



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

December 18, 2020

Hon. Jonathan Wilkinson
Minister of Environment and Climate Change Canada
ec.ministre-minister.ec@canada.ca

Re: Stronger Access Measures Needed for Jasper's Few Remaining Caribou

Dear Minister Wilkinson:

Thank you for your November 10 letter, in reply to Alberta Wilderness Association's Sept. 9, 2020 letter on emergency measures needed for Jasper caribou. We remain seriously concerned about the continued harmful access decisions being made by Parks Canada in caribou ranges in Jasper National Park and cannot help but wonder if you have been fully briefed. In particular, given the dire state of caribou, inappropriate access decisions have been made in Tonquin range, and a lack of urgency in prioritizing caribou re-occupancy of the prime Maligne caribou range must be addressed.

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.

Contrary to Parks Canada's claims, it is not only lingering 'Small Population Effects' from poor Parks' policies before 2006 that threaten Jasper's caribou. **Jasper Park's current access management decisions continue to fail caribou.**

Jasper managers agree that survival of Tonquin caribou, the highest remaining population, is crucial. Yet risky 'compromise'¹ access measures continue. To suit a few local interests, Parks Canada:

- is planning to lift Tonquin winter backcountry restrictions February 15 as usual, despite the overlap of snowmobile supply trails, and ski trails, with 'high value' late-winter habitat (Figures 15 and 29, Schmiegelow 2014);
- is allowing, since 2017, a Marmot Basin downhill ski run extension area ('Tres Hombres'), against expert recommendation (Schmiegelow 2014);
- is allowing intensive summer-fall backcountry access in Tonquin, despite caribou preferred habitat areas being highly transected by trails, and despite the habitat-reduction effects of trails, backcountry lodges and campgrounds (Figure 30, Schmiegelow 2014).

¹ Tonquin backcountry skiing opens February 16 "as a compromise to offer some protection to caribou while still allowing the existing stakeholders to operate during a shorter portion of the winter season." Jasper National Park. *Captive breeding strategy to address small caribou populations in Jasper National Park*. Draft May 2017. p. 8.

Figure 15. Spatial representation of access and habitat classes 3, 4, and 5 during the late winter (January 22nd to May 22nd) season 2002-2009.

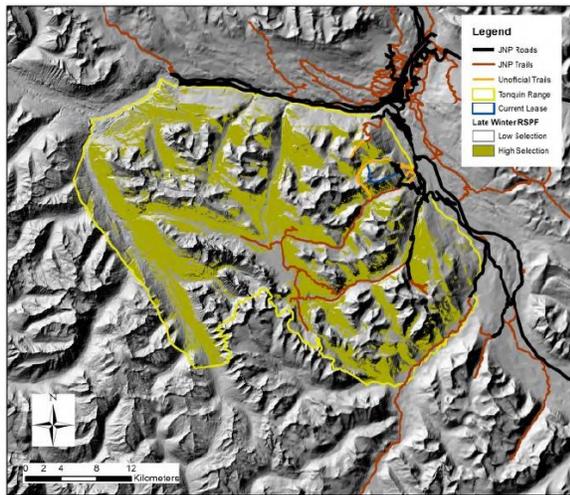
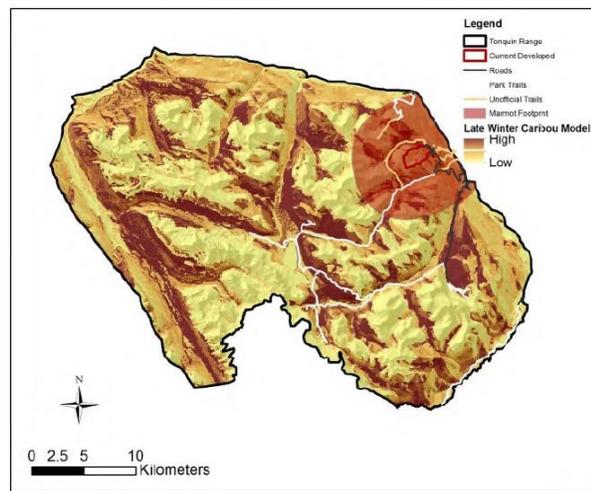
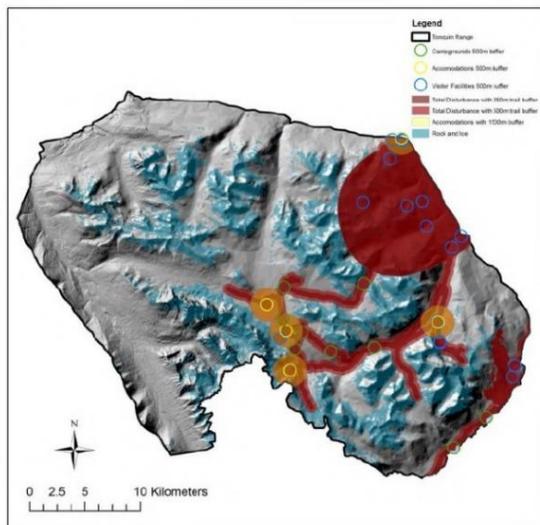


Figure 29. Tonquin caribou selection for distance to Marmot during the late winter season (January 22nd to May 22nd) using the full final dataset (2002-2009).



Tonquin range maps above indicate the overlap of snowmobile supply and skiing routes, allowed from February 16, with high quality 'late winter' caribou habitat (Source: Schmiegelow 2014)

Figure 30. Total disturbance (fires within 50 years and anthropogenic) and habitable areas in the Tonquin range. Total disturbance includes a 5 km around Marmot Basin.



Tonquin range map with disturbance impacts of Marmot Basin ski hill (red half circle), trails (red lines), and backcountry lodges and huts (orange circles). Trails and lodge sites overlap not only with high quality winter habitat, but also with high quality summer-fall habitat. (Source: Schmiegelow 2014)

Jasper managers agree that the Maligne range is prime caribou habitat. However, to suit a few local interests, Parks Canada:

- removed its early-winter backcountry ski restrictions in two Maligne areas beginning November 2020, signaling it will, in effect, retract important range areas when inconvenient caribou die off;
- continues to snowplow the Maligne Valley Road past Maligne Canyon, facilitating wolf access and re-occupancy.

These actions set a very poor example for other jurisdictions to manage their much larger caribou ranges, with more complex land-use issues, in accordance with the federal *Species at Risk Act (SARA)*.

Access Management Requests

AWA believes Parks Canada must reduce current harmful human access impacts in Jasper caribou ranges, to buy survival time and support successful caribou recovery. We request these measures:

In Tonquin:

- starting this winter, extend backcountry restrictions throughout the late winter;
- urgently re-assess and reduce current habitat impacts of summer-fall backcountry access;
- revoke 'Tres Hombres' 2017 ski run approval, and take other actions to reduce the caribou habitat-impairing impacts from Marmot Basin ski hill.

In Maligne:

- stop snow plowing Maligne Valley Road past Maligne Canyon and otherwise restrict Maligne backcountry winter human access, to minimize wolf re-occupancy chances and ensure this prime caribou range is ready to be safely re-populated by caribou as soon as possible.

Conservation Breeding

Parks Canada must conclude its many years of considering caribou conservation breeding. In that time, Maligne caribou have been extirpated and the Tonquin population has spiraled down. Canadians need to be updated promptly on what the upcoming January 2021 external scientific review finds. If it is a viable and ethical plan, it should proceed quickly while as many caribou as possible remain in these ranges.

We cannot emphasize enough that the dire approach of conservation breeding is senseless without taking stronger access measures in the meantime to support caribou survival and recovery.

Thank you for your serious consideration of these requests. We look forward to your reply at your earliest convenience.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION



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cc: Ron Hallman, President and CEO, Parks Canada
Alan Fehr, Superintendent, Jasper National Park
Tamaini Snaith, Director Conservation Programs, Parks Canada

'Schmiegelow 2014' referenced above is: Czetwertynski, S. and Schmiegelow, F. (March 2014). *Tonquin Caribou Risk Assessment Final Report*. Commissioned for Parks Canada's assessment of Marmot Basin Ski Area Guidelines and Development.