



Mackenzie County  
P.O. Box 640, 4511 – 46 Ave  
Fort Vermilion, AB  
T0H 1N0  
Ph: 780-927-3718

[info@AlbertaNWSAR.ca](mailto:info@AlbertaNWSAR.ca)

---

December 10, 2018

**RE: Input on Parks Canada Agency’s Draft Action Plan for Wood Buffalo National Park World Heritage Site**

Northwest Species at Risk Committee (NWSAR) would like to thank the Parks Canada Agency (PCA) for this opportunity to provide feedback on your *Draft Action Plan for Wood Buffalo National Park (WBNP)*, released on November 16, 2018.

NWSAR consists of six municipalities, three rural and three urban, in Northwest Alberta. The eastern boundary of our most northern municipal member, Mackenzie County, abuts WBNP along the park’s western boundary. Thus, our group has a vested interest in the action items associated with this Action Plan. NWSAR is pleased to provide the following response:

**6.5 Theme: Conservation Area Connectivity**

While we understand that, all action items under this theme are consistent with the recommendations of the Strategic Environmental Assessment (SEA) and Reactive Monitoring Mission (RMM), specifically RMM recommendations **10** and **11**. These action items overlook significant local concerns, and the fundamental process of regional land-use planning in Alberta.

Although, regional land-use planning is the most appropriate process to identify and pursue conservation of environmentally important landscapes and ecosystems. The *Draft Action Plan for WBNP*, provincial caribou range planning, or any other wider planning initiatives are not the opportunities to “cherry-pick” key elements of a regional planning process for implementation, prior to the appointment of the local Regional Advisory Committee (RAC) and the development of that land-use plan’s Terms of Reference.



NWSAR is aware of the *Pathway to Canada Target 1* under the Convention of Biological Diversity, and Alberta's separate protection of 17% of terrestrial lands and inland waters targets. NWSAR is concerned these global and national targets are taking precedence over the values and interests of northern Albertans. The establishment of new conservation areas adjacent to WBNP could have significant impacts on existing land users within those areas, and on future sustainable growth and economic opportunities. Depending upon the enforcement of new restrictions/regulations within the proposed new effective buffer zones, natural resource-based industries, agricultural, Indigenous and non-Indigenous land users (i.e. trappers, outfitters, hunters, and recreational users) could be adversely impacted.

**Page 55:** This table indicates that PCA and Environment and Climate Change Canada (ECCC) will lead the conservation area gap analysis in the Lower Peace Region. PCA recognizes that gap analysis is a priority in Northwest Alberta but fails to identify advancing the regional planning process in the same region as an action item in the table on **Page 53**.

#### *Recommendations*

**Page 53:** The Lower Peace Regional Plan in Northwest Alberta is yet to commence. Add Alberta as a *Lead* in this table to complete regional land-use planning in the surrounding WBNP area (Lower Peace Region) with a timeline, which allows for the establishment of the local RAC, meaningful consultation and a robust stakeholder engagement process.

**Page 54:** The workshops identified in this table must include several stakeholders from the surrounding WBNP region. Local: private land owners, farmers, employees within the natural resource industries, municipalities and Indigenous Peoples all have a wealth of knowledge and qualitative data, which can be used to support/confirm the information gaps.

### **6.9 Theme: Wildlife and Habitat Conservation**

Additional conservation areas surrounding WBNP reduces the area where free-roaming bison (not recognized as wildlife under Alberta's *Wildlife Act* outside protected lands) can be legally harvested. Additional conservation areas buffering the park will provide the opportunity for diseased bison herds to travel closer to livestock on agricultural lands and grazing reserves, and within closer proximity to



the *Endangered* “disease-free” Hay-Zama bison population<sup>1</sup>; essentially increasing the risk of Bovine Brucellosis and Tuberculosis disease transfer, threatening Canada’s Tuberculosis-free status and the long-term recovery of Wood Bison.

Since 2008, Indigenous and non-Indigenous Peoples can legally harvest the Hay-Zama bison herd through a limited entry draw, in a designated hunting zone and season. In February 2018, Alberta suspended the Hay-Zama bison hunt for the second time since its inception, because the herd’s minimum population count is below 400. The hunt serves to reduce the risks of Hay-Zama bison contracting Bovine diseases as their population and distribution increases eastwards towards WBNP. While NWSAR supports legal Indigenous and non-Indigenous harvest of “disease-free” bison, NWSAR believes this to be a contradictory tool to long-term recovery of Wood Bison, while diseased bison are “free-roaming” on the landscape. Permanently eradicating Bovine diseases from all herds within and surrounding WBNP is the optimal solution.

**Page 37:** PCA identifies prohibited harvest of bison within WBNP as the reason for reduced food security, for neighbouring Indigenous Peoples. Northwestern residents inform NWSAR that the presence of Bovine diseases in and around WBNP is the primary reason for reduced Indigenous harvest of bison, resulting in northern Indigenous food security issues.

#### *Questions*

Alberta recognizes the Ronald Lake and Wabasca bison herds as “presumed disease-free” (i.e. disease undetected by repeated testing) and PCA defines these herds as the only “free-roaming disease-free” bison herds (i.e. not translocated by humans such as Hay-Zama) – which definition is correct? Clarification is required here.

**Page 84:** The third item in this table identifies launching a collaborative multi-stakeholder bison disease management planning group to examine options and coordinate activities aimed at eliminating the risk of Bovine Brucellosis and Tuberculosis. The Federal Recovery Strategy for Wood Bison (2018) identifies the presence of *exotic Bovine diseases* on the landscape, as the single greatest threat

---

<sup>1</sup> See: Nishi (2017) *Status of the American Bison (Bison bison) in Alberta: Update 2017* – prepared for AEP and ACA



to Wood Bison recovery – Why does this action item not have a timeline already determined? This must be prioritized.

### *Recommendations*

Prioritize the launch of a collaborative multi-stakeholder bison disease management planning group, inclusive of local stakeholders including neighbouring municipalities, to begin tackling the greatest threat to Wood Bison recovery.

PCA, ECCC and AEP should increase stakeholder engagement and meaningful consultation with Indigenous and non-Indigenous Peoples on the southwest and western sides of WBNP, to ensure these perspectives are also captured and included in future analyses and decision-making in and around WBNP.

### *Conclusion*

Stakeholders in the Lower Athabasca Region were provided with a Terms of Reference and a local Regional Advisory Committee, inclusive of local stakeholders. This provided the opportunity to undertake a holistic regional land-use planning process; mapping out a 50-year vision inclusive of environmental, social and economic interests, values and goals. Arbitrarily identifying large conservation areas in the Lower Peace Region to buffer WBNP, takes the right away from Lower Peace residents to capture, design, discuss and put forth their 50-year vision for sustainable environmental, social and economic growth in Northwest Alberta.

While NWSAR understands the integral role that Indigenous governments and Peoples have in the successful implementation of this Action Plan, we hope that PCA, ECCC and jurisdictional governments recognize the significant role that WBNP's neighbouring municipalities and other land users also have.

Therefore, we request that all municipalities and other land users, with a vested interest in the outcomes of this Action Plan, be invited to participate in all workshops led by PCA/ECCC. A copy of this response is provided to AEP requesting our inclusion in all Alberta-led WBNP workshops.

We hope you strongly consider inclusion of our concerns and recommendations in the development of the *Final Action Plan for WBNP*. We look forward to your



response, if you would like any additional information please do not hesitate to contact us.

Yours Sincerely,



Lisa Wardley  
Chair, NWSAR  
Councillor, Mackenzie County



Crystal McAteer  
Vice Chair, NWSAR  
Mayor, Town of High Level

cc: Joseph Zebrowski, Strategic Communications Liaison Officer  
Parks Canada Agency

Andre Corbould, Deputy Minister Alberta Agriculture and Forestry

Bev Yee, Deputy Minister Alberta Environment and Parks

Scott Duguid, Acting Executive Director – Land Use Secretariat Office  
Alberta Environment and Parks

Jamie Curran, Assistant Deputy Minister – Livestock and Crops Division  
Alberta Agriculture and Forestry

Sue Cotterill, Director – Fish and Wildlife Policy Branch  
Alberta Environment and Parks

Northwest Species at Risk Committee

