



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

November 30, 2016

Kendra van Dyk
Integrated Land Use, Policy and Planning
Parks Canada
101 Mountain Avenue
P.O. Box 990, Banff, Alberta T1L 1K2
Opinion@pc.gc.ca

**RE: Plains Bison Reintroduction in Banff National Park Pilot Project 2017-2022,
Detailed Environmental Impact Analysis (DEIA)**

Dear Kendra van Dyk:

Alberta Wilderness Association (AWA), founded in 1965, works throughout Alberta towards more representative and connected protection of the unique and vital landscapes that are the source of our clean water, clean air and wildlife habitat. With over 7,000 members and supporters in Alberta and across Canada, AWA remains committed to ensuring protection of wildlife and wild places in Alberta for all Canadians.

AWA supports reintroduction of extirpated species and believes wild bison herds remain wild and they be managed as such. AWA's Position Statement (attached) notes that the following issues must be dealt with in regards to with the Banff National Park (BNP) plains bison reintroduction:

- **Fencing** - Minimal use of appropriate fencing, allowing for other wildlife population connectivity and the free roaming of the reintroduced bison. AWA does not support penned bison paddocks such as those used historically within BNP.
- **Bison Excursion** - National Parks staff must develop a strong relationship with ranchers on the eastern slopes as well as provincial Alberta Environment and Parks (AEP) staff to effectively manage bison roaming outside of the park, the spread of disease from cattle, and the possibility of inter-breeding with domestic cattle. A plan for dealing with escaped bison that leave BNP must be formalized.
- **Access and Visitor Experience** - Roads and other incursions into the wild natural areas planned for bison reintroduction must not be upgraded for access that would provide tourist attractants and further commercialization of BNP.

AWA will address these concerns within the context of the DEIA by Section.

3.3.2. River and Creek Crossings (p. 23)

The DEIA describes watercourse fencing as “plastic chain” and “plastic board curtain” for watercourse fencing. AWA requests the DEIA evaluate the potential impacts this material would have in the event of dislodgment (i.e. by flood, storm event, or human tampering). AWA recommends the use of material that is certified biodegradable or compostable as to limit litter and maintain the wilderness character of BNP should the material become loose.

3.4. Free-Roaming (p. 27); 3.4.1. Management Actions as Required (p. 27); Appendix 1. Bison Excursion Prevention and Response Plan (p. 135)

These sections address AWA’s concern that there must be a formalized plan for dealing with escaped bison and the relationships necessary between Parks Canada and adjacent ranchers, allotment holders, and the provincial government.

As the DEIA’ habitat suitability models show, habitat suitability values are higher outside the bison reintroduction zone to the east of BNP boundary for summer; these values increase even more drastically for winter. Given this, and given the proximity of the bison reintroduction zone to the easternmost boundary of BNP, geographic boundaries for management need to extend beyond the park. Given the joint federal-provincial management actions required if bison exit to the east of the ‘Hazing Zone’ on the easternmost boundary of BNP, AWA recommends the scope of the DEIA be amended (Section 2.10) to include adjacent areas to the bison reintroduction zone, as it applies to Sections 3.4 ‘Free-Roaming’, 3.5 ‘Assessing the Pilot Project’, 4.3 ‘Wildlife’, 4.7 ‘Visitor Experience and Safety’, and ‘Excursion Prevention and Response Plan’.

AWA requests that plains bison be up-listed by SARA to ‘endangered’ from extirpated, and a provincial strategy be developed to differentiate the status for wild bison and domestic bison based on ownership (commercial farm, a private conservation herd or in the wild).

4.2.1. Soils and Vegetation Existing Environment, Rare and Sensitive Plants (p. 32)

AWA recommends rare and sensitive plant surveys or studies need to be conducted. In the DEIA, “lack of information makes it difficult to predict any potential impacts from free-roaming bison on rare and sensitive plants. Low densities of bison suggest minimal or no impacts will occur during the course of the pilot project.” The DEIA is therefore not clear what impact, either adverse or advantageous, bison will have on rare and sensitive plants.

4.3.2. Impacts and Mitigation – Wildlife, Supporting Infrastructure (p. 63)

The DEIA notes the effectiveness of the adjustable fencing approach relies on the ability of staff, volunteers or others to deploy fences into bison-holding, when needed, in a timely manner. In Appendix 1, the Bison Excursion Response Matrix (Table 2), response and resolution times range from 24 hours to 1 week or as long as necessary. The DEIA should outline the methods of communication that will be provided to “staff, volunteers or others” in order to deploy management tactics within the response times given.

AWA recommends the DEIA evaluate environmental and socioeconomic impacts, including logistical considerations, in the event that fencing fails. However unlikely it is, there is a risk that fencing will become damaged or destroyed due to natural causes or human interference, or that they are not deployed successfully due to human error.

4.5. Species at Risk, Caribou (p. 81)

In the discussion of southern Mountain Caribou, the DEIA reads (p. 86) “In the 1970s caribou numbers in BNP peaked at close to 35.” This sentence should clarify the overall span of years in which the 1970s was the peak. The sentence is misleading as it implies the maximum caribou that occupied BNP in all history was 35. In addition, the data on Figure 40 does not correspond to the aforementioned statement.

4.5.2. Impacts and Mitigation, Westslope Cutthroat Trout (p. 90)

In Section 4.4.3, the DEIA states “very little is known about how extensively bison may or may not impact the aquatic ecosystem.” (p. 80). This is inconsistent with the following evaluation of impacts that determines there are negligible adverse impacts (p.92): “...it [is] unlikely bison will kill or harm individual cutthroat trout or destroy critical habitat.” (p. 90). Given that it is not known how bison may or may not impact the aquatic ecosystem, and given that Cuthead Creek is located within high suitability habitat for bison, mitigation measures (such as deterrent mechanisms) must be outlined in the event that bison come near Cuthead Creek and adversely affect westslope cutthroat trout critical habitat.

In addition, the recovery plan for westslope cutthroat trout is intended to restore populations to their former reaches. The DEIA should consider westslope cutthroat trout habitat, and all species at risk habitat, within the context of their ranges of recovery.

4.7 Visitor Experience and Safety (p. 96)

AWA believes roads and other incursions into the wild natural areas planned for bison reintroduction must not be upgraded for access that would provide tourist attractants and further commercialization of BNP.

The DEIA states a “modest” increase in visitation is expected (p. 99). AWA is concerned that human impacts have not been adequately assessed in the DEIA. The DEIA should discuss how permitting and visitation limits operate in the BNP backcountry currently, and whether or not there will be limits on visitation in the bison reintroduction zone considered in the future.

In addition, the DEIA considers the impacts to visitor experience, but the DEIA must also consider the impact human access may have on the bison. For example, at what numbers or during what activities do people cause stress on animals? At what numbers of people or during what activities will people and bison be at risk of conflict?

AWA believes the mitigation measure, “continue to minimally maintain trails (e.g. very few bridged river crossings, trails faint in places) to maintain wilderness character and to discourage big increases in visitation” is not adequate. A stronger method to limit the potential of commercialization due to visitors is to implement a limit on visitors with a permit system, similar to access limits in the Burgess Shale or Lake O’Hara areas. This would discourage an influx of unsustainable visitor use while maintaining quality of visitor experiences in the backcountry for those who have obtained a permit. AWA recommends human visitation limits or permits be considered. AWA also recommends human visitation scenarios be projected into the future in the anticipation that the 5-year pilot project proceed. Conversations with other jurisdictions such as Yellowstone National Park who have introduced bison successfully and currently struggle with managing visitor interactions with bison may prove insightful.

We hope your consideration of our feedback strengthens the DEIA.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read "Andrea Johancsik". The signature is fluid and cursive, written in a professional style.

Andrea Johancsik
Conservation Specialist

Attached: AWA Position Statement on American Bison

cc:

Karsten Heuer, Bison Reintroduction Coordinator
Parks Canada
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Honorable Shannon Phillips, Minister
Alberta Environment and Parks
AEP.Minister@gov.ab.ca

Andre Corbould, Deputy Minister
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Summary of AWA Recommendations

1. AWA requests the DEIA evaluate the potential impacts the material for watercourse fencing would have in the event of dislodgment. AWA recommends the use of material that is certified biodegradable or compostable as to limit litter and maintain the wilderness character of BNP should the material become loose.
2. AWA recommends the scope of the DEIA be amended (Section 2.10) to include adjacent areas to the bison reintroduction zone.
3. AWA requests that plains bison be up-listed by SARA to 'endangered' from extirpated, and a provincial strategy be developed to differentiate the status for wild bison and domestic bison based on ownership (commercial farm, a private conservation herd or in the wild)
4. AWA recommends rare and sensitive plant surveys or studies should be conducted.
5. AWA recommends the DEIA outline the methods that communication will be provided to "staff, volunteers or others" in order to deploy management tactics within the response times given.
6. AWA recommends the DEIA evaluate environmental and socioeconomic impacts in the event that fencing fails.
7. AWA requests clarification of caribou numbers in Section 4.5., Species at Risk.
8. Given that it is not known how bison may or may not impact the aquatic ecosystem, and given that Cuthead Creek is located within high suitability habitat for bison, mitigation measures (such as deterrent mechanisms) must be outlined in the event that bison come near Cuthead Creek.
9. The DEIA should consider westslope cutthroat trout habitat, and all species at risk habitat, within the context of their ranges of recovery.
10. AWA recommends human visitation limits or permits be considered.
11. AWA recommends human visitation scenarios be projected into the future in the anticipation that the 5-year pilot project proceed.
12. The DEIA must also consider the impact human access may have on the bison.