



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

May 12, 2023

Sal Rasheed  
Banff Field Unit Superintendent  
Parks Canada  
By email: [banff.superintendent@pc.gc.ca](mailto:banff.superintendent@pc.gc.ca)

**Re: Parks Canada's Application for Other Effective Area-Based Conservation Measure Recognition of Ya Ha Tinda Ranch**

Dear Mr. Rasheed,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide feedback on Parks Canada's application for other effective area-based conservation measure (OECM) recognition of Ya Ha Tinda Ranch. 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 7,500 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.

As you know, the important grassland and montane habitats of Ya Ha Tinda Ranch are used extensively by overwintering elk that migrate from Jasper and Banff National Parks. Elk, bighorn sheep, mule and white-tail deer, and predators including wolves and bears benefit from this largely undeveloped habitat that acts as a wildlife refuge. The unmatched scenery of the Ranch also makes it an attractive area for recreationists.

AWA supports the application for OECM recognition of Ya Ha Tinda Ranch. However, we would like to request that Parks Canada address a couple of key considerations, namely Indigenous inclusion in the application and management of the OECM, and issues with overgrazing within the Ranch.

The land that is now the Ya Ha Tinda Ranch has likely been inhabited by people for 10,000 years. Indigenous rights holders including the Stoney Nation should be consulted in the decision to apply for OECM recognition of the Ranch, and should be involved in conservation decisions and management of the Ranch to the extent that they want to be. Meaningful consultation of Indigenous rights holders in this process is important for reconciliation, upholding Indigenous rights, and achieving conservation objectives.

Because the Ranch is used to breed, raise, and train Parks Canada's horses, there have been problems with overgrazing caused by large numbers of horses and wildlife using the area. As a potential OECM,

grazing of horses needs to be managed in such a way that wildlife continue to be able to graze without compromising the state of the grassland ecosystem. This may mean keeping horse numbers at an appropriate level or using other mitigation techniques to ensure that horses and wildlife coexist on the landscape. This will ensure that the Ranch continues to contribute towards conservation of healthy wildlife populations in the province.

Although conservation is not always the primary purpose of an OECM, ecological integrity must remain a top priority of the Ya Ha Tinda Ranch to effectively conserve nature. AWA trusts that with OECM recognition, this area will be able to continue providing suitable wildlife habitat, intact montane and grassland ecosystems, and contribute towards Canada's commitment to protect 30 percent of lands and waters by 2030.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'Devon Earl', written in a cursive style.

Devon Earl  
Conservation Specialist

Cc: Claire Kirby, Policy Advisor, Land Use, Policy and Planning, Banff Field Unit, [Claire.Kirby@pc.gc.ca](mailto:Claire.Kirby@pc.gc.ca)