# Pygmy Whitefish Recovery Plan
# Summary of Public Response

## Pygmy Whitefish Recovery Plan Online Survey

On May 31, 2018, the draft Pygmy Whitefish Recovery Plan was posted online and the public was invited to participate in an online survey. The survey closed July 2, 2018.

The online survey was visited by 91 people and 15 completed the survey. In addition to the survey, there was one written submission from a stakeholder group. We would like to thank all the people that provided their input. It was very useful in developing the final Pygmy Whitefish Recovery Plan.

## What We Heard

| What We Asked | What We Heard | Our Response/What We did |
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| Have the primary threats to the pygmy whitefish (PYWH) been adequately identified and assessed? | Did we take into account environmental variability, can you identify all threats in the environment? | The primary environmental threat is climate change, which is briefly discussed in the plan. Maintaining a healthy population is the best way to account for environmental variability. |
| | Agreement that spills are a major threat. | |
| | A couple of comments about industrial activity, past and current, downstream of Hinton; was it considered? Is it being ignored? | This area is not within current PYWH range. See below for more detail. |
| | A couple of comments that PYWH might occur downstream of Hinton, or that a population may have existed east of Hinton prior to the industrial activity in the last 50 years. Suggestion that habitat downstream of Hinton should be protected in the PYWH recovery plan as a precautionary measure and recovery efforts in this area would benefit other fish species. | Minor clarifications were made about this. The following information is already included: The two PYWH found in 2000 are considered vagrants because no other PYWH have been found downstream of Hinton, including a 2014 survey in which 44 km between Hinton and Whitecourt were electroshocked (PYWH was the target species) and over 1300 fish were recorded – none were PYWH). |





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| | | It is impossible to determine the extent of the PYWH population 50 years ago, and the PYWH populations in Alberta are similar to those found globally: disjunct and isolated. Accordingly, the goal of the recovery plan is to maintain current population and distribution of PYWH. "Potential" PYWH habitat downstream of Hinton is accounted for in the Athabasca Rainbow Trout (ARTR) recovery plan. |
| Do you think that the maintenance conservation goal and associated objectives are appropriate? | Agreement with goal<br><br>Reiteration that the 200 km section between Hinton & Whitecourt could have had PYWH and that potential spawning areas in the lower reaches were not sampled or evaluated. | <br><br>See previous comments. If future survey work indicates that the PYWH range is larger, the recovery plan will be updated. However, it is unlikely that actions would differ from those already outlined in the ARTR plan. |
| Do you think that the proposed recovery actions are adequate and will help address the threats to pygmy whitefish? | No measure is too strong to help this fish; hopeful that actions will make a difference.<br><br>Plan was brief; actions not clear.<br><br>No meaningful mitigation for companies operating in PYWH range.<br><br>Reiteration that industry impacts are primarily downstream; Concern that industrial impacts like a dam on the Athabasca River has been 'taken care of' by ignoring the reach below Hinton. | <br><br>Could not see opportunity for clarification. Recovery plans are intentionally brief with a focus on identifying threats and actions required to mitigate them.<br><br>As per previous comments, if industrial activity is planned between Jasper and Hinton, then mitigation will follow the Athabasca Rainbow Trout recovery plan; these actions were not listed in the PYWH plan for brevity.<br><br>This plan did not consider the possibility of a dam on the Athabasca river because it was not deemed a threat in the foreseeable future. Protection of the reach below Hinton was not included as current PYWH habitat (see earlier comments). |

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| Please provide any additional comments on the draft pygmy whitefish recovery plan | Comprehensive and easy to follow; linking this plan to other fish species is good; the plan is based on sound science;<br>good work on the plan, hope it is successful. | |
| | Net sampling should never be used to assess populations as there are alternate methods that will work and are scientifically and statistically valid. | Various methods were used, with electroshocking being the primary method in recent surveys. |
| | Need more Conservation Officers to monitor fishing, or should close areas to fishing. | This comment is not relevant to PYWH because fishing is not a threat. |
| | Recommend a coordinated effort with Parks Canada to achieve effective legal protection of PYWH habitat (including upland and riparian areas) which would restrict transportation, commercial, and industrial development both within the National Parks and on provincial lands. This would be over and above the suggestion to maintain “groundwater flows and riparian habitat through effective land use practices and regulations”. | A Parks Canada biologist from Jasper was a contributing member of the recovery plan and AEP continues to work with Parks Canada. Transportation restrictions were not considered to be a feasible option. |
| | Regarding pipelines: pipeline is not currently “twinned”. It is inaccurate to extrapolate AER’s incident stats to NEB-regulated company incidents, Trans Mountain is not regulated by AER. | Corrections and clarifications were made. |
| | Why was COSEWIC’s Pygmy Whitefish Assessment & Status Report (posted October 2017) excluded from the recovery plan; need to explain why COSEWIC lists as ‘Not at Risk.’ | This has been included and explained in the Introduction (it was not available when the draft recovery plan was developed) |
| | (Comment not specific to this plan): Concern that Alberta Environment and Parks (AEP) does not communicate effectively on accomplishments of recovery | |

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| | plans. Also concerns related to the Athabasca Rainbow Trout. | To improve accountability of recovery plan implementation, standardized recovery plan progress reporting is being developed for all threatened and endangered species and will be made public when ready via the website. In the meantime, questions about fish species recovery in the Athabasca can be directed to Mike Blackburn. Development of a recovery plan indicates the province's commitment to protecting "this little fish" - it is not being ignored. |