# Appendix A Caribou Conservation Breeding and Augmentation Project in Jasper National Park Consultation Summary Tables

#### **Consultation activities in 2022**

Caribou conservation is a high profile issue across Canada, involving many jurisdictions and significant public attention. Conservation breeding of caribou at this scale is also a novel approach in North America. For these reasons, Parks Canada was committed to providing multiple opportunities for participation and conversation about the proposed project to ensure that the project and the Detailed Impact Assessment (DIA) are based on the best available knowledge and information. Consultation is critical to understanding more fully the potential adverse impacts of this proposed project and eliminating or mitigating these adverse impacts to the extent possible.

This appendix provides more detailed information about the consultation activities conducted in 2022, as well as the feedback received from Indigenous partners, stakeholders, the public, and government partners. It includes Parks Canada's response to the feedback received and how the DIA was updated to reflect the feedback where appropriate.

## Indigenous consultation

Table 1 summarizes the Indigenous consultation activities held in 2022. Table 2 identifies the Indigenous partner groups that were sent information and invited to attend consultation sessions and provide feedback. Table 3 identifies the Indigenous partner groups that attended at least one session.

Table 1 Indigenous consultation activities in 2022

Date	Consultation Activity	Participants / Recipients	
February 28	Update letter and notice of consultation	24 Indigenous partner groups	
April 7	Information Session	13 representatives from 8 groups	
May 11	Consultation Session	14 representatives from 10 groups	
June 1	Partnering and Collaboration Session	12 representatives from 9 groups	
June 15 and 22	Site Visits	15 representatives from 12 groups	

July 14	Letter Sharing Full Project Proposal and Draft DIA	24 Indigenous partner groups	
August 31	Notification of the start of Phase One of the contracting process	24 Indigenous partner groups, economic development contacts, and partner-owned business contacts	

# Table 2 Indigenous partners who were provided project information and invited to attend consultation activities in 2022

Alexis Nakota Sioux Nation	Aseniwuche Winewak Nation
Bighorn Chiniki Stoney Nation	Enoch Cree Nation
Ermineskin Cree Nation	Foothills Ojibway Nation
Horse Lake First Nation	Kelly Lake Cree Nation
Kelly Lake Métis Settlement Society	Lac Ste. Anne Métis
Louis Bull Tribe	Métis Nation of Alberta Region 4
Métis Nation British Columbia	Mountain Cree
Mountain Métis	Nakcowinewak Nation of Canada
O'Chiese First Nation	Paul First Nation
Samson Cree Nation	Simpcw
Stoney Tribal Administration	Sucker Creek First Nation
Sunchild First Nation	Swan River First Nation

# Table 3 Indigenous partners who attended at least one consultation activity in 2022

Aseniwuche Winewak Nation	Bighorn Chiniki Stoney Nation	
Kelly Lake Cree Nation	Lac Ste. Anne Métis	
Louis Bull Tribe	Métis Nation of Alberta Region 4	
Métis Nation British Columbia	Mountain Cree	
Mountain Métis	O'Chiese First Nation	
Samson Cree Nation	Simpcw	

Sucker Creek First Nation	Sunchild First Nation

#### Stakeholder consultation

Table 4 identifies the stakeholder organizations who were provided information about the project and invited to attend consultation activities and/or provide feedback. Table 5 identifies the stakeholder organizations who participated in a consultation meeting and/or provided written feedback on the proposed project and DIA.

Table 4 Stakeholder organizations provided project information and invited to consultation activities in 2022

Alpine Club of Canada	Alberta Wilderness Association
Association of Mountain Parks Protection and Enjoyment	Backcountry Horsemen of BC
Banff National Park	Calgary Zoo
Caribou Conservation Breeding Foundation	Canadian Parks and Wilderness Society, Northern Alberta Chapter and National Chapter
David Suzuki Foundation	fRI Research
Friends of Jasper	Harmony Foundation
Hostelling International	Marmot Basin and Jasper SkyTram
Mount Revelstoke and Glacier National Parks	Municipality of Jasper
Mount Robson Provincial Park	Rocky Mountain Wilderness Society
Tourism Jasper	Tonquin Valley Adventures
Tonquin Valley Backcountry Lodge	Faculty of Veterinary Medicine, University of Calgary
Wilderness Committee	Wildlife Society Alberta
Wildlife Society BC	Willmore Wilderness Area
Yellowstone to Yukon	BC Parks

Table 5 Stakeholder organizations who attended a consultation meeting in 2022

Alberta Wilderness Association	Association of Mountain Parks Protection and Enjoyment
Canadian Parks and Wilderness Society, Northern Alberta Chapter and National Chapter	Friends of Jasper
Hostelling International	Municipality of Jasper
Wilderness Committee	Wildlife Society BC
Yellowstone to Yukon	BC Parks

#### Public consultation

Table 6 summarizes the public consultation activities and submissions received.

Table 6 Public consultation activities and submissions in 2022

Date	Consultation Activity	Participants / Submissions	
April 27	Annual Public Forum Update	(unknown attendance)	
June 20	une 20 Parks Canada Staff Session 16 participants		
June 23 Virtual Public Session		~25 participants	
June 27 In-Person Public Session		~25 participants	
August/September Information Booths at Old Fire Hall		3 events	
July to September	Online Engagement	41 survey responses 10 posts on Let's Talk Mountain Parks 324 identical campaign letters 27 emails	

#### Government partner consultation

Parks Canada has been working closely with partners in Environment and Climate Change Canada (ECCC), the Government of Alberta (Alberta), and the Government of British Columbia (British Columbia) for a number of years as we explored the possibility of caribou conservation breeding as a recovery strategy for the Jasper/Banff Local Population Unit (LPU). These government partners have provided valuable information and insights that influenced the early development of the project proposal. Meetings with these partners are on-going. In July 2022, these government partners were provided the project proposal and draft DIA, and invited to

provide feedback and identify any concerns they may have. All three government partners provided written comment.

# **Summary of feedback**

Feedback on the proposed project and the draft DIA was received from Indigenous partners, stakeholders, the public, and government partners from April to September 2022. Much of the feedback received was generally supportive of the proposed project and recognized the importance and urgent need to act quickly to save caribou in Jasper National Park. However, some concerns about the proposed project were also shared.

All feedback received was considered, and where relevant, used to refine the project proposal and DIA. More specific details of the feedback received from Indigenous partners, stakeholders, the public, and government partners, and how this feedback informed the project and DIA, are presented below.

## Indigenous partners

Table 7 provides a summary of feedback provided by Indigenous partners during consultations in 2022, Parks Canada's response to this feedback, and how the DIA was changed to reflect this feedback.

Table 7 Summary of feedback provided by Indigenous partners during consultations in 2022

	Concern / Comment	Parks Canada Response	Change to DIA
	Overall project		
1	Concerned that the proposed conservation breeding project is not moving fast enough. If we wait too long, the caribou will be gone before we can start.	Parks Canada agrees that time is of the essence, but must also balance moving quickly with making sure the project is done well and doesn't put caribou at risk.	No change to the DIA was required.

	Concern / Comment	Parks Canada Response	Change to DIA
2	Parks Canada needs to find a balance between the competing interests of sustainable caribou populations and park visitation. The aims aren't mutually exclusive.  People want to see animals, but Parks Canada has the opportunity to evolve the experience into more than seeing. Visitors should understand why some areas are off-limits to visitors and understand Indigenous connections to caribou. This type of education and outreach is something that Indigenous partners can be involved in.	Parks Canada will continue to work with Indigenous partners to develop partnering opportunities with caribou recovery, including education and outreach opportunities.	Relevant details were added to Section 8.9 of the DIA to reflect this feedback.
	Indigenous collaboration		
3	Indigenous partners need to be partners with Parks Canada in caribou recovery. Partners would like to benefit from contracting opportunities during construction of the breeding centre and from employment and partnering opportunities during operations. It was requested that Parks Canada host a specific meeting to discuss staffing and the needs for running the facility and monitoring the released caribou if the project proceeds.  This request was raised multiple times by multiple partners over the course of consultations in 2022. It was similarly raised during the site visit held in 2019.	Parks Canada has incorporated feedback from Indigenous partners into an Indigenous Benefits Package as part of the contracting process to build the breeding facility if the project is approved. Parks Canada will provide information about the contracting process to Indigenous partners at all relevant steps.  Parks Canada will continue to engage Indigenous partners on potential employment and partnering opportunities during operations if a decision is reached to proceed with the project.	Relevant details were added to Sections 3 and 8.9 of the DIA to reflect this feedback.  The narrative of Section 8.9 was strengthened and now includes a reference to the development of an Indigenous Inclusion Plan to ensure a suitable process is established for further collaboration with Indigenous partners if this project proceeds.  The Indigenous Inclusion Plan will be developed in partnership with Indigenous partners through an Indigenous working group that will be set up within 6 months of project approval. The Indigenous working group will provide advice and direction on the interpretation and weaving of Indigenous knowledge into the project

	Concern / Comment	Parks Canada Response	Change to DIA
4	Interested in participating on an advisory / steering committee.	Parks Canada plans to invite Indigenous partner representatives to sit on an advisory committee.	Although the potential advisory and technical committees have not yet been finalized, examples of the types of committees that might be formed and include Indigenous partners were listed in Sections 2.4.5 and 8.9 in the DIA.
5	Indigenous partners should be involved in choosing a name for the breeding facility.	Parks Canada will continue to engage with Indigenous partners about a potential name for the breeding centre if the project proceeds.	Outside the scope of the DIA.
6	Indigenous partners requested the opportunity to harvest plants before any clearing work is done.	Parks Canada will continue to engage with Indigenous partners about harvesting plants prior to clearing if the project proceeds.	Details were added to the DIA to ensure that this request is actioned in Section 8.9.
7	Indigenous partners requested to be given antler sheds and hides from caribou at the facility.	Parks Canada will continue to engage with Indigenous partners about this request if the project proceeds.	Details were added to Section 8.9 of the DIA to reflect this feedback.
8	Indigenous partners requested that trees cleared for construction be provided to partner communities for firewood.	Parks Canada will continue to engage with Indigenous partners about the trees that are cleared as additional work on timber salvage plans is completed.	Additional investigations into this request are required, as such, no change to the DIA was made at this time.
9	Indigenous monitors or guardians should protect the caribou when they are released.	Parks Canada will continue to collaborate with Indigenous partners to develop opportunities such as proposed here.	The narrative of Section 8.9 was strengthened and now includes a reference to the development of an Indigenous Inclusion Plan to ensure a suitable process is established for further collaboration with Indigenous partners if this project proceeds. The Indigenous Inclusion Plan will be co-developed with Indigenous partners.

	Concern / Comment	Parks Canada Response	Change to DIA
	Sourcing caribou		
10	Concerned about potential impacts to source populations. Indigenous partners are supportive of the proposed conservation breeding project, as long as any populations outside Jasper National Park are not put at risk if caribou are removed to form the breeding population.  This concern was expressed multiple times by multiple partners.	Parks Canada shares this concern and will work closely with Indigenous partners, government partners, and other experts to ensure that removing caribou does not impact the long-term viability of the source population.	Wording in the DIA was strengthened to indicate that Parks Canada will work with others to avoid imperiling the long-term viability of source populations and to recognize that additional work is required in this regard.
11	If animals are removed from the À la Pêche population, Parks Canada should consider returning animals to that population once caribou populations in Jasper National Park are stabilized.	Parks Canada is willing to explore this possibility with Indigenous partners and provincial government partners.	Wording in the DIA was adjusted to clarify that any action to be taken in this regard is dependent on ongoing conversations with the Government of Alberta.
12	Concerned about capture myopathy and the impacts of capture on the caribou.	Capture myopathy or mortality related to capture and transport are always a risk. Knowledge gained over the past decades of caribou collaring for monitoring purposes and for translocation and maternity pens has shown that the mortality rate is very low and less than 1%. Parks Canada is confident that this low level of risk can be mitigated by strict capture protocols, adhering to temperature and chase time thresholds, and experienced personnel.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
	Breeding caribou		
14	Concerned about what caribou will eat in the facility.  Aseniwuche Winewak Nation participates in a lichen collection program for the Calgary Zoo. They recommended that Parks Canada consider a similar program. They would be interested in participating in such a program.	Parks Canada has discussed protocols for the breeding centre, including animal diet and care, with experts in the field (e.g. R.G. White Large Animal Research Station in Alaska, Calgary Zoo, etc.). Specific protocols from the breeding centre in Jasper are still be developed and will be adapted as needed based on research and monitoring.  Parks Canada will continue to engage Indigenous partners on different partnering opportunities, such as a lichen collection program.	Details were added to Section 8.9 of the DIA to reflect this feedback.
15	Concerned about caribou density in the breeding centre.	Parks Canada has discussed protocols for the breeding centre, including animal density and facility design, with experts in the field (e.g. R.G. White Large Animal Research Station in Alaska, Calgary Zoo, etc.). Facility design is still being developed. The well-being of caribou in the facility is a main priority.	This concern is sufficiently addressed in the DIA. No change was required.
16	Concerned about how caribou born in the facility will integrate back into the wild. Concerned about keeping caribou in the facility wild.	Parks Canada intends to keep the yearling pens as "hands-off" as possible to try to ensure that the caribou who are to be released can reintegrate into the wild successfully. Parks Canada will monitor released caribou and can adapt protocols within the facility as needed. Parks Canada has learned and will continue to learn from other caribou projects as well.	Details were added to Sections 2.4 and 11 about the science and monitoring plan and potential technical committees to help with knowledge deficiencies related to releasing captive-raised yearlings.

	Concern / Comment	Parks Canada Response	Change to DIA
17	Concerned about the health and well-being of caribou in the breeding centre. The intention of the conservation breeding project is to preserve the animals in Jasper National Park. However, some regions might be sacrificing their populations for this project, so Parks Canada has to be careful with the animals here. If something happens to the animals here, that is probably the end of caribou in Jasper National Park.	Parks Canada agrees that there is an important responsibility to care for the caribou in the breeding centre. The health and well-being of the caribou is a main priority for developing protocols for the project.	This concern is sufficiently addressed in the DIA. No change was required.
	Releasing caribou		
18	Concerned about wild populations accepting calves that have been born and raised in a facility.	There is evidence from other translocation projects (e.g. animals released from the South Purcell into the Columbia North Range) that new animals are accepted into existing populations quickly. Parks Canada will monitor released caribou and adapt processes if necessary.	Details were added to Sections 2.4 and 11 about the science and monitoring plan and potential technical committees to help with knowledge deficiencies related to releasing captive-raised yearlings.
19	Concerned about impacts from humans on newly released caribou.	Parks Canada will monitor released caribou and can adapt protocols or even institute temporary closures as needed.	This concern is sufficiently addressed in the DIA. No change was required.
20	Concerned about releasing calves without cows. Do the young caribou need adult caribou to learn from in the wild?	Parks Canada will want to retain females for breeding at the centre, so the mothers will not be released with the calves. Not all caribou will do well in captivity, so in some cases, adult caribou may be released with the calves and can serve as "aunties" to the yearlings. Released caribou will be monitored and protocols and procedures can be adapted as needed.	Details were added to Sections 2.4 and 11 about the science and monitoring plan and potential technical committees to help with knowledge deficiencies related to releasing captive-raised yearlings.

	Concern / Comment	Parks Canada Response	Change to DIA
	Adaptive management / learning from	others	
21	Requested the opportunity to learn from Indigenous communities who have experience with caribou recovery initiatives, such as the Klinse'za Maternity Penning project operated by West Moberly First Nation and Saulteau First Nation.	Parks Canada will look at potential opportunities to facilitate this knowledge sharing.	Details were added to Section 8.9 of the DIA to reflect this feedback.
22	There is an opportunity through this project for the knowledge of caribou that some Indigenous communities have lost through colonial history to be restored. Those Nations who continue to have connections to caribou can teach those Nations who have lost these connections. There needs to be opportunities for Nations to learn from each other.	Parks Canada will work with Indigenous partners to facilitate knowledge sharing between partners.	Details were added to Section 8.9 of the DIA to reflect this feedback.
	Project end		
23	There should be a plan to end this project once there has been success recovering the populations in Jasper National Park.	Parks Canada does not intend to breed caribou indefinitely. The project will continue to be evaluated against key milestones and the project will end and the site reclaimed when appropriate.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
	Seasonal closures / access manageme	ent	
24	Concerned about human impacts to caribou. The best way to mitigate effects to the caribou from humans is to limit public / visitor access to caribou habitat.	Parks Canada has instituted access closures to caribou habitat in winter. There is little evidence that summer use of caribou habitat has a negative effect on caribou with the existing limits in place, so at this time, no long-term closures of caribou habitat in the summer are anticipated.	This concern is sufficiently addressed in the DIA. No change was required.
25	It is a different visitor that goes into the backcountry and there may be opportunities to educate these visitors before they go. On the West Coast Trail, all hikers have to watch an orientation video before they go onto the trail. Parks Canada could consider doing the same for the Tonquin Valley.	Parks Canada will continue to engage Indigenous partners on opportunities to collaborate on outreach and education programs related to caribou recovery.	Commitment to collaborating with Indigenous partners on outreach and education programming was added to Section 8.9 of the DIA to reflect this feedback.
	Indigenous knowledge, ceremony, spir	ituality	
26	Requested a pipe ceremony before any work is done and at other key milestones / events during the project.  Expressed the importance that spirituality and ceremonies be part of the process.	Parks Canada will work with Indigenous partners to facilitate ceremonies as requested.	Currently addressed in the DIA; therefore, no change required.
27	Expressed the importance of traditional knowledge and culture informing the project and caribou recovery.	Parks Canada will continue to collaborate with Indigenous partners to develop processes in this regard.	The wording of Section 8.9 was strengthened to reflect this feedback.

	Concern / Comment	Parks Canada Response	Change to DIA
28	It would be interesting to share the stories of the various areas associated with the project and even more broadly in the park.  The colonial history of the creation of the park is an important part of the story too. It would be important to share what was here before the park, what happened when the park was created, and the future for caribou in the park.	Parks Canada will continue to collaborate with Indigenous partners on how to facilitate story sharing.	Commitment to collaborating with Indigenous partners on outreach and education programming was added to Section 8.9 of the DIA to reflect this feedback.
29	There is an opportunity for Indigenous partner communities to interview Elders and knowledge holders about caribou for this project. The youth could learn from Elders in this way.	Parks Canada will continue to collaborate with Indigenous partners on opportunities such as this recommendation.	The narrative of Section 8.9 was strengthened and now includes a reference to the development of an Indigenous Inclusion Plan to ensure a suitable process is established for further collaboration with Indigenous partners including knowledge sharing opportunities.
	Other comments		
30	Concerned about whether there will need to be predator control in the future.	Currently, the wolf density in Jasper National Park is at an all time low and is at a level that supports caribou recovery. Parks Canada will continue to monitor wolf populations in the park. If wolf populations rise, Parks Canada will analyze options to ensure caribou recovery is not jeopardized. We will use targeted and specific predator control if necessary (relocation or removal of specific predators).	Additional wording was added to section 8.7 on a commitment to develop a predator management strategy, which will establish thresholds and conditions under which targeted and specific predator management actions (relocation or removal) will be used, if required, to support augmentation of caribou in the Tonquin caribou range.

	Concern / Comment	Parks Canada Response	Change to DIA
31	Concerned about potential impacts to caribou from climate change. For example, potential changes to lichen abundance and distribution.	The effects of climate change are high on the list of threats for many of the species at risk in Jasper National Park. While scientists are trying to predict the effects of climate change, we can't anticipate every detail of how species will adapt to these changes, nor how those changes will ripple throughout ecosystems. In collaboration with Indigenous peoples and academics, Parks Canada is conducting important research within protected areas that will contribute to our understanding of current and future climate change impacts.	This concern was identified as a knowledge gap that will be addressed through the science and monitoring plan and the work of the Indigenous Working Group to advise on the weaving of Indigenous knowledge into the project in Section 11.
32	Concerned about the potential effects of the breeding centre on other uses of the land. For example, if the area is closed off to other animals, how will it affect grizzlies, wolverines, other species at risk. Everything is interconnected.	Parks Canada agrees that having a larger perspective of the ecosystem, not just caribou, is critical.	This concern is sufficiently addressed in the DIA. No change was required.
33	Indigenous partners noted that there is a lot of lichen on the deadfall at the proposed location for the facility. This lichen should be harvested before the deadfall is cleared for construction.	Parks Canada will consider this recommendation.	Wording in Section 8.9 was strengthened to reflect this recommendation.

# Stakeholders

Table 8 summarizes the feedback provided by stakeholders during consultations in 2022, Parks Canada's response to this feedback, and how the DIA was changed to reflect this feedback.

Table 8 Summary of feedback provided by stakeholders during consultations in 2022

	Concern / Comment	Parks Canada Response	Change to DIA
	Overall project		
1	Canadian Parks and Wilderness Society expressed confidence that Parks Canada is exercising due diligence with respect to consultations and planning and designing the project.	n/a	No changes to the DIA required
2	Some Environmental Non-Governmental Organizations (ENGOs) suggested that Parks Canada consider simultaneously repopulating the entire Jasper/Banff Local Population Unit (LPU) and not wait until the Tonquin population reaches 200 animals.	Parks Canada will consider this recommendation. We need to balance the growth and stability of the Tonquin population and the potential re-occupation of these other ranges. We also need to learn more from the augmentation of the Tonquin population before we consider how to re-occupy these other ranges.	This comment is currently outside the scope of the DIA as only the augmentation of the Tonquin population was considered at this stage. The DIA may be amended in the future to reflect this concern depending on the success of the program.
	Facility location and access		
3	ENGOS expressed concern that the public must be kept away from the facility, including any trails immediately surrounding the facility. They recommended keeping the location confidential, installing a security system, physically and visually separating the public from caribou, and using temporary area closures around release pens.	Parks Canada agrees that the breeding facility will need to be closed to the public and we will take steps, including appropriate signage and security measures, to prevent disturbance from visitors at the site. Parks Canada will develop outreach and education programs to help connect the public to the project away from the facility location.  Parks Canada will consider the specific recommendations from stakeholders, but we are confident that existing tools and regulations will allow us to prevent unauthorized public access to the facility.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
4	ENGOs are concerned about how many staff will be at the facility, how often they will sleep at the facility, and how they will use the surrounding landscape.	Not all of the operational plans are finalized; however, Parks Canada anticipates that there will 4-5 staff members at the facility for regular work hours. Staff will only stay overnight during critical periods, for example during calving or during high fire risk periods. Staff will only use the landscape for operational activities. The facility is in Declared Wilderness Zone II, so no other use is permitted in this area. Priority is to not disturb caribou and have human interactions with caribou in the facility as little as possible. There will be buffers to minimize visual and noise disturbance from workers to the caribou.	This level of operational detail is not required to be included in the DIA.
5	ENGOs are concerned about the long-term impacts of the facility if it is built in Zone II Wilderness. They recommend that the facility be built with minimal disturbance, low impact construction be explored, consideration given to impacts on other at-risk species, and be fully decommissioned after the program ends.	The program is intended to be long-term but not permanent. The breeding centre would be built with a plan for eventually decommissioning and restoring the site to its natural state. The DIA will determine potential impacts to the environment and other species at risk in the proposed facility location. If the project is approved, recommendations in the DIA will be used by the contractor to develop site-specific environmental protection plans to ensure the protection of the environment to the extent possible during construction.	This concern is sufficiently addressed in the DIA. No change was required.
	Sourcing caribou		

	Concern / Comment	Parks Canada Response	Change to DIA
6	ENGOs are concerned about potential impacts to source populations, especially as a number of potential source populations also have low populations and are facing pressures from habitat destruction.	Parks Canada's priority is to ensure that the long-term viability of any potential source population is not negatively impacted by the removal of any animals. We continue to work with provincial and federal partners, as well as other experts, to determine these source populations.  Parks Canada will continue to work with federal and provincial partners to support regional habitat security as outlined through the Multispecies Action Plan and the 2022 Jasper National Park Management Plan.	Wording in the DIA was strengthened to indicate that Parks Canada will work with others to avoid long-term negative impacts to source populations and to recognize that additional work is required in this regard.
7	ENGOs are concerned about potential impacts to the À la Pêche population if it is used as a source population, especially as this population is facing pressures from habitat insecurity. They recommend careful modelling to demonstrate how many animals can be taken without threatening the stability of the population. They also recommend developing partnerships and agreements with the Government of Alberta regarding source animals from the À la Pêche.	Parks Canada's priority is to ensure that the long-term viability of source populations is not imperiled if we remove animals from any particular population, including the À la Pêche population. Parks Canada is in discussion with provincial and federal partners to make final determinations about how many caribou can possibly be sourced from various populations.  Parks Canada will continue to work with federal and provincial partners to support regional habitat security as outlined through the Multispecies Action Plan and the 2022 Jasper National Park Management Plan.	This concern will be addressed through ongoing conversations with the Government of Alberta, other government partners, Indigenous partners and other experts. Language was added to DIA regarding Parks Canada's willingness to pursue an inter-jurisdictional agreement with the Government of Alberta for the shared management of the À la Pêche population.
8	ENGOs are concerned about using the Brazeau population as source animals. They are concerned that the complete depopulation of this population will cause the population to lose the knowledge of the Brazeau landscape. They recommend that animals taken from the Brazeau be tracked and become part of the translocated population when animals are returned	Parks Canada intends to move the entire remaining Brazeau population into the breeding facility in order to preserve the genetics and behaviour of this population given its precarious survival over the long-term.  Parks Canada will track the Brazeau animals and will strongly consider translocating them back to the Brazeau range as we agree that this may be the	The concern about the Brazeau population is sufficiently addressed in the DIA and no further change is required. The recommendations are currently out of scope of the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA
	to the Brazeau range. Some ENGOs are also concerned that removing caribou from the Brazeau range will create entitlement amongst backcountry users to continue using that range when Parks Canada wants to reintroduce caribou there. They recommend that Parks Canada use consistent messaging about reoccupation plans and the need to protect habitat in terms of reoccupying these ranges. Finally, Alberta Chapter of the Wildlife Society recommends that work with the Brazeau population be monitored and shared broadly through peer-reviewed literature.	best opportunity for successfully re-establishing the Brazeau population.  Parks Canada recognizes the importance of what we learn through this program to other caribou recovery initiatives in North America. We will closely monitor and record all activities with this program and share what we learn.  Parks Canada will consider the other specific recommendations from ENGOs related to the Brazeau population.	
9	ENGOs are concerned about potential impacts to the Tonquin population if it is used as a source population. They strongly recommended that as many remaining Tonquin wild caribou as possible continue to occupy their range to increase the likelihood of the captive-raised yearlings' survival when released into that range.	Currently, Parks Canada is considering capturing and translocating a few males and potentially a few females from the Tonquin population in order to preserve local genetics within the captive population that may otherwise disappear. Parks Canada agrees that any animals removed from the Tonquin should not imperil that population as augmentation will likely be more successful if captive-raised animals are released into an extant population.	This concern is sufficiently addressed in the DIA. No change was required.
10	ENGOs expressed concern about capture myopathy.	Capture myopathy or mortality related to capture and transport are always a risk. Knowledge gained over the past decades of caribou collaring for monitoring purposes and for translocation and maternity pens has shown that the mortality rate is very low and less than 1%. Parks Canada is confident that this low level of risk can be mitigated by strict capture protocols, adhering to temperature and chase time thresholds, and using experienced personnel.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
11	ENGOs are concerned about potential impacts to wild population dynamics through the capture and translocation of some members of the population. Removal of wild animals may impact migration patterns and neurological behaviours of the captive caribou. It may also impact the social dynamics of the wild populations.  ENGOs made a number of recommendations, including: robust monitoring of wild population health, dynamics, behaviour, and population stability and growth; and defining the criteria of how females will be selected.	Parks Canada will consider these recommendations through the source population identification discussions with provincial and federal partners.	No change to the DIA was required as this concern will be addressed through ongoing discussions about source populations with provincial and federal partners.

	Concern / Comment	Parks Canada Response	Change to DIA
	Breeding caribou		
12	ENGOs expressed concerns about keeping caribou wild in the facility. They recommended keeping captive animals primarily in outdoor pens that mimic the wild as much as possible, at a relatively low density, and keeping human contact to a minimum. Canadian Parks and Wilderness Society also recommended that caribou within the facility should be fed locally harvested food when available.	Parks Canada shares this concern. Handling protocols are being developed with experts based on their experiences in other facilities to try to limit human contact with caribou as much as possible. The intention is keep yearlings that are to be released in the pens furthest from the buildings and to have as little human contact with these animals as possible. The most intensive handling of animals will only be with the breeding females.	This concern is sufficiently addressed in the DIA. No change was required.
13	ENGOs are concerned about the health and well-being of captive caribou, including: facility density, how caribou will adjust to life in captivity; keeping caribou as repetitive breeders; and the potential for disease transmission.  Recommendations included: collaborating with Indigenous partners and behavioural ecologists, both of whom may have insights into assessing the health of caribou; working with Indigenous partners to conduct ceremony prior to capturing caribou and upon their introduction to captivity; defining criteria that will be used to assess how individuals adapt to captivity; re-releasing caribou who do not adjust to captivity to their wild population; and establishing a	Parks Canada has consulted and will continue to consult with animal husbandry experts and veterinarians who have extensive experience with captive caribou to develop appropriate animal handling protocols and proposed animal density within the facility. Parks Canada has also worked with and learned from other similar projects, such as maternity penning projects (e.g. Nakusp, Mount Revelstoke, Klinse-za) to learn from their experiences regarding vegetation, ground trampling, and animal health. The health and well-being of the breeding population and captive-raised caribou released into the wild is of utmost importance to Parks Canada.  Operational details have not yet been finalized; however, consideration of defining how individuals adapt to captivity will be developed. Parks Canada plans to re-release caribou that don't adapt to captivity and will also consider returning animals back to the wild after a period of time at the breeding facility.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
	maximum yearly limit of how long females stay in the facility.	Indigenous partners have expressed the need for ceremony at key milestones and during specific actions associated with this project. Parks Canada will facilitate these ceremonies as requested by partners. Behavioural ecology is already a component of the science plan and will be considered.  Parks Canada will carefully monitor the health of caribou in the facility and is drafting disease protocols from both mitigation and prevention perspectives.	
	Releasing caribou		
14	ENGOs are concerned about potential impacts to captive-raised and wild caribou if supplemental feed is used in release pens. They recommend that Parks Canada define how long the supplemental feed will be provided and how captive-bred caribou will be weaned from supplemental feed to ensure the success in finding sufficient wild forage.	Operational details have not yet been finalized. We anticipate there will be supplemental feed in the soft release pens. Parks Canada agrees that careful consideration will have to be developed to transition caribou from supplemental feed to wild forage.	Operational details are out of scope of the DIA.
15	ENGOs are concerned about the proposed length of time caribou will spend in the soft release pens. They recommend that criteria should be developed to gauge when to open the soft release pen and recommend the development of contingency plans if the released juvenile caribou do not bond to the individuals from the wild population.	The proposed timeframe for the soft release pen is based on previous experience from translocations, particularly of the South Selkirk and South Purcell populations. Released caribou will be monitored and adaptations to the release process will be made as necessary. Parks Canada will develop contingency plans as operational plans are finalized.	Operational details are out of scope of the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA
1	ENGOs recommended that Parks Canada consider using captured Brazeau animals as part of the eventual Brazeau re-introduction.	Parks Canada will track the Brazeau animals and will strongly consider translocating them back to the Brazeau range as we agree that this is may be the best opportunity for successfully re-establishing the Brazeau population.	This recommendation is currently out of scope of the DIA, as only augmentation of the Tonquin population is considered. The DIA can be amended in the future if needed.

	Concern / Comment	Parks Canada Response	Change to DIA
	Adaptive management / learning from	others	
17	Canadian Parks and Wilderness Society suggested that Parks Canada must use the best available science and traditional knowledge to inform breeding, rearing, and release of caribou to optimize caribou welfare in captivity and survival rates in the wild.	Working with partners and learning from other projects is a key component of this proposed program. Beginning in 2017, we have engaged with a number of experts from universities and institutions on the topics of population ecology, caribou ecology, conservation breeding, genetics, animal health and husbandry, and the feasibility of conservation breeding. This collaboration included a multi-week scientific review where Parks Canada presented the project to scientists around the world.  Parks Canada has worked with experts from the Large Animal Research Station, the Smithsonian Institute, Toronto and Calgary Zoos, maternity penning projects (Revelstoke, Klinse-za, Nakusp), various universities (Alberta, Calgary, British Columbia, Montana), etc. Additionally, Parks Canada has engaged, and will continue to engage, with Indigenous partners who have close connections to caribou.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
18	ENGOs noted that this project is uniquely positioned to demonstrate how Indigenous knowledge can be woven with western science to create a holistic program that addresses multiple landscape and species attributes. Methods of weaving Indigenous knowledge with western science is a relatively new field and Parks Canada has the opportunity to demonstrate how this approach can be applied to species recovery.	Parks Canada is committed to weaving Indigenous knowledge and western science to strengthen this project. The details of how this will be achieved will be decided in collaboration with Indigenous partners through long-term relationships.	Language was added to the DIA to reflect Parks Canada's commitment to weave Indigenous knowledge with western science to support the project.
19	A number of stakeholder groups noted there is an opportunity through this project for Parks Canada to work with Indigenous partners in a comanagement context to bring caribou back to the landscape.  Recommendations included: a mandatory Indigenous Advisory Committee, a governance structure that includes a collaborative decision-making framework, and cultural monitoring.	Parks Canada has engaged with and consulted Indigenous partners on this proposed project over the last several years. Indigenous partners have expressed interest in collaborating on this project in a number of ways, including collecting lichen, delivering outreach and education programs, monitoring caribou, participating in the capture and release of caribou, and oral history projects. Parks Canada will continue to explore these potential collaborations if the project is approved.  Parks Canada recognizes the importance of Indigenous perspectives and knowledges in guiding and shaping this project if it is approved. The governance structure of this project is not yet finalized and we will continue to collaborate with Indigenous partners to determine appropriate means through which their meaningful collaboration in this project can be achieved, including in the governance structure.	The DIA was amended based on Indigenous partner feedback.  Although the potential advisory and technical committees have not yet been finalized, examples of the types of committees that might be formed and include Indigenous partners were listed in Sections 2.4.5 and 8.9 in the DIA.
	Project end		

	Concern / Comment	Parks Canada Response	Change to DIA
20	ENGOs strongly believe that the conservation breeding program must have an end date and an exit strategy. 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.	The program is intended to be long-term but not permanent. The breeding centre would be built with a plan for eventually decommissioning and restoring the site to its natural state. It is too early to determine exactly when that endpoint will be.  If the technique is successful, there are several options for the end of the program. If the health and welfare of animals in the program were jeopardized or the technique was not successful in growing the Tonquin population, the program would be ended.  The program will be assessed periodically against key milestones. For example, after the first few releases of caribou into the wild population, once the Tonquin reaches 200 caribou, or the Brazeau or Maligne reaches a sustainable population.	This concern is sufficiently addressed in the DIA. No change was required.
	Seasonal closures / access manageme	ent	

	Concern / Comment	Parks Canada Response	Change to DIA
21	ENGOs expressed concern about human use impacts on caribou and caribou habitat in the park.  Recommendations included: monitor human use in caribou ranges, especially as the populations grow; consider permanent limits to human activity within caribou ranges; and integrate caribou habitat use patterns with visitor use data to define an evidence-based threshold of visitation beyond which caribou are adversely affected.	Critical habitat protection in national parks is important and caribou, wild or reintroduced, cannot thrive without these protections in place. Parks Canada has worked to protect habitat and will continue to protect habitat as required under the Canada National Parks Act and the Species at Risk Act.  Parks Canada will also continue other caribou recovery actions to minimize human use impacts on caribou and caribou habitat, including closing occupied caribou ranges in the winter. Parks Canada will continue to monitor the impacts of human activities in caribou ranges in other seasons, and will take action as necessary. We will use the best information available to inform caribou recovery actions and will partner with relevant research projects whenever possible.	This concern was identified as a knowledge gap that will be addressed through the science and monitoring plan in Section 11.
22	ENGOs expressed concerns about Parks Canada's visitor access management. In particular, Canadian Parks and Wilderness Society noted that caribou conservation is about people management.  Recommendations included: managing where and when people can access areas of the park; defining the threshold level of human use that impacts caribou use of habitat; and informing the public and stakeholders about the overall strategy to recover the Jasper-Banff LPU.	In Jasper National Park, visitor experiences will be managed in a way that does not compromise caribou recovery. The priorities for park management are outlined in the 2022 Jasper National Park Management Plan and are regulated by the <i>Canada National Parks Act</i> .  Parks Canada will develop outreach and education programs to help connect the public to the project, including caribou recovery more broadly for the LPU.	Outside the scope of the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA
23	ENGOs and the Alpine Club of Canada expressed support for caribou habitat recovery and protection, including limiting human use and access to summer and winter caribou ranges.	Seasonal closures are outside the scope of the proposed conservation breeding project; however, they are a caribou recovery measure that will continue to be implemented.	Outside the scope of the DIA.
	Other comments		
24	The Association of Mountain Parks Protection and Enjoyment (AMPPE) expressed concern about the threat of climate change to caribou recovery.	The effects of climate change are high on the list of threats for many of the species at risk in Jasper National Park. While scientists are trying to predict the effects of climate change, we can't anticipate how species will adapt to these changes, nor how those changes will ripple throughout ecosystems. In collaboration with Indigenous peoples and academics, Parks Canada is conducting important research within protected areas that will contribute to our understanding of current and future climate change impacts.	This concern was identified as a knowledge gap that will be addressed through the science and monitoring plan in Section 11.
25	ENGOs are concerned about caribou habitat security in the park. They noted that for long-term survival of caribou in the park, caribou need secure, intact, high-quality habitat. They also noted that a successful program will ensure that caribou reoccupy ranges that they don't occupy any more, which requires keeping caribou habitat in unoccupied ranges in a good quality state.	Parks Canada recognizes that critical habitat protection in national parks is important and caribou, wild or reintroduced, cannot thrive without these protections in place. Parks Canada will continue to protect caribou habitat in occupied and unoccupied ranges as required under the <i>Species at Risk Act</i> , the <i>Canada National Parks Act</i> , and the 2022 Jasper National Park Management Plan.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
26	ENGOs are also concerned about caribou habitat security regionally. 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.  Recommendations included: learning from the Klinse-za project, specifically in their efforts to secure habitat and landscape-level protection; working with adjacent jurisdictions and Indigenous partners on a landscape-level caribou restoration program; and working with Alberta, British Columbia, and Indigenous partners to achieve more connected, secure habitat adjacent to national park boundaries.	Parks Canada will continue to work with federal and provincial partners to support regional habitat security as outlined through the Multispecies Action Plan (2017) and the 2022 Jasper National Park Management Plan. We will participate in relevant research projects whenever possible. We will continue to comment on provincial caribou range planning in Alberta and caribou population planning in BC as invited.  Parks Canada will explore external relationships as we recognize the importance of this work. Parks Canada will continue to learn from the Klinse-za project and will implement learnings where applicable.	Outside the scope of the DIA.
27	Stakeholders strongly recommended that Parks Canada develop and deliver public education and engagement programing for park users regarding the conservation breeding program to increase understanding and long-term support.	Parks Canada will continue to deliver and further develop outreach and education programs to explain the conservation breeding project and caribou recovery in the park more broadly to park users.	Outside the scope of the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA
28	Canadian Parks and Wilderness Society is concerned that there is no social science being done with the program. Parks Canada should undertake surveys with the public and stakeholders to measure their willingness to prioritize caribou recovery over their own recreational goals, visitor motivation to recreate and/or recover caribou, and visitor expectations regarding caribou management and recreation management in caribou habitat. The information from this work can be used to amend educational materials, communications, and perhaps inform management decisions.	Parks Canada does not generally do this type of social science research. The management decisions regarding visitor use and ecological integrity will be guided by the 2022 Jasper National Park Management Plan, the Multi-Species Action Plan (2017), the <i>Species at Risk Act</i> , and other relevant legislation, regulations, and policy.	Outside the scope of the DIA.
29	The Association of Mountain Parks Protection and Enjoyment noted that tourist and recreational activities are being impacted by the caribou recovery program. They recommended that Parks Canada keep communications open and engage with tourism and recreational groups as partners.	Parks Canada will continue to deliver and will develop additional outreach and education programs to explain the conservation breeding project and caribou recovery in the park more broadly to park users. We will also continue to engage with stakeholders about this project.	No change to the DIA was required.

# **Public**

Table 9 summarizes the feedback provided by the public during consultations in 2022, Parks Canada's response to this feedback, and how the DIA was changed to reflect this feedback.

Table 9 Summary of feedback provided by the public during consultations in 2022

	Concern / Comment	Parks Canada Response	Change to DIA
	Overall project		
1	Concerned that the conservation breeding proposal is only focusing on increasing the caribou population. Other measures also need to be taken, including habitat protection and improvement, limiting development in caribou habitat, seasonal or permanent human access restrictions in caribou habitat, fixing the original causes of decline of caribou populations, and public education about caribou recovery actions.	Parks Canada agrees that conservation breeding is only one tool for caribou recovery. Parks Canada will continue to implement the other caribou recovery strategies already in place and will consider implementing additional measures as may be required in the future. These actions include caribou habitat protection, seasonal access closures, outreach and education, and ecosystem and wildlife monitoring and management.	Concern is sufficiently addressed in the DIA. No change was required.
2	Concerned that increasing caribou populations will lead to other unintended consequences, such as: an increase in backcountry visitation to see caribou, which could have a negative impact on caribou; increased competition for a limited number of resources; aggressive caribou posing a public safety risk; impact to hiking trails and visitor access to parts of the park; and impact to recreationalists and ranchers outside the park.	Parks Canada does not anticipate a significant increase in backcountry use if this project proceeds because of existing measures that regulate visitor use in the Tonquin Valley. These regulations will remain in place regardless of whether the project proceeds.  Parks Canada knows that in the past, the caribou populations in the park were much higher than current levels. Parks Canada anticipates that as populations increase, caribou will move into currently unoccupied caribou habitat. Caribou habitat quality remains high and protected, and Parks Canada believes that higher population levels can be supported. Caribou will be monitored and adaptations to the program will be made as needed.  Parks Canada has never documented an aggressive interaction between humans and caribou in the park.	Concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
		The impact of conservation breeding and augmentation on human recreation will be minimal. No new long-term closures related to this proposal are planned. There may be temporary, short-term closures, and seasonal closures may be re-instated in currently unoccupied caribou ranges if they are reoccupied.	
		Parks Canada does not anticipate that caribou populations in Jasper National Park will grow large enough, even through conservation breeding and augmentation, that they will have an impact on private land outside of the park boundaries.	
3	Concerned about the goal of reaching 200 caribou in the Tonquin population as there is not enough historical evidence that the population was ever that large. The population should be kept to 50 animals.	While Parks Canada recognizes that it is difficult to know exact numbers of caribou historically, there is reliable evidence that the populations were much larger than they are now. In the 1960s, there was a single-day count of 168 individuals in the Tonquin population and monitoring data shows that the Tonquin population was over 100 animals in 2006 and 2008.  A population of 50 individuals likely has fewer than 10 reproductive females, which puts the population at the quasi-extinction level. Leaving a population at 50 individuals will lead to its eventual extirpation, and waiting until the population drops below 50 individuals will mean it is too late to start a project such as the one proposed.  Parks Canada is confident that the current habitat will support a population of 200 individuals; however, through the ongoing monitoring program, adjustments can be made to the program as needed.	Concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
4	Concerned that the project is not moving fast enough. Time is of the essence.	Parks Canada agrees that time is of the essence, but must also balance moving quickly with making sure the project is done well and doesn't put caribou at risk.	No change to the DIA was required.
5	Concerned that it is too late to recover the caribou.	In January 2021, an independent group of experts reviewed the conservation breeding proposal and found that there is scientific evidence that a conservation breeding project could support caribou recovery in Jasper National Park.	No change to the DIA was required.
6	Concerned that the proposed conservation breeding project is a significant intervention that will require care and feeding of animals, including veterinary care. Some questioned if there are other less intensive interventions that can be used instead or if the future of caribou should be determined by natural factors. Others suggested that human intervention is critical and that Parks Canada needs to correct past mistakes.	Parks Canada recognizes that the proposed conservation breeding project is an intensive wildlife management project. However, the cause of caribou decline in Jasper National Park is linked to past management actions. We have considered and evaluated other possible interventions, but research shows these interventions are not likely to be successful in the Jasper context. The evidence also shows that if Parks Canada does nothing to intervene, the caribou populations will eventually become locally extinct. Parks Canada would like an opportunity to correct past management actions. Parks Canada also has an obligation to try to protect and restore species at risk, including caribou.	No change to the DIA was required.

	Concern / Comment	Parks Canada Response	Change to DIA
7	Concerned about the funding of the proposed project. Some thought that the funding might be better spent elsewhere, such as asset maintenance or outreach and education. Some were worried that not enough funding would be allocated, that inflation would greatly increase project costs, or that a change in government would result in funding being cut.	The Government of Canada is committed to recovering species at risk, and southern mountain caribou have been identified as one of six Priority Species. The health and well-being of caribou in the facility is a top priority for Parks Canada and funding will be allocated and maintained accordingly.  Currently, it is estimated that the facility will cost approximately \$13M to build. An additional \$2M per year will be required to operate the program, including capture, augmentation, and research monitoring. Together, the program costs are estimated at \$34M over the first 10 years; annual costs are expected to decrease after year 10 until project conclusion. Cost estimates developed using outside expertise are \$54M over 20 years. These cost estimates, especially for the construction of the facility, are anticipated to increase given the rapid increase in material costs, inflation, labour shortages, and supply-chain challenges. Parks Canada is aware of this potential and contingency planning is in place.  Conservation breeding, because of associated infrastructure, is a costly approach; however, Parks Canada believes that it is the best option to recover caribou populations in Jasper National Park. Other alternatives have been explored; however, these other approaches are not feasible although they would be less expensive.  Funding is allocated within Parks Canada for conservation priorities, such as caribou recovery. Funding for asset and infrastructure maintenance is allocated through a separate process. Parks Canada has invested significantly in assets in the last several years; investment in conservation and in assets are not mutually exclusive.	Outside the scope of the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA
	Facility location and access		
8	Concerned about the long-term impacts of the facility being built in Zone II Wilderness. Recommend that the facility be built with minimal disturbance and be fully decommissioned after the program ends. Low impact construction should be explored, and consideration of impacts to other atrisk species in the area must be made.	The program is intended to be long-term but not permanent. The breeding centre would be built with a plan for eventually decommissioning and restoring the site to its natural state. It is too early to determine exactly when that endpoint will be. The program will be assessed periodically against key milestones to determine an appropriate endpoint.  The proposed project is subject to a DIA that will determine potential impacts to the environment and other species at risk in the proposed facility location. If the project is approved, recommendations in the DIA will be used by the contractor to develop site-specific environmental protection plans to ensure the protection of the environment to the extent possible during construction.	Concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
9	Concerned that the proposed location of the facility may affect visitor access to the area.	Should this project proceed, there will be no significant or long-term closures to the Geraldine Fire Road; however, public access to the Geraldine Fire Road, Geraldine Lakes, and Fryatt Valley will be impacted at times, and with some changes to the current winter access offered.  1. During construction of the facility, for public safety there will likely be temporary, short-term closures of the road for road repairs and upgrades, brushing and clearing of the site, and facility construction.  However, Parks Canada will work with the contractor to minimize the duration of the closures and, whenever possible, schedule work during low visitation periods. When construction is completed and the facility is operational, normal summer use of the road will resume.  2. Adjustments to the current cross-country ski and snowshoe routes at the south end of Highway 93A and on the Geraldine Fire Road will be required during operation of the breeding centre. Some plowing on Highway 93A from Athabasca Falls to the breeding centre on Geraldine Fire Road will be needed to accommodate year-round vehicle access to the breeding centre. We are considering options for alternative ski and snowshoe routes on this section.	Concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
10	Concerned about wildfire risk in the area of the proposed location for the breeding facility.	The design of the facility considers wildfire risk, including a fire break, vegetation treatment prior to construction, building protections (e.g. sprinklers and non-flammable material), and egress routes along the perimeter of the fence. A fire management plan will be developed, as will an operational plan that includes evacuation plans.	Concern is sufficiently addressed in the DIA. No change was required.
11	Concerned about public access to the facility. Some advocated that there should be no public access and recommended Parks Canada take measures to ensure the public cannot access or view the caribou in the facility. Others thought that the facility should be open to the public so that people could learn more about caribou and caribou recovery in the park.	The facility cannot be open to public access to protect biosecurity protocols and the health and wellbeing of the caribou in the facility. Parks Canada will have appropriate signage, fencing, and security measures to ensure there is no unauthorized access to the facility. We will also develop outreach and education programs so that the public can learn about caribou recovery and feel connected to the program without accessing the facility.	Concern is sufficiently addressed in the DIA. No change was required.
12	Concerned that the proposed location is not in commonly used caribou habitat. Recommended locating the facility at the Sunwapta Warden Station or the Tonquin Warden Station.	Parks Canada assessed multiple locations to determine the proposed location for the facility. The proposed facility location is in caribou habitat, although not the most ideal habitat, and caribou have been observed near this proposed location as recently as 2022. This site is considered the preferred location because it is:  - relatively quiet, with low human disturbance  - close to typical caribou habitat  - away from large concentrations of other wild ungulates and entirely separate from domestic livestock that may carry contagious diseases  - relatively close to source sites for wild caribou and release of captive-raised caribou  - relatively close to utilities and services required to run the facility	Concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
		<ul> <li>accessible to Parks Canada staff and specialists from the Jasper townsite</li> </ul>	
		Neither the Sunwapta Warden Station nor the Tonquin Valley would be suitable locations. Existing infrastructure is not sufficient for the specialized buildings and pens that need to be constructed. The Sunwapta Warden Station is very close to commercial operations and a busy day use area, which would not be ideal for the facility. The costs of building the facility in this location would be much higher. Similarly, the costs of building the facility in the Tonquin Valley would be extremely high and it would be difficult for veterinary staff or other experts to visit the facility efficiently, as well as to bring feed and other supplies to the facility on a regular basis.	
13	Concerned about the proximity of the facility to the highway. Without game fences and highway overpasses, caribou will be killed on the highway.	When ready to be released, the caribou will be transported to soft release pens close to existing populations rather than being released directly from the facility. Parks Canada does not anticipate that caribou will move close to the highway shortly after release, although they might come close to or cross highways as part of their natural movements during certain times of the year. Parks Canada has mitigation measures in place to reduce the potential for vehicle collisions with caribou on the highways. No caribou have been hit by vehicles since before 2005.	No change to the DIA was required.
14	Concerned that Jasper National Park will become a caribou ranch. Recommends building the facility on private land outside the park.	Parks Canada proposes locating the facility along the Geraldine Fire Road, 30 km south of the Jasper townsite. This site is considered the preferred location because it is:  - relatively quiet, with low human disturbance  - close to typical caribou habitat  - away from large concentrations of other wild ungulates and entirely separate from domestic livestock that may carry contagious diseases	No change to the DIA was required.

	Concern / Comment	Parks Canada Response	Change to DIA
		<ul> <li>relatively close to source sites for wild caribou and release of captive-raised caribou</li> <li>relatively close to utilities and services required to run the facility</li> <li>accessible to Parks Canada staff and specialists from the Jasper townsite</li> </ul> The size of the facility will be about 65 ha, which is a constant and part of Jacobar National Part (which is	
		very small portion of Jasper National Park (which is 11,000 km²).	
	Sourcing caribou		
15	Concerned about potential impacts to source populations, including the long-term survival and potential social impacts to these populations.	Parks Canada's priority is to ensure that the long-term viability of any potential source population is not imperilled by the removal of any animals. We continue to work with provincial and federal partners, as well as other experts, to determine these source populations.	Wording in the DIA was strengthened to indicate that Parks Canada will work with others to avoid long-term negative impacts to source populations and to recognize that additional work is required in this regard.
16	Concerned about potential impacts to the À la Pêche population if it is used a source population. Recommended that the lack of habitat security for this population be addressed before it is a target for augmentation by this program.	Parks Canada's priority is to ensure that the long-term viability of any potential source population is not imperilled by the removal of any animals. We continue to work with provincial and federal partners, as well as other experts, to determine these source populations.  Parks Canada will continue to work with federal and provincial partners to support regional habitat security as outlined through the Multispecies Action Plan (2017) and the 2022 Jasper National Park Management Plan.	Outside the scope of the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA
17	Concerned about potential impacts to the Brazeau population if it is used as a source population.	Currently, we intend to capture all of the remaining animals in the Brazeau population and translocate them to the breeding facility. This population is well below quasi-extinction levels and is facing imminent extirpation. By moving this population into the breeding facility, we can preserve the genetic and behavioural characteristics of the population.  Further analysis and collaboration with experts and partners will inform decisions on any potential source population.	Concern is sufficiently addressed in the DIA. No change was required.
18	Concerned with potential impact to Tonquin population if it is used as a source population. Some were concerned that the Tonquin population would be lost before augmentation could occur if the population was not taken into captivity.	We are considering capturing and translocating a few males and potentially a few females from the Tonquin population in order to preserve local genetics within the captive population that may otherwise disappear. However, we do not want to take all of the animals or threaten the stability of the population as there is a greater chance of success to augment an extant population rather than trying to reintroduce caribou into the Tonquin Valley later.  Further analysis and collaboration with experts and partners will inform these decisions.	Concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
19	Concerned about genetic diversity of the breeding population.	Parks Canada intends to draw animals from source populations that are genetically and behaviourally suitable and only from populations that can sustain removals without affecting that population's long-term persistence. We have completed several fine-scale genomic analyses on source populations to help inform these requirements. From this work we have a good understanding of genomic diversity in caribou and would draw from several sources in order to maximize genetic diversity within the captive population. Genetic monitoring and matching in the captive population will be important as we strive to maintain and maximize genetic diversity. It will also be important to bring new bulls into the facility on a regular basis to maintain genetic diversity.	Wording in the DIA was strengthened to indicate that Parks Canada will work with others to avoid long-term negative impacts to source populations and to recognize that additional work is required in this regard.
20	Concerned about capture myopathy.	Capture myopathy or mortality related to capture and transport are always a risk. Knowledge gained over the past decades of caribou collaring for monitoring purposes and for translocation and maternity pens has shown that the mortality rate is very low and less than 1%. Parks Canada is confident that this low level of risk can be mitigated by strict capture protocols, adhering to temperature and chase time thresholds, and experienced personnel.	This concern is sufficiently addressed in the DIA. No change was required.
	Breeding caribou		
21	Concerned that the facility be secure from predators.	The facility will have a secure perimeter fence comprised of a physical barrier (high tensile mesh wire) with underground skirt, a visual barrier (cloth, geotextile) and an electric fence to prevent predators from accessing the pens. The fence will be patrolled by staff at least on a daily basis to ensure physical integrity. Electrical connectivity will also be monitored	Additional description of the fencing and patrol work was added to the Section 8.7.

	Concern / Comment	Parks Canada Response	Change to DIA
		permanently. Additional predator deterrents will be considered as needed.	
22	Concerned about what caribou will eat at the facility. Some were concerned whether there are suitable food sources, grazing locations, and natural water sources at the proposed location. Others were concerned that if wild food sources are collected to feed caribou at the facility, there would be a negative impact on wild populations through the loss of their food sources.  Recommendations included: seeding the area to boost natural food; and ensuring there is a natural water body and normal forage sources so that the caribou do not need to be fed.	Caribou will be rotated through pens to ensure they can access native vegetation as much as possible; however, Parks Canada plans to provide additional pelleted feed, similar to the type of feed used at the Alaska Large Animal Research Station and in several maternity pens. Caribou at the facility will also have regular access to lichen.  Lichen collection places have not yet been decided, but the priority will be to identify areas that are outside of currently occupied caribou ranges. Parks Canada is committed to working with partners, including Indigenous partners, on lichen collection. Our priority is to ensure that actions from this program do not negatively impact other caribou populations.  While having natural water would mimic the wild, it comes with risks of mud, contamination, and higher risk of infection and disease. Additionally, water must be provided in the winter when natural sources are not available. Parks Canada has assessed this tradeoff, opting for more secure water sources in favour of caribou well-being.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
23	Concerned about the health and well-being of captive caribou.  Specific concerns included: disease transmission, especially chronic wasting disease (CWD); how caribou will adjust to being in a facility and in close contact with humans; population density in the facility; manipulating population dynamics in the facility; and that caribou from different populations won't breed in the facility.	The health and well-being of caribou in the facility is of utmost importance to Parks Canada. Health screening on potential source populations is being done and we will take animals from CWD-free areas. Animals will be tested when first brought into the facility for a number of different diseases and placed in quarantine for a certain amount of time. Disease control protocols will be in place to prevent the spread of disease within the facility and to wild populations.  Parks Canada agrees with the importance of proper animal husbandry protocols for the facility. We have and will continue to engage with a number of experts on caribou biology, conservation breeding, and animal husbandry.	This concern is sufficiently addressed in the DIA. No change was required.
	Recommendations included: using proper animal husbandry at the facility; working with experts about how to raise caribou in captivity; allowing natural weaning to take place; and separating caribou in the breeding centre by age and sex.	Parks Canada will engage an external technical advisory committee on animal husbandry and health and will develop and implement an animal husbandry plan. The plan will be monitored and adapted as needed, including possible changes in weaning age and social dynamics in the facility to support survival and reproduction in the wild.	
		The social dynamics of caribou are important. Woodland caribou have been shown to be adaptable to integration into populations from which they are not derived. Increasing genetic diversity by bringing animals from different populations will be positive for caribou.	

	Concern / Comment	Parks Canada Response	Change to DIA
24	Concerned about keeping caribou wild in the facility.	Parks Canada agrees that animal handling in the facility will have to be carefully managed. The intention is to keep yearlings that are to be released in the pens furthest from the buildings and to have as little human contact with these animals as possible. The most intensive handling of animals will only be with the breeding females to ensure their health and well-being while at the facility.	This concern is sufficiently addressed in the DIA. No change was required.
	Releasing caribou		
25	Concerned about the ability of captive-raised caribou to adapt to the wild. Specific concerns included: caribou raised in a forested area will not adapt to a more alpine environment when released; captive-raised caribou won't know how to survive in the wild, especially if released without their mothers; captive-raised caribou will not be accepted by wild populations; captive-raised caribou will be released too young, before they have learned population dynamics; captive-raised caribou won't stay where they are released; captive-raised caribou will be killed by predators upon release.  Recommendations included: allowing caribou to learn population dynamics before they are released and using public education and area closures to protect released caribou.	A number of measures will be used to try to increase the likelihood of captive-raised caribou surviving in the wild. When released, the captive-raised caribou will be placed into a soft release pen with extant animals from whom they can learn. Females will be released just before the rut, so that they can integrate with the harems. There will also likely be snow on the ground at high elevation when females are released in September or October, which will help prevent predator access to the populations. Additionally, the winter seasonal closures in caribou habitat will remain in place, predator density is at an all-time low in Jasper National Park, and caribou will be released within the core of their range, away from where most predators are located in the park. The caribou will be monitored after release, and additional measures can be taken to protect caribou as needed, including the targeted relocation or removal of individual predators.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
26	Concerned about the soft release approach, including: moving wild caribou into the pen may cause undue stress; inadequate food source in the release pen; not enough time for the captive-raised yearlings and wild population to bond; and an increased risk of predation for captive-raised caribou.	The proposed soft release approach is based on experiences in other similar projects, such as the successful integration of caribou in the South Purcell and South Selkirk translocations. Females will be released at 14 months and just before the rut, so that they can integrate with the harems. We will use "aunts and uncles" (previously wild caribou) to help yearlings learn skills and knowledge to live in the wild. The soft release pens will be located close to where the extant population is known to be at that time of year to the extent possible. There will also likely be snow on the ground at high elevation when females are released in September or October, which will help prevent predator access to the populations. Additionally, the winter seasonal closures in caribou habitat will remain in place, predator density is at an all-time low in Jasper National Park, and caribou will be released within the core of their range, away from where most predators are located in the park. The caribou will be monitored after release, and additional measures can be taken to protect caribou as needed.	This concern is sufficiently addressed in the DIA. No change was required.
27	Concerned about the proposed age for release. Recommendations included releasing caribou later in life than 10 months of age as woodland caribou do not breed until 28 months and releasing older individuals who are past their prime breeding age.	Females will be released at 14 months of age based upon recommendations from experts in the field.  Although holding them longer in captivity would allow them to be closer to reproductive age when released, the facility density would become higher due to many overlapping age categories. This could compromise caribou well-being.  Parks Canada intends to release caribou that are not suited to captivity, including those who are no longer of breeding age.	This concern is sufficiently addressed in the DIA. No change was required.

	Concern / Comment	Parks Canada Response	Change to DIA
28	Concerned what may happen to caribou if they leave Jasper National Park or that Parks Canada will try to constrain or control caribou movement or migration.	Jasper National Park is part of a larger regional ecosystem where wildlife are free to move back and forth across park boundaries on to the provincial landscape. Parks Canada, and Environment and Climate Change Canada more broadly, work closely with our provincial partners to try to enhance caribou futures across the land base. Both British Columbia and Alberta are working to improve conditions for caribou.  Caribou will be monitored once they are released. There may be times when caribou will have to be relocated if they move into areas where they are at risk; however, Parks Canada supports natural movement of caribou. There are no plans to confine the movements of the caribou populations.	Outside the scope of the DIA.
	Adaptive management / learning from	others	
29	Monitoring released caribou and adapting the program accordingly will be of utmost importance for the success of the program.	Parks Canada will monitor released caribou and make adjustments to the program as needed.	This concern is sufficiently addressed in the DIA. No change was required.
30	The best available science and Indigenous knowledge should inform the project. Recommendations included that Parks Canada should engage with experts and others conducting captive breeding and that Indigenous communities should be collaborators on the project.	Working with partners and learning from other projects is a key component of this proposed program. Beginning in 2017, we have engaged with a number of experts from universities and institutions on the topics of population ecology, caribou ecology, conservation breeding, genetics, animal health and husbandry, and the feasibility of conservation breeding. This collaboration included a multi-week scientific review where Parks Canada presented the project to scientists around the world.  Additionally, Parks Canada has engaged with Indigenous partners on this proposed project over the last several years. Parks Canada will continue to	Language was strengthened in the DIA to reference the development of an Indigenous Inclusion Plan and to provide examples of the types of committees that might be created to guide the project. These committees would include various experts and Indigenous partners / knowledge holders as appropriate.

	Concern / Comment	Parks Canada Response	Change to DIA
		engage and collaborate with Indigenous partners on this project through various partnering and collaboration initiatives.	
31	Recommended that Parks Canada share the successes and failures of the project as it could serve as a model for others to follow if successful.	Parks Canada recognizes that the proposed conservation breeding project will be of interest to other jurisdictions and organizations working on caribou recovery. We plan to share what we learn from this project through reports and information sessions.	Outside the scope of the DIA.
	Project end		
32	Concerned that this project should have a defined end point. Parks Canada should not breed caribou indefinitely. If the program is not successful at growing the populations, it should also be ended. The more time the facility is in operation, the more chances for unintended consequences. Recommendation to have clear thresholds to end the program early and a hard end date if successful at augmenting populations.	The program is intended to be long-term but not permanent. The breeding centre would be built with a plan for eventually decommissioning and restoring the site to its natural state. It is too early to determine exactly when that endpoint will be.  If the technique is successful, there are several options for the end of the program. If the health and welfare of animals in the program were jeopardized or the technique was not successful in growing the Tonquin population, the program would be ended.  The program will be assessed periodically against key milestones. For example, after the first few releases of caribou into the wild population, once the Tonquin reaches 200 caribou, or the Brazeau or Maligne reaches a sustainable population.	This concern is sufficiently addressed in the DIA. No change was required.
33	Concerned that habitat condition has not been considered when determining the desired population size to be achieved. Recommended that the project include a habitat management component, measuring	Caribou prefer old growth forests, which change very slowly. The ecological integrity monitoring program is actively monitoring the impacts of climate change on alpine habitat. We have also nearly completed a finescale vegetation map, which will allow us to understand changes to habitat overtime in more	No change to the DIA is required.

	Concern / Comment	Parks Canada Response	Change to DIA
	how the park forest structure has changed over the 70+ years since it supported caribou in larger numbers.	detail. Based on the information currently available, we believe that the current ecosystem has the capacity to sustain a larger population. More work is needed to refine the recovery objective.	
34	Parks Canada needs a plan in case the reintroduction of caribou through breeding does not work in Jasper National Park.	Monitoring of wild and released animals will be integral to understanding the success/failure of the program. Potential next steps will be determined based on what is learned from this program.	This concern is sufficiently addressed in the DIA. No change was required.
	Seasonal closures / access manageme	ent	
35	There was both explicit support for and explicit opposition to winter closures / visitor access restrictions to support caribou habitat protection and caribou recovery. A slightly greater number of individuals expressed explicit support for winter closures / visitor access restrictions.	Seasonal closures in winter caribou habitat will remain in place whether or not the proposed conservation breeding program moves forward in order to support the recovery of the Jasper/Banff Local Population Unit.  In Jasper National Park, caribou and their habitat are protected under the <i>Canada National Parks Act</i> and <i>Species at Risk Act</i> . While these legislations do not prescribe specific management actions to take, they direct Parks Canada to protect and recover species at risk and their habitat, which includes reducing threats. The Recovery Strategy for Woodland Caribou, Southern Mountain population, in Canada identifies facilitated predator access into caribou habitat on packed trails created during winter recreational activities as a threat to the species. Seasonal winter closures are an effective measure to reduce this threat.	Outside the scope of the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA
36	Concern about long-term changes to backcountry access in winter and summer in caribou ranges, including impacts on commercial operators, guides, and visitors/customers. It was recommended that further work on caribou conservation needs to be accompanied with resources put towards replacing comparable backcountry use.	No new long-term closures related to this proposed conservation breeding program are planned. There may be temporary, short-term closures. For example, there could be delays or temporary closures during construction of the breeding facility for safety reasons, or temporary closures at locations where young caribou are released.  If the recovery of the Tonquin population is successful and if caribou are re-introduced to ranges that caribou are not inhabiting at the time (e.g. Brazeau range and Maligne range), seasonal closures in winter caribou habitat may be re-instated as they once were when caribou lived in these ranges.  In Jasper National Park, caribou and their habitat are protected under the Canada National Parks Act and Species at Risk Act. While these legislations do not prescribe specific management actions to take, they direct Parks Canada to protect and recover species at risk and their habitat, which includes reducing threats. The Recovery Strategy for Woodland Caribou, Southern Mountain population, in Canada identifies facilitated predator access into caribou habitat on packed trails created during winter recreational activities as a threat to the species. Seasonal winter closures are an effective measure to reduce this threat.  Parks Canada will continue to invest in backcountry infrastructure in ways that align with the 2022 Jasper National Park Management Plan, including relevant objectives under Key Strategy 1: Conserving Natural and Cultural Heritage for Future Generations (e.g. Objectives 1.1 and 1.4), Key Strategy 2: True-to-Place Experiences (e.g. Objectives 2.4, 2.5, and 2.7), and the Tonquin Valley Area Management objective.	Outside the scope of the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA
37	Concern about human use impacts on caribou and caribou habitat. Recommendations included prohibiting all human activity in caribou habitat and reducing commercialism in Jasper National Park.	There is no evidence that removing all human activities will effectively allow caribou populations in Jasper National Park to recover. Parks Canada already restricts human access to occupied caribou habitat in the winter to reduce facilitated predator access to caribou ranges. However, there is no evidence that human use of caribou habitat in the summer, with the current controls in place, has negative impacts on the caribou populations in Jasper National Park. While ecological integrity and conservation is the first priority of Parks Canada, visitor experience and allowing Canadians and others to connect to these special places is also important. At this time, there are no plans to restrict all human access to caribou habitat in the park. Development in the park will be managed according to the priorities outlined in the 2022 Jasper National Park Management Plan and regulated by the Canada National Parks Act and other associated regulations and policies.	No changes to the DIA required.
	Other comments		
38	Concerned about the potential impacts of climate change on caribou recovery. It was also suggested that the Brazeau and Maligne ranges may no longer be suitable caribou habitat because of climate change, and that caribou should only be reintroduced to the the Tonquin and À la Pêche ranges.	The effects of climate change are high on the list of threats for many of the species at risk in Jasper National Park. While scientists are trying to predict the effects of climate change, we can't anticipate how species will adapt to these changes, nor how these changes will ripple throughout the ecosystems. In collaboration with Indigenous peoples and academics, Parks Canada is conducting research within protected areas that will contribute to our understanding of current and future climate change impacts. While protected areas tend to be more resilient to climate change, it has the potential to affect caribou and their habitat.	This concern was identified as a knowledge gap that will be addressed through the science and monitoring plan in Section 11.

	Parks Canada Response	Change to DIA
	There is no evidence that the current habitat in Jasper National Park has been made unsustainable to caribou by climate change. While Parks Canada does not know the future effects of climate change, we do know that not taking action to augment caribou populations now will lead to their eventual extirpation in the park.	
Concerned about caribou habitat security in Jasper National Park. Recommendations included that Parks Canada: prioritize caribou habitat protections; mitigate habitat degradation risks; manage the Maligne caribou range for reoccupation as soon as possible; and manage human use impacts to caribou habitat.	Critical habitat protection in national parks is important and caribou, wild or reintroduced, cannot thrive without these protections in place.  Parks Canada is committed to manage large areas of the park as wilderness, where minimal facilities and low levels of human use contribute to providing the habitat requirements of wide-ranging species like wolverine, mountain goats, caribou, grizzly bears and wolves (Objective 1.1 of the JNP Management Plan) Parks Canada has worked to protect habitat by:  - approving Marmot Basin Ski Area's site guidelines and long-range plan, which reduced the ski area's leasehold by 17%, created 118 hectares of wilderness habitat to benefit caribou and other wildlife, and prohibited ski lift development in off-piste ski runs;  - eliminated PCA operational snowmobile use in the Tonquin Valley area;  - prohibiting trail development, limiting the number of random camping permits available, reducing random camping group sizes in caribou habitat and reducing commercial outfitting operations;  - ongoing assessments of projects, including prescribed fire, for their impact on caribou and caribou habitat; and  - ongoing research and monitoring to understand the potential for large-scale habitat changes caused by fire, forest insects, climate change,	Outside the scope of the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA
		species to an ecosystem, or wildlife management practices.	
		Parks Canada will also continue other caribou recovery actions to minimize human use impacts on caribou and caribou habitat, including closing occupied caribou ranges in the winter. Parks Canada will continue to monitor the impacts of human activities in caribou ranges in other seasons, and will take action as necessary.	
40	Concerned about caribou habitat security regionally / outside of Jasper National Park. It was recommended that Parks Canada work with the provinces of BC and Alberta to improve landscape connectivity and habitat security on surrounding provincial lands.	Parks Canada will continue to work with federal and provincial partners to support regional habitat security as outlined through the Multispecies Action Plan (2017) and the 2022 Jasper National Park Management Plan. We will participate in relevant research projects whenever possible. We will continue to comment on provincial caribou range planning in Alberta and caribou population planning in BC as invited.	Outside the scope of the DIA.
41	Concerned that caribou in the park can no longer migrate as they used to because of human disturbance and infrastructure.	Many southern mountain caribou populations do not have long-distance, seasonal migrations. The Tonquin, Maligne, and Brazeau populations exhibit behaviours more closely resembling northern BC populations where they look for low snow conditions to find lichen. Marmot Basin has reduced habitat availability to the Tonquin population, but the Tonquin range extends from west of Mount Robson Provincial Park to Highway 16 to Whistlers Creek and Cavell Meadows to the Whirlpool Valley. Caribou are regularly observed freely moving throughout this range, and migrate elevationally seeking lichens.	No change to DIA required.

	Concern / Comment	Parks Canada Response	Change to DIA
42	Concerned about the potential need for predator control in the future if an increase in the caribou population leads to an increase in the wolf population in the park. Some people called for Parks Canada to develop a plan to control predators and ungulates long-term in the park. Others were opposed to any predator control measures.	Parks Canada does not anticipate that an increase in the caribou population will lead to a substantial increase in the wolf population in the park. In the past when Jasper National Park experienced a large increase in wolf populations, there were over a thousand elk helping to support that growth. Two hundred caribou will provide some food for wolves, but it is not a high enough density to actually increase wolf populations. If caribou populations are large enough, they can also sustain some level of predation.  Parks Canada will continue to monitor predator and prey populations and will take actions as necessary if these populations start to become imbalanced. A predator management strategy will be developed, which will establish thresholds and conditions under which targeted and specific predator management actions (relocation or removal) will be used, if required, to support augmentation of caribou in the Tonquin caribou range.	Language referencing the science and monitoring plan regarding predator and prey populations was strengthened in the DIA. It was made more clear that targeted and specific predator control (relocation or removal) would be implemented if necessary.
43	It was recommended that an outreach and education program be developed for the project to increase understanding and support. It was also recommended that Parks Canada share more information about the program and the science, and share camera footage / photographs of caribou inside the breeding centre. It was suggested that Parks Canada involve the guiding community in caribou recovery, at least in terms of supporting public awareness and education.	Parks Canada will continue to deliver and further develop outreach and education programs to explain the conservation breeding project and caribou recovery in the park more broadly to park users. This work may include sharing remote camera feeds and working with external partners to promote the recovery work. It may also include the development of a volunteer program that may include opportunities such as a lichen collection program.  Parks Canada will continue to engage with stakeholders and the public about this project if it proceeds, including exploring ways in which stakeholders and the public can collaborate on the project if it proceeds.	No change to DIA required.

	Concern / Comment	Parks Canada Response	Change to DIA
44	Concerned about the loss of ski culture and history, recreational ski and backcountry opportunities, and the closures of the Tonquin Valley outfitters. There was a question about why the campgrounds could continue to operate while the commercial operators in the Tonquin Valley could not.	While the seasonal closures of occupied caribou habitat are linked to caribou recovery more broadly and support the proposed conservation breeding project, they are not related solely to conservation breeding and are thus not part of the proposal. These actions will continue to be implemented regardless of the decision on conservation breeding in order to support the recovery of the J/B LPU.  Parks Canada agrees that winter recreation is important for JNP and is committed to reviewing restrictions to minimize the impact to ski and recreational opportunities in the park. We also review and consider proposals from recreational users and external partners (e.g. Hostelling International and the Alpine Club of Canada) for new or enhanced recreational opportunities in the park. Jasper National Park's management priorities are outlined in the 2022 Jasper National Park Management Plan and are regulated by the Canada National Parks Act.  As of October 2022, Parks Canada reached an agreement with Tonquin Valley Adventures and Tonquin Valley Backcountry Lodge to end their licences of occupation and to purchase all infrastructure and non-moveable assets.	No changes to the DIA required. Some elements are also outside the scope of the DIA.
45	Concerned that the DIA and consultation processes are not meaningful given that decisions were taken unilaterally, such as extending the winter closure period in the Tonquin and Brazeau ranges.	While connected to caribou recovery broadly, seasonal closures are not related solely to the proposed conservation breeding project. The continued implementation of the seasonal closures, and operational and management decisions around these closures, will be continued regardless of the decision on whether to proceed with the conservation breeding project. The consultation process was focused on the proposed conservation breeding project and related DIA.	Outside the scope of the DIA.

## Government partners

Table 10 summarizes the feedback provided by government partners during consultations in 2022, Parks Canada's response to this feedback, and how the DIA was changed to reflect this feedback.

Table 10 Summary of feedback provided by government partners during consultations in 2022

Concern / Comment	Parks Canada Response	Change to DIA
Overall project		

	Concern / Comment	Parks Canada Response	Change to DIA
1	Both Alberta and ECCC noted that this project proposes removal of caribou individuals from Alberta and /or British Columbia. As such, they noted it is crucial that Parks Canada work in coordination and cooperation with neighbouring jurisdictions to implement the project without jeopardizing recovery efforts in other jurisdictions.  Both Alberta and ECCC recommend that any potential capture and translocation of À la Pêche caribou should be based upon coordination and cooperation with Alberta. They both recommended the development of a joint agreement and joint technical committees with Parks Canada relative to the proposed project and the implications specific to the À la Pêche population, as well as other potential source populations.  ECCC also noted that the success of the project could be enhanced by utilizing the knowledge and expertise of multi-jurisdictional collaborators, including Indigenous peoples and stakeholders who are working towards shared conservation and recovery objectives.	Parks Canada has been and continues to work collaboratively with Alberta, British Columbia, Indigenous partners, and stakeholders. For example, over the last several years, Parks Canada has facilitated ceremony, data sharing, site visits, and meetings related to caribou recovery with Indigenous partners. Similarly, we have hosted meetings and shared information about caribou recovery with various stakeholders, including Canadian Parks and Wilderness Society, Alberta Wilderness Association, Caribou Conservation Breeding Foundation, and the Interpretive Guides Association. Parks Canada is regularly sharing information with Alberta (e.g. information on the À la Pêche population) and British Columbia and has collaborated closely with British Columbia in the development of the proposal. For example, British Columbia and Parks Canada shared information on facility design and requirements and collaborated on site selection.  Parks Canada is willing to develop necessary agreements to support this project. Parks Canada is recognized as a separate competent authority under the <i>Species at Risk Act</i> for all individuals occurring on federal lands managed by our Agency, and as such, has the legal responsibility and authority to recover the Jasper/Banff LPU. To promote interjurisdictional collaboration, if the project is approved, Parks Canada intends to establish a governance structure (such as an external advisory committee) that supports ongoing collaboration.	Wording was added to the DIA to clarify the development of the necessary interjurisdictional agreements, technical committees and advisory groups with Alberta, British Columbia, Indigenous partners and ECCC.

	Concern / Comment	Parks Canada Response	Change to DIA
2	British Columbia recognized the strong, positive relationship between British Columbia and Parks Canada that has been developed and maintained through regular communication and information sharing since the early investigative work of the project.  British Columbia noted their desire to continue to collaborate with Parks Canada through regular communication and information sharing as the next steps towards implementing the project are taken. British Columbia also noted that they are keen to continue to learn from Parks Canada's experiences with this project.  British Columbia recommended that because one or more British Columbia Southern Mountain Caribou populations may be identified as a potential donor population to support the proposed Project, early and ongoing conversations are required between British Columbia and Parks Canada to confirm feasibility of select British Columbia populations to contribute individuals to the project as well as to assist Parks Canada in navigating British Columbia's policy and regulatory requirements.	Parks Canada is committed to continue regular communication and information sharing with British Columbia as we work together to discuss potential source populations in the Province of British Columbia and as Parks Canada continues to work towards project approval. We are also willing to develop necessary agreements to support this project and to ensure we work within British Columbia 's policy and regulatory requirements.  Parks Canada's priority is to avoid imperilling the long-term viability of any potential source population of caribou, as well as to avoid endangering British Columbia 's Section 11 agreement with the Government of Canada.	The DIA was updated to reflect British Columbia's interest in working with Parks Canada to identify potential source populations in the province.

	Concern / Comment	Parks Canada Response	Change to DIA
3	Alberta is concerned that the current proposal and draft DIA lack specific and direction actions and adaptive management strategies that are likely necessary to ensure that the successful and responsible release and survival of a critically imperiled species at risk.	Parks Canada acknowledges that details about specific and direct actions and adaptive management strategies are not detailed in the draft DIA or the project proposal. A detailed Science and Monitoring Plan is under development for the project. It is designed to measure and report on all aspects of conservation breeding, from veterinary science in the facility to caribou ecology in the wild. A dedicated, informed, and neutral technical committees will be established to assist Parks Canada in identifying caribou research and monitoring needs within an adaptive management framework.	Additional details were added to Section 11 of the DIA regarding the development of a Science and Monitoring Plan and establishment of a technical committees as required.
	Sourcing caribou		
4	Alberta and ECCC expressed concern with some of the uncertainties regarding source populations in the project proposal and draft DIA. Alberta is concerned specifically about the proposed number and timing of any potential removals from the À la Pêche population. ECCC noted that it is crucial to clearly identify the potential impacts and risks to source population recovery, and outline an adaptive approach fro mitigating any risks and monitoring outcomes.	Parks Canada agrees that source population removals must not jeopardize the feasibility of recovery for other populations or LPUs. The recovery of southern mountain caribou is a priority for the whole of the Government of Canada, and the population and distribution objectives outlined in the Recovery Strategy apply equally to all LPUs, including the À la Pêche LPU and Jasper/Banff LPU.  Parks Canada will not undertake any actions that would risk Alberta or British Columbia's commitments to the conservation and recovery of Woodland Caribou and related Section 11 agreements with the Government of Canada.  Parks Canada will not capture any caribou from provincial lands or shared populations such as the À la Pêche population or other regional populations located in British Columbia without full agreement from Alberta and British Columbia respectively.  Parks Canada's preliminary work on impacts to source populations illustrated that there may be	Wording in the DIA was strengthened to emphasize that work completed to determine potential source populations is preliminary and more work will be completed once a project decision has been reached.  To promote inter-jurisdictional collaboration, Parks Canada intends to establish a governance structure (such as an external advisory committee, Indigenous Working Group and joint technical committees) to support ongoing collaboration on topics such as appropriate source populations and numbers that could be provided for the conservation breeding project.  Parks Canada will work with partners to develop the necessary inter-jurisdictional agreements in support of this project.  Parks Canada will only capture caribou on provincial lands or from a shared

	Concern / Comment	Parks Canada Response	Change to DIA
		scenarios where source animals could be removed without compromising recovery objectives in the À la Pêche population. Parks Canada agrees that additional modelling work is required and proposes to undertake that work in close collaboration with Alberta and British Columbia.	population (i.e. À la Pêche population) under a Parks Canada-provincial agreement.
5	Alberta expressed concern with the population demographics used in the Parks Canada models. They recommended some improvements to refine the model inputs (e.g. population sizes, differential fitness, demographic rates) and factoring in environmental and recovery action uncertainty to address overall risks and inform potential scenarios.	Parks Canada welcomes the opportunity to utilize the model inputs as proposed and to work closely with Alberta on future population modelling in support of the project.	References to future modeling work was strengthened in the DIA to reflect this concern.
6	Alberta is concerned with Parks Canada's subdivision of the À la Pêche population into mountain resident and seasonal migratory ecotypes. Alberta suggested that this approach is not in agreement with their management approach and that their assessment of recent studies and the historical context is that there is a single caribou ecotype in the À la Pêche population. Applying the assumption of a partitioned population could induce unnecessary, and potentially misleading, bias that could mask the potential impacts of outcomes for the À la Pêche population. They suggest that subdivisions should not affect the decision or strategy for removals.	Parks Canada agrees that the population as a whole should be considered to determine the appropriate number of source animals that could be captured from the À la Pêche population.  Parks Canada will set up a joint technical committee with Alberta to collaborate on additional source population modelling, capture details and the relevance of different ecotypes on the sourcing strategy. Parks Canada will not capture animals from provincial lands or a shared population (such as the À la Pêche population) without a Parks Canada – provincial agreement in place.	Wording added to the DIA on the commitment to set up a technical committee with the provinces on source population modelling and capture details. Included a commitment to only capture caribou on provincial lands or from a shared population (i.e. À la Pêche population) under a Parks Canadaprovincial agreement in Section 2.4.

	Concern / Comment	Parks Canada Response	Change to DIA
7	Alberta recommended that conservation salvage of Tonquin and Brazeau caribou be the primary founders for the proposed breeding facility in Jasper National Park.	Parks Canada agrees and intends to translocate all of the Brazeau population to the breeding facility (because they are functionally extirpated) as well as a few animals from the Tonquin population. Parks Canada believes that augmentation has a greater likelihood of success if animals are introduced to an extant population and therefore will only be capturing a small number from the Tonquin population.  Ideally, a cautious distribution of founders across many populations reduces the impacts on any one population.	No changes to the DIA were required.
8	Alberta recommended that after an established evaluation period, a risk-benefit approach could be advanced that addresses potential opportunities for additional population sources, including the À la Pêche and other southern mountain caribou populations in British Columbia.	Parks Canada is concerned that additional delays to prove the concept may lead to the extirpation of the Jasper/Banff LPU. There is evidence that caribou can be kept in captivity successfully (e.g. Large Animal Research Station, various maternity pens, St. Felicien, Calgary Zoo, etc.). In January 2021, Parks Canada hired Foundations of Success to lead a scientific review of the proposed conservation breeding project with independent experts. This review concluded that there was reasonable confidence that a conservation breeding strategy is technically feasible in Jasper National Park.  Parks Canada will set up joint technical committees with the provinces of Alberta and British Columbia to model the potential for various source populations in each province and determine appropriate capture methodologies.	Additional wording addressing this concern was added to the DIA.

	Concern / Comment	Parks Canada Response	Change to DIA	
	Releasing caribou			
9	Alberta is concerned with Parks Canada's suggestion to release captive-raised individuals or return previously captured caribou back into wild populations like the À la Pêche. Alberta is concerned that releasing captive animals or returning formally wild caribou could introduce novel diseases into the À la Pêche caribou population. Alberta recommends that no animal held in the conservation breeding facility should be released back into the À la Pêche population, including returning population founders.	Parks Canada agrees that health monitoring and management is a core component of the proposed project. Health controls in modern large mammal captive rearing and reintroduction programs is an excellent mitigation against spread of pathogens.  Parks Canada will set up a joint technical committee with provincial, federal and Indigenous partners and other external experts to review animal husbandry practices, including biosecurity measures required to prevent the introduction of novel diseases.  Parks Canada would also recommend engaging in health surveillance and monitoring in wild populations to understand current baseline health concerns and to better understand how to respond to emerging or novel disease, such as chronic wasting disease.  The initial proposal to return animals to the À la Pêche population is meant to reduce the impact of removing animals from the population. Parks Canada will not return population founders or captive-raised animals to the À la Pêche population if not supported by Alberta. However, we also note that during consultations, a number of Indigenous partners and stakeholders suggested that if Parks Canada were to remove animals from the À la Pêche population, we should consider returning animals to this population as a mitigation measure.	Wording was added to the DIA to indicate that any returns will be based on further recommendations and advice from the technical steering committee and based on health monitoring protocols. Wording was also added to indicate Parks Canada's commitment to enter into interjurisdictional agreements with the provinces, including an agreement with Alberta for the ongoing shared management of the À la Pêche population.	
10	Alberta is concerned that the estimated population size of caribou within the Jasper/Banff LPU has been chronically low, including during the period overlapping with reported low wolf density estimates. They noted that the Parks Canada caribou	Parks Canada acknowledges that the population of caribou in the Jasper/Banff LPU were low during the period where there was low wolf density. However, by the time wolf densities were below 3 wolves/1000 km² or even 2 wolves/1000km², the caribou subpopulations were too small to recover on their own.	Wording on wolf management was broadened in the DIA to include other predators as well. A predator management strategy will be developed, which will establish thresholds and conditions under which targeted and specific predator management actions (relocation or	

Concern / Comment	Parks Canada Response	Change to DIA
survival rate for the Tonquin population is much lower than what Alberta has documented for southern mountain caribou populations on provincially managed lands. They are concerned that À la Pêche animals might be translocated to the facility when their probability of survival in their native range is currently significantly better than the proposed release environment conditions.  They are concerned that there is no discussion on the impacts of other predators (i.e. cougars, bears) and their contribution to the low adult female survival in Jasper National Park. Alberta suggests that the cause of caribou decline is not yet fully mitigated. There is insufficient evidence provided to indicate that undue threats to released caribou, and resulting caribou demographic rates, are no longer a factor and may compromise or negate program goals.	Survival has been reported as an average across the entire time series, due to low precision associated with low sample sizes. Internal information and data sets indicate higher survival in the low wolf time period. We have refined our survival models to better reflect these changes over time, but we need to do more work to communicate these differences.  Parks Canada monitoring has found that survival estimates (unpublished and imprecise) from the Tonquin population indicate population stability and slight growth from 2016-2022. This subpopulation is very small and the growth potential is small. Long-term habitat security continues to be high within the boundaries of protected areas.  Any translocated À la Pêche animals would become part of the breeding population and would be kept in captivity, protected from predators and other sources of mortality. Survival in captivity is generally high, much higher than in natural systems.  Parks Canada agrees that there are specialist predators of caribou other than wolves and that those predators will also have impacts on caribou. Caribou mortality and predation is monitored through collars and mortality visits. A predator management strategy will be developed, which will establish thresholds and conditions under which targeted and specific predator management actions (relocation or removal) will be used, if required, to support augmentation of caribou in the Tonquin caribou range.	removal) will be used, if required, to support augmentation of caribou in the Tonquin caribou range.

	Concern / Comment	Parks Canada Response	Change to DIA	
	Other			
11	BC Parks expressed concern that the ground vegetation at the proposed facility location would become riled quickly. They recommend having a secondary fallow station.	Parks Canada has designed the facility large enough to address this concern, we are building more than we need in one facility. We expect the habitat will be degraded significantly in the facility and so animals will get supplemental feed and water. Rotation through the pens will be important and we are building that concept in. We might have to reduce density for a number of years in addition to rotation through the pens.	This concern is sufficiently addressed in the DIA. No change was required.	
12	Alberta and ECCC expressed concerned with Parks Canada using the maximum wolf density referenced in the Recovery Strategy. Alberta noted the federal Recovery Strategy is explicit that there is insufficient scientific evidence to define the maximum density of wolves among southern mountain caribou populations. Alberta suggests that a lower wolf density than what is outlined by the federal recovery strategy may be needed to support caribou recovery. Both Alberta and ECCC recommended that Parks Canada use more recent wolf density recommendations.	Parks Canada agrees that the maximum density of wolves should be lower than that listed in the federal Recovery Strategy. Hebblewhite and Serrouya et al. recommend densities ranging from 1.5 – 4.3 wolves/1000 km². Wolf density in JNP is estimated currently at 1.2 wolves/1000 km².	The wolf density required to support caribou recovery and citations were updated in the DIA.	
13	Alberta expressed concern that Parks Canada has stated that wolf control is not required due to low wolf densities within Jasper National Park and any action would be ineffective without also addressing alternative prey populations.	Parks Canada recognizes the effectiveness of wolf population management in Alberta and British Columbia.  Parks Canada's aim is to minimize intervention and improve ecological integrity where prey and predators are maintained at natural levels and allowed to exist with minimal human intervention. The goal of the proposed program is to augment caribou	Language referencing the science and monitoring plan regarding predator and prey populations was strengthened in the DIA. A predator management strategy will be developed, which will establish thresholds and conditions under which targeted and specific predator management actions (relocation or removal) will be used, if required, to	

	Concern / Comment	Parks Canada Response	Change to DIA
	Alberta noted that wolf population management has demonstrated effectiveness for the À la Pêche and other caribou populations in Alberta and British Columbia. Alberta is concerned that Parks Canada's plan did not adequately justify the dismissal of wolf management to needed improvements to the conservation and recovery potential in the context of the conservation breeding project.  Alberta is concerned that the wolf density estimation methods are not presented in sufficient detail. Given the difficulty and uncertainty with estimating wolf density, Alberta advises to not solely rely on using the Parks Canada wolf density estimates for critical decision-making.	populations until self-sustaining levels are achieved, at which point this type of human intervention would end.  Parks Canada collaborates with researchers to use models, collars, and remote cameras to estimate wolf density. Parks Canada is also collaborating with external experts to better quantify wolf density, and to have our current methods reviewed. Parks Canada will continue to monitor and manage wolves in the park.	support augmentation of caribou in the Tonquin caribou range.
14	ECCC noted that a clearly defined system of governance would be valuable for the public and stakeholders to understand how decisions will be made and have confidence that the appropriate experts and knowledge holders will be consulted.	Parks Canada agrees with these recommendations and many of these plans are currently in development. These operational plans and protocols will be finalized if the project is approved.	Reference was added to the DIA regarding the finalization of operational plans before the project is implemented, as well as the creation of external advisory and technical committees that will be created to support operations.