

PROTECTED AREA REPRESENTATION GAP ANALYSIS

Spray Lake Sawmills FMA/B9 Areas

Prepared for:

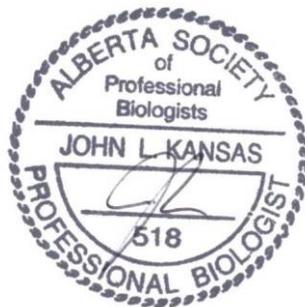
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EXECUTIVE SUMMARY

This report presents a protected area gap analysis for the Spray Lake Sawmills FMA/B9 Quota area, as required for Forest Stewardship Council (FSC) certification. The analysis follows standard approaches for representation gap analysis used by the Secretariat for the Convention on Biological Diversity (CBD) and World Wildlife Fund. The approach compares the distribution of key biodiversity areas with the distribution of protected areas as a means of finding where important elements of biodiversity (i.e. habitat, ecosystems) remain unprotected or under-protected. Alberta Natural Subregions were used as a coarse-filter surrogate for landscape, community and species-level biodiversity in the SLS FMA/B9 Quota area. Alberta government targets for province-wide Natural Subregion protection are significantly lower than current standards for protected areas. SLS has adopted a 12% protection level proportionate to the occurrence of these subregions in the FMA.

The FMA comprises portions of five Natural Subregions - Montane, Lower Foothills, Upper Foothills, Subalpine and Alpine. Lower elevation lands in the Montane and Lower Foothills subregions support disproportionately higher levels of vegetation composition, structure and vertebrate wildlife diversity than do the Upper Foothills, Subalpine and Alpine natural regions. Furthering protection of low elevation habitats in the FMA is a primary goal of this gap analysis.

Thirty-seven percent of the RRA is currently comprised of formally protected areas, including Wildland Provincial Parks (WPP) and Provincial Parks (PP) (Don Getty WPP, Elbow-Sheep WPP, Bluerock WPP, Sheep River PP), which occur immediately adjacent to and functionally within the FMA. More than 188 km² of currently protected lands were former timber quota lands, voluntarily contributed by SLS to the Crown for the purpose of protecting lower elevation Foothills landscapes. Protected areas (including candidate conservation management areas from the South Saskatchewan River Basin planning process) are abundant in the FMA and region for the Alpine, Subalpine and Montane subregions. Provincial and 12% SLS targets for these three subregions have been met or exceeded. No further protected areas are recommended for these subregions in the SLS FMA/B9 Quota area.

Protected areas within the Foothills Natural Region are under-represented in the SLS FMA and regional environs. SLS will utilize three potential sources to fill protected areas gaps:

- 1) The Red Deer River ESA, for formal protection. The Red Deer River portion of nationally significant ESA #20 occurs in the northern portion of the FMA and crosses mainly Lower Foothills lands, with some Upper Foothills. This ESA (or portions thereof) offers strong potential as a protected areas candidate for Foothills habitats in the FMA. SLS will collaborate with interested parties and stakeholders through the formal protection process, outlined in this paper.
- 2) The passive landbase areas designed to meet specific ecological objectives and serve as permanent reserves. Portions of the passive and active landbase will be designed with stakeholders to contribute to a protected area network beyond the management unit.
- 3) South Saskatchewan Regional Planning Candidate Conservation Management Areas having ecological integrity serving as formal or informal protected areas. The SSRP is a government led process and the draft plan is due for public release, the fall of 2013.

SLS will collaborate with interested parties to assess the Foothills Natural Region gaps and initiate a collaborative process to fill gaps from both the Red Deer River ESA and the passive landbase sources. This process of collaboration will be open to all interested parties including: First Nations, government, commercial interests, disposition holders, ENGO stakeholders and the public.

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1.0 INTRODUCTION

1.1 Background

Spray Lake Sawmills (1980) Ltd. (SLS) is pursuing Forest Stewardship Council (FSC) forest management certification for the SLS Forest Management Agreement Area (FMA) and B9 Quota area. SLS is currently being audited to FSC's National Boreal Standard (FSC Canada 2004). In May 2012 an independent FSC accredited certification body submitted a Forest Management Certification Assessment report (Rainforest Alliance - SmartWood 2012). The report presented an evaluation of the ecological, economic and social performance of Spray Lake Sawmills Ltd. as defined by the Forest Stewardship Council. Discrepancies or gaps were identified between some aspects of SLS's management system and the requirements of the forest stewardship standard, resulting in non-conformance reports (NCR). The assessment team differentiated between major and minor non conformances depending on the severity of the non-conformance. Major non conformances must be corrected before the certificate can be issued. Minor non-conformances do not prohibit issuing the certificate, but they must be addressed within the given timeframe to maintain the certificate.

Principle 6 (Environmental Impact) of FSC's National Boreal Standard calls for forest management that conserves biological diversity and its associated values. Criteria 6.4 of Principle 6 requires the applicant "*.....to protect representative samples of existing ecosystems within the landscape in their natural state and to record these ecosystems on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources*" (FSC Canada 2004). Indicator 6.4.1 of Criteria 6.4 requires that "*.....the applicant completes (or makes use of) a peer-reviewed gap analysis to address the need for protected areas in the eco-region(s) and ecodistrict(s) in which the forest is situated*". A major NCR (04/12) was issued to SLS pertaining to Indicator 6.4.1, with the rationale being that "*.....SLS has not completed a peer-reviewed scientific gap analysis and has not used the gap analysis and other HCVF attributes to locate additional protected areas.*" This report constitutes SLS's corrective actions to demonstrate conformance with the requirement(s) referenced above.

1.2 Objectives

- Summarize concepts and approaches for protected area representation gap analysis;
- Review the history and current status of key biodiversity elements and protected areas within and surrounding the SLS FMA and B9 Quota areas;
- Identify gaps in protection of important elements of biodiversity in the SLS FMA and B9 Quota areas and region.
- Determine if the current and additional protected areas in the SLS's management areas contribute to long-term protection of biodiversity and that these protected areas tie into a landscape-level network.
- Outline a process and approach for selection of candidate protected areas.

2.0 PROTECTED AREA GAP ANALYSIS - CONCEPTS AND APPROACHES

Gap analysis is a land planning approach that assesses the comprehensiveness of existing protected areas networks and identifies underrepresented elements of biological diversity (Scott et al. 1993; Flather et al. 1997). Gap analysis methodologies grew out of a concern for nationally and globally declining biological diversity (Scott et al. 1987; CBD 1992; Lawton and May 1995), combined with general scientific acceptance that protected areas offered the most effective tool for safeguarding biodiversity through limiting habitat loss (Soule 1991, Balmford et al. 1995; Margules and Pressey 2000; Bruner et al. 2001). In its simplest form, gap analysis entails comparing the distribution of key biodiversity areas with the distribution of protected areas and finding where important elements of biodiversity (i.e. habitat, ecosystems) remain unprotected or under-protected (Dudley and Parrish 2006).

Gap analysis is completed at a number of different scales depending largely on the jurisdiction in question. Most gap analyses to date have been conducted for large land areas including at the global (Rodrigues et al. 2004), national (Jennings 2000; Iacobelli et al. 2006; Dudley and Parish 2006;), state/provincial (Lowry et al. 2007), and regional (Davis et al. 1995; Stoms et al. 1998) scales. Gap analysis is less commonly completed at the scale of an administratively delineated land management concession (Dudley and Parish 2006).

Gap analysis methods can range from simple descriptive or matrix (i.e. map-less) comparisons of biodiversity and protected areas distribution, to spatially explicit digital overlays backed by algorithms to select optimum protected areas networks. The level of sophistication of the intended gap analysis is influenced by the quantity and quality of existing biodiversity data, scale of assessment, and level of understanding of the responses of species, ecosystems and landscapes to human land uses.

Contemporary approaches to protected area gap analysis generally require the identification and mapping of biodiversity elements against which protected areas distribution can be compared. A variety of biodiversity elements can and have been used for gap analysis including: focal species, habitat types of key wildlife species, vegetation alliances, ecological land units, and enduring features (landforms) (Jennings 2000; Iacobelli et al. 2006). Although the ultimate goal is to preserve individual species, most gap analyses are of the coarse-filter variety and use surrogates of species-level biodiversity such as representative landscapes/ecosystem types, enduring features, or focal species/assemblages. This is because, detailed knowledge of the status, distribution and trend of all species is not available in most regions (Margules and Pressey 2000; Higgins et al. 2004).

3.0 HISTORY OF GAP ANALYSIS IN THE SLS FMA/B9 REGION

3.1 Province of Alberta Protected Areas Approach

The Government of Alberta, Tourism, Parks, and Recreation (TPR) has created a network of parks and protected areas which are assigned different land classifications providing varying degrees of protection. These areas allow for a range of activity from preservation to developed recreation sites. The purpose of these protected lands is to preserve the natural landscapes, features, and processes that represent the province's environmental diversity (Koch 2011). Gap analysis, as part of the Special Places 2000 program was used to identify and select candidate protected areas. An example is the report by GAIA (1996) which used enduring features gap analysis (Kavanagh and Iacobelli 1995) to identify and select a number of candidates for protection in the Foothills Natural Region of Alberta.

Alberta TPR uses Natural Subregions as their framework for protection. Provincial area-based protection targets range from 1.3% (Mixedgrass subregion) to 7.1% (Montane subregion) and average 2.7% for the 16 Natural Subregions. In the SLS FMA/B9 region provincial targets for Natural Subregion protection range from a low of 2.5% in the Lower Foothills to a high of 7.1% in the Montane. Targets for protection vary widely between jurisdictions provincially, nationally and internationally. For example, IUCN The World Conservation Union has suggested that countries set aside at least 10 per cent of their terrestrial area into protected areas, British Columbia targets 12%, whereas Mongolia targets 30% protection nationally. SLS has adopted a 12% target for the 5 Natural Subregions on the FMA.

3.2 SLS Participation in Special Places 2000

SLS participated on the Special Places 2000 Provincial Coordinating committee and fully supported the establishment of The Sheep River Provincial Park and Bluerock, Wildland Provincial Parks. The Special Places 2000 committee was the result of the World Wildlife Fund Canada's Endangered Spaces Campaign launched in 1989. The purpose of this campaign was to create protected area networks to maintain biological diversity in Canada.

In 1996, GAIA Environmental completed a Gap analysis of the Foothills Natural Region for the World Wildlife Fund Canada to be used by the Special Places Committee, for the purpose of filling ecological gaps in the Foothills Natural Region. The GAIA report (GAIA 1996) focused specifically on identifying gaps within the Foothills Natural Region of Alberta including lands within the SLS timber quota areas. Specific study objectives of the GAIA report included:...."*an assessment of representation of ecological diversity in the Foothills Natural Region, through a gap analysis of enduring features; an evaluation of the adequacy of enduring feature representation; and the development of recommendations regarding candidate site boundaries and sizes, and their adequacy in securing long-term conservation of biological diversity in the Foothills Natural Region.*"

After GAIA reviewed the entire Alberta Foothills Natural Region, including the location of the existing SLS FMA, 14 areas were recommended for formal protection. The Sheep River area, located within the SLS timber quota, was the only area identified meeting the study objectives that was located near the FMA. Prior to park establishment in 2001, the Sheep River and

Bluerock Wildland Provincial Parks were identified in the Provincial Integrated Resource Plan (IRP) as “permanent timber land base”.

The GAIA report identified 5,045 hectares (50.4 km²) of land in the former Sheep River Wildlife Sanctuary as a candidate to be included into a regulated protected area. The report also recommended that the boundaries of this candidate be expanded to include adjacent upland areas. As the Special Places 2000 committee worked toward identifying a regulated protected area candidate, 18,889 hectares (189 km²) of SLS timber quota areas were voluntarily contributed by SLS and incorporated in to the Sheep River Provincial Park and adjacent Bluerock Wildland Provincial Parks. The additional hectares were protected to provide a logical topographic boundary for the parks. In 2001, SLS received a plaque in recognition from the Minister of Environmental Protection of Alberta for its participation and contribution to the provincial protected areas network.

In 2006, the government of Alberta changed the ecological classification of approximately 114 km² of the Sheep River Provincial Park and Bluerock, Wildland Provincial Parks, originally classified as Foothills Natural Region to Montane. Prior to the change in classification the FMA area had a surplus of Foothills Natural region in Protected Areas. Due to the classification change, the FMA area now has a surplus of Montane Natural Region and a deficit of Foothills Natural Region in protected areas.

3.3 South Saskatchewan Regional Plan CCMA's

SLS participated on the 18 member South Saskatchewan Regional Advisory Council (RAC) from June of 2010 through December of 2011. The purpose of the RAC was to provide advice to the Alberta government on future resource management plans for the South Saskatchewan Region. As part of that work, the RAC nominated nine Candidate Conservation Management Areas using gap analysis methods. Two of the Candidate Conservation Management Areas, the Ghost (CCMA 9) and the Elbow/Highwood/Kananaskis Foothills (CCMA 8), have been identified as potential protected areas within and immediately adjacent to the SLS's FMA.

SLS is deferring management activities in the proposed conservation management areas and will support protected area designation as agreement is reached with all stakeholders, the public and the government of Alberta.

The government completed public and stakeholder consultation for plan awareness and input in January of 2010 and received feedback on the Regional Advisory Council advice, in December of 2012. The next step, involves the government planning team reviewing public and stakeholder information and the RAC advice, to complete a draft regional plan. The government is estimating the draft South Saskatchewan Region Plan will be available for public and stakeholder review by the fall of 2013.

4.0 CURRENT GAP ANALYSIS FOR SPRAY LAKES FMA/B9 REGION

The gap analysis for the SLS FMA and B9 Quota follows 7 steps, guided by recent scientific literature. These steps are adopted mainly from the Secretariat of the Convention on Biological Diversity, which published a guide to gap analysis for protected areas networks (Dudley and Parish 2006). The approach also follows principles outlined in the WWF's landscape based approach to gap analysis (Iacobelli et al. 2006). The WWF approach is a coarse-scale, landscape-based assessment of ecological representation wherein spatial units delineated by landform and climate are used as surrogates for biological diversity at multiple scales. Both of the above-mentioned approaches are designed for national-level gap analysis. Because the SLS gap analysis is for a much smaller and administratively-based jurisdiction, we've added an initial step designed to clarify the geographic context and scale of the assessment.

Step #1	Determine the gap analysis landscape scope and scale.
Step #2	Identify focal biodiversity and set key targets.
Step #3	Evaluate and map occurrence and status of biodiversity.
Step #4	Analyse and map the occurrence and status of protected areas.
Step #5	Use the information to identify gaps.
Step #6	Prioritise gaps to be filled.
Step #7	Develop a strategy and take action.

In the next several sections of this report each of the above steps are completed using biodiversity information and evidence from the recent High Conservation Value Forest (HCVF) report (Kansas and Mogilefsky 2013), and protected areas information from a preliminary review of protected areas and gap analysis in the SLS FMA by Koch (2011). This analysis also takes into account past, present and future gap analysis studies as summarized in Section 3.0 above.

4.1 Step #1: Gap Analysis Scope and Scale

The SLS FMA and B9 Quota areas are based on administrative (as opposed to ecological) boundaries as dictated by timber harvest management agreements. The FMA extends in a narrow band from Sundre in the north to the southern end of Kananaskis Country. Total area of the gross land base is 3,290 km² of which a maximum of 2,285 km² is subject to timber harvest. The assigned timber management areas are discontinuous from north to south with significant breaks in the FMA along the Bow River (20-km) and Sheep River (10-km) valleys (Figure 1). The boundaries of the FMA/B9 Quota intersect Alberta Natural Region and Subregions in a somewhat 'haphazard' manner (Figure 2).

Dudley and Parish (2006) contend that "*.....protected areas should never be regarded as separate from the wider landscape*"....and that "*...protected areas should be integrated into wider management systems, to ensure both the long-term survival of the biodiversity contained within the protected area....*". For the above reason and for the purpose of meeting size criteria for large landscape-level forest criteria of the FSC Boreal Standard, SLS designated a larger regional area for landscape-level gap analysis purposes. Figure 2 illustrates this region and its relationship with the SLS FMA and Alberta Natural Regions and Subregions. This expanded regional assessment area (RAA) is 7,831 km² in size.

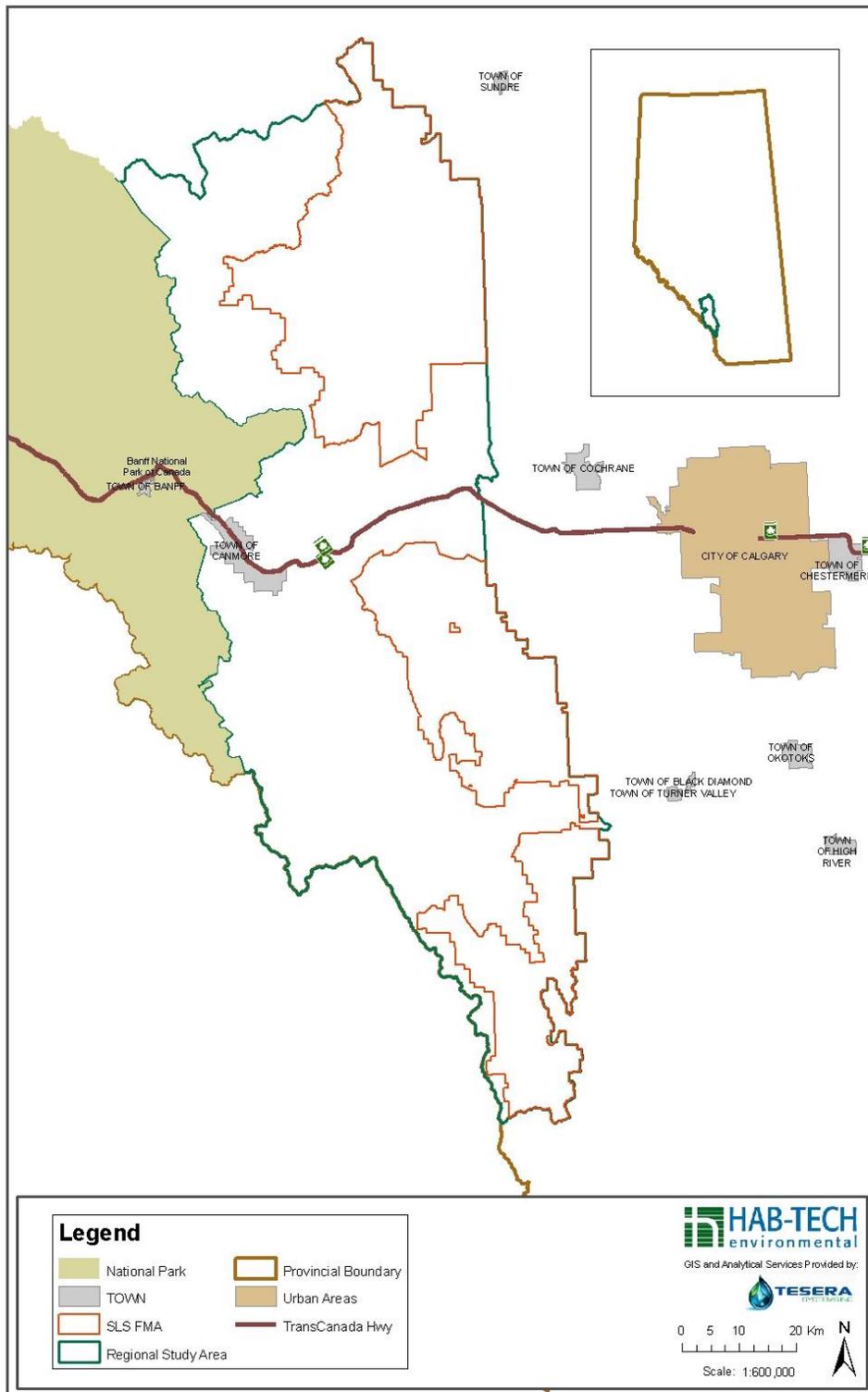


Figure 1. Spray Lake Sawmills Ltd. Forest Management Area.

The eastern boundary of the RAA is delineated by the eastern extent of the SLS FMA and Rocky Mountain Forest Reserve, beyond which fragmented agricultural lands occur. This boundary also approximates the transition between the Rocky Mountain and Parkland Natural Regions in the south FMA and between the Foothills and Boreal Mixedwood Natural Regions in the north FMA. The northern boundary of the RAA is the transition between the Red Deer River and North Saskatchewan River watersheds. The western boundary of the RAA is the eastern border of Banff National Park and the Continental Divide between Alberta and British Columbia. The southern boundary of the RAA is the divide between the Bow and Oldman River basins.

Natural Subregion representation in the RAA/FMA include (in descending order of land area): Alpine (16.1%/0.63%) Subalpine (35.7%/31.6%), Montane (24.6%/27.62%), Upper Foothills (14.4%/22.79%), and Lower Foothills (8.8%/17.32%). Negligible areas of Boreal Mixedwood (<0.1%) and Foothills Parkland (0.4%) occur in the FMA but not in the RAA; these subregions are not included as part of the gap analysis.

4.2 Step #2: Identification of Focal Biodiversity Indicators/Targets

Natural Subregions will serve as the key biodiversity indicator at the provincial (Alberta) and regional (FMA region) scales, consistent with Alberta government and WWF methodology (GAIA 1996; Iacobelli et al. 2006). Natural Subregions are used as a coarse-filter surrogate for landscape, community and species-level biodiversity in the SLS FMA/B9 Quota area. Current Provincial targets associated with this indicator are based on the Level 1 Natural History theme targets at the provincial scale. The target selected for Natural Subregion protected area representation in the SLS FMA is 12% of the provincial supply of subregions, recognizing existing provincial protected areas and scaled to the relative proportion of the subregion occurring in the FMA. The 12% target is consistent with targets set out by the IUCN and the province of British Columbia. They are also the same as the original province of Alberta targets under the Special Places 2000 program. Further details on biodiversity indicators and targets are discussed in Sections 4.3 and 4.5.

4.3 Step #3: Evaluate and Map Biodiversity

Figure 2 shows the distribution of Natural Subregions in the FMA and RAA. The FMA lies within the Front Ranges and foothills of the eastern slopes of the Rocky Mountains. Elevations increase from east to west in the study region, with lowest elevations occurring in the Montane and Lower Foothills subregions, intermediate elevations in the Upper Foothills subregion, and highest elevations in the Subalpine and Alpine subregions. The representation of deciduous and mixedwood forest cover types generally decline as elevations increase.

Plant species richness, vegetation structural diversity, landscape level diversity, and vertebrate wildlife species richness are all highest in the lower elevation portions of the FMA (Collister and Kansas 2003; SLS 2006; Kansas and Mogilefsky 2013), largely in association with mixedwood, deciduous and riparian forests. Riparian mixedwood forest, shallow marsh wetlands, old growth deciduous forests, upland grasslands, and old growth conifer forests were identified as ecosystem-level, High Conservation Value Forest attributes because of their regional uniqueness/rarity and their floristic, structural and vertebrate species at risk diversity (Kansas and Mogilefsky 2013). The distribution of these habitat types are shown in the Figures 3 and 4.

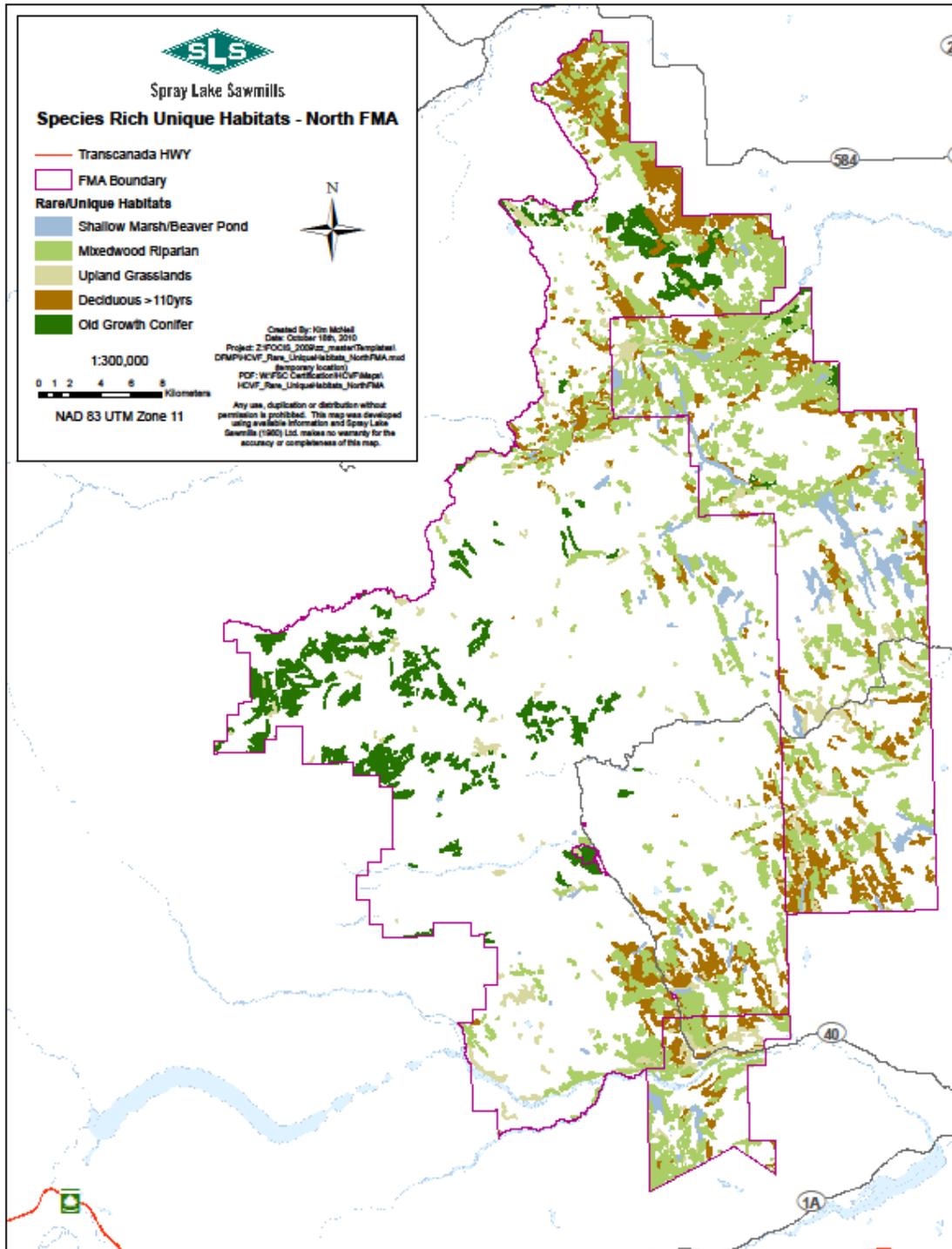


Figure 3. Species-Rich and Uncommon habitat types in the FMA-North

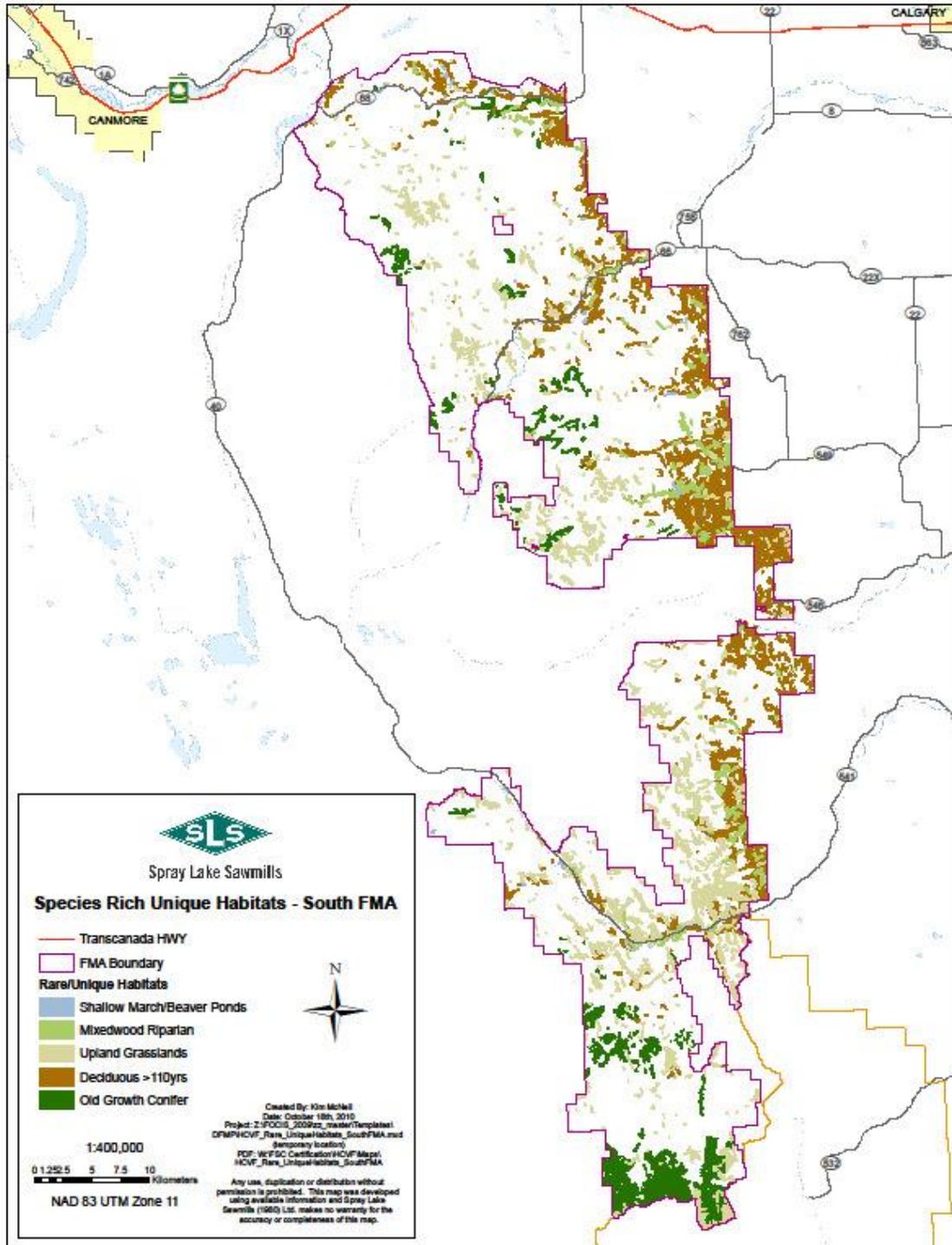


Figure 4. Species-Rich and Uncommon habitat types in the FMA-South

A disproportionate amount of the uncommon and species-rich ecosystems occur in the lower elevation Montane and Lower Foothills Natural subregions and along major river and creek valleys (e.g. Highwood, Sheep, Elbow, Jumpingpound, Ghost and Red Deer). Ecologically sensitive management and protection of lower elevation lands in the Montane and Lower Foothills subregions near the eastern boundary of the FMA/B9 Quota are important to conserve long-term biological diversity in the FMA (SLS 2006, Kansas and Mogilefsky 2013).

4.4 Step #4: Existing Occurrence/Status of Protected Areas

Figure 5 shows the distribution of currently protected areas within the regional vicinity of the SLS FMA/B9 Quota. Approximately 37% of the RRA is comprised of formally protected areas, including the Wildland Provincial Parks (WPP) and Provincial Parks (PP) (Don Getty WPP, Elbow-Sheep WPP, Bluerock WPP, Sheep River PP). These areas occur immediately adjacent to and functionally within the FMA. The majority of formally protected land occurs at higher elevations west of the FMA in a mosaic of Subalpine and Alpine subregional lands in the Elbow-Sheep WPP and Don Getty WPP.

Approximately 329 km² of protected lands also occur along the Sheep River and Bow River valleys in what is now mapped as the Montane Natural Subregion. Industrial activity does not occur in PPs or WPPs. Although backcountry recreation is common, these areas are wilderness in nature and offer a level of protection commensurate with Level II of the IUCN classification of protected areas management (IUCN 1994; Dudley and Parish 2006).

4.5 Step #5: Protected Area Gap Identification

This section of the report identifies current status and gaps in protected areas coverage in the SLS FMA and RAA. Natural Subregion representation is used as a coarse-filter surrogate for landscape, ecosystem and species level biodiversity (Section 4.3). Table 1 provides a summary of the land area supply and protected area targets by Natural Subregion in the FMA and RAA. The table identifies protected area gaps by Natural Subregion in the FMA; summarizes SLS's historic protected area contributions; identifies the South Saskatchewan River Basin Candidate Conservation Management Areas identified by the Resource Advisory Committee, and; outlines the passive landbase available to meet specific ecological objectives and serve as permanent reserves. The passive landbase is discussed in Section 4.6.4.

4.5.1 Rocky Mountain Natural Region

The Rocky Mountain Natural Region comprises three subregions based on elevation, topography and vegetation characteristics. These include Montane, Subalpine and Alpine.

4.5.1.1 *Montane Subregion*

The Montane Subregion occupies 8,768 km² (1.3%) of the province of Alberta. The Alberta Tourism, Recreation and Parks department currently targets 620 km² (7.1%) of the Montane's four Level 1 Natural History themes for protection. This 7.1% target for Montane subregion protection has been reached in the form of 26 parks and protected areas (Koch 2011).

Table 1. Existing Protected Area Coverage and Targets in Alberta and SLS FMA/RAA, by Natural Subregion.

Natural Subregion	Land Area Supply Province (km ²)	Land Area Supply RAA (km ²)	Land Area Supply FMA (km ²)	% Province Supply in FMA	Current Province Protected Area Targets (km ²)	Provincial Targets - Based on 12% (km ²)	SLS Protected Targets (km ²)	Protected Areas in RAA (ha)	Protect Areas in FMA	SSRP Candidate Protected Areas	FMA Passive Landbase	Protected Area Gap in FMA
<i>Alpine</i>	15,084	1,266	21	0.14	645 (4.3%)	1,810	2.5 km ²	1,146 km ²	0	54.4km ² (in RAA) including 3.2 km ² in the FMA	20 km ²	0
<i>Subalpine</i>	25,218	2,807	1,040	4.12%	645 (2.6%)	3,026	97.6 km ²	1,396 km ²	0	171km ² (in RAA) including 5.3 km ² in FMA	497 km ²	0
<i>Montane</i>	8,768	1,934	909	10.36%	620 (7.1%)	1,052	44.9 km ²	329.4 km ²	0	2.9 km ² (All in the FMA)	178 km ²	0
<i>Lower Foothills</i>	44,899	695	570	1.27%	1125 (2.5%)	5,388	66.4 km ²	0.0	0	0.0	107 km ²	66.4 km ²
<i>Upper Foothills</i>	21,537	1,129	750	3.48%	710 (3.3%)	2,584	71.7 km ²	8.0 km ²	0	3.0 km ² (None in the FMA)	173 km ²	71.7 km ²

The Montane subregion comprises 730 km² (21.6%) of the FMA and 1,934 km² (24.6%) of the RAA (Figure 2). A total of 329.4 km² (17.0%) of Montane lands are currently in protected area status in the context of the RAA. This includes lower elevation portions of the following protected areas: Bow Valley WPP, Bluerock WPP, Sheep River PP, Elbow-Sheep WPP, Spray Valley PP, Don Getty WPP. All of these protected areas are sufficiently intact, close to, and connected to the SLS FMA to provide sources of biological diversity for the FMA. An additional 2.9 km² of Montane occurs in Candidate Conservation Management Area #8 in the southern portion of the FMA (Figure 6). The Passive landbase comprises approximately 178 km² (24%) of the Montane subregion in the FMA.

The SLS 12% proportional target results in a protection goal of 44.9 km² of Montane lands for the FMA and region. This calculation takes into account the 620 km² of Montane land already protected in Alberta. The Sheep River /Bluerock protected area occurs largely in the Montane subregion (35.5 km²) and occurs within the heart of the southern portion of the FMA. This protected area was formerly within the SLS FMA and was voluntarily contributed by SLS to be a formally protected area under the Special Places 2000 program. Taking into account: the Sheep River/Bluerock contribution by SLS and the total of 329.4 km² in the RAA, we conclude that no significant gaps in protected areas coverage occur at the regional scale for the Montane subregion.

4.5.1.2 Subalpine Subregion

The Subalpine Natural Subregion occupies 25,218 km² (3.8%) of the province of Alberta. The Alberta government targeted 645 km² (2.6%) of the Subalpine's 5 Level 1 Natural History themes for protection (Table 1). All of the provincial targets for Subalpine subregion protection have been reached in the form of 30 parks and protected areas (Koch 2011). No gaps in protected areas coverage occur at the provincial scale for the Subalpine Natural Subregion, based on Alberta Tourism, Recreation and Parks targets.

The Subalpine subregion comprises 1,138 km² (31.6%) of the FMA and 2,807 km² (35.8%) of the FMA region (Figure 2). CCMA #8 (Figure 6) and CCMA #9 (Figure 7) would add an additional 171.1 km² of protected Subalpine habitat if selected (Table 1). Of this total, 5.3 km² lies within the FMA. A total of 1,396 km² (49.7%) of Subalpine lands are currently in formal protected area status in the RAA. This includes portions of the following protected areas: Bow Valley WPP, Bluerock WPP, Sheep River PP, Elbow-Sheep WPP, Spray Valley PP, Don Getty WPP and Ghost River Wilderness Area. These large landscape-level subalpine forests occur immediately adjacent to the western boundary of the FMA. Approximately 497 km² of the Subalpine subregion in the FMA is classified as passive landbase and will not be harvested. Large patches of these permanent retention areas occur in the high elevation portions of the FMA (see Section 4.6.4). Protected subalpine lands both in and out of the FMA offer significant reservoirs of biological diversity for the FMA and region.

The SLS 12% proportional target results in a goal of 97.6 km² of protected Subalpine for the FMA. This calculation takes into account the 645 km² of Subalpine land already protected in Alberta. Based on the 49% protection of Subalpine lands in the region and the extensive patches of passive landbase, we conclude that no significant gaps in protected areas coverage occur at the regional scale for the Subalpine subregion.

4.5.1.3 Alpine Subregion

The Alpine Subregion occupies 15,084 km² (2.3%) of the province of Alberta. The Alberta government currently targets 645 km² (4.3%) of the Alpine's 5 Level 1 Natural History themes for protection. All of the provincial targets for Alpine subregion protection have been reached in the form of 30 parks and protected areas (Koch 2011). No gaps in protected areas coverage occur at the provincial scale for the Alpine subregion, based on Alberta Tourism, Recreation and Parks targets. Alpine habitats are scarce in the FMA, occupying just 21 km² (<1.0%). This subregion does not support commercial timber harvest. Protected areas in the RAA cover 1,146 km² or 90.5% of the Alpine subregion occurring in the FMA region. The SLS 12% proportional target results in a goal of 2.5 km² for the FMA and region. We conclude that no significant gaps in protected areas coverage of Alpine lands occur at the regional scale.

4.5.2 Foothills Natural Region

The Foothills Natural Region occurs east and at lower elevations than the Rocky Mountain Natural Region. This Region comprises two Subregions based on differences in elevation, topography and vegetation. The Lower Foothills Natural Subregion occurs at lower elevations and has warmer summers and colder winters than the Upper Foothills Natural Subregion. The boundary between the Lower and Upper Foothills is characterised by a change in dominance from mixedwood and deciduous forest stands on all aspects in the Lower Foothills Natural Subregion to conifer-dominated forests in the Upper Foothills Natural Subregion (Natural Regions Committee 2006).

4.5.2.1 Lower Foothills Subregion

The Lower Foothills Subregion occupies 44,899 km² (6.8%) of the province of Alberta. The Alberta government targets 1125 km² (2.5%) of the Lower Foothills five Level 1 Natural History themes in the Province for protection. Currently a total of 276.7 km² (24.6%) of Lower Foothills lands in the Province of Alberta is in protected status in the form of 12 parks and protected areas (Koch 2011). The Lower Foothills subregion comprises 570 km² (17.3%) of the FMA and 695 km² (8.8%) of the FMA region (Figure 2). No formally protected areas occur within the Lower Foothills subregion lands within the FMA and RAA, based on revised Natural Regions/Subregions mapping (Natural Regions Committee 2006). Prior to these changes the Sheep River Provincial Park and Bluerock Wildland Provincial Parks protected a combined 114 km² of Lower Foothills habitat, respectively (see Section 3.2). A total of 107 km² of Lower Foothills lands in the SLS FMA/B9 Quota area occur in the form of passive landbase (e.g. riparian area, non-timber lands, steep slopes) and is protected from timber harvest.

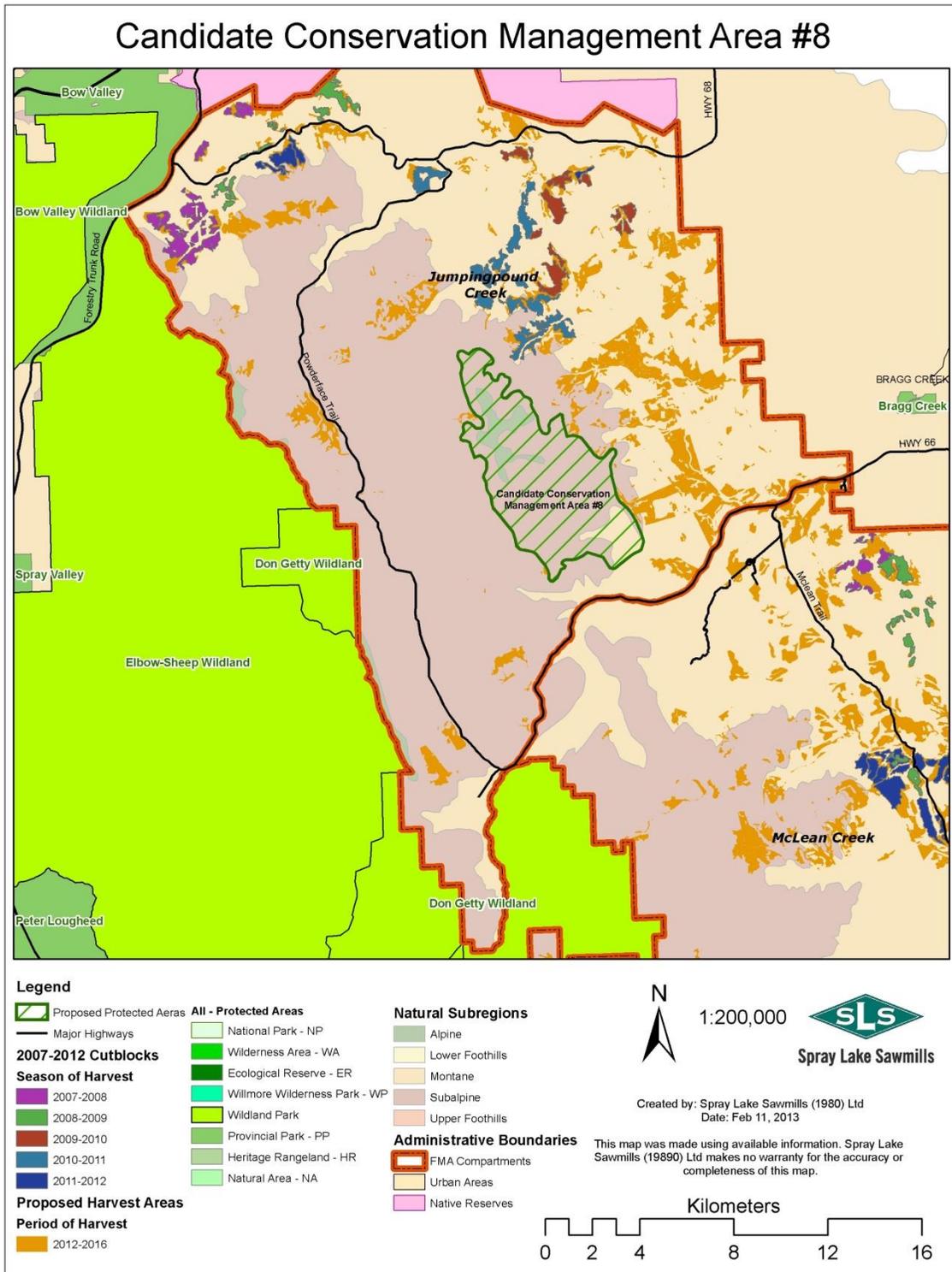


Figure 6. Candidate Conservation Management Area #8 - SSRB Planning Process

Candidate Conservation Management Area #9

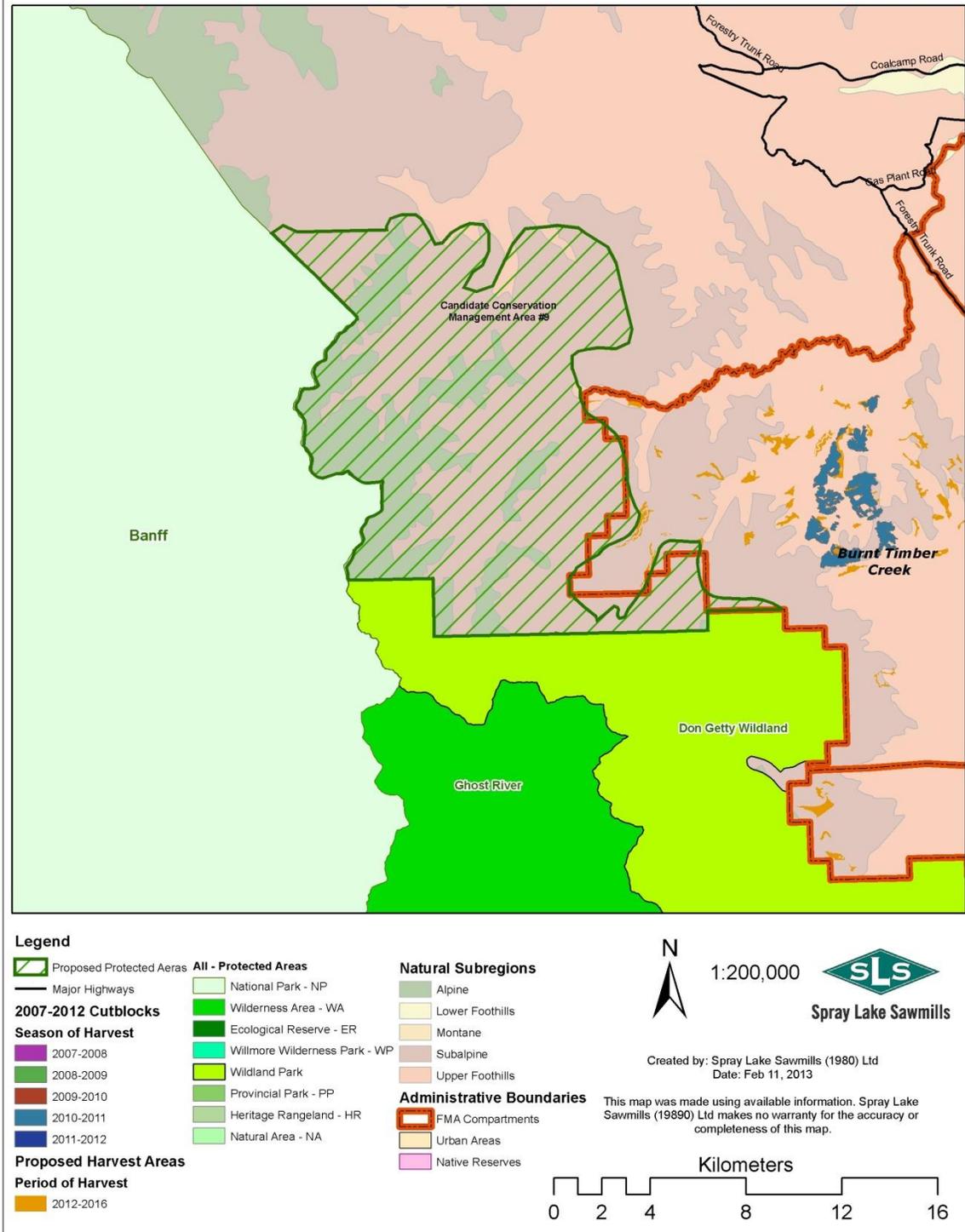


Figure 7. Candidate Conservation Management Area #9 - SSRB Planning Process

The SLS 12% proportional target results in a goal of 66.4 km² of protected Lower Foothills lands for the FMA. This calculation takes into account the 277 km² of Lower Foothills land already protected in Alberta. No lands are currently formally protected in the Lower Foothills Natural Subregion in the FMA or RAA resulting in a significant gap in the formal protection of Lower Foothills lands in the FMA. This does not include portions of the 107 km² of the Lower Foothills passive landbase, potentially available to contribute to a protected area network beyond the management unit.

4.5.2.2 Upper Foothills Subregion

The Upper Foothills Subregion occupies 21,537 km² (3.3%) of the province of Alberta. The Alberta government targets 710 km² (3.3%) of the Upper Foothills five Level 1 Natural History themes in the province for protection. Currently, a total of 551.4 km² (2.6%) of Upper Foothills lands in the Province of Alberta is in protected status in the form of 19 parks and protected areas (Koch 2011).

The Upper Foothills Natural Subregion comprises 750 km² (22.7%) of the FMA and 1,129 km² (14.4%) of the FMA region (Figure 2). A total of 8.0 km² of Upper Foothills lands are currently protected in the RAA immediately adjacent to but outside of the FMA (Koch 2011). This is an area east of the Ghost River Wilderness area in Don Getty WPP (Figure 5). If selected, Candidate Conservation Management Area #9 (Figure 7) from the South Saskatchewan River basin planning process would add another 3.0 km² of protected Upper Foothills land. A total of 173 km² of Upper Foothills lands the SLS FMA/B9 Quota area is in the form of passive landbase and is protected from timber harvest.

The SLS 12% proportional target results in a goal of 71.7 km² of protected Upper Foothills lands for the FMA. This calculation takes into account the 551 km² of Upper Foothills land already protected in Alberta. No lands are currently formally protected in the Upper Foothills Natural Subregion in the FMA, and only 8 km² are protected in the RAA. We conclude that gaps remain in the formal protection of Upper Foothills lands in the FMA and RAA. This does not include portions of the 173 km² of the Upper Foothills passive landbase, potentially available to contribute to a protected area network beyond the management unit.

4.6 Step #6: Gap Prioritization

Section 4.5 identified that protected areas representation gaps occur in the Upper and Lower Foothills Natural Subregions at both provincial and regional scales. Protected areas gaps for these two subregions also occur in the FMA. The High Conservation Forest Assessment (Kansas and Mogilefsky 2013) and Section 3.3 of this report identified lower elevation lands, including those in the Lower Foothills and Montane subregions, as biodiversity 'hotspots'. Upper Foothills lands do not tend to be as diverse as Lower Foothills and Montane lands because of the relative scarcity of deciduous and mixedwood forests, riparian forests, and marsh wetlands (Natural Regions Committee 2006). From a biodiversity richness perspective, Upper Foothill habitats are more similar to Subalpine habitats than they are to the Lower Foothills or Montane.

4.6.1 Special Case of the Sheep River/Bluerock Protected Areas

In Section 3.2, the origins of the Sheep River Provincial Park and adjacent Bluerock Wildland Provincial Park were described. These protected areas were established to assist in fulfilling Foothills Natural Region protected area targets, since at the time these two parks were classified almost entirely as being within the Lower Foothills Natural Subregion. As recognized by GAIA, (1996) this area is a hot-spot of ecological diversity, because of the occurrence of lower elevation deciduous, mixedwood and riparian forest cover types (Collister and Kansas 2003). Figure 8 illustrates the disproportionate abundance of high suitability habitat for multiple focal vertebrate wildlife species in the area, in the context of the remainder of the southern portion of the FMA.

No other portion of the SLS FMA region offers an equivalent combination of ecological diversity, lack of industrial development, and limits to motorized vehicles as does the Sheep/Bluerock protected area. The Conservation Biology Institute (2007) singled out the Sheep River Provincial Park/Bluerock Wildland Park block as being one of only two protected areas larger than 10,000 ha in the Foothills of Alberta and northeast British Columbia. The other was Bearhole Lake Provincial Park (~18,000 ha) which occurs in the province of British Columbia.

Regardless of whether the Sheep River/Bluerock protected areas are classified as Lower Foothills or Montane, this area is a vital reservoir of lower elevation vegetation and wildlife diversity in the heart of the former SLS FMA. This protected area connects two large chunks of Spray Lake's FMA as well as higher elevation Subalpine and Alpine protected lands of the Elbow-Sheep Wildland Provincial Park to the west.

Prior to the changes in Natural Region and Subregion classification (Natural Regions Committee 2006), the voluntary removal of these areas from the SLS FMA and conversion to protected areas would have resulted in an additional 114 km² of Lower Foothills protected land exceeding SLS's self-imposed 12% target. This level of contribution would have represented approximately 20% of the total Lower Foothills FMA subregion in formal protection status. Based on current classification of these lands, the designation of Sheep River/Bluerock as a protected area adds to a regional and provincial surplus of Montane protected lands.

4.6.2 Environmentally Significant Areas in Protected Area Selection

Both GAIA (1996) and the government of Alberta relied heavily on existing Environmentally Significant Areas (ESAs) as the preliminary basis for selection of candidate sites for protection. Alberta Tourism, Parks and Recreation state that..... "*.....ESAs represent places in Alberta that are important to the long-term maintenance of biological diversity, soil, water, or other natural processes, at multiple spatial scales. They are identified as areas containing rare or unique elements in the province, or areas that include elements that may require special management consideration due to their conservation needs.*" In the case of GAIA's gap analysis process, 180 existing ESAs in the Foothills Natural Region were initially considered as candidates for protection under Special Places 2000 mandate. These were eventually filtered down to 12, which included the Sheep River area. The only Lower Foothills protected area candidate, selected by GAIA (1996), adjacent to the SLS FMA, was located in the Sheep River Area.

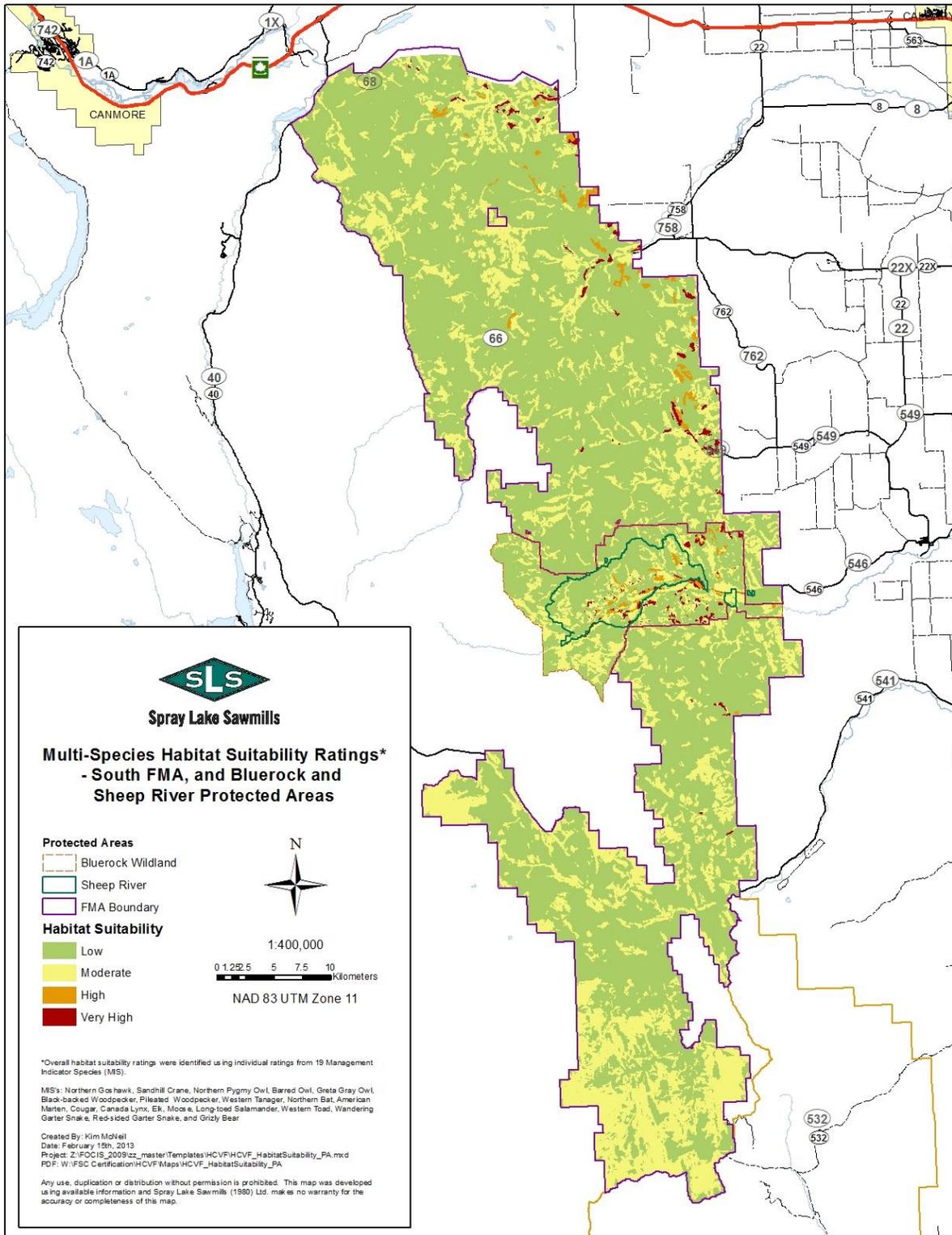


Figure 8. Multi-species Habitat Ratings in the Sheep River/Bluerock areas and region.

GAIA (1996) noted that all short-listed candidates were... "*...by and large...the least developed*" and that, in Alberta, ESAs are used as planning tools for conservation and protected areas designation. GAIA (1996) further stated that... "*the results of this report underscore the difficulty in developing an adequate protected areas network for the Foothills Natural Region primarily because of the extent to which the land base is already fragmented by various resource and recreational activities. No pristine or wilderness areas remain that have not suffered some loss of their original ecological integrity*". The Conservation Biology Institute (2007) echoed GAIA's comments stating... "*It is difficult to predict how much of the ecoregion could be placed into new protected areas via the existing political process. With over 86 percent of the ecoregion already allocated in logging tenures and with oil and gas development widespread, it is going to be difficult to establish many new protected areas even though the science strongly argues for much more land placed under protection status.*"

According to changes in Alberta Natural Regions mapping (Natural Regions Committee 2006), both Lower and Upper Foothills Subregions occur only in the northern portion of the SLS FMA north of the Bow River (Figure 2). It is noteworthy, that neither the GAIA (1996) gap analysis nor the recent SSRB gap analysis selected either Lower or Upper Foothills habitats in the SLS FMA north of the Bow River (as currently mapped) as protected area candidates or CCMAs. This is likely because of the presence of widely scattered private lands (in B9), the levels of multiple land use, and relative shortage of ESAs in this area (Figure 9).

4.6.3 Red Deer River ESA #20

A single, nationally ranked Environmentally Significant Area occurs in and adjacent to the northern portion of the FMA, with its eastern extent - the Red Deer River valley - traversing both Lower and Upper Foothills lands in the FMA (Figure 9). ESA (#20) is very large (9,438 km²) and extends north to the Brazeau/Cardinal River confluence area. The Red Deer River portion of this ESA transects the FMA from east to west. The portion of ESA #20 in the FMA is comprised of 22.4 km² of Lower Foothills and 6.9 km² of Upper Foothills lands. The HCVF report for SLS, selected the Red Deer River valley portion of ESA #20 as a High Conservation Value Forest attribute because it represents a natural east-west movement corridor for numerous species of wildlife, as well as a wintering area for ungulate populations and spawning habitat for a number of fish species (Kansas and Mogilefsky 2013). Figure 3 shows the disproportionate amount of species rich and uncommon habitat types along the Red Deer River corridor including riparian mixedwood forests and old growth deciduous forests. A close up of the distribution of Natural Regions and unique habitat types occurring in the portion of the Red Deer ESA #20 that transects the SLS FMA is shown in Figure 10.

The Conservation Biology Institute (2007) report stressed the importance of main river corridors in the Foothills region as potential protected or special management areas. They noted that

"Functionally connecting existing and new protected areas is an important consideration in this ecoregion and the main river segments highlighted offer an important opportunity to do that both from the standpoint of aquatic and terrestrial conservation values."

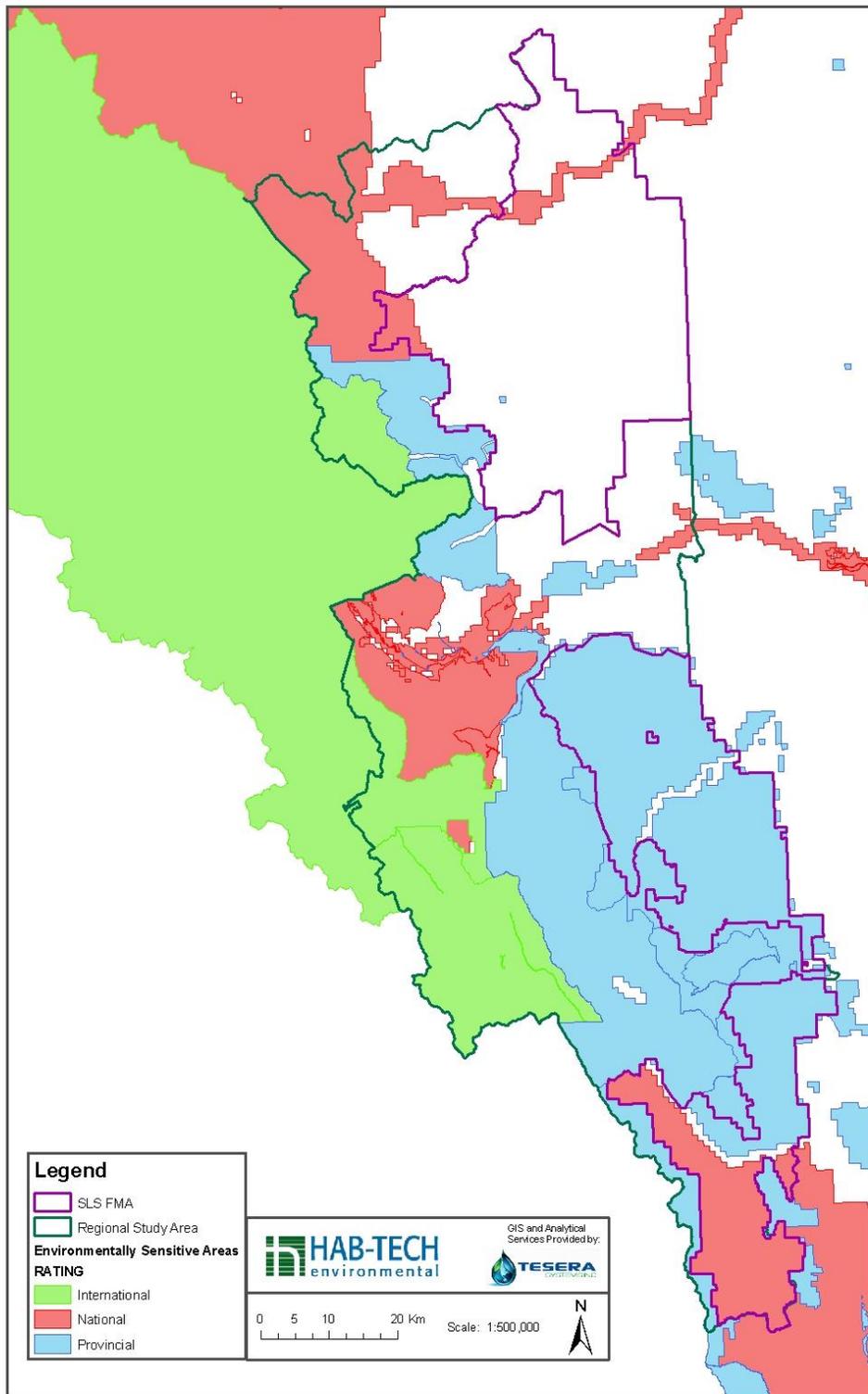


Figure 9. Environmentally Significant Areas in the SLS FMA and Region.

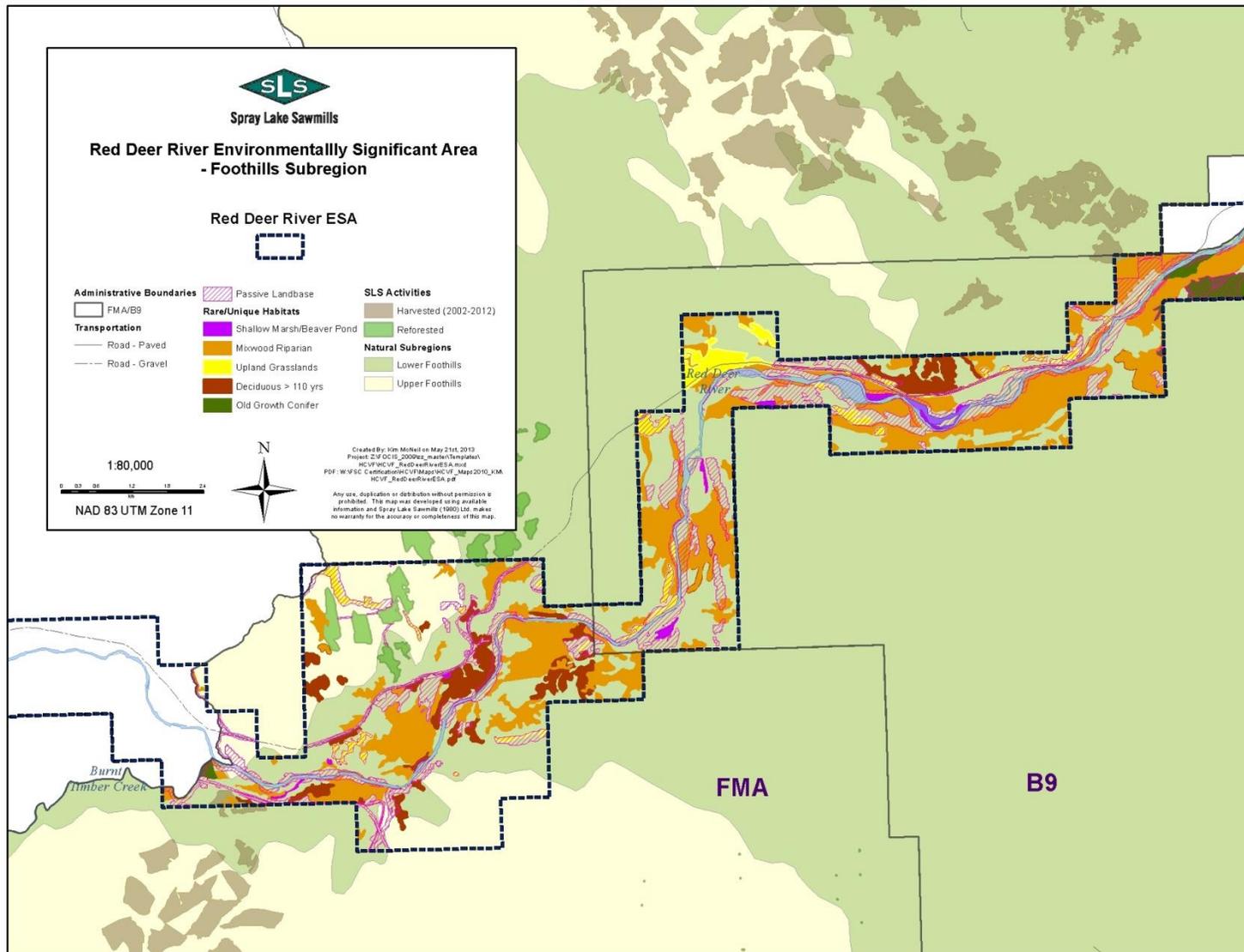


Figure 10. Unique and biodiversity rich habitat types in Red Deer ESA (#20).

Bentz and Karpuk (1990) and Sweetgrass Consultants (1997) noted that the Upper Red Deer River ESA was one of the most diverse river valleys in the Foothills of Alberta and that it offered the following important ecological benefits:

- key winter ungulate habitat and travel corridor;
- high wildlife species diversity;
- sport fishery (including Bull Trout, Brook Trout and Mountain Whitefish);
- important migration corridor for Mountain Whitefish;
- diverse shrubland and riparian plant communities;
- important recreational watercourse; and,
- Critical Wildlife Zone.

We conclude that portions of the Red Deer River ESA #20 and immediate environs offer strong potential to serve as a formally protected area candidate in the FMA, primarily to fill a portion of the gaps identified in the biologically diverse Lower Foothills subregion.

4.6.4 Protection Role of the Passive Landbase

Approximately 28.8% of the SLS FMA is not subject to timber harvest now or into the future (SLS 2006). These areas, which contain permanent retention of vegetation, are referred to as passive landbase. The portions of the passive landbase containing natural habitat (i.e. not industrial sites, roads, or pipelines etc.) occur primarily in the following situations:

- on steep slopes;
- within riparian/wetland buffers (hydrological protection);
- 'unproductive stands' from a harvest perspective;
- non-forested lands;
- protected areas; and,
- isolated and non-accessible stands.

The areas set aside as passive landbase encompass a wide range of habitat types, including each of the five unique and biodiversity rich habitat types identified as HC VF (i.e. shallow marsh/beaver ponds, upland grassland, riparian mixedwood forest, old growth conifer forest and deciduous forest >100 years). Figures 11 and 12 illustrate the distribution and size of patches of passive landbase in the north and south portions of the SLS FMA, respectively. Table 2 summarizes land areas for the 5 unique habitat types within the passive versus active (planned harvest) landbases in the SLS FMA. This summary shows that shallow marsh, upland grassland and high elevation forests comprise a higher proportion of the passive versus active landbase. Patch sizes of the passive landbase are highly variable and some habitat patches (i.e. particularly old growth conifer in the Subalpine) are relatively large in the context of the active landbase. Through design and inclusion of active landbase, patch sizes can be greatly increased to provide an ecologically important network beyond the management unit.

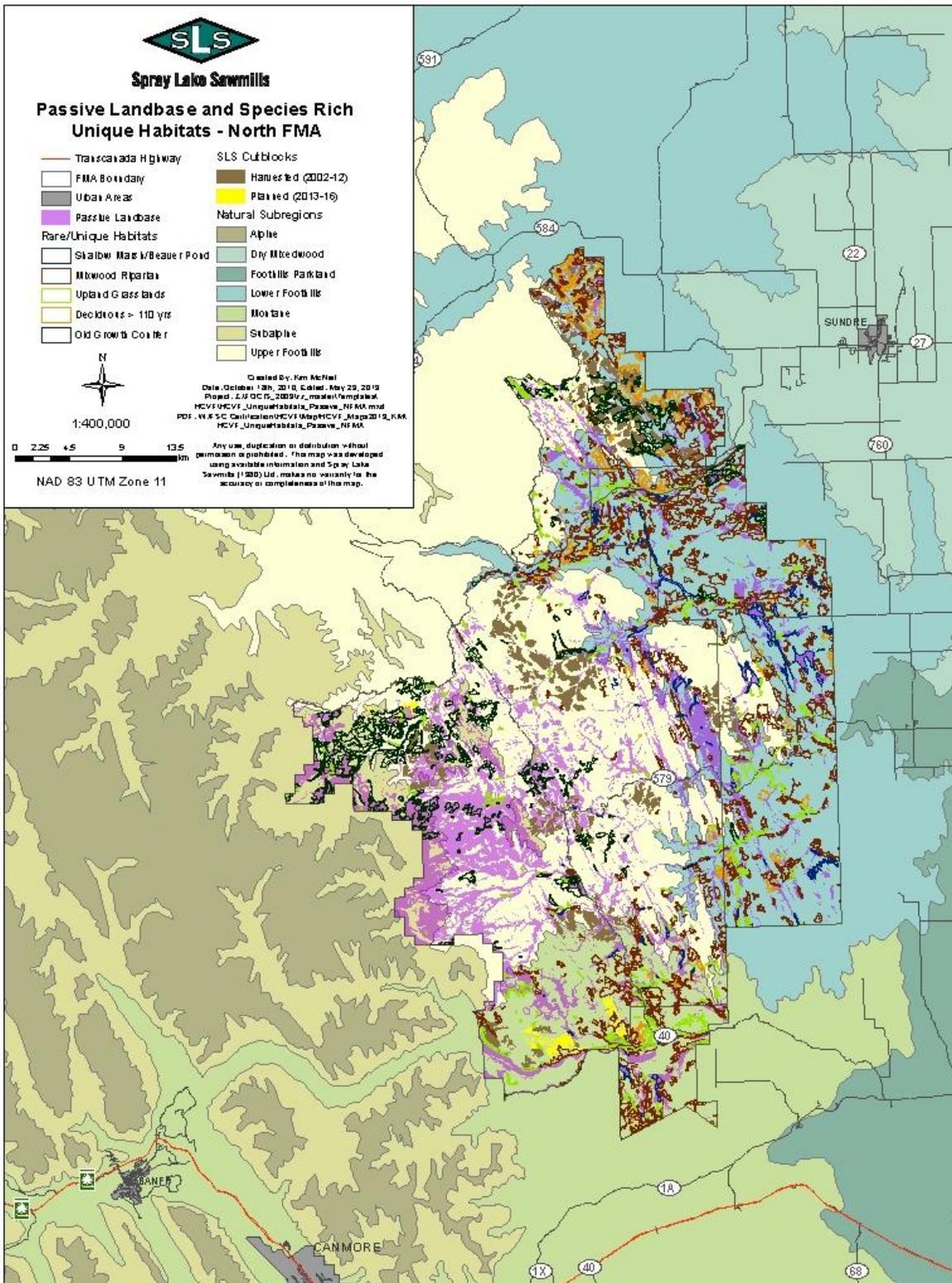


Figure 11. Passive Landbase and Unique, Species-Rich Habitats in the North FMA.

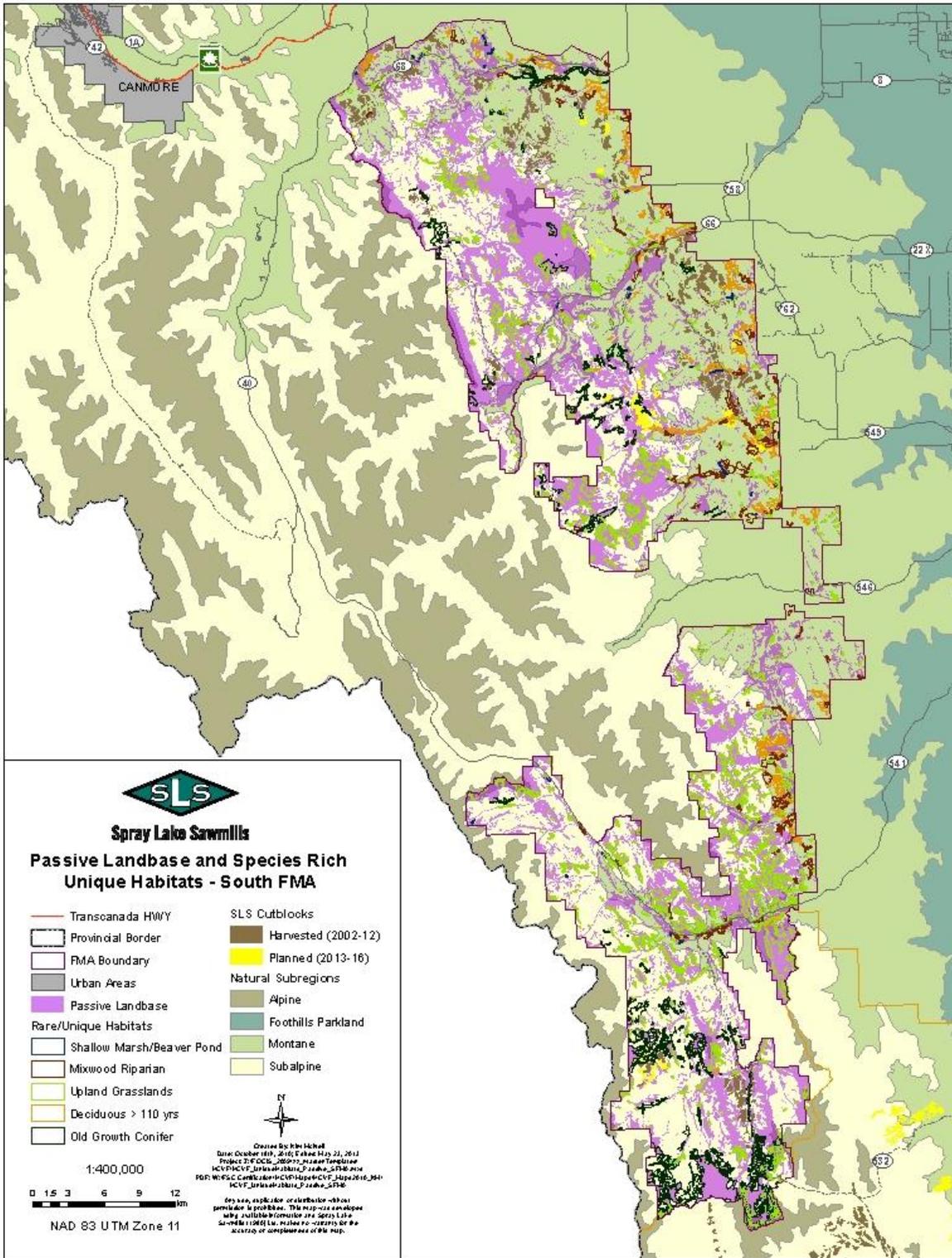


Figure 12. Passive Landbase and Unique, Species-Rich Habitats in the South FMA.

Table 2. Unique/Species Rich Habitat Type Proportions in Passive vs. Active Landbase

Habitat Type	Montane		Subalpine		Alpine		Lower Foothills		Upper Foothills	
	<i>% of Passive</i>	<i>% of Active</i>								
Shallow Marsh/Beaver Pond	93.8	6.2	95	5	n/a	n/a	88.2	11.8	100	0
Upland Grassland	82.4	17.6	87.2	12.8	97.5	2.5	54.8	0.4	98.3	0.4
Riparian Mixedwood Forest	12.7	87.3	39.3	60.7	n/a	n/a	4.2	83.9	5.1	94.9
Deciduous Forest >110 years	14.3	85.8	74.4	25.6	n/a	n/a	2.5	94.1	1.5	98.5
Old Growth Conifer Forest	37.8	62.2	57.7	42.3	83.1	16.9	15.9	84.1	22.2	77.8

4.7 Step 7: SLS Strategy for Filling Protected Area Gaps in FMA

Protected areas within the Foothills Natural Region are under-represented in the SLS FMA and regional environs. SLS will utilize three potential sources to fill protected areas gaps: 1) The Red Deer River ESA for formal protection. The Red Deer River portion of nationally significant ESA #20 occurs in the northern portion of the FMA and crosses mainly Lower Foothills lands, with some Upper Foothills. This ESA (or portions thereof) offers strong potential as a protected areas candidate for Foothills habitats in the FMA. SLS will collaborate with interested parties and stakeholders through the formal protection process, outlined in this paper; 2) The passive landbase areas, designed to meet specific ecological objectives and serve as permanent reserves. Portions of the passive and active landbase will be designed with stakeholders to contribute to a protected area network beyond the management unit; and, 3) SSRP CCMA's having ecological integrity serving as protected areas. (pending final SSRP regional plan land use designations). The SSRP is a government led process and the draft plan is due for public release, the fall of 2013. SLS has elected to use a 12% protected areas target for prioritizing gaps. Targets for protection inside of the FMA are 66.4 km² for Lower Foothills and 71.7 km² for Upper Foothills. These targets are based on outstanding deficits in Provincial Foothills subregion targets (based on 12% protection) and SLS's proportionate share of provincial land area supply of these two Subregions.

The following outlines SLS's defined process for meeting Foothills protection targets set by SLS in the FMA. Note, that steps 2-4 are designed for candidates to be moved toward formal protection.

4.7.1 Step 1: Site Identification and Selection

SLS has identified the following sources to fill gaps and serve as the protected areas network: 1) The Red Deer River ESA; and, 2) passive landbase areas designed to meet specific ecological objectives and serve as permanent reserves. SLS will work with interested parties to assess the Foothills subregion passive landbase for ecological integrity and collaborate with interested parties on an ongoing basis. Portions of the passive and active landbase will be designed with stakeholders to contribute to a protected area network beyond the management unit (similar to how the FSC quantifies protected area contributions in British Columbia). This process of collaboration will be open to First Nations, government, commercial interests, disposition holders, ENGO stakeholders and the public. 3) SLS will recognize SSRP, CCMA's having ecological integrity in the Foothills subregion, serving as formal or informal protected areas. The SSRP is a government led process and the draft plan is due for public release, the fall of 2013.

4.7.2 Step 2: Feasibility Assessment

The second step is to conduct a series of feasibility assessments. These will include an ecosystem assessment and a strategic environmental assessment, to evaluate the environmental condition of the candidate sites and the impact that the potential new protected area could have socially and environmentally. In addition, First Nations, government, commercial interests, disposition holders, NGO stakeholders and public consultations will be conducted to determine the feasibility of turning a candidate site into a formal or protected area reserve beyond the management unit. The results of these ecological, social and economic assessments will help to

determine the boundaries and the various options available for protection, in accordance with the land use zoning, disposition, ownership and jurisdiction of the land area targeted.

4.7.3 Step 3: Securement & Agreement

Once a candidate site(s) is selected for formal protection, the type of protected area will determine the instruments available for securing the lands.

4.7.4 Step 4: Regulatory Process

SLS will commit to deferred timber harvesting and nominate site(s) to help meet Protected Area gaps in the Upper and Lower Foothills Natural Subregions. For candidate(s) to be nominated for formal protection, the provincial government will then lead this process. In Alberta, protected areas are legally designated in two ways.

- Provincial parks, wildland provincial parks, heritage rangelands, provincial recreation areas, natural areas and ecological reserves are established by order-in-council, under their respective *Acts*. Orders-in-council are issued by the Lieutenant Governor-in-Council.
- Wilderness protected areas such as White Goat, Ghost River and Siffleur wilderness areas and Willmore Wilderness Park were established in legislation. Their boundaries are described in "schedules" under their respective *Acts*.

5.0 SUMMARY AND CONCLUSIONS

5.1 Protected Area Gap Analysis Summary

- The purpose of this gap analysis was to assess the comprehensiveness of the existing protected area network in the Spray Lake Sawmills (SLS) FMA/B9 Quota and region and to identify and prioritize underrepresented elements of biological diversity.
- Two previous representation gap analyses were conducted in the area: 1) for the Foothills Natural Region at a provincial scale in the mid-1990s; and, 2) on-going for the South Saskatchewan River Basin planning area at a watershed/regional scale. These gap analyses resulted in the selection of several existing or candidate protected areas in and immediately adjacent to the FMA. SLS officials were actively involved with both of the previous gap analyses/planning processes.
- The current gap analysis conducted for the SLS FMA/B9 Quota follows standard scientific approaches used by the Secretariat for the Convention on Biological Diversity (CBD) and World Wildlife Fund.
- The gap analysis considers both the SLS FMA/B9 Quota and a broader region of contiguous Natural Subregions surrounding the FMA. This is consistent with methods used for the HCVF and by the Secretariat for the Convention on Biological Diversity.
- Natural Subregions were used as a coarse-filter surrogate for landscape, community and species-level biodiversity in the SLS FMA/B9 Quota area.
- The FMA region comprises portions of the five Natural Subregions (from lower to higher elevation) - Lower Foothills, Upper Foothills and Montane, Subalpine and Alpine.
- Lower elevation lands in the Montane and Lower Foothills subregions support disproportionately higher levels of vegetation composition, structure (vertical and horizontal) and vertebrate wildlife diversity than do the Upper Foothills, Subalpine and Alpine natural regions.
- Approximately 37% of the RAA, is formally protected including: the Wildland Provincial Parks (WPP) and Provincial Parks (PP) comprised of the Don Getty WPP, Elbow-Sheep WPP, Bluerock WPP, and Sheep River PP, which occur immediately adjacent to and functionally within the FMA. Approximately, 28% of the FMA is designated as passive landbase, and is not planned for timber harvest. These areas are extensive, and offer significant sources of gap-filling potential as permanent reserves beyond the management unit.

- Upper elevation Subalpine and Alpine Subregion lands are significantly protected in the Province of Alberta, meeting Level 1 protected area targets used by Alberta Tourism, Parks and Recreation. Almost 50% of the Subalpine Subregion lands are protected in the FMA region, and an additional 8.5 km² of mixed Subalpine/Alpine lands in the SLS FMA are candidates for protection as part of the soon to be released South Saskatchewan River plan.
- The Montane Natural Subregion is well protected in the Province of Alberta, meeting Level 1 protected area targets used by Alberta Tourism, Parks and Recreation. A total of 329.4 km² (17.0%) of Montane lands are currently in protected area status in the FMA region. This includes lower elevation portions of the following protected areas: Bow Valley WPP, Bluerock WPP, Sheep River PP, Elbow-Sheep WPP, Spray Valley PP, Don Getty WPP. An additional 3 km² of Montane is being considered as a candidate for protection in the FMA as part of the South Saskatchewan River Basin planning framework.
- Currently, a total of 551.4 km² (2.6%) of Upper Foothills lands in the Province of Alberta is in protected status in the form of 19 parks and protected areas (Koch 2011). Approximately 71.7 km² of lands remain to be protected in the Upper Foothills to meet SLS's proportionate 12% target. The Don Getty Wildland Provincial Park protects 8 km² of Upper Foothills lands in the northern portion of the FMA region, immediately west of the FMA boundary. Another 3 km² of Upper Foothills land is a potential source for protection as candidate conservation management areas as part of the SSRB planning process.
- Approximately one-quarter (24.6%) of the Level 1 targets have been reached for Lower Foothills protection in the province, based on Alberta Tourism, Recreation and Parks information. Approximately 848 km² of lands remain to be protected in the Lower Foothills in order to meet provincial targets. SLS has adopted a proportionate share of 12% for the Lower Foothills target and has identified a gap of 66.4 km² for the FMA.

5.2 Protected Area Gap Analysis Conclusions

- The SLS FMA region currently contains an overall high proportion of protected areas. Approximately 37% of the RAA is comprised of formally protected areas, including the Wildland Provincial Parks (WPP) and Provincial Parks (PP) (Don Getty WPP, Elbow-Sheep WPP, Bluerock WPP, Sheep River PP), which occur immediately adjacent to and functionally within the FMA. Additional Subalpine, and Alpine lands have potential to be added within the FMA (8.8 km²) and immediately adjacent (217 km²) the FMA, as part of the SSRB planning process.

- The existing protected areas in the Subalpine and Alpine zones of the FMA and region are sufficient to protect biological diversity at a landscape level. No further protected areas are recommended in these two Natural Subregions, other than the 8.5 km² of land being considered for protection as part of the SSRB planning process.
- The Montane Natural Subregion is well represented (17.0%) by protected areas in the SLS FMA region, including the Sheep River Provincial Park/Bluerock Wildland Provincial Park block. No further protected areas are recommended for this subregion, in the FMA, other than the 3 km² of land being considered for protection as part of the SSRB planning process.
- Protected areas within the Foothills Natural Region are under-represented in the SLS FMA and regional environs. The Lower Foothills subregion is more biologically diverse than the Upper Foothills and as such is of higher priority for protection.
- The Alberta government targets of 2.5% and 3.3% for province-wide Lower and Upper Foothills protection are significantly lower than current standards for protected areas identified in the literature. SLS has adopted a 12% protection level proportionate to the occurrence of these two subregions in the FMA.
- Based on SLS's 12% proportional protection target, SLS and stakeholders will identify approximately 71.7km² and 66.4 km² of protection in the Upper and Lower Foothills subregions respectively in the FMA region.
- SLS will utilize three potential sources to fill protected areas gaps: 1) The Red Deer River ESA for formal protection. The Red Deer River portion of nationally significant ESA #20 occurs in the northern portion of the FMA and crosses mainly Lower Foothills lands, with some Upper Foothills. This ESA (or portions thereof) offers strong potential as a protected areas candidate for Foothills habitats in the FMA. SLS will collaborate with interested parties and stakeholders through the formal protection process, outlined in this paper; 2) The passive landbase areas designed to meet specific ecological objectives and serve as permanent reserves. Portions of the passive and active landbase will be designed with stakeholders to contribute to a protected area network beyond the management unit; and, 3) The SSRP CCMA's having ecological integrity, serving as formal or informal protected areas. The SSRP is a government led process due for public release, in the fall of 2013.

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