

December 17, 2024

The Honourable Steven Guilbeault
Minister of Environment and Climate Change
House of Commons
Ottawa, Ontario
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Subject: Failure to Recover Woodland Caribou in West-Central Alberta - Request for Imminent Threat Assessment

Dear Minister Guilbeault:

The Alberta Chapter of the Wildlife Society, Canadian Parks and Wilderness Society Northern Alberta Chapter, and Alberta Wilderness Association would like to draw your attention to the ongoing plight of the last remaining southern mountain caribou (SMC) and boreal caribou populations along the eastern slopes of the Rocky Mountains in west-central Alberta.

We strongly request that Environment and Climate Change Canada (ECCC) urgently develops and publishes an updated Imminent Threat Assessment for Alberta's provincially managed SMC populations and simultaneously initiate an Imminent Threat Assessment for the adjacent Little Smoky boreal caribou populations.

Our request is in alignment with your department's comprehensive work to develop and publish an imminent threat assessment for imperilled caribou populations in Quebec. We make our request for caribou in west-central Alberta given ongoing alteration, fragmentation and destruction of caribou habitat, increasing endangerment of these caribou populations, loss of recovery potential, and the harmful and lasting impact that the extirpation of these last caribou on Alberta's eastern slopes would have for Indigenous Peoples, ecosystems, and the general public.

It is of vital importance that ECCC assesses the current state of west-central Alberta caribou populations and their critical habitat and assess planned future land management developments in the ranges of these populations. Our request is urgent, regardless of ongoing work by the Government of Canada to amend the SMC recovery strategy and the Government of Alberta's process to develop sub-regional plans.

We request acknowledgement of your receipt of this correspondence. And at your convenience we would appreciate a meeting with your office to discuss this matter.

Respectfully,



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Enclosure:

1) Background to Request for Imminent Threat Assessment – Woodland Caribou in West-Central Alberta

2) Citations

Background to Request for Imminent Threat Assessment – Woodland Caribou in West-Central Alberta

With a former distribution in Alberta that extended along most of the eastern slopes of the Rocky Mountains, only three SMC populations (Redrock-Prairie Creek, Narraway, and A la Peche) and a single boreal caribou population (Little Smoky) now exist on provincially managed lands in west-central Alberta. The existence of these populations is being supported solely through lethal reduction of wolf populations delivered by the Government of Alberta. The destruction of caribou critical habitat continues, resulting in profound and escalating threats to caribou persistence and recovery. The correlation between SMC extinction risk and human-caused habitat alteration and loss is well documented (e.g., Johnson et al., 2015), and published reports show the same correlation for boreal caribou. All caribou populations in west-central Alberta show significant indications of extirpation risk.

Your department prepared and published an Imminent Threat Assessment for SMC in 2018 (Government of Canada, 2018), and the Minister of Environment formed the opinion that SMC are facing imminent threats to recovery. We understand that the Government of Canada declined to invoke an emergency order in consideration of enactment of a conservation agreement with the Government of Alberta in 2020 (Government of Canada, 2020). Our assessment, however, is that to date actions specified in this conservation agreement have not been delivered to produce discernible benefits for west-central Alberta caribou. On the contrary, the endangerment of those caribou populations and their critical habitat has increased since 2018.

Through a Freedom of Information application to the Government of Alberta, we received caribou occurrence and demographic information for the Redrock-Prairie Creek and Narraway populations. Our review of this information corroborated published analyses (MacNearney et al., 2016, Williams et al., 2021) that the occurrence and distribution of these populations is dramatically collapsing in association with high levels of human-caused habitat alteration, fragmentation, and loss on the caribou winter ranges. We did not submit a Freedom of Information request for A la Peche caribou data, but it is well known that the occurrence and distribution of that population also shows a consequential decline. As outlined in published research papers, and supported by monitoring conducted by provincial jurisdictions, occupancy collapse and range contraction in association with human-caused habitat destruction is a key indicator foreshadowing population extinction for woodland caribou, and many other species.

In response to ongoing human developments, SMC are being forced to abandon their natural migratory behaviour in Alberta and are increasingly unable to annually migrate to winter range in the foothills (Government of Alberta - Freedom of Information caribou data, Government of Alberta sub-regional planning presentations, MacNearney et al., 2016, Williams et al., 2021). Some individual caribou continue to migrate to portions of their foothills winter range, but only to those areas where undisturbed and biophysical critical habitats still exist (Williams et al., 2021). Given the extensive and ongoing

destruction of critical habitat in their natural wintering areas, the populations are increasingly forced to maladaptively remain in mountainous areas year-round. As described by the Government of Alberta during stakeholder engagement sessions, caribou living in the mountains during winter face poor access to forage (Thomas et al., 1996) and, especially concerning, suffer unsustainably elevated levels of mortality due to avalanches (Government of Alberta sub-regional planning presentations). Year-round residency in the mountains is hazardous for individual caribou and threatens population viability. For example, the Government of Alberta reported a high proportion of the Redrock-Prairie Creek population being killed in avalanches in a single year, and one avalanche resulted in the extirpation of the Banff caribou population.

SMC recovery in Alberta will be greatly challenged if their distribution continues to collapse in the face of ongoing winter range habitat destruction. The current level of winter range occupancy must be supported, and occupancy of the broader winter range areas enabled. As is the case with distribution collapse, published research shows that loss of life history patterns, such as the loss of annual migration demonstrated by SMC in Alberta, is also a predictor of extinction vulnerability.

While not a migratory caribou population, ongoing habitat alternation, fragmentation and loss is confining the Little Smoky caribou to an ever-smaller enclave of remaining habitat. The extensive impact of recent timber harvesting within and adjacent to the Little Smoky caribou range is obvious through simple inspection of *Google Earth* imagery. The Little Smoky caribou range has been documented as having the highest level of human-caused habitat disturbance of any boreal caribou range in Canada, and yet, habitat loss continues. The Little Smoky caribou population has particular significance, as the last boreal caribou population along the eastern slopes, and since it has significant genetic distinctiveness (Gubili et al., 2017).

The Government of Alberta is engaged in developing two sub-regional plans that encompass the caribou ranges discussed here; however, delivery of these plans will be moot if the potential for caribou recovery has been lost. As specified in the woodland caribou conservation agreement between the Governments of Canada and Alberta (Government of Canada, 2020), the sub-regional plan for the Redrock-Prairie Creek and Narraway populations was to be finished in 2022; however, it remains overdue. We strongly support the potential value of Alberta's sub-regional planning as a step towards achieving caribou conservation and recovery. However, based on discussions we participated in during stakeholder engagement sessions it is unclear if the resulting sub-regional plans will enable caribou persistence in west-central Alberta, let alone facilitate their recovery.

We commend the Government of Alberta's recent actions to start forest growth on geophysical exploration lines in parts of the west-central caribou ranges; however, those actions will take decades to regrow critical habitat and provide tangible benefits for caribou. The loss of caribou habitat in west-central Alberta has accelerated due to timber harvesting (Nagy-Reis et al., 2021); it is not balanced by recent restoration actions.

Wolf culling remains the current approach being employed to avoid caribou extirpation in west-central Alberta. As documented by scientific reports, caribou populations quickly re-enter a state of decline if wolf management is halted or becomes ineffective.

We note that recently the province of Alberta inexplicably disabled effective alternative prey population management in west-central caribou ranges.

The Government of Canada published the boreal caribou recovery strategy in 2012, and the SMC strategy in 2014, and is currently seeking to amend the SMC strategy. We applaud your department for these efforts. It is clear, however, that the conservation status of caribou in west-central Alberta has declined since the strategies were published. We are concerned that the completion, approval and implementation of the SMC recovery strategy amendment may be too late to enable recovery of SMC in west-central Alberta, as the potential to conserve and recover these caribou continues to diminish. Our concern holds true for the Little Smoky caribou population, since there seems to be no end in sight for critical habitat destruction in that caribou range.

As noted in the federal recovery strategies, recovery of woodland caribou is feasible, if the necessary efforts are made. At some point, however, the biological reality of caribou endangerment can't be overcome if critical habitat is ever diminishing.

Citations Enclosed in Letter to the Honourable Steven Guilbeault

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