no public or stakeholder consultation and no specified shelf-life or review details provided in the draft Range Plan. The NWSAR does not support the development of interim regional plans for caribou range planning that have not been developed through the appropriate process established by Alberta's *Land-use Framework* (2008).

### **Steps Being Taken by Jurisdiction**

**Page 67:** *Alberta is currently exploring a variety of options to provide legal mechanisms which enable caribou range plans, including amendments to existing provincial legislation and establishment of Section 11 conservation agreements with the Federal Government.*

The NWSAR supports this approach and will look forward to reviewing and commenting on the options the Government of Alberta decides to pursue to enable legal mechanisms for caribou range plans. Alberta should be looking towards to providing legal protection for species at risk under Alberta's *Wildlife Act* (2000).

### **Caribou Rearing Facility**

**Page 68/69:** *Caribou Rearing Facility*

Page 69 of the draft Range Plan states, "A rearing facility for caribou has never been attempted". The NWSAR believes this method to be highly experimental, with little guarantee of success and actually exposing the caribou to greater risks of wildfire or rous predators that could enter the facility. Additionally, all caribou inside the rearing facility do not count towards the population size of the caribou herd outside the facility. Any deaths resulting from this method could further expedite the local population's stability, survival and recovery.

The NWSAR believes that funding for rearing facilities would be better spent on pilot habitat restoration projects over the immediate short-term, particularly in areas with higher density of underutilized seismic lines and abandoned wells.

Industry perspective:

- Potential to increase or maintain population numbers above the Federal Recovery Strategy threshold - helping to reduce the risk of an EPO under the SARA.
- Rearing facilities are essential to increase caribou populations to enable self-sustaining populations.
- Stabilizing and increasing caribou populations is key to mitigate the risk of an EPO and to maintain a working landscape.
- Rearing facilities alone is not a solution.
- Provides economic opportunities.
- Can facilitate research gaps.
- Could potentially increase caribou populations in the short-term.
- Also a potential opportunity for First Nations involvement and participation.
- Beneficial if targeted to the "right areas" - not all ranges require rearing facilities.
- The most effective means to maintain a working landscape, while also providing an opportunity for a growing population of caribou - particularly on very large ranges such as the Northwest. The engagement of First Nations and other stakeholders for the management of a local rearing program will be beneficial for sustainable forest management and social license.
- Uncertainty surrounding the desired effect - successful?
- Concerns surrounding increased cost to operators within the local vicinity.
- Potential access restrictions within rearing facilities.
- Unclear on allocation of total costs for construction and operations.
- Piloting of rearing facilities is required to prove potential effectiveness/challenges before broad application of this management tool is implemented province-wide.
- What about existing or approved pipeline and other industrial assets within the facilities?
- What is the cost to Albertans for establishment and management of the facility?
- There is a potential risk to other species.
- May sacrifice other values.
- Cannot be justified if action on habitat, and alternate prey and predator management does not occur concurrently.
- What activities will be allowed within the facility?
- Industry is likely to be affected by the effect of the facility on the wild Little Smoky population - which could increase the risk of Federal intervention (caribou within the facility are not considered wild, if wild population dwindles Feds could act).
- A costly method that has unknown outcome at present.
- Requires a government funding mechanism.
- May impact activities that support local economies.

- Recognizing that this may create employment opportunities to support rearing facilities, it cannot be implemented at the expense of broader socio-economic impacts.
- Should consider caribou harvesting moratoriums to maximize the rearing facility effects.
- Cost-prohibitive in the remote northern ranges, with likely little positive effect.
- Pilot projects should be completed to determine effectiveness, implementation should be based on sound science.
- If predators were excluded, the industry should be allowed to continue operating within these facilities.
- Should be mobile over space and time - this is only a short-term solution.
- Cost certainty provided by a finite cap on any industry contribution.

ENGO perspective:

- Rearing facilities are not a long-term solution and do not provide any protection for critical habitat. There are significant risks of failure, and even if they were successful, they would likely be used to delay effective habitat protection measures and self-sustaining caribou populations.
- Provides temporary population management support if a plan is put in place to achieve the 65% undisturbed habitat threshold.
- Rearing facilities are highly complex, expensive and staff intensive. They cannot be used at the expense of action on habitat restoration, land conservation towards achieving 65% undisturbed habitat within ranges.
- Focusing on rearing facilities may distract from addressing the real problems of unsuitable habitat conditions caused by lack of appropriate management and continued habitat destruction.
- Rearing facilities are a misallocation of resources for caribou conservation; these activities may be even less appropriate in areas such as the Northwest ranges, where other large scale conservation solutions are possible.

Indigenous perspective:

- Maternal penning is effective for initial recovery trajectory for small herds. In NE-BC, penning worked to increase the population from 12 females to 70 over 4 years at a cost of \$50,000 per calf. The benefit of maternal penning decreases in larger remnant populations because of larger birth rates and survivability.
- Rearing facilities are expensive, resources could be better invested in other recovery management initiatives.
- First Nations would like to see the governments providing alternative game to support sustenance hunting, if rearing facilities were established and sustenance hunting of caribou was prohibited/discouraged.

### **Predator Management**

**Page 70:** *A wolf reduction program has been ongoing in west-central Alberta since 2005/06, avoiding extirpation and benefitting, both the Little Smoky and A La Peche populations.*

*Beginning in winter season 2016/17, a wolf population reduction program was also initiated in the East Side Athabasca and Cold Lake caribou ranges, to avoid extirpation. There may be a need to expand the predator control program into other populations while habitat recovers, if populations continue to decline.*

While the NWSAR does not support predator control as a long-term strategy for caribou survival and recovery, the NWSAR does support expanding predator control to other caribou ranges. However, the Government of Alberta's current wolf reduction program, while seemingly effective, is very expensive and viewed as controversial by the public.

In line with *Recommendation 4* of the NWSAR report, we urge the Government of Alberta to continue recent discussions with Alberta's Trappers Association and local expert Indigenous and non-Indigenous trappers of the NWSAR region towards establishing a strategic network of predator managers on their traplines. We would anticipate that all trappers involved in the program would complete any necessary training to avoid trapping the "wrong" predators and unintentionally proliferating the predator issues for caribou.

Industry perspective:

- Stabilizing and increasing caribou populations is key to mitigating the risk of an EPO and to ultimately maintaining a working landscape.
- Predator management has proven successful as a temporary measure, but cannot be considered a long-term tool.
- By prioritizing caribou recovery through predator management, other values may be impacted or put at risk.
- Could increase moose and deer populations, ultimately creating an imbalanced ecosystem and defies the principal of ecosystem-based management.
- There is not a strong link between the efficacy of the current wolf cull and the population of caribou.
- Little work has been done to establish whether wolves that have been killed were actually preying upon caribou, and without the associated effort to address alternate prey, the efforts have proved ineffective at keeping wolf populations in check.
- Practices such as poisoning wolves reduces industrial social license.
- The size and the remoteness of some caribou ranges may render predator management unfeasible - this approach requires an assessment of possible effectiveness prior to full implementation within all caribou ranges.
- This approach requires integration with restoration efforts (i.e. some level of access will be required on the landscape, which could contradict reclamation of linear features).
- Need to consider cougars and bears in predator management, as well as wolves.
- Predator control, primary prey reduction and restoration are integral components to be combined for success. Use of local trappers, hunting, etc. need to be incented as opposed to poisoning.



- Informed vs. a blanket approach to decision-making; just because this approach may work in one range, does not mean it will work all ranges.
- Used in conjunction with local trappers, hunters and outfitters - targeted critical areas of predator management to bring a balance, without eliminating another species.
- Some species, such as grizzly bears, are also identified as threatened; balancing the management of multiple species may pose challenges.

ENGO perspective:

- Although predator management may be necessary at this time, it cannot become a long-term solution and must be accompanied by habitat restoration and maintenance.
- Cannot be implemented in lieu of habitat restoration, protection and conservation.
- Predator management has already been used and there has not been an increase in caribou numbers.
- Predator management is controversial and unpopular with the general public. It should only be used as part of a comprehensive range plan that includes all the other elements outlined in the GOA draft Range Plan. There has been a historic emphasis on predator management and not sufficient attention focused on habitat protection. Predator management must not include the use of poison.
- The short term predator and alternate prey population management proposed in the GOA draft Range Plan is inappropriate given the lack of commitment and clarity on achieving long-term habitat recovery goals. CPAWS will not support long term population management if the necessary undisturbed habitat targets are not being met. Social license for predator and alternate prey control does not exist if habitat is not appropriately provided and protected for caribou.

Indigenous perspective:

- Without predator management, caribou recovery will be impossible.
- Treaty First Nations have advocated for predator management agreements to be negotiated in the context of a Government to Government relationship and Treaty Rights to hunt, trap and fish in accordance with their own traditional seasonal round. \*\*\*
- Strong public opposition to predator management.
- Strong lobbying by other economic stakeholders for control of predator management programs.
- First Nations will require independent technical support. \*\*\*

### **Alternate Prey Management**

**Page 70:** *Alberta will manage these increased ungulate populations through a combination of [harvest by Indigenous Peoples and general specialized hunting license opportunities](#).*

In line with *Recommendation 5* of the NWSAR report, the NWSAR supports the Government of Alberta providing additional hunting licenses for alternate prey species with caribou ranges. We

would further encourage the Government of Alberta to extend this commitment to outfitters, providing certainty for their business operations.

### **Identification of Biophysical Attributes**

**Page 73:** *Three data sources were used by Alberta to update and further understand biophysical habitat attributes across provincial caribou ranges. Where available, Alberta Vegetation Inventory (AVI), which relies on detailed ortho-image classification of forest stands, was used as a basis to update biophysical attributes. Remaining areas were classified using a combination of Landsat satellite imagery classified by the Earth Observation for Sustainable Development of Forests (EOSD, 2009) project and Ducks Unlimited (DU) Canada's Enhanced Wetland Classification. Although at a lower resolution, the combined satellite data (DU and EOSD) were classified (as best possible) into equivalent AVI classes.*

The data available in these datasets is very limited, and therefore, inaccurate for Northern Alberta. The NWSAR is of the opinion that planning for permanent land-use designation changes is inappropriate when planning from such data. To reiterate, the NWSAR recommends completing full biophysical inventories for all caribou ranges and utilizing current third party research (such as CPAWS modelling and analysis) to prioritize pilot habitat restoration projects where applicable.

### **Protection Measures Monitoring**

**Page 73:** *Protection Measures Monitoring*

The NWSAR supports local monitoring initiatives with Indigenous Peoples, industry and other local land users.

### **Appendices**

**Page 21:** *2.4.8 Candidate Conservation Areas 19. Designate a new Conservation Area within a portion of FMU F20.*

**Page 29:** *3.4.8 Candidate Conservation Areas 29. Designate a new Conservation Area within a portion of FMU F10.*

**Page 38:** *4.4.8 Candidate Conservation Areas 39. Designate a new Conservation Area within a portion of FMU P8.*

The NWSAR is pleased with the recent announcement that the Government of Alberta made in relation to suspending consideration of conservation lands recommended in the Caribou Task Force Report pending further review and the outcome of the socio-economic impact assessment.

The NWSAR expects the Government of Alberta to obligate this commitment to all Albertans and not designate any new conservation areas in Northwest Alberta, until the likely socio-economic impact can be realized and appropriate stakeholder engagement can occur through the regional planning process.

**Page 92:** *10.4.8 Conservation Areas \*\*\* let's discuss this.*

Table 1: Anthropogenic and Natural Disturbance (%) in Caribou Ranges from 2012 and 2017

Caribou Range	(%) 2012 Anthropogenic Disturbance	(%) 2017 Anthropogenic Disturbance	(%) 2012 Natural Disturbance (wildfire)	(%) 2017 Natural Disturbance (wildfire)
Caribou Mountains	23	37	44	45
Yates	21	61	43	36
Red Earth	44	68	30	38
Richardson	22	36	67	65
West Side Athabasca	68	84	4	6
East Side Athabasca	77	88	26	32
Cold Lake	72	87	32	30
Bistcho	61	91	20	38
Nipisi	66	94	6	8
Chinchaga	74	97	8	12
Slake Lake	63	99	37	37
Little Smoky	95	99	0.2	<1%

Table 2: Total Change in (%) of Disturbed Habitat in Caribou Ranges from 2012-2017

Caribou Range	Total Change in Disturbed Habitat (%)	Predominant Reason for Total Disturbed Habitat Change
Caribou Mountains	+8	Anthropogenic
Yates	+13	Anthropogenic
Red Earth	+22	Anthropogenic
Richardson	+2	Anthropogenic
West Side Athabasca	+17	Anthropogenic
East Side Athabasca	+9	Anthropogenic
Cold Lake	+6	Anthropogenic
Bistcho	+23	Anthropogenic/Natural
Nipisi	+27	Anthropogenic
Chinchaga	+21	Anthropogenic
Slake Lake	+19	Anthropogenic
Little Smoky	+4	Anthropogenic