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October 28, 2013

**Re: Comments on the Plan for the Reintroduction of Plains Bison in Banff National Park**

Dear Ms. Luey,

The Canadian Parks and Wilderness Society – Southern Alberta Chapter (CPAWS SAB) is pleased to provide comments on the Plan for the Reintroduction of Plains Bison in Banff National Park. CPAWS SAB is part of a national non-profit organization dedicated to protecting Canada's wilderness. Since our inception in 1967, CPAWS Southern Alberta Chapter has had a long history of involvement with many aspects of Banff National Park management.

CPAWS SAB strongly supports efforts to improve the ecological integrity of Banff National Park by reintroducing “missing” native species and restoring natural processes. Reintroduction of wild free-roaming plains bison will help achieve both of these goals, CPAWS SAB has reviewed the plan and commends Parks Canada for their efforts to reintroduce this iconic species as part of a broader international conservation effort. Overall, we support the reintroduction plan and its approach. We also appreciate that the plan is easy to read, well laid out and puts strong emphasis on education. We note two areas of on-going concern below regarding the fencing plan, and the need for adequate resources to ensure success.

In particular, we support:

1. The vision and phased approach to re-introduce free-roaming wild plains bison to the park.
2. An adaptive management approach with ongoing monitoring and evaluation as key elements of the re-introduction strategy.
3. Strong planning and safety protocols associated with the re-introduction program.
4. Citizen science and engagement opportunities including robust educational efforts (with the Calgary Zoo etc.).
5. Herd size (initial and growth targets), selection, release location and method.

The element of the plan that is of on-going concern to us is the proposed fencing. We also note that it will be important to ensure adequate long term resources are available to ensure the success of this conservation effort.

### **1. Fencing:**

We understand the need for some fencing to control and guide the free-roaming wild plains bison herd, particularly at the outset of the initiative, but we are concerned about the potential impact of the fencing on the movement of other wildlife species. For this reason we suggest that more detail be included about the fencing plan, including on the following key points:

- All fencing used for this initiative should be permeable to other species of wildlife so as to not impede their movement.
- We are particularly concerned about the fence proposed in the Upper Cascade River valley at Stoney Creek. If fencing is used at this location, we recommend that it be fitted with a large gate that is left open unless on-going monitoring demonstrates that bison are moving towards the fence. We also recommend that this permeable fence be built as a temporary structure to be removed when the project expansion into the lower Cascade area is approved.
- Except for the fence at Carrot Creek, we recommend that there be an explicit goal of removing fencing within 10 years of the re-introduction.
- We recognize the importance of permanent fencing in the Carrot Creek area to keep bison off the TransCanada Highway and away from the highly populated Canmore region. Given its importance, the Carrot Creek fence needs to have the most significant investment to ensure it is permanently impermeable to bison. This is where a state-of-the-art fence is most important.

### **2. Capacity and Resources:**

A successful re-introduction for bison in Banff will require considerable resources to ensure its long term success. It is important that Parks Canada has the necessary capacity to take on this initiative while not compromising other current habitat and conservation management measures in the park. This is a large undertaking and a key element to its success lies in long term research and monitoring, and on-going management and education. We recognize that recent budget cuts to the Parks Canada Agency pose challenges for resource management and monitoring work within the Agency. To ensure there is adequate funding in place for this plan CPAWS is actively working to encourage the federal government to invest in science-based on-the-ground conservation outcomes like the bison (and caribou) reintroductions in Banff.



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CPAWS SAB is encouraged by this conservation effort in Banff National Park and congratulates Parks Canada on the re-introduction plan. As stated above, we strongly support re-introduction of wild free-roaming plains bison into Banff to help restore the park's full suite of native species and natural processes. With further clarification of the fencing proposals as outlined above, and with the commitment of adequate dedicated resources to ensure the long term sustainability of this new conservation effort, CPAWS fully supports this initiative.

Sincerely,

Anne-Marie Syslak  
Executive Director CPAWS SAB