

January 17, 2018

Honourable Minister Shannon Phillips
Alberta Environment and Parks
208 Legislature Building
10800 97 Avenue
Edmonton, Alberta
T5K 2B6

Dear Minister Phillips,

We have thoroughly reviewed the draft range plan for woodland caribou, released December 2017. While the plan effectively outlines the lack of habitat protection for woodland caribou in Alberta and describes many potentially effective approaches, it does not constitute a range plan or range-specific plans. The draft range plan only indicates an intent to develop range-specific plans based on the applicable strategies. Therefore, the process is incomplete, and will not be effective until plans are developed that employ those strategies at the range plan level.

As a minimum, the range plans might be considered complete when:

1. All proposed conservation areas have been officially designated as Wildland Provincial Parks, with the appropriate phase-out of existing dispositions and prohibition of new dispositions.
2. For each specific range, restoration targets and mechanisms have been set for each 5-year period until all legacy anthropogenic disturbance has been formally deemed restored.
3. A Regional Access Management Plan has been prepared, reviewed, and approved for each specific range.
4. For each specific range, Alberta Environment and Parks, Alberta Agriculture and Forestry, Alberta Energy and the Alberta Energy Regulator, have prepared tenure rules, annual allowable cuts, joint development and zonation plans that demonstrate how and when the 65 per cent undisturbed threshold will be achieved in 50-70 years.
5. For each specific range, maps are prepared for a series of 10-year periods demonstrating how the restoration, access and development, and zonation plans referred to above will achieve the 65 per cent undisturbed threshold within 50-70 years.
6. Every requirement of the provincial range plan and specific range plans are encoded in enforceable statutory provisions.

We believe these requirements must be achieved in range plans for the federal minister to determine there is effective protection of caribou habitat provided by said plans.

Until the range plans have been completed, evaluated, and implemented as described above, the Minister of Environment and Climate Change is obliged to determine that there is no effective protection of caribou habitat in Alberta and to recommend an order under section 61(2) of the Species at Risk Act.

We strongly prefer that Alberta meet its obligations to deliver effective range plans by April, 2018. Due to the extreme time pressures to conclude range plans, multi-stakeholder workshops designed to deliver on

these plans must be focused, effectively facilitated, and drive towards resolution on specific quantitative solutions to ensure genuine progress. Therefore, we are committed to work collaboratively with your staff and other stakeholders over the next three months to ensure effective range plans are delivered.

Yours sincerely,

Simon Dyer, Alberta Director
Pembina Institute



Michael Bloomfield, Executive Director
Harmony Foundation



Christyann Olson, Executive Director
Alberta Wilderness Association



Kecia Kerr, Executive Director
Canadian Parks And Wilderness Society



Rachel Plotkin, Ontario Science Projects Manager
David Suzuki Foundation



Art Jackson, President
West Athabasca Bio-Regional Society



CC:

Honourable Margaret McCuaig-Boyd, Minister of Energy

Honourable Oneil Carlier, Minister of Agriculture and Forestry

Jonathan Wilkinson, Parliamentary Secretary to the Minister of Environment and Climate Change

Andre Corbould, Deputy Minister, Alberta Environment and Parks

Ronda Goulden, Assistant Deputy Minister Policy and Planning

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