



ALBERTA WILDERNESS ASSOCIATION

*"Defending Wild Alberta through
Awareness and Action"*

Emily Chamberlain, Planning Team Leader
Alberta Tourism, Parks and Recreation – Parks Division
Suite #1, 250 Diamond Avenue
Spruce Grove, Alberta, T7X 4C7

July 25, 2008

Re: William A. Switzer Provincial Park Management Plan

Dear Emily,

Further to request for input, Alberta Wilderness Association (AWA) would like to take this opportunity to provide Tourism, Parks and Recreation (TPR) with our comments regarding William A. Switzer Provincial Park's future management and the issues which any future management plan must address.

Opportunity for Effective Consultation

AWA recognizes TPR's recent work in offering Albertans the opportunity to comment on the designation and management of our province's parks and protected areas. As the government agency in trust of protecting Alberta's natural landscapes, and offering Albertans a chance to interact with them through education and recreation, it is important that TPR continuously offers the province's citizens the chance to provide effective input into the planning and management of the parks and protected areas network. It is important that Albertans, including AWA, receive the opportunity to comment on a Draft Management Plan for William A. Switzer Provincial Park, prior to it being approved and instated. As part of this process, effective consultation must include the completion of the communication loop by TPR providing information on what Albertans said and how these comments were worked into future revisions. This helps ensure that Albertans see their input as being effective and offers a transparent and accountable model for government.

It has been our experience that this phase of communication is not routine and we find it disconcerting when final plans are released with no mention of the concerns expressed by AWA and others and no explanation of why these concerns have or have not been incorporated into the final plan.

In good faith, we have spoken with AWA members and supporters who live in the region of William A. Switzer Provincial Park as we prepared our comments for you.

Protection of Environment of the Highest Calibre

Under Provincial Park designation, William A. Switzer exists to protect provincially significant natural heritage. This must continue to be the principle goal of the park and every effort must be made to ensure the security of this value, including ecological functioning, natural processes, biodiversity and the full complement of native flora and fauna species. Subsidiary considerations, such as recreation and leisure opportunities must not continue or be developed at the expense, or loss, of the natural values within the park. Provincial Parks are a popular destination for many Albertans and visitors from elsewhere. As such, they should lead the example in land stewardship and exemplify Alberta's commitment to the long-term security of its rich and diverse landscapes.

Consideration of Buffer Zones and Adjacent Land Uses

As part of the protection of the natural values within the provincial park, consideration must be taken of impacts to the park from adjacent land uses. TPR and the management plan must address the pressures from the surrounding area, including petroleum, forestry and coal mining industries. While not under TPR jurisdiction, staff must take every opportunity to work with other government bodies, including the departments of Sustainable Resource Development, Energy and Environment to ensure that surrounding land uses do not negatively affect the values within the provincial park. In working with other departments, the designation of buffer zones of limited development immediately outside the park boundaries will help to dampen impacts from surrounding land use. Buffer zones must be considered a compulsory complement for all parks and protected areas in Alberta.

Preservation of Historical and Cultural Values

Another reason for Provincial Park designation is to protect cultural features. AWA recognizes William A. Switzer Provincial Park as containing significant heritage that must continue to be protected. In-situ conservation of our historical and archeological heritage is an important resource for understanding our province's past and the park offers the chance to provide high-quality programs on the area's heritage. Education programs should work to encourage an appreciation of the area's historical and cultural heritage in-situ, disregarding intrusive measures such as the moving of artifacts for interpretive displays. Enforcement must work to protect these values as well.

Recreation Types and Intensity

All recreation and leisure opportunities must be subsidiary to the primary objectives of natural and historical/cultural heritage protection. No further development of recreation and leisure facilities should take place if it will negatively impact the natural and cultural heritage values. That being said, provincial parks allow visitors to come in contact and interact with our natural environment and a healthy and sustainable appreciation and recreation program should be in place. Low-impact, self-propelled recreation should be promoted within the park and opportunities for a more intimate experience, such as primitive camping and foot-only access tenting areas be considered in any future development. AWA makes note that currently motorized boating is allowed on both Jarvis Lake and Gregg Lake. Monitoring of water quality, ecosystem functioning, and other possible impacts from motor boating must be carried out to ensure that this activity is not negatively impacting the aquatic and land-based ecosystems. Should it be shown that motor boats are having a significant adverse effect on the ecology of the park, their use should be suspended or moderated.

Education Programs

Provincial Parks, in offering a first line of interaction with Alberta's natural environment and cultural heritage, possess the opportunity for a strong education component to visitor's time in the park. Education programs should focus on the significance of the area, the need for protection and how TPR works to ensure the lasting security of these areas. Furthermore, programs should be developed to inform visitors of rules and regulations, safety concerns, appropriate behavior, minimizing impacts to the park, and possible interactions with wildlife. Various methods may be employed, including kiosks, presentations, literature, and interaction with interpretive and enforcement staff. Education programs are also an opportunity to promote further exploration of Alberta's natural heritage through self-propelled recreation in the surrounding area and personal development through learning low-impact practices while enjoying Alberta's wild spaces.

Enforcement

Substantial capacity issues must be addressed within the parks network, including William A. Switzer Park. Enforcement is a very real part of ensuring security of our province's natural and cultural heritage. As such, financial and human resources must be adequate to address both education and enforcement objectives. There must be sufficient enforcement personnel on the ground to educate and enforce the park's rules, and they must be given a measure of power appropriate to carrying out their duties to the fullest. Strong, enforceable regulations must be present and penalties must be substantial enough to deter visitors from disobeying them.

On Safety

Obviously, there are inherent risks associated with outdoor recreation and natural settings. However, care must be taken to ensure that the welfare of staff, residents, and visitors is of the highest priority through safety practices and precautions. Roads, trails, and their intersections must be clearly signed. Hazards and important safety information must be adequately posted. Care must be taken to ensure that human-wildlife conflicts are minimized. As part of ensuring the safety of all present in the park, adequate enforcement must be carried out with appropriate penalties and a strong education component must be employed to make users aware of inherent dangers, regulations, and suitable behavior within the park.

Infrastructure Development

AWA recognizes that William A. Switzer Provincial Park has been substantially developed to offer visitors recreation and education opportunities. We also acknowledge that there currently exists a residential subdivision and retreat centre in the park. The current mandate of Parks includes meeting the needs of a growing population and in the future it may be considered necessary to further develop the parks infrastructure to meet this objective. Care must be taken to ensure that future development is both absolutely necessary and appropriate and will not be a detriment to natural and historical/cultural values. Any structures within the park should be constructed using sustainable materials and methods, as well as offering the ability to reclaim the land under foot should they be decommissioned in the future. Aesthetically, buildings, kiosks, amphitheatres, etc. should be of an architecture and décor consistent with the heritage styles of the area so as to better blend into the natural and cultural background and offer visitors an authentic experience. AWA also supports the development of gateway communities to provide services and support to parks and recreation areas.

Mountain Pine Beetle

AWA has argued for many years that pine beetles may harm forestry, but they don't necessarily harm forests. A forest is a complex system of trees, shrubs, flowers, mosses, lichens, dead wood, mammals, birds, insects, soil micro-organisms, soil, water, and air. Pine beetles are native invertebrates. Forests have evolved over tens of thousands of years to live with them. Pine beetles may kill some pine trees (not the young ones) but, unlike salvage forestry operations, they do not affect spruce, fir, or deciduous trees, nor do they destroy understory plants, mosses, or soils. AWA is concerned that measures to "fix" the pine beetle problem may do more damage to forests than the pine beetles themselves. There is considerably less reason to "manage" for pine beetles in protected areas, where production of timber is not an issue. Protected areas should be places where natural processes are allowed to run their course, including the mountain pine beetle. AWA does not oppose Phase 1 treatment, that being the detection and felling and burning of individual trees. However, we strongly object to any measures to clear-cut areas to prevent pine beetle spread. There is no evidence that this works in any way.

Please add AWA with my name to your mail list to receive future updates regarding the William A. Switzer Provincial Park Management Plan. Should you wish to discuss these points further, please contact me through the information provided at the bottom of this letter.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



Chris Wearmouth
Conservation Specialist