



Mackenzie County
4511-46 Avenue, Box 640
Fort Vermilion, AB
T0H 1N0
Ph: 780-927-4266

info@AlbertaNWSAR.ca

The Honourable Shannon Phillips
Minister of Alberta Environment and Parks
Minister Responsible for the Climate Change Office
208 Legislature Building
10800 – 97 Avenue
Edmonton, AB, T5G 2B6

April 17, 2018

Dear Minister Phillips:

Northwest Species at Risk Committee (NWSAR) thanks you and your ministry for this opportunity to provide feedback on Alberta's boreal caribou range planning. This document provides NWSAR's comments on Alberta's *Draft Provincial Woodland Caribou Range Plan* (hereon in referred to as the Draft Range Plan or Provincial Range Plan), released on December 19, 2017.

We look forward to continued engagement and dialogue with you and your ministry on Alberta's approach to boreal caribou recovery in Northwest Alberta. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Lisa Wardley
Chair, NWSAR Committee
Deputy Reeve, Mackenzie County

cc: Ronda Goulden, Assistant Deputy Minister, Policy and Planning, Alberta Environment and Parks
Brian Makowecki, Executive Director, Planning Branch, Alberta Environment and Parks



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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 exploratory in nature, with limited guarantee of success. Caribou ranges, particularly in the northwest, have limited available data and research once compared to other caribou 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.

NWSAR would like to see a commitment from Alberta's government for equal funding for research and monitoring across all provincial caribou ranges.

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 absent 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 would likely be more effective when multiple jurisdictions establish and synchronize 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 are not being implemented and/or hunter harvest of the same caribou is legal and somewhat unregulated.

In line with *Recommendation 10* of the NWSAR report, inter-jurisdictional harmonized planning efforts should be provided in the Provincial Range Plan; this



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could build stakeholder confidence in the success and effectiveness of multi-jurisdictional caribou range planning.

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.*

Will Alberta commit to funding for such research in Northwest Alberta? NWSAR open houses shed light on the varying behavioural displays of caribou around different types of anthropogenic disturbances in Northwest Alberta.

In line with *Recommendation 8* of the NWSAR report, NWSAR is confident that a standardized approach for observational/scientific monitoring of the influence that different types of human use on various anthropogenic disturbances can have on caribou, will provide evidence that alternate methods (as opposed to buffering every type of disturbance by 500m) could be more applicable in northwestern caribou ranges. A commitment to funding for research in northwestern ranges could help Caribou Ranges Plans to be more effective and successful over time.

Integrated Land Management

Page 30: *Integrated Land Management (ILM)*

In line with *Recommendation 1* of the NWSAR report, NWSAR supports 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. However, industry describes the Draft Range Plan as having insufficient clarity regarding the implementation of ILM, highlighting the following concerns:

1. 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 these issues have led to legal challenges with liabilities and third party access agreements;



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2. Multiple industries have had challenges in the past with coordinating the implementation of restoration measures along shared corridors;
3. Clarity is required on leadership of roles and responsibilities between Alberta and industry on the delivery of ILM (i.e. industry stakeholders will deliver plans and Alberta will review/grant approval? The effort and costs to prepare plans needs to have a realized value to business, and solutions require a cumulative effects solution of which ILM is a contribution only);
4. A clear definition of ILM is required, as ILM is dependent on regional stakeholders working together;
5. How will the ILM plan adapt to changes in circumstances and how will it be enforced?;
6. This approach could create changes in liability and costs to different sectors that will need to be managed and appreciated; and
7. Greater inter-department coordination will be required, and Alberta should be cautious of the additional workload, permitting timelines and restrictions put on industries.

NWSAR agrees that integrated land and sub-surface tenure management is part of the solution to achieve higher levels of undisturbed habitat for caribou, as regulated access management can reduce the proliferation of uncoordinated infrastructure within the caribou ranges. However, NWSAR would like to see the above concerns addressed by the Government of Alberta through the establishment of range-specific multi-stakeholder working groups, including impacted municipalities, before mandatory requirements are imposed on the working landscapes within and surrounding caribou ranges.

Determining to what extent new ILM regulations will impact industrial operations, municipal infrastructure, long-term growth and development within and outside all caribou ranges is an important step during further multi-stakeholder engagement.

Page 30: 3.2.1 Restoration

In line with *Recommendation 2* of the NWSAR report, NWSAR supports 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". 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



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industry will be recognized as contributions to the program – appropriate credit will be applied”.

As some caribou ranges have little-to-no industrial activity and therefore limited funds to support restorative efforts, NWSAR would also like to see a commitment from both the federal and provincial governments to equally distribute restoration funding across all caribou ranges.

Existing parks such as Wood Buffalo National Park and Caribou Mountains Provincial Wildland Park, could benefit from an injection of funds for habitat restoration from the recently announced Federal Budget of \$1.3 billion, to help protect species at risk. This funding could help to increase the undisturbed habitat levels in the Caribou Mountains, Yates and Red Earth caribou ranges.

NWSAR believes that habitat restoration sub-committees should involve biologists, Indigenous Peoples, industry and municipalities local to each region, with a multi-species focus – some caribou ranges overlap with habitat of other vulnerable species, and habitat of self-sustaining wildlife, such as the Hay-Zama bison.

Page 31: 3.2.1 Restoration

Most importantly in line with *Recommendation 2* of the NWSAR report, NWSAR is 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”.*

NWSAR believes that this step will enable a true baseline for which planning can occur towards: a higher undisturbed habitat trajectory (over space and time); meaningful public participation can be conducted (identifying disturbances for restoration that limit conflicts with Indigenous Peoples' and other stakeholder values and interests); and will help to identify areas of most benefit for the caribou, thus reducing the risks associated with any misallocation of habitat restoration funding in areas that are naturally recovering.



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Further, NWSAR would like to see a commitment from the Government of Alberta to make the methodology for the process to complete caribou range-specific inventories publicly available for comment, prior to its implementation.

While NWSAR would like to see caribou population numbers increase, we believe that habitat restoration on a trajectory towards 65% undisturbed habitat is not the only method to achieve this goal. In some northern ranges the 65% threshold may not be accomplished, particularly in caribou ranges where intense wildfires have been (and could continue to be) prevalent over the coming decades.

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.*

Industry has concerns over the stability of below ground pipelines that either, retain vegetation or receive restoration measures. For example, tree root growth could compromise the stability of pipelines carrying harmful substances which could lead to very severe environmental, health and safety impacts to wildlife, industrial operators and other land users.

Industry also highlights that, tree clearing, line spacing and line width requirements in the Draft Range Plan are too prescriptive and will not allow for effective operations to occur in many areas. The required hand cut lines create an increased safety risk; the width restrictions of 0.75m prohibit safe extraction of injured workers; and most voluntary restoration is likely to be reduced until greater certainty is provided regarding the terms for receiving appropriate credit to off-set their costs.

NWSAR reiterates the above concerns from industry stakeholders, as such, we would like the addition of "where it is feasible to do so" added to this section as per:

By retaining vegetation and re-vegetating pipeline corridors throughout caribou ranges, where it is feasible to do so, pipelines can remain active and economically viable, while contributing to undisturbed caribou habitat over time.



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Page 38: The ILM section of the Draft Range Plan (pages 30-38) provides information on managing the different activities of working landscape within caribou ranges towards a 65% undisturbed habitat threshold. NWSAR believes a new *section 3.2.5* should be added providing information on the *Management of Transmission Lines* under ILM.

The legal requirements and regulations for the operation of transmission lines governed by other statutes are distinctly different to those of pipelines. Perhaps, the proposed new operational regulations and restoration requirements in the Draft Range Plan cannot be met by power distribution companies, because of direct conflicts with other Acts and directives. Additional engagement is required with transmission line and distribution operators to determine feasible solutions that are also beneficial for caribou.

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 NWSAR is encouraged to see the Government of Alberta including a multi-species approach to access management for caribou range planning, an 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.

NWSAR believes that further meaningful consultation is required with all stakeholders if other environmental values (aside from caribou values) are being considered during caribou range planning, which could further impact land user groups. This type of decision-making is perhaps more appropriately completed during the development of the respective regional land-use plan.

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*



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of Alberta, will prepare Regional Access Management Plans, which are range-specific and considerate of the need to achieve caribou objectives.

How will the new guidance be delivered – through the use of a new directive? 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.

NWSAR urges Alberta to enable time for industrial operators to review such guidance prior to developing Regional Access Management Plans, to ensure that they are able to comply and accommodate any defined requirements. NWSAR would also like to see municipalities added as a responsible stakeholder during RAMP developments, alongside industry sectors. Opportunities for municipalities and other stakeholders to review and comment on RAMPs, prior to their implementation is what NWSAR would like to see in the Provincial Range Plan.

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.*

NWSAR believes a 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 (see also, comments made pages 37 and 38).

NWSAR would like to see a commitment made for continued industry access for necessary maintenance and pipeline stability checks.

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

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



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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.*

In a bid to facilitate mandatory and effective ILM in northwestern caribou ranges, NWSAR believes that municipalities could be uniquely well-positioned to become LOC holders with strong industry partnerships on long-term access roads; facilitating shared access among user groups, ultimately reducing access conflicts and the requirements for additional infrastructure for multiple users.

Municipalities would treat all LOC roads under the existing rules and conditions, in order to protect the public from accessing sensitive areas, and would have the continued ability to close access to wildlife-sensitive areas during critical times (i.e. rutting, calving, etc.).

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.*

See comments listed above for pages 37, 38 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 looks to offer continued uncertainty to prospective investors in natural resources within all caribou ranges. Can the Government of Alberta provide clarity on this message?

In line with *Recommendation 6* of the NWSAR report, NWSAR recommends a caribou recovery policy impact assessment be completed; to determine the level of environmental and liability risks associated with multiple un-reclaimed assets,



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alongside prioritizing Orphan Well Association funding and to secure natural resource investment from stakeholders who could contribute towards reclamation of their assets.

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.

NWSAR has heard many concerns with the proposed aggregated spatial harvest sequencing from the forestry sector including, but not limited to:

1. The proposed notion that the forest will grow to facilitate aggregated harvest patterns in a manner that will not adversely reduce Annual Allowable Cuts (AACs) and anticipated timber harvest volumes, over a 100-year period. In reality the boreal forest is a complex system of diverse plant species and ecosystems, which overlap and grow randomly throughout the landscape. Forestry professionals believe restricting harvest to confined compartments will most likely impact many economic variables;
2. The specified compartments for any given decade reduces the ability to average out the harvest of tree species' size, age and type, and transportation haul distances across the Forestry Management Agreement (FMA) area to satellite yards and mills;
3. Further to this, companies are concerned that they may be forced to harvest sub-optimum trees, which are either too young or too old;



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4. A reduction in their early logging season access could mean a reduction in employment for some companies. Early logging season access is defined as areas of merchantable timber within an FMA that are easily accessed from major roadways, without having to wait for all other roads to reach higher/full capacity for heavy equipment;
5. The uncertainty surrounding the salvage policy for natural disturbances within caribou ranges under the proposed aggregated spatial sequencing; and
6. The uncertainty surrounding unpredictable impacts such as Soft Wood Lumber Agreement amendments and/or the price of lumber, if another recession sets in and the specified compartments for that decade are far from the mill. Under these circumstances, some companies may find it difficult to balance the economics which could adversely impact profits, employment, salvage harvesting strategies and contributions to Government Tax Revenues.

While 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 FMA, and thus affect the operations of other FMA partners, regardless of whether they log within the caribou range boundaries.

This sector will need additional time to:

1. Allocate funds for redrafting 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 AACs within a predetermined compartment for any given decade, in the unpredictable event that a wildfire should initiate timber harvesting elsewhere in the FMA, outside of the predetermined compartment for that decade;
5. Facilitate solution-based discussions between all parties involved in the DFMP to ensure they can limit any reduction in volume, employment, access, etc.; and



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6. For aggregated harvest scenario development evaluating the most favourable sequences that limit impacts on economic variables and are of benefit to the caribou.

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.

NWSAR has concerns about access and the usage of lands within predetermined compartments 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 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 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 compartment in the same given decade, the harvest of sub-optimum or younger timber stands could become unavoidable, in order for companies to achieve viable profit margins.

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



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Management of Sand and Gravel Activity

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

1. New sand and gravel dispositions will have a no surface access restriction beyond 500 metres of an optimized approved road network, as determined by the Long-term Road Access Plan.

Restricting aggregated industry extraction for within-range use only, could have economic impacts for some sand and gravel operators. NWSAR would like to see approved long-term access roads facilitating access to the known aggregate industry resources within caribou ranges. This could enable the ease for use of available aggregate sources within ranges and limit the economic impacts to the industry.

NWSAR would also like to see new applications for sand and gravel dispositions outside of the 500m buffer to access roads within caribou ranges would be considered on a site-specific basis.

Progressive reclamation of each phase as the successive phase is being mined.

Surface Material Lease (SML) holders pay the FMA holders Timber Damage Assessments, which include charges for reforestation. Mandating SML holders to reforest disturbed areas is requiring SML holders to pay twice for the same restoration efforts. NWSAR would like to see this revised.

Final reclamation consisting of 100% of the entire phase being reclaimed, with vegetation equal to what would have been on the site naturally before disturbance.

Requiring this level of restoration be complete assumes that any variation from the pre-disturbed state is incompatible with the objective of caribou recovery. The landscape within caribou ranges is variable, not unlike other natural regions and sub-regions in Alberta; the ranges include wetlands and multiple waterbodies.

NWSAR suggests that final reclamation requirements for the aggregate industry be of suitable sustainable caribou habitat, which is naturally diverse.



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Management of Transmission Lines

Page 53: *Management of Transmission Lines*

Same comments as listed above for page 37, 38 and 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.*

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, 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 a commitment to reviewing the Range Plan after 5% or more of any caribou range has been further disturbed by wildfire.



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

Is there a strategy and/or a definition available to review for this "high state of readiness"? NWSAR has concerns if the "high state of readiness" is the same response as seen during the Bistcho caribou range wildfire in 2012.

On June 21, 2012 a wildfire caused by lightning strike started north of Zama City. Over 60% of the total area burned, occurred during the wildfire's "major run" on the evening of July 10, 2012. Approximately 135,000 hectares of forest within the Bistcho caribou range was burnt during this wildfire, predominantly with a burn severity rating of <94%.

The updated habitat disturbance levels, provided by Alberta in the Draft Range Plan, shows that the Bistcho caribou range has the highest increase of natural disturbance levels (18%), since 2012. The 2012 wildfire north of Zama City significantly contributed to this increase.

At the October 2014 Wildland Fire Canada Conference, the Government of Alberta provided a presentation¹ of their findings on the 2012 wildfire north of Zama City. Fundamentally, they concluded that "*Alberta has the tools for judging the likelihood of "blow-up" fire events*".

Natural Resources Canada (NRC) enlisted the assistance of 178 tiny satellites, to provide fire managers with an advanced warning on fires burning in Canada's forests. Every day, approximately 7 terabytes of data is uploaded to a fire detection company in Vancouver, named Tanka. Tanka then sends NRC the coordinates of any fires which have started within the last 24 hours, along with information on how large they are, how fast they're growing and what kind of fuel is in the area².

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

¹ Presentation available at: <https://sites.ualberta.ca/~wildfire/2014/PDFs/AOu.pdf>

² Information Available at: <https://www.tanka.com/>
<https://www.wired.com/story/the-science-of-fighting-wildfires-gets-a-satellite-boost/>



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ranges. A response NWSAR hopes will aim to identify the risks of “blow-up” fires during wildfire events, and to reduce the impacts of all wildfires on habitat within caribou ranges, by utilizing readily available data from NRC.

In addition to this, NWSAR believes Alberta should work with the forestry sector to explore the development of a wildfire mitigation strategy within and outside of all caribou ranges that have merchantable timber. Timber stands more susceptible to intense wildfire, or that act as fuels, could be logged in order to prevent cases of “blow-up” fires in caribou habitat.

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.

NWSAR commends Alberta’s recent letter to the Honourable Minister McKenna, Honourable Minister Carr and Parliamentary Secretary, Jonathan Wilkinson announcing Alberta’s decision to suspend consideration of the conservation lands recommended in the *Caribou Task Force Report*, pending further review and the outcome of the socio-economic impact study. NWSAR looks forward to further engagement on this discussion.

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

In 2001, the Caribou Mountains Wildland Provincial Park was established. On the Government of Alberta’s website³ 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 within the Caribou Mountains Wildland Provincial Park.

³ Information available at: <https://www.albertaparks.ca/parks/northwest/caribou-mountains-wpp/>



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NWSAR looks forward to further engagement on this as the discussion surrounding candidate conservation areas and likely activities re-surfaces.

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.*

NWSAR and many other stakeholders are concerned that Alberta Environment and Parks may be disproportionately 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.

NWSAR 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.*

NWSAR reiterates 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*



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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.

NWSAR would like to know what percentage (%) of each caribou range the candidate conservation areas (F10, F20 and P8) measure for Bistcho, Yates, Caribou Mountains and Chinchaga.

The 2012 federal Recovery Strategy for Boreal Caribou acknowledges that as more information is continually gathered by jurisdictions, range delineation and population demographic information will be updated and may result in revisions to range boundaries, and perhaps even additional transboundary ranges. Will Alberta provide any public consultation with stakeholders who may be (further) impacted by caribou range boundary revisions?

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 with 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,*



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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."*

NWSAR would like to know where the above principles fit into "interim regional plans", developed for caribou range planning, that have not established a RAC, no public or stakeholder consultation and no specified shelf-life or review details provided in the Draft Range Plan.

NWSAR does not support the development of interim regional plans for caribou range planning that have not been developed through the appropriate process, without appropriate stakeholder consultation, as outlined above, established by Alberta's *Land-use Framework* (2008) and under section 5 of Alberta's *Land Stewardship Act* (2009).

Rather, in line with *Recommendation 7* of the NWSAR report, NWSAR recommends assessing the cumulative effects of future activities likely to impact caribou habitat, identify long-term phased development and prioritize areas more likely to develop into and sustain functional habitat for caribou over the longer-term. This can be achieved by working with local stakeholders to identify underutilized/non-beneficial disturbances for reclamation, developing trade-off mechanisms for future development, incentivizing multiple-industry coordination and reclamation and setting aside areas for future infrastructure access, transportation corridors and major utility artery planning.

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.*

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



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mechanisms for caribou range plans. Alberta could be looking towards 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*". This method is seemingly exploratory, with little guarantee of success and could in reality expose the caribou to greater risks of wildfire or rouse 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 adversely expedite the local population's stability, survival and recovery.

In British Columbia, the West Moberly and Sauleau First Nations⁴ and the Revelstoke Caribou Rearing in the Wild⁵ organization are currently operating caribou maternity pens which are much smaller in size, than the rearing facility proposed in Alberta's Draft Range Plan. While these groups are seeing some success, progress is slow. Alberta should be very cautious in their approach to establishing large rearing facilities. Industry questions whether activity would be considered within the proposed rearing facility(ies)?

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*

⁴ Information Available at: <http://www.westmo.org/news/clinse-za-caribou-maternal-release> <https://www.cnrl.com/corporate-responsibility/environment/biodiversity> <https://www.newswire.ca/news-releases/governments-of-canada-and-british-columbia-to-collaborate-with-first-nations-on-recovery-of-southern-mountain-caribou-674238843.html>

⁵ Information Available at: <http://rcrw.ca/> <http://rcrw.ca/web/wp-content/uploads/2017/03/RCRW-Factsheet-5-April-25-2017-FINAL-.pdf>



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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 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 as an interim measure. Alberta's current wolf reduction program, while seemingly effective in stabilizing local caribou populations, 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. Additionally, trap check windows would benefit from being increased and trappers/trapline holders would require reasonable financial compensation to participate.

Clear Hills County, the County of Northern Lights and Mackenzie County all currently offer wolf management incentive programs with financial rewards to participants who legally and ethically harvest wolves, within the respective municipal boundaries.

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, NWSAR supports the Government of Alberta providing additional hunting licenses for alternate prey species within caribou ranges, which reduces the abundance of predators. We would further encourage the Government of Alberta to extend this commitment to



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all outfitters, providing certainty for their business operations, so long as the reduction in alternate species is sustainable for their populations.

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, potentially inaccurate for Northern Alberta. NWSAR believes that planning for permanent land-use designation changes with limited data is unjust. NWSAR recommends completing full biophysical inventories for all caribou ranges and utilizing current third party research, modelling and analysis to prioritize pilot habitat restoration projects in conjunction with local stakeholders.

Protection Measures Monitoring

Page 73: *Protection Measures Monitoring*

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

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.*



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

Page 92: 10.4.8 Conservation Areas

NWSAR commends Alberta's recent letter to the Honourable Minister McKenna, Honourable Minister Carr and Parliamentary Secretary, Jonathan Wilkinson announcing Alberta's decision to suspend consideration of the conservation lands recommended in the *Caribou Task Force Report*, pending further review and the outcome of the socio-economic impact study.

As such, NWSAR would like the above candidate conservation area statements removed from 2.4.8; 3.4.8; and 4.4.8 of Alberta's Provincial Caribou Range Plan. NWSAR looks forward to further engagement on this discussion.

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