

Trout Unlimited Canada



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

January 17, 2018

Dear Minister Phillips,

Trout Unlimited Canada (TUC) is supportive of Alberta Environment and Parks' increased focus on the recovery of native fish and fish habitat along Alberta's East Slopes. We are encouraged by the recently launched North Central Native Trout (NCNT) recovery program as a multi-year, multi-species approach to native fish recovery. Despite existing recovery plans and management plans, to date, few efforts have resulted in meaningful recovery of Alberta's salmonid species at risk. However, through cumulative effects modelling and the best available science, TUC believes all stakeholders can direct more strategic and focussed efforts towards our shared goal of healthy and robust populations of native salmonids in Alberta.

Trout Unlimited Canada will support the NCNT program through the following ways:

- Partner with AEP and other stakeholders on habitat rehabilitation efforts in target watersheds (example: Rocky Creek rehabilitation, upper Pembina River restoration projects);
- Engage our chapters, volunteers, and partners in habitat assessment and restoration efforts; and
- Work with AEP to deliver shared educational messaging related to the NCNT program and other recovery initiatives for species at risk.

TUC understands that proposed angling closures associated with the NCNT program may be contentious. As strong conservationists, anglers are the foremost advocates for improved habitat management and protection. As anglers, conservationist and landowners, many of our members have dedicated countless hours and dollars to support conservation efforts throughout the Eastern Slopes. Indeed, it is frustrating to see continued decline of fish populations despite these efforts.

In the past, provincial fisheries biologists have implemented a wide array of strategies including increasingly restrictive angling regulations, meanwhile activities such as off-highway vehicle

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(OHV) use, resource development and road building have fragmented and degraded habitat. At the same time, non-native species compete with and hybridize with native species.

TUC is saddened that the status of native fish populations has declined such that fishery managers have now had to resort to full angling closures in selected watersheds. While catch and release angling is an effective management tool for stable fish populations, the science suggests even incidental or accidental mortality related to catch and release angling may elevate the risk a population faces. We support the proposed angling closures with the following questions and conditions:

Land use and habitat:

- How will future land use planning support recovery efforts and limit habitat degradation (i.e. build fewer roads, better road crossings, etc.)?
- Meaningful improvements to the fish populations in the Kakwa River watershed require habitat improvement and management as part of an effective plan;
- Expand or create Public Land Use Zone designations (PLUZ) allowing the Province to better regulate activities on public lands including designating OHV trails;
- Review and update Alberta Timber Harvest Operating Ground Rules to better protect fish habitat (i.e. protect riparian buffers on ephemeral streams); and
- Remove, replace, or remediate culverts along provincial roadways that are fragmenting and degrading fish habitat.

Fishing closures and angling:

- Commit to sharing results of this pilot with all stakeholders including the public;
- Commit to re-opening angling within pilot watersheds after 5 years, unless the results of monitoring data clearly support extending closures;
- During closure period, explore other management opportunities to address angling-related mortality, for example:
 - o A special licence or stamp for fishing sensitive populations (example: an East Slopes Fishing Licence with surcharge to support recovery efforts) which includes mandatory education as a prerequisite on fish identification, ethics/best practices;
 - o A draw-based system to limit angling pressure and harvest on high priority streams;
 - o Consider opportunities to create and/or expand angling opportunities elsewhere to take pressure off wild and native fisheries;
 - o Other strategies such as seasonal closures, gear restrictions, limiting access (i.e. road closures and reclamation, OHV trail closures and reclamation).

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Poaching:

- Increase enforcement within closed waters to limit poaching and ensure closures achieve meaningful results;
- Educate prosecutors and the judiciary on conservation issues and encourage increased penalties/fines for poachers (legislation already empowers this);
- Increase accessibility and marketing of the Report-A-Poacher program to encourage reporting of all reportable offences;

Trout Unlimited Canada strongly believes the recovery of East Slopes salmonids is not just a Fisheries Management issue, nor is it solely the responsibility of Alberta Environment and Parks. Protection of these shared resources for current and future generations demands action across ministries, including Alberta Agriculture and Forestry, Alberta Transportation, Alberta Energy, and Justice and Solicitor General.

We look forward to discussing this further.

Sincerely,

A handwritten signature in black ink that reads "Silvia D'Amelio". The signature is fluid and cursive.

Silvia D'Amelio
Chief Executive Officer, Trout Unlimited Canada

CC:

Andre Corbould, Deputy Minister Environment and Parks

Travis Ripley, Executive Director, Fish and Wildlife Policy Branch, Environment and Parks

Honorable Oneil Carlier, Minister of Agriculture and Forestry

Honorable Kathleen Ganley, Minister of Justice and Solicitor General

Honorable Brian Mason, Minister of Transportation

Honorable Margaret McCuaig-Boyd, Minister of Energy

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