



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 10, 2009

Dear Minister Prentice

Re: Draft Waterton Lakes National Park of Canada Management Plan

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

Public Consultation

- AWA is concerned about the ill-defined consultation process for the draft management plan. Apparently public comment has been solicited, though it would be impossible to tell this from Parks Canada's website - <http://www.pc.gc.ca/eng/pn-np/ab/waterton/index.aspx> . At the time of writing, the draft plan is still not available on the website and there is nothing to suggest that public opinion is being sought.
- Although *Section 5.1.1 Direction* states: "Parks Canada will become an externally focused organization involving Canadians in managing, protecting and operating the park," *Section 1.2 Management Plan Review Process* describes only local and regional consultation efforts. In light of the inadequate web-based consultation opportunities, this means that the majority of Canadians have little chance to even become aware that a management planning process is in progress, less still to be involved "managing, protecting and operating the park."

General

- 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 maximizing the "visitor experience."
- It is curious to be invited to provide comment on a draft plan which is not yet finished. For example, *Section 9.0 Summary of Strategic Environmental Assessment* states simply: "To be completed when draft plan finalized." This is clearly inadequate.



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- Similarly, *Section 8.2 Management Effectiveness Monitoring* is "to be completed." If this crucial tool to measure the plan's effectiveness has not yet been developed, then why has the draft plan been published now? Why not wait until it is complete?
- Marketing jargon pervades the draft plan, and is not appropriate in a management plan for a National Park. Language such as "continually re-evaluating and renewing products," or "adjust product offer and placement," (p21) 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.
- 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 Waterton 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.
- In contrast, the draft plan "brings forward important policy direction for the ecological integrity of Waterton National Park *and integrates it with new content* intended to strengthen direction in a number of areas, from visitor experience to outreach programming and work with aboriginal communities, and reflect changes in government policy and decisions" (emphasis added). This does not indicate that ecological integrity is being maintained as the first priority; more that is likely to be undermined by other considerations.
- 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 Waterton 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.
- A proposal to "increase visitation to the park from the current 380,000 to 400,000 by 2012" (p22) comes entirely out of the blue, with no attempt to justify this target, or to put it into any sort of ecological context. Where is the documentation, or the science to suggest that such an increase in



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visitor numbers is sustainable? AWA believes strongly that growth in the number of visitors is not necessarily, in itself, a measure of success.

- Similarly, the draft plan proposes increasing activity in the Park's "shoulder seasons": "Marketing of new and existing authentic, park based, visitor experiences will be improved and special events particularly in the shoulder seasons ... will be encouraged" (p22). These "shoulder seasons" can have particular significance for wildlife – particularly wildlife coming out of hibernation hungry, or preparing to go into hibernation – and yet this is given no emphasis in a blind push to "market visitor experiences."
- Winter events are also proposed, to "grow winter visitation" (p38), again without any attempt to justify this growth, or put it into any kind of ecological context.
- 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."

Wilderness Areas

- The proposal to "Amend the Park Zoning Plan to increase Zone II wilderness/declared wilderness areas within the Waterton Valley to provide an additional level of protection to rare and sensitive habitat on the Blakiston alluvial fan" (p29) is commendable.

Waterton Community

- AWA supports the reaffirmation that "The Waterton Community's existing limits to development will be maintained." (p31)

Blakiston Valley

- Although AWA generally accepts the important role of fire on the landscape, the proposal to "Improve distribution of Whitebark and Limber pine by reintroducing fire into the landscape" raises some concerns. Whitebark pine and limber pine are both seriously impacted by introduced pine blister rust, and there has been some suggestion that fire encourages the growth of *ribes* species, a secondary host to the rust. So the use of fire will need to be both targeted and closely monitored.

Cameron Valley

- Although the "future best" for the Cameron Valley will include wildlife corridors between the main and side valley that are "effective and actively used," the only objective listed in this section – maintaining and improving "engaging, compelling recreational opportunities" – is unlikely to achieve this future state.



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Foothills

- AWA supports the proposed action "The remote wilderness experience will be protected, trails maintained at their current state, and no new facilities will be developed."

Climate Change

- The draft plan makes no mention of future climate change, and how management of the park may need to adapt in future to climatic and moisture differences. Waterton National Park may have a role to play in 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.

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: Janice Smith, Waterton National Park, Parks Canada