



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

September 1, 2022

Hon. Steven Guilbeault  
Minister of Environment and Climate Change Canada  
[ministre-minister@ec.gc.ca](mailto:ministre-minister@ec.gc.ca)

### **Jasper Caribou Conservation Breeding Strategy**

Dear Minister Guilbeault:

Alberta Wilderness Association (AWA) appreciates the opportunity to comment on the proposed conservation breeding strategy for south Jasper National Park caribou populations.

Founded in 1965, AWA 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 7,500 members and supporters in Alberta, across Canada, and around the world AWA remains committed to ensuring protection of wildlife and wild places in Alberta for all Canadians.

In 2020, when Jasper's Maligne caribou population was declared extirpated, AWA urged Parks Canada to transparently review conservation breeding, and proceed if it was viable and accompanied by improved range management. We appreciate that Parks Canada convened an external scientific review in early 2021 and published in a timely manner the experts' findings that conservation breeding was necessary for Jasper caribou to survive.

Despite our intense frustrations with Parks Canada range access decisions in recent decades - which too often appeared to prioritize local recreation interests over habitat security, while caribou populations spiraled down in their remnant range areas - AWA accepts that the remaining small Tonquin and Brazeau caribou populations cannot recover on their own.

On the positive side, we appreciate that since the early 2000s, Parks Canada has managed for more sustainable elk and wolf populations focused in Jasper's valley bottoms, reducing caribou predation risks. We recognize backcountry winter access was reduced in the last decade. We welcomed Parks Canada's October 2021 decision that there will no longer be any snow-season backcountry access in the Tonquin and Brazeau caribou ranges, to further reduce predation risk and winter-time stressors for south Jasper's remaining caribou.

AWA supports Indigenous partnerships and collaboration in any Jasper conservation breeding program.

**With the habitat and access management provisos below, AWA believes that the proposed conservation breeding program is a necessary interim measure to keep wild caribou in Jasper National Park, where they belong.**

### Reviewing the Best Path to Re-populating Jasper-Banff Caribou

AWA strongly supports the overall goal to re-populate the Jasper-Banff Local Population Unit (LPU) of Tonquin, Maligne, Brazeau and Banff ranges to reach a total population of 300-400 caribou. That is in line with more secure, representative distributions and populations of the mid-twentieth century, although the LPU boundary still likely omits historical range area important for these migratory southern mountain caribou. We agree with a Tonquin population goal of at least 200 caribou for a stable population and to allow for dispersal and migration.

However, instead of waiting until Tonquin reaches 200 animals, we request that the re-occupation strategy for Maligne, Brazeau and Banff should be re-assessed every five years to determine the best path to obtain a secure, connected caribou population of 300 to 400 across the LPU. Although it is urgent for Parks to proceed with conservation breeding coupled with stronger range management measures, the projected 5-10 years to re-populate Tonquin to 200 animals may be too optimistic. Re-occupation of the prime Maligne caribou range in particular should not necessarily wait until Tonquin reaches 200 animals. Stakeholders and the public should be kept informed of the overall LPU strategy, to know that habitat and access is being managed deliberately for caribou recovery across the LPU.

We strongly support an 'interim' program that attains its population goals and then ceases operations. Program facilities and infrastructure should be decommissioned, with caribou habitat conditions and access management enabling populations to withstand random events and persist over the long term.

### Access and Habitat Measures for Program Success

Conservation breeding is highly manipulative and invasive for wild caribou. We urge Parks Canada to pursue more precautionary access management measures for secure, connected habitat, to set up the conservation breeding program for success.

#### Tonquin Range

We understand the logic of capturing some Tonquin caribou and all remaining Brazeau caribou and transporting them to the conservation breeding facility, given their approaching extirpation. It is crucial that as many remaining Tonquin wild caribou as possible can continue to occupy their range, to increase the likelihood of the facility-raised yearlings' survival when they are released into that range.

For success in the face of impending caribou extirpation, Parks Canada should re-assess and reduce:

- summer-fall recreation access impacts to Tonquin caribou, with urgency. Our request is informed by Dr. Fiona Schmiegelow's 2014 expert findings that substantial high-quality summer and autumn season caribou habitat is transected by busy recreation trails, and by recent anecdotal evidence of increasing Tonquin day-use visits such as by trail runners.
- Marmot basin ski resort impacts, which substantially contract the usable range. For example, approval for Tres Hombres downhill ski runs in the Whistlers Creek area should be revoked.
- barriers and threats in adjacent connected areas. For example, in February 2022 some Tonquin caribou were observed in BC's Mt. Robson area on Highway 16.

#### Maligne Range

To re-populate Tonquin, Maligne and Brazeau caribou ranges to reach Parks Canada's LPU population goals, AWA believes that the prime Maligne caribou range should be prioritized for caribou re-occupancy as soon as possible. People have ample recreation and economic opportunities outside Jasper caribou ranges, whereas these caribou are critically imperilled and have no other secure habitat.

Securing Maligne caribou habitat includes prohibiting new overnight commercial visitor accommodation in the Maligne Valley, and ending the winter plowing of the Maligne Road past Maligne Canyon.

#### Transboundary Connections

The February 2022 sighting of some Tonquin caribou in BC's Mt. Robson area is a recent reminder that connectivity between federal and provincial lands is important for caribou security and recovery. Critical habitat for southern mountain caribou also includes 'matrix' habitat adjacent to ranges that should be managed for suitable predator/prey dynamics. AWA requests that Parks Canada engage with Alberta, British Columbia and Indigenous nations and communities to achieve more connected, secure habitat adjacent to national park boundaries for successfully re-populating Jasper-Banff caribou.

#### Outreach

We request that Parks Canada increase resources for high quality Parks Canada-delivered education to visitors and Jasper residents of caribou habitat requirements and recreation impacts on caribou.

#### Breeding Program Approach

As Parks Canada discusses with Alberta and BC potential caribou source populations from provincial lands for a conservation breeding start-up, AWA emphasizes that the numbers and pace of transferred breeding females should not jeopardize the viability of the donor populations.

For animal husbandry, AWA supports the provisions to minimize mortality at all stages, and to keep the captive animals as wild as possible, primarily in outdoor pens at relatively low density.

#### Conclusion

Weighing the alternatives, AWA believes that Parks Canada must do its utmost to ensure that the magnificent caribou under its care in Jasper are not lost to future generations of Canadians.

Parks Canada should proceed with this conservation breeding program, as an interim measure in combination with the precautionary range management measures outlined above, so that wild caribou can thrive in Jasper National Park, where they belong.

Thank you for considering these comments.

Sincerely,



Carolyn Campbell  
Conservation Director

cc: Ron Hallman, President and CEO, Parks Canada  
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