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Honourable Shannon Phillips
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August 5th, 2016

Re: CPAWS Comments on the Draft Little Smoky and A La Peche Caribou Range Plan

Dear Premier Notley and Minister Phillips,

In June of 2016 the Government of Alberta invited the public to provide feedback on the *Draft Little Smoky and A La Peche Caribou Range Plan* (the “Draft Range Plan”), developed in response to the federal government’s *Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou), Boreal population, in Canada* (the “*Boreal Recovery Strategy*”), and *Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou), Southern Mountain population, in Canada* (the “*Southern Mountain Recovery Strategy*”). Boreal woodland caribou and southern mountain woodland caribou recovery, and the protection of their habitat, has long been a focus of the Canadian Parks and Wilderness Society (CPAWS) Northern Alberta chapter, and CPAWS welcomes the opportunity to provide feedback on the Draft Range Plan.

CPAWS is a national charity whose vision supports the conservation and protection of species and ecosystems throughout Canada. CPAWS is the only national charitable conservation organization solely dedicated to the protection and sustainability of public lands across the country.

CPAWS has been active in conservation in Alberta since 1967. Our role as an organization is to provide landscape-scale, science-based support and advice for the conservation and protection of Alberta’s wilderness. As a collaborative organization, we often work together with government, First-Nations communities, industry, individuals, and other non-governmental organisations to find conservation solutions on a shared landscape.

Woodland caribou are an important part of our boreal ecosystem, and an iconic Canadian species. Range plans offer an opportunity to provide protection and proper management of our land, for caribou, and a large suit of other boreal species. According to the *Boreal Recovery Strategy* and *Southern Mountain Recovery Strategy*, Range plans for boreal and southern mountain caribou should:

- demonstrate how at least 65% undisturbed habitat in the range will be achieved and maintained over time;



- identify range-specific activities likely to destroy critical habitat within each range; and
- list the laws of the province and conservation measures that will be used to prevent activities likely to destroy critical habitat.^{1,2}

Range plans are one factor considered by the federal Minister of the Environment in forming an opinion on whether the laws of the province effectively protect critical habitat within each caribou range.^{3,4} Therefore, range plans must demonstrate how critical habitat will be legally protected and how the 65% undisturbed habitat in each range will be achieved and maintained.

While there are some positive and progressive actions in the Draft Range Plan, such as a commitment to the restoration of legacy seismic lines and a change in energy activity rescheduling, overall the Draft Range Plan will not protect the Little Smoky and A La Peche caribou. The Draft Range Plan does not successfully identify how the habitat will be returned to 65% undisturbed, nor does it take appropriate steps to ensure the long term persistence of caribou in the wild without the need for aggressive human intervention. In this document, we have outlined some of the troubling aspects of the Draft Range Plan that are cause for concern, as well as some of the actions that we support.

Strengths of the Draft Little Smoky and A La Peche Caribou Range Plan

The level of disturbance within the Little Smoky and A La Peche ranges far surpasses the 35% disturbed habitat threshold outlined in the *Boreal Recovery Strategy* (Figure 1).⁵

¹ Environment Canada, *Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou), Boreal population, in Canada*, (2012), Ottawa [hereinafter, *Boreal Recovery Strategy*] at 38.

² Environment Canada, *Recovery Strategy for the Woodland Caribou, Southern Mountain population (Rangifer tarandus caribou) in Canada*, (2014), Ottawa [hereinafter, *Southern Mountain Recovery Strategy*] at 53.

³ *Boreal Recovery Strategy* at 38.

⁴ *Southern Mountain Recovery Strategy* at 50.

⁵ Environment Canada, *Recovery Strategy for the Woodland Caribou (rangifer Tarandus Caribou), Boreal Population, in Canada, Update*, 2012, doi:10.2307/3796292.



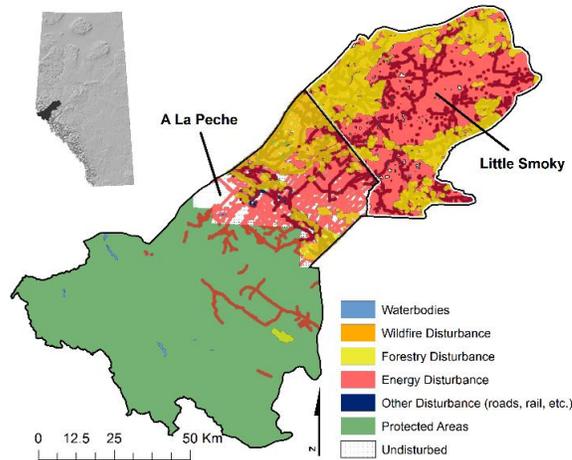


Figure 1. Disturbance in the Little Smoky and A La Peche caribou ranges.

The assessment carried out by the federal government in the *Boreal Recovery Strategy* clearly outlines the need for each caribou range to have minimum 65% undisturbed habitat in order for caribou to have a chance to become self-sustaining. Due to the extreme amount of disturbance within both the Little Smoky and A La Peche ranges, restoration to achieve the 65% undisturbed habitat is necessary.

CPAWS is encouraged that this Draft Range Plan recognizes the need for restoration and commits to the restoration of all historical seismic lines that require assistance within the A La Peche and Little Smoky ranges within five years. CPAWS is also pleased that the oil and gas industry, which has been responsible for the seismic line disturbance, will be funding the restoration.

CPAWS supports the removal of coal and metallic and industrial mineral rights within the ranges.

CPAWS supports the reservation of all peat, sand and gravel dispositions within the range under Section 4.7, requirements 26 and 27 of the Draft Range Plan.

CPAWS is supportive of voluntary activity rescheduling in exchange for energy agreement extensions as outlined in requirement 12 of the Draft Range Plan. The current practice of continuous industrial activity in order to maintain lease rights leads to unnecessary disturbance with little economic gain. Voluntary activity rescheduling provides the opportunity to decrease future disturbance, not only within caribou range, but across the province.



Concerns about the Draft Little Smoky and A La Peche Caribou Range Plan

In general, the Draft Range Plan is vague and left us with many questions and concerns regarding the future of the caribou in the Little Smoky and A La Peche herds. The Little Smoky caribou's range is over 95% disturbed by human activity. It is therefore unacceptable that any new disturbance be allowed within this range, especially when the Draft Range Plan fails to address how critical habitat will be protected from activities likely to destroy it, or demonstrate a plan for the achievement of the federal requirement of 65% undisturbed habitat.

Thus, CPAWS has the following concerns regarding the Draft Range Plan:

1. It fails to illustrate how the province will achieve the federal recommendation of 65% undisturbed habitat;
2. It fails to adequately restrict forest harvest within range;
3. It allows new petroleum and natural gas lease sales, as well as new oil and gas disturbance within a range that is over 95% disturbed;
4. It fails to identify a candidate protected area in Alberta's foothills, which are highly under-represented in Alberta's protected areas network;
5. It targets population management methods that are controversial (wolf culling, alternate prey culling) and experimental (predator exclusion fencing) rather than habitat recovery;
6. It sets inadequate monitoring timelines and adaptive management strategies; and
7. It does not explore creative solutions for caribou conservation.

Details on each concern are presented below.

1. The Draft Range Plan fails to illustrate how the province will achieve the federal recommendation of 65% undisturbed habitat in caribou range

In the *Boreal Recovery Strategy*, critical habitat is defined as:

- the area within the boundary of each boreal caribou range that provides an overall ecological condition that will allow for an ongoing recruitment and retirement cycle of habitat, which maintains a perpetual state of a minimum of 65 percent of the area as undisturbed habitat; and
- biophysical attributes required by boreal caribou to carry out life processes.⁶

For the Little Smoky range, which has only 5 percent undisturbed habitat, critical habitat is initially identified as the existing habitat that over time would contribute to the attainment of 65 percent undisturbed habitat.⁷ The

⁶ *Boreal Recovery Strategy* at 32.

⁷ *Ibid*, at 35.



Boreal Recovery Strategy states that the precise location of the 65 percent undisturbed habitat within the range will vary over time, recognizing that the biophysical attributes for boreal caribou will vary over space and time with the dynamic nature of the boreal forest.⁸

The *Southern Mountain Recovery Strategy* defines critical habitat for the Central Group, of which the A La Peche subpopulation is a member, as habitat which provides for an overall ecological condition for low elevation winter range and Type 1 matrix range that will allow for an ongoing recruitment and retirement cycle of habitat and which maintains a perpetual state of a minimum of 65 percent of the area as undisturbed.⁹ Type 1 matrix range consists of the areas within a subpopulation's annual range that have not been specifically delineated as summer or winter range and may include seasonal migration areas and areas of lower use compared to delineated seasonal ranges.¹⁰

For the A La Peche subpopulation, critical habitat includes habitat which is currently undisturbed as well as adjacent habitats that over time would contribute to the attainment of 65 percent undisturbed habitat.¹¹ Similar to the *Boreal Recovery Strategy*, the *Southern Mountain Recovery Strategy* states that over time, the precise location of the 65 percent undisturbed habitat within those ranges will shift as disturbed areas age into mature forests and other new disturbances occur.¹²

Both the *Boreal Recovery Strategy* and the *Southern Mountain Recovery Strategy* identify activities that are likely to result in the destruction of critical habitat, including:

- forestry cut blocks;
- industrial and infrastructure development; and
- linear features such as roads, seismic lines and pipelines.¹³

The Draft Range Plan Permits the Destruction of Critical Habitat.

The Draft Range Plan allows new disturbance footprint within the Little Smoky and A La Peche ranges in the form of forestry cut blocks, roads, oil and gas developments, seismic lines and pipelines. Both the *Boreal Recovery Strategy* and the *Southern Mountain Recovery Strategy* define critical habitat in these ranges as the existing habitat that over time would contribute to the attainment of 65% undisturbed habitat. The *Southern Mountain Recovery Strategy* also explicitly includes currently undisturbed areas within the definition of critical habitat.

Any forested area within these ranges, other than areas where forest cover has been effectively permanently removed (for example, all weather roads and certain permanent industrial disturbances), could contribute over time to the attainment of 65% undisturbed habitat. Therefore, any forested area within these ranges, regardless of seral stage, could contribute to the attainment of 65% undisturbed habitat and is, by definition, critical habitat. It

⁸ *Ibid*, at 32, 35.

⁹ *Southern Mountain Recovery Strategy*, *supra* note 3, at 44.

¹⁰ *Ibid*, at 13.

¹¹ *Ibid*, at 47.

¹² *Ibid*, at 45.

¹³ *Boreal Recovery Strategy*, *supra* note 2, at 36-37; *Southern Mountain Recovery Strategy*, *supra* note 3, at 50.



is the existence of mature forest cover, and the potential to develop into mature forest cover, with the required habitat attributes, that defines critical habitat within these ranges. As reflected in the preamble to the *Species at Risk Act* (“SARA”),¹⁴ protection of the habitat of species at risk is key to their conservation.

The *Recovery Strategies* identify forestry cut blocks, industrial development, roads, seismic lines and pipelines as activities that are likely to result in the destruction of critical habitat. It is irrational that the Draft Range Plan would then propose that more of those very activities be permitted in a range that is already 95% disturbed. An ongoing recruitment and retirement cycle aimed at maintaining undisturbed habitat above 65% in perpetuity cannot reasonably begin by destroying some of the very habitat that would contribute to that goal. Permitting industrial activities to disturb existing forest cover, regardless of seral stage, before the 65% objective is reached would be contrary to the *Recovery Strategies* and contrary to the SARA provisions prohibiting the destruction of critical habitat. Further anthropogenic disturbance of forest cover may only be considered after the ranges have reached 65% undisturbed habitat.

The Draft Range Plan Lacks Detail on Restoration Priorities

While we are supportive of the restoration commitments made within the Draft Range Plan, CPAWS has concerns with the lack of apparent planning and detail surrounding the restoration and management of the habitat. The Draft Range Plan fails to identify the criteria that will be used to determine which lines will require assistance to recover, and where this restoration will occur. Prioritization for habitat restoration at an individual line scale has been completed by fRI Research¹⁵ and should be considered when implementing the restoration plan.

The Draft Range Plan does not identify where the restoration will occur, nor the amount of undisturbed habitat that will be created through the seismic line restoration. A quick analysis completed by CPAWS’ shows that restoration of historic seismic lines alone will not be enough to create undisturbed habitat on 65% of the range.

A comprehensive plan to reach 65% undisturbed is necessary, and needs to prioritize restoration efforts to derive the most of the limited time and financial resources available. A zonation approach to prioritize restoration efforts and manage activity has long been supported in caribou range planning and has already been conducted at a broad scale by CPAWS Northern Alberta.¹⁶ The zones displayed in the second Figure 1 (page 6 of the Draft Range Plan) and described in Section 4.2.1 of the Draft Range Plan are inadequate, unclear, and fail to define what is and is not allowed in each zone. In the A La Peche and Little Smoky ranges, zones should clearly define which activities are allowed and which are prohibited.

CPAWS Northern Alberta has applied a zonation approach to the Little Smoky caribou range in volume 2 of *Alberta’s Caribou: A Guide to Range Planning*.¹⁷ CPAWS recommends that protected areas be designated in

¹⁴ *Species at Risk Act*, SC 2002, c 29

¹⁵ fRI research is working on a comprehensive restoration plan detailing the location and amount of regrowth for all legacy seismic lines and prioritizing restoration in the Little Smoky and A La Peche caribou ranges. This report is expected to be released summer of 2016.

¹⁶ Russell, T, Pendlebury, D, and Ronson, A. *Alberta’s Caribou: A Guide to Range Planning Vol 2 Little Smoky*. CPAWS Northern Alberta, 2016. 36pp.

¹⁷ *Ibid.*



Zone 1, and that priority restoration activity occur in Zone 1 first followed by Zones 2, 3, and 4. Zones 1-3 make up 65% of the Little Smoky range and represent an area that should be subject to no further industrial disturbance (Figure 2).

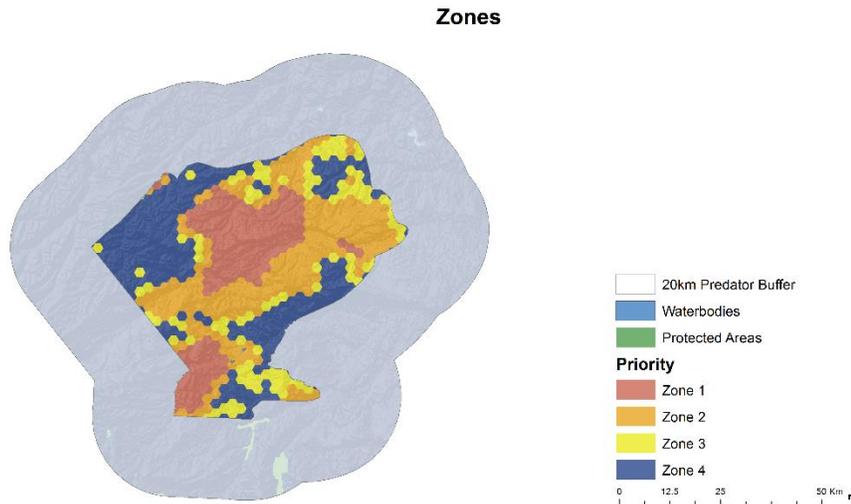


Figure 2. The four priority zones for restoration and protection within the Little Smoky caribou range.
Taken from Russell, T, Pendlebury, D, and Ronson, A. *Alberta's Caribou: A Guide to Range Planning Vol 2 Little Smoky*. CPAWS Northern Alberta, 2016. 36pp.

The remaining zone 4 should be managed with caribou as the priority. A good range plan should outline, how, when, and where restoration will occur so that the minimum 65% undisturbed habitat is achieved. A zonation approach similar to the one included in volume 2 of *Alberta's Caribou: A Guide to Range Planning* should be used in this Draft Range Plan, and a zone that is designated solely for caribou, where industrial or recreational activity is not permitted must be included in the Draft Range Plan.¹⁸

CPAWS would also like clarification on some of the definitions in the Draft Range Plan relating to restoration.

- Under Section 3.2.2, the historical footprint that will be restored starts as of April 1, 2016, however enhanced footprint restoration requirements only apply to new footprint created after April 1, 2017 (Section 4.3 requirement number 2). This leaves a one year gap in restoration within range which does not allow all disturbance to be considered. This gap must be closed.
- In Section 3.2.2 it is unclear when the habitat is considered restored. Usually, 40 years after initial disturbance is used as the time taken to return habitat to undisturbed.¹⁹

¹⁸ *Ibid.*

¹⁹ *Ibid.*



- In Section 3.2.2 the Draft Range Plan defines forestry cut blocks as initially restored. This is misleading as the habitat remains disturbed.

The Draft Range Plan should provide a more detailed timeframe for when all disturbance, including forestry cut blocks, is considered restored.

2. The Draft Range Plan fails to adequately restrict forest harvest within range, leading to more disturbance

Allowing Ongoing Forest Harvest Does Not “Maintain and Increase Habitat”

As part of the 0 – 5-year plan displayed in Section 3.1, in the first Figure 1, and in the table in Section 4.1 in the Draft Range Plan, historical forest harvest will be completed within the range. Not only is this an increase in disturbance, as it will involve the removal of habitat, but the Draft Range Plan claims that it is to “[m]aintain and increase effective habitat...to...further reduce impacts on caribou habitat and mitigate mountain pine beetle threat.” CPAWS disagrees that further harvest within the range will achieve any of these stated outcomes. *No further harvest should occur within the range, and the Draft Range Plan should outline how any disturbance and restoration will be working towards the goal of 65% undisturbed habitat.*

The current mountain pine beetle strategy has not been effective in stopping the spread of pine beetle into Alberta and has led to unsustainably high levels of harvest within range. As well, the strategy does not selectively target pine trees, but increases the harvest of all coniferous trees. Section 4.8 of the Draft Range Plan states that mountain pine beetle infestations result in damaging impacts to hydrological function, ecosystem function, sensitive sites, and wildlife habitat. The harvest of trees results in the same types of ecosystem damage described in the Draft Range Plan as the loss of trees attributed to mountain pine beetle. *This statement is misleading and should be changed to reflect the true reason for increasing harvest – loss of revenue from damaged trees.*

In section 4.5 it is not clear whether there are any restrictions or reductions on forest harvest. It is stated that forest harvest may only remove “second-pass” or “reserve block” stands, but only until all of that area is removed. In requirement number 6, it states that carryover volume must be harvested outside of the range before inside of the range. CPAWS believes that this point needs revision. *Only allowing companies to harvest within range after everything else is harvested is not a restriction. No new harvest should occur within the range in order to achieve 65% undisturbed habitat.*

In requirements 7 and 8 it is not clear if the volume of harvest allowed in range are reductions in volume, or what portion of the annual allowable cut (“AAC”) it makes up. *CPAWS recommends a reduction in AAC within the forest management units and no harvest within range. Disturbance in range must be managed to achieve 65% undisturbed habitat.*

Four forest management areas/units intersect with range boundaries, yet only two (FMU W15 and FMU E8) are specified in the Draft Range Plan. *Restrictions for the other two forest management units (FMU G15 and FMU E14) must be clarified.*



An analysis of the impact of forest harvesting and energy development scenarios in the Little Smoky range found that allowing forest harvesting and energy development delayed the achievement of the 65% undisturbed habitat objective by approximately 65 years (from approximately 2040 to 2105) as compared to a no further activity scenario. In the A La Peche range, the delay was also approximately 65 years, from approximately 2035 to 2100.²⁰

The Draft Range Plan does not contain any analysis of the delay that may occur in achieving the 65% undisturbed objective in either of the ranges as a result of permitting the additional industrial disturbances identified in the Draft Range Plan. Such an analysis must be completed to properly evaluate the Draft Range Plan.

Courts in Canada have established that time is of the essence in the protection of species at risk.²¹ As reflected in the preamble to *SARA*, measures to prevent the reduction or loss of the species should not be postponed. Any delay to the achievement of 65% undisturbed habitat as a result of allowing new disturbances in the Little Smoky and A La Peche ranges cannot be acceptable.

No further forest harvest should occur within the range.

3. The Draft Range Plan allows new petroleum and natural gas lease sales, as well as new oil and gas disturbance within a range that is over 95% disturbed

In the Draft Range Plan, there are many provisions for allowing new disturbance within the energy sector, yet no indication of how overall disturbance levels within the range will be managed. The federally required 65% undisturbed habitat needs to be achieved. With the current levels of disturbance within the ranges, it is hard to imagine there will be a circumstance where new disturbance will be necessary. No new seismic exploration or other energy disturbance should be allowed within the range. *New activity that requires new disturbance should not be considered.*

The allowance of new petroleum and natural gas leases as stated in Section 4.6 under requirement 13 is unacceptable. *CPAWS would like the current moratorium on the sale of all leases within range to become permanent. The potential of returning expiring leases to the Province should be explored within the Draft Range Plan; leaving this option out is an oversight that should be amended.*

Pipelines are long-term disturbances and are inappropriate within this range. They lead to decreased habitat connectivity and increased habitat disturbance. Overall disturbance and its contribution to the necessary 65% undisturbed habitat within range is once again not considered.

²⁰ Ministerial Task Force, *Ministerial Task Force, Little Smoky and A La Peche Caribou Ranges, Final Report*, (22 July 2015), Edmonton, at 26.

²¹ *Georgia Strait Alliance v Minister of Fisheries and Oceans*, 2010 FC 1233, at para 66; *Western Canada Wilderness Committee v Minister of Fisheries and Oceans*, 2014 FC 148 at para 101.



Borrow excavations (section 4.7 requirement 28), along with all other new disturbances should not be permitted within range.

CPAWS is concerned to see that low impact seismic lines are not included in linear feature density calculations. Adequate evidence supporting the exclusion of low impact seismic lines from disturbance calculations is not provided. Low impact seismic lines can have an impact on food availability for alternate prey species, predator and human access to habitat, and caribou usage of habitat. *Low impact seismic should therefore be included in the calculations of linear feature density, and included in mandatory restoration. Given the fragile state of these herds, a conservative approach should be taken and all disturbance should be included when evaluating the total impact to the range.*

4. The Draft Range Plan fails to identify a candidate protected area in Alberta's foothills, which are highly under-represented in Alberta's protected areas network;

The Draft Range Plan provides no protected area designation within either of the herd's ranges. Globally, protected areas have demonstrated over time to be one of the only effective methods for stopping the decline of at-risk or endangered species. *Thus, a portion of the range should be designated as a legislated protected area to ensure that some area of the range remains permanently removed from further industrial activity and therefore provides suitable, protected habitat for caribou.*

A legislated protected area in the Little Smoky range will also provide protection within the foothills natural sub region in Alberta. This natural sub region is highly underrepresented in our parks and protected areas network. Protecting it will help Alberta in meeting its demonstrated commitment to the internationally agreed upon Aichi Target 11 from the UN Convention on Biological Diversity.²²

The designation of a Public Land Use Zone ("PLUZ") is found in section 5.0 of the Draft Range Plan. However, it is unclear where the PLUZ would be located without the inclusion of a map. CPAWS would support a PLUZ designation, as such a designation would allow the government more control and management of both industrial and recreational impacts in the area. *CPAWS would like to see a greater commitment to the enforcement of inappropriate activities within any proposed PLUZ – from industrial activity as well as impactful recreational activities such as motorized off-highway vehicles.*

²² United Nations Convention on Biological Diversity, "The Strategic Plan for Biodiversity 2011-2020 and the Aichi Biodiversity Targets," 2010.



5. The Draft Range Plan targets population management methods that are controversial (wolf culling, alternate prey culling) and experimental (predator exclusion fencing) rather than habitat recovery

Population Management Without Habitat Recovery is Ineffective

The short-term predator and alternate prey population management proposed in the Draft Range Plan is inappropriate given the lack of commitment to achieving long-term habitat recovery goals. The Draft Range Plan fails to demonstrate how it will meet the long-term habitat goal that will allow for self-sustaining wild caribou populations, and instead plans for ongoing population management for 50 years. 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.*

The Proposed Caribou Rearing Facility

The proposed “caribou rearing facility” should be called what it is – a predator exclusion fence experiment with a highly unstable herd. Clear language should be used so as to not confuse the people of Alberta. There are many risks associated with the proposed caribou rearing facility that need to be addressed in the Draft Range Plan, including, but not limited to: risk of fire, risk of disease, food availability within the enclosure over the long term, predator breaches, and trophic cascade changes to the ecosystem due to the exclusion of apex predators. The Draft Range Plan needs to clarify the location, timeline of operation, funding, costs, and whether or not forest harvest, and oil and gas activities will be allowed to continue operation within the facility. More details for the caribou rearing facility are needed. *This type of extreme measure is inappropriate without achieving the amount of undisturbed habitat that is necessary for caribou to become self-sustaining in the long term.*

6. The Draft Range Plan sets inadequate monitoring timelines and adaptive management strategies

Monitoring and Proposed Adaptive Management Actions in the Draft Range Plan are Inadequate

The Draft Range Plan calls for monitoring of the success of the plan every five years. Five year stewardship reports are too infrequent given the potential issues that could arise from this Draft Range Plan and the low populations of caribou left in the Little Smoky and A La Peche herds.

Under requirement 47 the Government of Alberta must review and update the Draft Range Plan at least every 5 years from the date of its approval. This timeline should be changed to an “as necessary” format so that if or when proper monitoring determines that the management activities outlined in the Draft Range Plan are not working, an update should occur. Undertaking a review every five years is a useless exercise if the plan has not been working for 4 of them. In addition, an emergency plan, or “Plan B” has not been identified. If this draft plan is not working as shown by the monitoring, then a “Plan B” is necessary in order to be “adaptive”.



In addition to the infrequent requirements for monitoring, the criteria for the measurement of success of this Draft Range Plan requires more detail and must include specifics on monitoring the achievement of federal recovery strategy requirements.

Industrial land users (Section 7.2, requirement 42.) should be required to get approval for, rather than report on additions or modifications to footprint annually after the fact.

Caribou population thresholds and emergency habitat management actions need to be established in the Draft Range Plan. If suitable habitat falls below a certain amount due to unforeseen circumstances such as fire, or the population falls below a set threshold, an emergency protection plan should be in place to allow the government to halt any and all activity within the range to protect the caribou population.

7. The Draft Range Plan does not explore creative solutions for caribou conservation

There are a number of creative solutions that the Draft Range Plan could include that would maintain a healthy economy while ensuring self-sustaining caribou populations. Some of these potential solutions include:

- A pooling of the wood fibre supply outside of caribou range so that all forestry companies in the area can share the pooled supply. No forest harvesting would therefore need to occur within the caribou ranges while ensuring that no forest company goes out of business;
- Job repurposing training programs could train Albertans on growing industries such as forest restoration, solar panel installation, and wind farm creation and maintenance;
- Forest restoration requirements to offset proposed future disturbance; and
- The return of unproductive energy leases to the Crown.

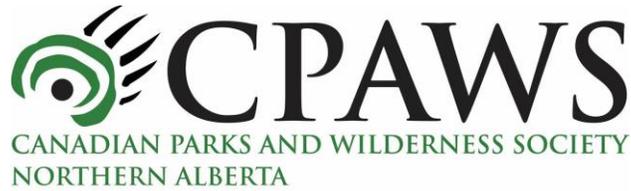
In Conclusion

The Draft Range Plan as currently written fails to meet the requirements of the *Boreal Recovery Strategy* by not identifying where, when, and how 65% undisturbed habitat will be achieved in the Little Smoky and A La Peche ranges. The Draft Range Plan does not restrict industry from disturbing the landscape within range in any meaningful way. The Draft Range Plan should include a legislated protected area that will ensure a portion of the critical habitat will be protected and available for caribou and other boreal species permanently.

This Draft Range Plan is the first range plan to be publically released in all of Canada and therefore sets an important precedent for the rest of the country. It is important not only to the Little Smoky and A La Peche caribou that this plan be successful, but for all woodland caribou. As it is now, CPAWS Northern Alberta has no confidence in this Draft Range Plan's ability to restore the two herds to self-sustaining status.

We are urging you, Premier Notley and Minister Phillips, to create a plan for the A La Peche and Little Smoky herds that will give these caribou a chance and set a good example for the rest of the Alberta and Canada. This





range plan needs to include a protected area, a detailed plan on how SARA requirements of 65% undisturbed habitat will be met, and a halt on any new disturbance within the range.

Thank you for considering our comments.

Sincerely,

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