



# ALBERTA CHAPTER OF THE WILDLIFE SOCIETY

Honourable Devin Dreeshen  
Alberta Agriculture and Forestry  
229 Legislature Building  
10800 - 97 Avenue NW  
Edmonton, AB  
Canada T5K 2B6

July 23, 2020

## **Re: Increased access to fibre helps protect jobs**

Dear Minister Dreeshen:

The Alberta Chapter of The Wildlife Society is a non-profit organization representing over 450 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. As a society we have been engaged in many past conversations about forestry in Alberta, and we have played an active role on the Alberta-Pacific Forest Industries Public Advisory Committee since its inception.

We are writing in response to the Government of Alberta's recent announcement of increasing the Annual Allowable Cut (AAC), thus increasing access to fibre for forestry companies in Alberta and protecting jobs in rural communities. Your Ministry has said this effort seeks to provide stable investments and employment for hard working rural Albertans. We would like to obtain more clarity on this recent announcement to better understand the mechanisms by which more fibre access will be provided to companies operating in Alberta, and its implications on other landscape and ecological values.

The press release from the Ministry of Agriculture and Forestry from May 3, 2020 refers to a Forest Jobs Action Plan, which aims to "support forest jobs and fibre access for Alberta's forest industry". Specifically, we would like to obtain more information on three aspects of the action plan: 1) how planting sites will impact forest age structure; 2) logging unallocated areas of existing tenures; and 3) ensuring alignment with caribou task forces.

First, one of the actions in this plan is to plant recently burned sites to ensure a quicker return to forest cover. The plan references the use of superior, naturally occurring seedlings that will provide long term resilience for Alberta's forests. We would like more information on how this will result in increased fibre access and its potential impacts on mature and old forest levels in Alberta over time. Is the government relying on an Allowable Cut Effect to provide increased access to fibre? If so, we



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would appreciate some clarity on how that will be accomplished. We would also like to understand if this approach will be used on entire tenures, or specific portions of tenures.

If the government is relying on an Allowable Cut Effect to provide this increased AAC, we would like to better understand how key wildlife values will be maintained within managed forests. For example, providing an Annual Allowable Cut Effect means that the average age of our forests will decrease over time. However, we know that various migratory birds and species at risk depend on a proportion of old forest to meet their life cycle needs. How might these species be impacted by these changes? Other species, such as Barred Owls have conservation management plans in place, how might these species be impacted by these changes? Our dedicated and experienced members are ready to work with government forestry staff to ensure any changes to AAC do not overly impact species at risk which rely on specific forest age structures for survival.

Second, the Forest Jobs Action Plan also states that AAC will be increased by providing access to previously unallocated areas of existing tenures. Could you please provide specific examples of what is meant by this statement and what operational changes Albertans can expect to see on the ground as a result of these changes? We are unsure what unallocated areas within tenures exists. For example, will riparian buffers be changed? Will steeper slopes be logged and will this increase the equivalent clear-cut area on a watershed basis? These are critical questions to ensure the integrity of our source waters and the abundant biodiversity and species at risk that they support.

Finally, the Forest Jobs Action Plan states that forest management plans will align with work being done by the caribou sub-regional task forces. Can you please expand on how you see increased access to fibre supply and an increase in the AAC as in line with woodland caribou recovery planning in Alberta? What are the specific mechanisms by which these two planning processes will align? We would also appreciate additional information on how an increased AAC might affect other species at risk recovery efforts, including Bull trout, Westslope cutthroat trout and Athabasca rainbow trout.

Thank you for taking the time to review our letter and to provide more context for this recent announcement. The ACTWS represents an active community with many of our members working to ensure sustainable management of Alberta's resources. In many cases, these individuals are working alongside, or within, forestry companies in Alberta. It is important for our membership to have a better understanding of the Government of Alberta's recent announcements and their implications for wildlife in Alberta.

Sincerely,



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*Alex Beatty*  
Alex Beatty

President, Alberta Chapter of The Wildlife Society

CC: Jason Nixon MLA, Minister of Alberta Environment and Parks

CC: Marlin Schmidt MLA, Critic for Environment

CC: Lorne Dach MLA, Critic for Agriculture and Forestry