



The Alberta Fish & Game Association is your voice in conservation

June 23, 2021

Honourable Jason Nixon
Minister of Alberta Environment and Parks
Office of the Minister
323 Legislature Building
10800 - 97 Avenue
Edmonton, AB, T5K 2B6
Emailed to: aep.minister@gov.ab.ca

Re: AFGA Response to Draft Bull Trout Recovery Plan

Dear Minister Nixon,

The Alberta Fish and Game Association (AFGA) appreciates the opportunity to comment on the *Draft Bull Trout Recovery Plan* that was released to the public in May 2021. As you are aware, Darryl Smith, AFGA Provincial Fish Chair sat on the advisory panel. During development of the plan, he made numerous comments and identified concerns. There are fundamental issues that must be addressed before AFGA can support the document.

The document presented should be viewed only in the context of further discussion and a legislated requirement to fulfill timeline obligations under the *Species at Risk Act (SARA)* or *Alberta's Wildlife Act*. From the beginning, our representative identified that the development of such a 'strategy' required the direct participation of not only Alberta Environment and Parks (AEP), but other key ministries including Agriculture and Forestry, Energy, Infrastructure, Justice, Municipal Affairs, and Transportation, as the starting point.

While the forestry and energy sectors were represented on the advisory committee through their industry associations, this falls far short of the direct industry representation that is critical for such a strategy to be implemented. It should be anticipated that there will be direct negative impacts and costs to their operations under such a strategy. The lack of participation by First Nations, municipal, and local governments from the outset of development of this is an additional shortcoming. Without the involvement of all these groups from the start, understanding of what is achievable and the overarching consequences including necessary trade-offs, this document represents just another in a series of 'paper plans' coming from a singular perspective.

Why is this critical? Alberta has a long history of developing documents for *Species at Risk* that ultimately lead to only limited or no action on the ground. You must look no further than past efforts related to Bull Trout and Woodland Caribou to note this failure in recovery efforts, where a cascade of earlier plans exist that have identified the same issues repeatedly. The result is that the only significant actions are related to sportfishing regulation changes, academic study, and further monitoring.

While AEP, during the advisory committee meeting, noted that this is a Government of Alberta (GoA) document, the reality is that ministries continue to operate in separate siloes and a hierarchical structure. The level of buy-in, legislated changes to policy, reporting, and transparency that is required for such a strategy to be successfully implemented is unknown as it relates to these other ministries.

One needs to look no further than Agriculture and Forestry where they are proposing to increase the annual allowable cut (AAC) in our forests by 30 percent. This can only occur by allowing harvest in environmentally sensitive areas including riparian buffers or decreasing the rotational age of harvest. The result will be an increase in watershed level cumulative effects negatively impacting the habitat of Bull Trout.

Alberta Energy is on the cusp of allowing further coal strip mining along the East Slopes in what overlies the current range of Bull Trout. This will lead to further loss or fragmentation of habitat. AFGA would question how such actions by these ministries are consistent with recovery efforts for Bull Trout, if it is a priority for the GoA?

Even within AEP there are policy contradictions related to gravel mining within riparian areas or in relation to aquifers that negatively impact habitat. This is further complicated when approvals for development, including those within riparian areas, often rest at a municipal level.

In theory we can achieve recovery objectives provided we are prepared to make the necessary sacrifices. The reality is, that in the past, society has not been prepared to take the necessary actions at a watershed and landscape level to allow for the resiliency, integrity, and productivity of the ecosystem to be restored. AEP has continually indicated throughout the process that they do not have the ability to ensure that the necessary changes to land use occur. This responsibility rests with other ministries. It makes no sense to include certain actions within the document if they cannot be implemented to the degree required.

Habitat is foundational and the most critical element for Bull Trout that must be addressed. While the strategy alludes to the importance of habitat, there is little substance in the document to see an overall reduction in human-induced impacts on habitat, at the scale required. This is both from a watershed or a landscape level. Attempting to reverse past practices implies that the overall footprint of industry and recreationalists must be reduced. Such action is essential if the goal is the long-term maintenance of coldwater habitat within the province which is further complicated by climate change. Actions are required now to buffer these effects. Whether the various ministries and industries are prepared to meet this challenge with the resulting trade-offs and consequences must be determined, as other actions, at best, maintain the status quo. No strategy can be effective if you fail to ensure that the foundation can actually be built.

AFGA is concerned about the development of benchmarks that fail to rely on empirical and consistent data sets and methodology. We recognize that Bull Trout populations are not at historical densities or age structure composition. The use of a model such as the Fish Sustainability Index (FSI) as the measure of recovery cannot be supported. The FSI, derived from a subjective assessment of historical habitat and fish population dynamics, is limited to use as part of a risk analysis exercise only. The FSI may allow for a high-level assessment of potential carrying capacity of habitat, but as the underlying data set is subjective, it does not identify the actual current carrying capacity. The intention of FSI was as a landscape tool to help educate and inform managers, industry, and the public of perceived risk, not as an empirical methodology. Risk assessment tools are perspective-driven and valuable to gain an understanding of the issues, but not as a measure of recovery.

The benchmarks must therefore be built on empirical methodology that take into account natural variability within fish populations. The recovery goals must be clearly and transparently disclosed at the start, to all stakeholders before actions are undertaken. For example, if a density of Bull Trout of two per mile, with 50% are adults is the current estimate, using agreed upon standardized methodology, the recovery goal from the outset must identify the timelines and resulting density that would be expected based on recovery actions. Changing goals, benchmarks, or altering response timelines of recovery only contribute to a lack of support by the public and industry for long term management of species.

While we are supportive of increasing the awareness of Bull Trout and other native trout conservation, including a coordinated approach to actions, the importance of Alberta's coldwater species, whether native or naturalized, must not be lost. The survival of all these species is tied to an effective plan that addresses habitat as the foundation.

There is an urgency to move forward. The last four years have seen only the development of what can be described as more 'paper'. While some positive changes are occurring on the landscape, they are not at the intensity that is required to deal with recovery of species that have critical habitat needs. Only once there is an understanding of the level of commitment from the other GoA ministries and industry, can a plan with realistic goals be developed and implemented. This must be known now!

AFGA is suggesting that the other ministries must at least support a plan where one watershed, that is under stress that is defined at a minimum of a Hydrological Unit Code (HUC) 10, be designated in each of the following watersheds, Oldman, Bow, Red Deer, North Saskatchewan, Athabasca, and Smoky Rivers. These HUCs would then have comprehensive ecosystem-based actions undertaken that will lead to the resiliency, integrity, and productivity returned to historical levels. Those watersheds where the ecosystem continues to function at historical levels would see no further expansion of activity or linear disturbance. Landscape level habitat, education, enforcement, and sportfishing regulation programs would occur concurrently. If collectively we cannot commit to this level of action, then we need to be transparent and indicate the rationale for the trade offs and the consequences.

AFGA appreciates AEP consulting with our organization on this key issue impacting our fish, wildlife, and the habitat upon which they depend. Transparency and reality must be the cornerstone of species at risk recovery actions. By continuing to approach the issue as an academic exercise, in a single perspective, or through siloes will only perpetuate unsuccessful past practices.

Yours sincerely,



Victor Benz

President, The Alberta Fish and Game Association

cc:

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