



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

The Hon. Jim Prentice,
Minister of Environment,
House of Commons
Ottawa, ON,
K1A 0A6

December 17, 2009

Dear Minister Prentice

Re: Draft Jasper National Park of Canada Management Plan

Thank you for the opportunity to comment on the draft Management Plan for Jasper National Park. Please accept these as Alberta Wilderness Association's (AWA) official comments and recommendations for the draft plan.

There are many very commendable aspects of the draft plan, of which AWA thoroughly approves. Recognition of the value of the Park's Wilderness Areas, seasonal closures of trails to minimize grizzly bear displacement and measures to deal with invasive plants are all excellent elements of the plan. But AWA also has a number of concerns, and offers the following recommendations to strengthen the plan, and Park's Canada's commitment to maintaining its ecological integrity.

Public Consultation

- AWA is concerned about the consultation process for the draft management plan. Having reviewed the draft management plans for Banff and Waterton National Parks, it came as a relief to find that the draft Jasper plan was at least accessible on-line. This does of course mean that people who are aware of the management planning process can view the draft plan online, which was not the case for the other two draft plans. But the extent to which Parks Canada has worked to solicit public input outside the community of Jasper, to "engage a diverse community of interested Canadians" (p19) is unclear.

General

- Although the draft plan contends that "This is not a new plan"(p6), it marks a considerable departure from the previous 2000 Management Plan, which was intended to "guide the overall direction of the park for the next 10 to 15 years." One cannot but wonder what is the urgency to rewrite the plan with such a change in direction.
- The tone of the draft plan appears to reflect a continuing shift away from Parks Canada's legal responsibility to manage the park primarily to maintain or restore ecological integrity, in favour of the "visitor experience."



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- Although AWA commends the plan's vision that "The health of the park and surrounding ecosystem is paramount," it is not clear that this draft plan is adequate to achieve that laudable goal.
- It is curious to be invited to provide comment on a draft plan which is not yet finished. *Section 8.0 Monitoring and Reporting* is "to be completed"; *Section 9.0 Summary of Strategic Environmental Assessment* is "to be completed when draft plan finalized"; and *Section 10.0 Summary of Priority Actions* is "under development." Similarly, Performance Measures are incomplete. This is clearly inadequate.
- Marketing jargon pervades the draft plan, and is not appropriate in a management plan for a National Park. Language such as "support product development and promotion" (p23) should have no place in this plan.

Ecological Integrity

According to the 2001 *Canada National Parks Act*, "maintenance or restoration of ecological integrity, through the protection of natural resources and natural processes, shall be the first priority of the Minister when considering all aspects of the management of parks." This must be emphasized very clearly in the plan; in *Section 1.3 Regulatory and Policy Context*, for example.

- For example, the draft plan for Banff National Park, under 1.3 *Regulatory and Policy Context*, states "the Parks Canada Agency is accountable for ensuring that management of each national park gives first priority to the maintenance or restoration of ecological integrity." This needs to be given similar prominence in the Jasper plan. Ecological integrity must be a primary part of the vision for the park, and it should be the very first key strategy, taking precedence over all subsequent strategies.
- The fact that the new draft plan "is a rewritten plan that brings forward important policy direction for the ecological integrity of Jasper National Park *and integrates it with new content intended to strengthen direction in a number of areas*" is very concerning to AWA. Coupled with "A renewed focus on experiential tourism" (p20), this does not seem to tally with the requirement to manage the park with ecological integrity as the *first priority*.
- If, as the draft plan states, current ecological integrity is rated as "in fair condition with a stable trend" (p12), then surely this is not adequate for one of the world's premier national parks. If ecological integrity is now to be "integrated" with new content, then it seems unlikely that this will result in any improvement in integrity.
- In *Section 6.2 Three Valley Confluence*, the draft plan states "The three valleys provide vital conduits for wildlife movement..." Yet the fact that 280 km of official trails have recently been approved in the area, most of which are multiple-use trails, again raises the question of where ecological integrity will fit in when increased visitor use is an option.



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- AWA believes that the draft plan must provide more context about how the park fits into the broader regional context as part of a much larger mountain ecosystem. Decisions made within Jasper National Park will have significant effects beyond the park boundary, on everything from wildlife populations to water quality and quantity and in general ecosystem protection.

Visitor numbers

- AWA appreciates that encouraging sustainable levels of visitation to the parks is, and should be, a major consideration of Parks Canada, but we have grave concerns that the plan's failure to keep growth of visitor numbers in any sort of ecological perspective is ill-considered.
- An "Indicator of Success" for the Park (p25) is that "At least 1,908,000 people visit the park in 2010/11 and visitation increases on average by 2% per year to 2012/13." AWA strongly opposes this 22% increase in visitors over ten years, which comes out of the blue with no apparent ecological context. Where is the documentation, or the science to suggest that such an increase in visitor numbers is sustainable or will not negatively impact the Park's ecological integrity? AWA believes strongly that growth in the number of visitors is not necessarily, in itself, a measure of success.
- AWA reminds Parks Canada of its own *Guiding Principles and Operating Policies* (1994) which state that "Public demand alone is not sufficient justification for provision of facilities and services in support of inappropriate activities. Services, facilities and access for the public must directly complement the opportunities provided, be considered essential, take account of limits to growth, and not compromise ecological and commemorative integrity nor the quality of experiences."

Wildlife

- The absence of any performance measures for wildlife is a glaring omission. There must be mortality targets for grizzly bears and caribou.
- Grizzly bears are correctly identified as one of the "ecological matters of greatest concern" (p13). The proposal to "Address sources of both direct and indirect mortality" (p35) is commendable, though how this will be achieved is not explained.
- AWA appreciates the recognition that "The three sub-herds in South Jasper National Park all show a long-term declining trend," and the statement that "Addressing these threats to reverse the current trend is a priority for Jasper National Park" (p13).
- It is difficult to see the reasoning behind the optimism that "Visitor opportunities can be created while resolving management challenges, as evidenced in recent work related to caribou conservation," (p18)
- With respect to caribou, the draft Plan recognizes that "The Athabasca and Miette River valley bottoms are places where high ecological value and high use overlap, and are affected by transportation corridors, man-made disturbances, fire suppression and invasion by non-native plants" (p33). But it stops short of making the one serious recommendation that might save the Miette caribou herd: the winter closure of the Maligne Lake road. AWA strongly believes that this precautionary measure is necessary to ensure the future survival of this herd in the long term. At the very least this should be introduced on a trial basis.



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- "Interim conservation measures" for caribou are alluded to on p34, but not explained. Presumably, the continuing "long-term declining trend" of the Park's caribou suggests that they are insufficient.
- The draft plan includes the key action to "Reduce risk of caribou mortality cause by vehicle collisions" (p52) though it does not explain how this will be achieved.
- The draft plan implies, with little justification, that winter use can be increased without any impact on declining caribou: "Explore ways to enhance winter recreation opportunities and achieve actions to support caribou recovery" (p65).
- Stable / increasing caribou herds are listed a number of times as "Indicators of Success" (p42, 56), but there is no suggestion of what action will be taken if these herds continue to decline.
- Stable/ increasing caribou herds should also be listed as "Indicators of Success" for the Backcountry (p66).

Managing Growth and Development (p29)

- The title for this section must be changed, as it implies the encouragement of growth and/or development, which are not necessarily appropriate. If the community of Jasper is not to expand, then how will an annual commercial growth rate of 1,700 square meters be accommodated?

Section 5.2.1 Direction (p23)

- This section states that "New recreational activities and events will be subject to an assessment process," and lists "principles to guide the discussion on new activities." While "Respecting Natural and Cultural Resource Protection Goals" is the first principle listed, it must be stressed that this is the overriding principle. "Facilitating Opportunities for Enjoyable and Meaningful Visitor Experiences," or "Valuing and Involving Local Communities," must only be considerations where they do not undermine this first principle.

Section 6.2.3 Outside the Community of Jasper

- AWA opposes the use of the Jasper airstrip for recreational purposes.

Climate Change

- The draft plan acknowledges that "A major knowledge gap... is our understanding of how climate change is likely to impact park ecosystems" (p14), but gives little indication of how this problem will be improved. Although "Improve our understanding of the impacts of climate change" is listed as a Direction (p34), the plan does not go far enough in discussing the enormous potential impacts of climate change on the park's future. (*Climate and Atmosphere* is somewhat oddly listed as an "Indicator of Success" on p35). How will management of the park adapt to losses of glacial and icefield ice, or to changes in habitat availability for animals such as pikas? Jasper National Park may have a role to play in the future in maintaining genetic diversity of species, and allowing species to change their geographic range as conditions change, but this is not discussed in any way in the plan.



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In conclusion, while AWA recognizes that there are many commendable elements to the draft management plan, there are many elements that must be changed if the plan is to reflect the primary mandate of maintaining ecological integrity. AWA looks forward to hearing what changes will be made to the plan before it is finally completed.

Yours truly

ALBERTA WILDERNESS ASSOCIATION

Nigel Douglas,
Conservation Specialist

cc: Hon. David McGuinty, Liberal Environment Critic,
cc: Hon. Linda Duncan, NDP Environment Critic,
cc: Dave McDonough, Superintendent of Waterton National Park, Parks Canada
cc: Greg Fenton, Superintendent, Jasper National Park -