

**ACTWS**  
Alberta Chapter of  
The Wildlife Society

Ronda Goulden  
Assistant Deputy Minister, Policy and Planning  
Policy and Planning Division  
Environment and Parks  
10th floor Petroleum Plaza ST  
9915 - 108 Street  
Edmonton, AB  
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11 September 2019

**Re: Draft Agreement for the Conservation and Recovery of Woodland Caribou in Alberta**

Dear Ms. Goulden,

The Alberta Chapter of the Wildlife Society (ACTWS) is an organization representing over 300 wildlife professionals in the province of Alberta. We are affiliated with The Wildlife Society, through our membership in the Canadian Section, providing international reach in wildlife science. The ACTWS welcomes the opportunity to comment on the draft Agreement for the Conservation and Recovery of the Woodland Caribou in Alberta (“the draft Agreement”), under Section 11 of the Species at Risk Act.

We are encouraged by the progress in formalizing a plan between the Governments of Alberta and Canada to conserve woodland caribou in Alberta. However, the process to accomplish this has been in place for more than 7 years and this draft agreement continues to be a “plan to make a plan.” Our primary concern is that the goals within this draft plan are not supported with any tangible actions or effective targets.

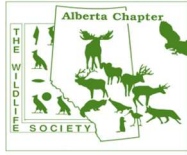
Specifically:

- The wording regarding forest harvest within caribou ranges suggests that there will be minor reductions in timber removal over time. It is hard to imagine how any further clear-cut logging will contribute to the restoration of woodland caribou habitats when all of the provincial woodland caribou ranges are substantially below the minimum 65% undisturbed habitat goal established in the Federal Recovery Plan. Clear-cut logging has been a significant detriment to woodland caribou habitats. An alternative that should be evaluated is partial cutting (see Vitt et al. 2019). This pilot project, initiated 22 years ago in west central Alberta, demonstrated that up to 90% removal of the canopy coverage still:
  1. supported healthy lichen populations;
  2. encouraged coniferous tree regeneration;
  3. did not result in any new road access development; and

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4. most importantly, partial cutting did not promote the growth of browse suitable for wolf prey (moose, elk, deer).
- The goal of a net reduction in habitat disturbance cannot be achieved without a policy of limiting all new energy developments (pipelines, well pads, powerlines) to existing disturbances. There is nothing in the draft plan that appears to coincide with this goal. There needs to be a moratorium on any new energy development footprint.
  - Access management plans are necessary; albeit, they needed to be initiated 40 years ago. The experience with access management in west central Alberta (see Hervieux et al. 1996), is that although they reduce duplication of access, the result is that the entire range becomes accessible. Again, this plan does nothing to achieve the goal of at least 65% undisturbed habitat.
  - The interactions of forest harvest, an expanding disturbance footprint and access have the potential to accelerate herd declines and need to be acknowledged and studied.
  - Full reporting to the public is a requirement if progress is to be evaluated in a transparent manner. Moreover, the deliverables must be formalized in legislation to be effective.

In summary, the draft agreement provides limited progress towards woodland caribou conservation in Alberta. We find that the draft does not fulfill the Species at Risk Act obligations and the Minister of Environment and Climate Change should take necessary steps to ensure that the Government of Alberta follows through on more immediate and tangible actions.

We look forward to your comments and actions on this urgent issue.

Sincerely,

John Wilmshurst, PhD, P.Biol.  
Executive Director, ACTWS

cc: Ministry of Environment and Climate Change Canada, Canadian Wildlife Service  
Niall O'Dea, Associate Assistant Deputy Minister, Canadian Wildlife Service, ECCC

Vitt, D. H., L. Finnegan, and M. House. 2019. Terrestrial bryophyte and lichen response to canopy opening in pine-moss-lichen forests. *Forests* 10: 233. doi:10.3390/f10030233

Hervieux, D., J. Edmonds, R. Bonar, and J. McCammon. 1996. Successful and unsuccessful attempts to resolve caribou management and timber harvesting issues in west central Alberta. *Rangifer* 16(4):185–190. doi:10.7557/2.16.4.1241

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