



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

April 09, 2026

Alberta's Species at Risk team  
Ministry of Environment and Protected Areas  
By email: [epa.engagement@gov.ab.ca](mailto:epa.engagement@gov.ab.ca)

**Subject: AWA's Feedback on the Draft Wood Bison Recovery Plan**

Dear Alberta's Species at Risk team,

Alberta Wilderness Association (AWA) is writing to provide feedback on the Draft Wood Bison Recovery Plan as part of the public engagement process initiated by the Ministry of Environment and Protected Areas on March 11, 2026.

AWA, founded in 1965, is an Alberta-based conservation organization with over 10,000 members and supporters across Alberta and around the world. AWA works toward the completion of a protected areas network and the responsible stewardship of Alberta's public lands, waters, and biodiversity to ensure future generations continue to benefit from them. We appreciate the opportunity to provide feedback on this important recovery plan.

AWA supports the plan's stated long-term goal of achieving self-sustaining, disease-free wood bison populations that provide ecological and cultural benefits. However, we are concerned that this goal will not be achievable without significantly stronger commitments to habitat protection.

Wood bison were once widespread across Alberta but were brought to the brink of extirpation approximately 150 years ago. While conservation efforts have enabled their return to parts of the province, some populations remain critically small and highly vulnerable. The Wabasca herd, in particular, has declined to fewer than ten individuals, highlighting the urgent need for immediate and meaningful recovery actions.

While the actions outlined in the draft plan are important, they will not be sufficient if habitat protection is not prioritized. Without enforceable measures to protect habitat, and with continued prioritization of industrial development in the north of the province, wood bison will face increasing pressure and direct competition for space and resources. Under these conditions, it is unlikely that populations will become self-sustaining. AWA is deeply concerned that without strong habitat protections, wood bison will continue to struggle.

## **Habitat Needed to Support Recovery**

AWA supports the inclusion of wood bison recovery considerations within broader land-use planning frameworks. However, recent sub-regional plans, such as the Upper Smoky and draft South Athabasca, have failed to deliver on one of their central objectives: the recovery and conservation of woodland caribou. This raises serious concerns about the government's ability to prioritize species recovery within the regional planning process.

Given this context, AWA is not confident that existing and proposed land-use approaches will provide sufficient protection for wood bison. This concern is further compounded by the province's stated objective to expand oil and gas production, which is likely to increase industrial pressures on already disturbed landscapes.

Although habitat is acknowledged within the land-use planning context, it is notably absent as a central component of the recovery actions outlined in Section 5. AWA strongly recommends that habitat protection be made a core part of the recovery strategy, supported by clear, measurable objectives. Without explicit commitments to protect and restore habitat, land-use planning alone will not achieve meaningful recovery outcomes.

## **Recovery Strategies and Actions**

### **Habitat protection**

Habitat protection must be integrated across all recovery strategies. As industrial activity continues to expand across Alberta, protecting intact ecosystems, including key foraging areas and seasonal habitats, will be essential to maintaining and rebuilding viable wood bison populations. This is particularly critical in the context of increasing cumulative land-use pressures.

### **Disease Management and Collaboration**

AWA supports actions aimed at reducing the probability of disease transmission between populations, including between the Ronald Lake and Delta populations, and the Wabasca and Garden River populations. However, these actions must be undertaken in full collaboration with Indigenous Nations and organizations, including the Ronald Lake Buffalo Herd Cooperative Management Board (RLBH CMB), whose knowledge and leadership are very important to effective and culturally appropriate management.

Collaboration outlined between the Government of Alberta and Parks Canada should explicitly include Indigenous Nations and knowledge holders as full partners in decision-making processes.

AWA also supports collaboration with local communities, including Guardian programs, to improve understanding of bison movement, distribution, and behaviour.

## **Establishment of Additional Populations**

AWA recognizes the ecological importance of bison as a keystone species and their role in restoring ecosystem function. However, without adequate habitat protection, the long-term success of new populations is questionable. Expanding populations into landscapes that continue to face increasing industrial disturbance risks undermining recovery efforts. Habitat protection must therefore precede or accompany any efforts to establish new populations.

### **Ronald Lake Population**

AWA supports the continued role of the RLBH CMB and recognizes the importance of its work in developing a management plan for the herd. This collaborative approach is critical to guaranteeing the long-term sustainability of the population and maintaining its disease-free status.

### **Wabasca Population**

The Wabasca population is at immediate risk of extirpation and requires urgent and decisive intervention. Given the extremely small population size, monitoring alone is insufficient. While Section 3.2 identifies continued monitoring of abundance and distribution as an action, this does not adequately address the urgent need to stabilize and recover the population.

AWA acknowledges that Section 5.5.1 includes actions to reinforce the Wabasca population and identifies key knowledge gaps related to the factors limiting population growth. However, AWA recommends that addressing these knowledge gaps be treated as a top priority within the recovery plan. A clear and immediate commitment to research is needed to identify the underlying causes of the population's lack of recovery.

Without a strong understanding of these limiting factors, efforts to reinforce the population may be less effective or risk failing altogether. This work should be carried out in close collaboration with local Indigenous Nations, organizations and knowledge holders, whose expertise and long-standing relationships with the land are critical to informing both research and management actions.

AWA appreciates the opportunity to provide input on the Draft Wood Bison Recovery Plan and looks forward to seeing a clear and meaningful commitment from the Government of Alberta to the protection and restoration of wood bison habitat. Guaranteeing that habitat protection is prioritized alongside recovery actions will be essential to achieving self-sustaining, disease-free populations and securing the future of these threatened populations.

Please do not hesitate to contact AWA if you have any questions or wish to discuss our feedback further. We would welcome the opportunity to continue engaging in this process.

Sincerely,



Pamela Narváez-Torres, Conservation Specialist  
Alberta Wilderness Association