



# ALBERTA CHAPTER OF THE WILDLIFE SOCIETY

Premier Jason Kenney  
Office of the Premier  
307 Legislature Building  
10800 - 97 Avenue  
Edmonton, Alberta T5K 2B6

June 30, 2020

## Re: Easing Environmental Regulations and Policies

Dear Premier Kenney:

The Alberta Chapter of the Wildlife Society is a non-profit organization representing over 400 wildlife professionals in the province of Alberta. Our mission is to inspire and empower wildlife professionals to engage in science-based management and conservation of wild animals and their habitats. We are affiliated with The Wildlife Society, the largest organization of wildlife professionals in the world. Each of our members loves Alberta for the diversity of economic, wilderness and wildlife opportunities it provides. Our dedication to that outcome is reflected in our thoughtful, innovative work.

Over the past few months, the Alberta Government has announced several changes to policy and regulations regarding Alberta's environmental practices and use of public land. Many of these changes are concerning. We are writing today to express our interest in working with the Alberta Government on red tape reduction without weakening environmental regulations to the point where our public lands and wildlife will be at risk. As an organization with a diverse membership of wildlife professionals, we feel we are well positioned to offer expertise in updating Alberta policy and regulations in ways that meet economic and ecological needs.

Here is a list of policy changes that we find particularly concerning:

1. Rescinding the coal policy

The Coal Policy from 1976 designated several areas in the Foothills and Rocky Mountain ecoregions as inaccessible to open-pit coal mining. This policy provided certainty for Albertans and industry regarding where open-pit mining could occur. The headwaters of the Foothills and Rocky Mountains are essential water towers for millions of Albertans and contain a significant number of fish and wildlife species, some of which have been designated as species at risk. Development that puts these ecosystems at risk should be avoided in the interests of all Albertans. Industry benefits from this certainty because they do not need to develop a proposal for a mine that will be rejected in the environmental impact assessment process. The 1976 policy is a foundational piece for managing



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development approvals of our crown lands; removing it will actually create more red tape as industrial interests will submit proposals for mines that are not likely to be approved by review panels based on environmental impacts.

## 2. Changes to increase the forestry annual allowable cut

Forestry practices in Alberta are continually evolving and improving based on forestry science and industry best practices. Many of our members, including people working in the forestry sector, are uncertain as to where an additional 13% for the annual allowable cut (AAC) could be found. The current system of calculating AAC allocates all the trees that can be removed from the ecosystem sustainably; removing more puts landscape integrity at risk. Programs can always be implemented that improve efficiencies in the forestry industry, including how quickly forests regenerate after natural or man-made disturbances, but these measures are unlikely to create an abundance of trees that can sustain a 13% increase in AAC.

## 3. Changes to Alberta Parks

The plan to Optimize Alberta Parks is concerning for many reasons, including changes to camping availability, reduced protection for species at risk, and potential increased damage to public lands caused by increased random camping across the province. We detailed these concerns in a letter to Minister Nixon dated April 16, 2020. We appreciate the decision to keep 17 of the 20 provincial parks slated for closure open for 2020 to ensure abundant camping opportunities for Albertans. We encourage Minister Nixon to commit to keeping these sites open beyond 2020. Other changes to the organizational structure of the Ministry of Environment and Parks further weaken Alberta Parks by removing essential ecological and planning staff from the Parks division.

Individually, these changes significantly alter how people use public lands and how industrial activities are approved across Alberta. None of these changes were open for public consultation, which we find particularly concerning. In addition, it seems that little attention has been paid to the cumulative effects of these changes. Through the science of cumulative effects analysis, any opportunity for expanded resource development can be recognized and the development impacts can be mitigated.

For example, as parks are delisted and revert to crown land, they may be open for forestry, coal-mining, or oil and gas exploration. These new developments could further endanger species at risk, hinder public access and enjoyment of public lands, reduce certainty for industrial investment, and increase unemployment.

Our members have expertise in all aspects and value the application of current, relevant, and robust science in decision making. We are available to assist with advice on:

- Public and First Nations consultation programs



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- Habitat and wildlife assessments
- Forestry and industrial best practices and land use planning
- Protected area planning and management
- Cumulative effects planning and mitigation

We look forward to working with your government to find solutions that reduce red tape, provide certainty for industrial development proposals, and reduce potential impacts to wildlife and human communities across Alberta. We would appreciate your response to our organization's offer.

Respectfully,

Alex Beatty

Alberta Chapter of The Wildlife Society President

cc: Minister of Alberta Environment and Parks, Jason Nixon  
Minister of Finance, Travis Toews  
Minister of Agriculture and Forestry, Devin Dreeshen  
Minister of Energy, Sonya Savage  
Minister of Indigenous Relations, Rick Wilson  
Associate Minister of Red Tape Reduction, Grant Hunter  
Associate Minister of Natural Gas, Dale Nally  
Leader of the Opposition, Rachel Notley  
Environment and Parks Critic, Marlin Schmidt