



**ALBERTA WILDERNESS ASSOCIATION**

*"Defending Wild Alberta through Awareness and Action"*

January 31, 2012

Superintendent Greg Fenton  
Jasper National Park

Superintendent Pam Veinotte  
Banff Field Unit, Parks Canada

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**AWA Comments on Conservation Strategy for Southern Mountain Caribou in Canada's National Parks**

Dear Superintendents Fenton and Veinotte:

Please consider these comments submitted by Alberta Wilderness Association (AWA) as part of the public consultation regarding Parks Canada's Conservation Strategy for Southern Mountain Caribou in Canada's National Parks.

Alberta Wilderness Association, founded in 1965, is a province-wide conservation organization with 7,000 members and supporters in Alberta and around the world. AWA promotes awareness and protection of Alberta's wild lands, wildlife and wild waters.

We are most supportive of the decision by Parks Canada to take "bold steps in protecting caribou on national park lands." (Conservation Strategy, page 5). It is intrinsically important to ensure that mountain woodland caribou remain to play their role in the health and functions of the alpine ecosystem as they have for many centuries. Mountain woodland caribou are also an important indicator species for the health of remote alpine areas: protecting their habitat to ensure their survival will also benefit other sensitive species.

We strongly support the strategy's approach to reduce human and alternate prey access to caribou habitat, and thereby reduce wolf access. We also support managing and restoring habitat to ensure it remains suitable for caribou. These habitat-related actions in our view address the root causes for dwindling herd populations. These elements of the strategy should be reflected in further reductions in road and trail access and preventing additional ski hill access in caribou range.

We also strongly support and urge Parks Canada to work with provincial government and industry partners to reduce roads and access in the portion of these caribou ranges adjacent to national parks.

It will be crucial to the strategy's success to have effective education accompanying proposed access reduction. We are confident that park visitors will strongly support changes that protect caribou if they understand the issues. We suggest adding related educational themes include broader values of remote intact wilderness areas for other sensitive species and for our watershed health.

AWA will strongly oppose predator management and maternity penning if it appears that they are being used as default actions in the event that reduced human and alternate prey species access is deemed too unpopular. We urge that the early actions taken establish a major focus on habitat access management and habitat quality.

Similarly, we do not support translocation as the first or main strategy, but agree it may be useful to maintain and augment populations provided bold steps are also being taken to reduce habitat access. For Banff Park, translocation should only happen after meaningful reduction in habitat access by humans and alternate prey species.

We are reluctant to endorse prescribing burns within caribou habitat as the consequences of loss of control will be dire.

We are concerned that the statement that "development within important caribou habitat to be considered under exceptional circumstances only, and must not adversely affect caribou" (page 14) might be used to justify unnecessary disturbance. We would prefer that the statement be removed, or at least limited to a narrow specific concern such as pressing human safety issues.

We would like further clarification of how Parks Canada's 'important habitat' identification and action plan will relate to critical habitat identification and associated recovery planning under SARA. We support Parks Canada moving forward now, but we also do not want to lose the strength of a SARA critical habitat designation and recovery plan applied to this issue as soon as possible.

We also request promptness and transparency as the southern mountain caribou conservation strategy proceeds: promptness because of the imminent danger of extirpation of these populations, and transparency on scientific and advisory committee recommendations and public and stakeholder consultation results around mountain caribou conservation.

Thank you very much for considering these points. Please do not hesitate to contact us if you have any questions related to these comments.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink that reads "Carolyn Campbell". The signature is written in a cursive style with a horizontal line underneath the name.

Carolyn Campbell  
Conservation Specialist