



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Elk Island National Park
Site R.R.#1
Fort Saskatchewan, AB
T8L 2N7
(Attn: Management Planning)

January 11, 2011

Dear Sir/ Madam

Re: Draft *Elk Island Management Plan*

Thank you for the opportunity to comment on the draft Elk Island Management Plan. Please accept these as Alberta Wilderness Association's (AWA) official comments and recommendations for the draft 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 needs to be emphasized right at the beginning of the draft plan, in the *Introduction*, and it needs to be a core principle which prevails throughout the entire plan. In the current draft, the *ecological integrity* priority is not referred to until the very end of the draft plan, where *Section 12.6, Conclusion* mentions, seemingly in passing, that "Residual and cumulative impacts can be reduced by implementing Parks Canada's commitment to managing for ecological integrity as the first priority." This is not sufficient.

Visitor Numbers

AWA believes that, while welcoming visitors to the Park is an important priority, it must be clear that this must take place within the priority for maintaining ecological integrity. The target (page 14) "The number of park visits increases by two percent annually" gives no justification for why this target has been selected, and does not even give any timeline (ie is the number of visits to increase annually, in perpetuity, or just for the life of this current version of the plan?). This target must be removed.

Climate Change

The plan belatedly mentions climate change in section 12.3 *Environmental Analysis of the Park Management Plan*, where it says: "The park is being subjected to some internal cumulative stressors. Even greater are external cumulative stressors, such as climate change and intensive land use. The park management plan recognizes the implications and importance of these cumulative effects, and strives to avoid or mitigate them as best possible." But the plan gives no indication of how the effects of climate change will be "mitigated."



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Fixed-Roof Accommodation

AWA believes that there should be no fixed-roof accommodation in the Park. This may be appropriate at certain locations outside the Park for visitors to the Park.

Golf Course

The golf course should remain at its present footprint size, or less. Use of pesticides and fertilizers must be prohibited.

In conclusion, while AWA recognizes that there are many commendable elements to the draft management plan, there are 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