Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

Todd Loewen

Minister of Forestry and Parks
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Re: Allison Creek — Tecumseh Forest: Request for protection of endangered five-needle pines.

Dear Minster Loewen,

Alberta Wilderness Association (AWA) is writing to express our concerns regarding untagged five-needle pines proposed for harvest in the Allison Creek – Tecumseh Mountain Forest harvest block.

Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 10,000 members and supporters in Alberta and around the world, AWA is dedicated to conserving Alberta's wild spaces and species and advocating for conservation strategies that protect Canada's biodiversity.

Both species of five-needle pines in Alberta, the Whitebark Pine and Limber Pine, are designated *Endangered* by both the provincial *Wildlife Act* and federal *Species at Risk Act*. On November 24th, AWA was informed through a volunteer tree inventory and report from Spry [1](report) that volunteer surveyors (hereafter known as volunteers) identified five-needle pines that require further field verification in the Allison Creek – Tecumseh Mountain Forest. Volunteers documented 61 confirmed or suspected five-needle pines, with an additional concentration of five-needle pines recently discovered near the Beehive Cliff area. The region identified by volunteers through the inventory also overlaps with the WPEFC 2014 Whitebark Pine habitat range, as well as the 2015 Government of Alberta Whitebark Pine habitat model from Lidar.

Of the five-needle pines that volunteers surveyed, 93 percent were not tagged by West Fraser for retention, and 71 percent of retention candidate trees had previously not been flagged (Western Red Cedar, Douglas Fir and Whitebark Pine) during preliminary work. These findings raise concerns

[1] Tecumseh and Allison Creek Proposed Harvest Tree Survey (November 23, 2026). Prepared by Jamie Lowe-Wylde.

about the completeness of field-level identification for candidate retention trees and large five-needle pines (Figure 1) that have gone untagged.

We request that there be a deferral of harvesting for the Allison Creek/Tecumseh Mountain Forest cutblocks until a comprehensive professional and independent five-needle pine inventory is completed within the area identified in the report, locally known as "Beehive Cliff" area (Figure 2). If the inventory deems this area ecologically significant, or if the stand contains more than 20 percent Whitebark Pine, Limber Pine or a combination of these species — as per the Final Draft of the 2025 C5 Forest Management Plan (FMP) recommendation from the Whitebark Pine Ecosystem Foundation of Canada (WPEFC) — then the stand must be excluded from the commercial forest land base.

Additional Recommendations:

- The professional tree inventory should be expanded to include all planned harvesting in the Allison Creek and Tecumseh areas, to ensure that West Fraser is meeting their commitment under VOIT ID 14-1 within the FMP, which aims to "Maintain identified Whitebark and Limber Pine trees, saplings, and seedlings". Expanding this survey would ensure that the FMP target of "A minimum of 95% protection of all known Whitebark and Limber Pine trees, saplings, and seedlings,[2]" is attained.
- Health transects should be completed for five-needle pines in the area, including for the identification of "plus trees" (rare, high-value whitebark or limber pine trees that may have resistance to white pine blister rust), for which West Fraser has set a target of 100% protection with their FMP.[3]
- Current retention practices of Whitebark Pines should be improved, as current practices often target single-tree retention (Figure. 3). Additional neighbouring trees should also be retained, as studies show that Whitebark Pines with a minimum of 8 neighbouring trees (recommended in the BC Forestry Best Management Practices) [4] showed a greater than 50 percent chance of survival when compared to their lone counterparts.[5]

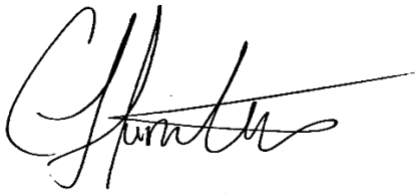
Lastly, we would like to express support for additional forest retention requested with the Spry report, in order to maintain the integrity of the Beehive loop connection trail, and the overall trail

[2] https://www.westfraser.com/sites/default/files/2025-06/C5_FMP_20250610%20web.pdf
[3] Ibid
[4] https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/best-management-practices/wbp_retantion_guidelines_harvest_practitioners.pdf
[5]Murray, M. P., Berg, J., & Huggard, D. J. (2021). Harvest Retention Survivorship of Endangered Whitebark Pine Trees. Forests, 12(6), 654. https://doi.org/10.3390/f12060654

system in the region. This Trail network is unique to the area and provides sustainable tourism opportunities that help support the Crowsnest Pass as a place to recreate and visit.

We look forward to continued discussion on these issues and would welcome an opportunity to meet and discuss further.

Sincerely,
Alberta Wilderness Association



Cameron Hunter
Conservation Specialist



Figure 3: Large five-needle pine identified in Spry report

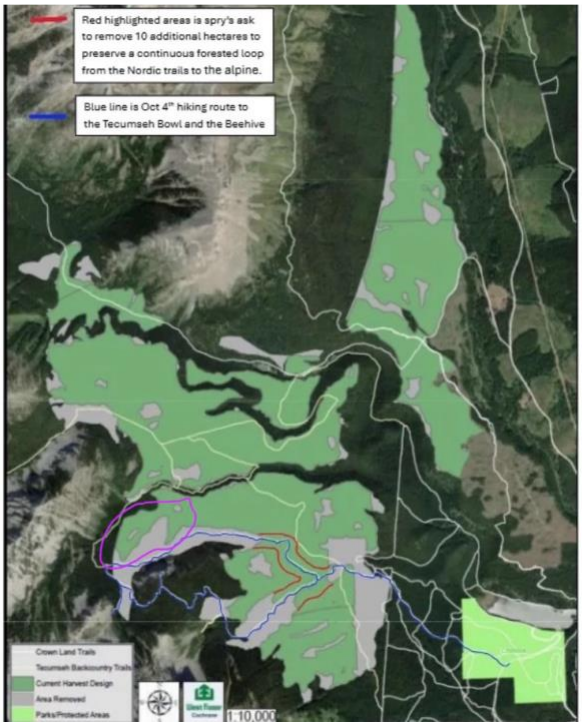


Figure 1: Proposed additional 10- hectare forest retention area required to complete the Beehive Loop. Five-needled pine area (Beehive Cliff) circled in purple.



Figure 2: Single tree retention example from recent harvesting in Daisy Creek