



February 15, 2018

The Honourable Shannon Phillips
Minister of Environment and Parks
Government of Alberta
208 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

Re: Comments on Provincial Native Trout Recovery Initiatives

Dear Minister Phillips,

The Alberta Chapter of The Wildlife Society (ACTWS), an organization representing over 300 wildlife professionals in the province of Alberta, is writing to express our concern for the state of Alberta's East Slope stream-dwelling trout species. We are also writing to applaud your Department's recent efforts in species recovery and planning in Alberta and to provide further commentary on current approaches.

As you are aware, several trout species are currently imperilled within Alberta. Arctic grayling are a species of special concern but have gone missing over a broad sweep of their former range. Athabasca rainbow trout, bull trout and westslope cutthroat trout are all listed as "Threatened". Mountain whitefish are deemed to be secure, yet populations are dwindling and the status of the species requires a re-examination, at least in several watersheds.

Given the tenuous status of these species, the ACTWS would like to recognize your Department's recent efforts in species recovery planning and implementation, notably the North Central Native Trout recovery program. The ACTWS endorses the value of a science-based approach and the testing of assumptions, like harvest mortality, through a five-year moratorium on angling. This action is no doubt controversial, but it is also necessary to identify all the limiting factors to native trout recovery. We would, however, urge you to direct your fisheries staff to continue to engage in information sessions to help anglers (and others) understand the background, implications and promise of the various recovery strategies.

The ACTWS also welcomes the efforts to deal with chronic habitat issues in the recovery effort, such as connectivity problems because of improperly installed and maintained culverts, eroding Off Highway Vehicle (OHV) trails and areas of poor riparian health. However, the recovery of native trout populations will only happen with a government-wide, cooperative, collaborative approach. It is beyond the scope of your fisheries staff to deal with higher-level changes to land use practices, in the arena of forestry and energy, although they can play a supportive role in providing advice and recommendations. We would urge you to undertake the necessary conversations with your provincial cabinet to help other Ministers understand native trout recovery is a Government of Alberta initiative, not one solely of your department.

ALBERTA CHAPTER OF THE WILDLIFE SOCIETY

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In addition to your Department's recent efforts through the North Central Native Trout recovery program, we are also aware of other work being directed at westslope cutthroat trout populations in the Bow and Oldman watersheds. However, it is difficult for the ACTWS to comment on the cutthroat recovery plan because it is, of yet, unclear what the strategies are for that species (and for bull trout populations in those watersheds). We would like to advocate for a more seamless approach to native trout recovery efforts.

We would also like to make the following observation and recommendation for all native trout recovery initiatives. From the recently commissioned report *Ecological Response to Human Activities in Southwestern Alberta: Scientific Assessment and Synthesis* it is clear that linear footprint (i.e., road and trail density) provides the clearest indication of effect on trout, especially those at risk. One of the clearest linkages to native trout recovery in the Bow and Oldman watersheds will be the reduction and restriction of OHV use through substantial reduction of trail density and by habitat restoration efforts. The recommendation from the ACTWS would be to ensure all future land use plans in the East Slopes incorporate linear density thresholds below 0.6 km/km² to ensure that not only native trout populations have a chance of recovery, but many wildlife species do as well.

The ACTWS looks forward to your response to our recommendations on native trout recovery initiatives in Alberta.

Sincerely,

A handwritten signature in black ink, which appears to read "Delinda Ryerson". The signature is written in a cursive style and is positioned above a thin horizontal line.

Delinda Ryerson
Executive Director
Alberta Chapter of The Wildlife Society