



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

January 25, 2017

Honourable Minister Catherine McKenna,
Minister of Environment and Climate Change Canada
Email: ec.ministre-minister.ec@canada.ca

Parks Canada Agency
Email: parlonsdeparcscanada.letstalkparkscanada@pc.gc.ca

RE: Minister's Round Table 2017 – Parks Canada Consultation

Dear Minister McKenna:

Alberta Wilderness Association (AWA) appreciates the opportunity to participate in the Minister's Round Table and provide written recommendations to the Minister of Environment and Climate Change Canada and the Parks Canada Agency to help improve the management of our National Parks. AWA believes it is essential that this consultation is being conducted broadly so that the public can be engaged. We also want to recognize the commitment to make submissions publicly available, thereby helping others learn about concerns and ideas from people across the nation.

AWA works throughout Alberta towards more representative and connected protection of the unique and vital landscapes that are the source of our clean water, clean air and wildlife habitat, including the five National Parks within the province. With more than 7,000 members and supporters in Alberta and across Canada, AWA remains committed to ensuring protection of wildlife and wild places. Please accept this letter as AWA's official submission.

Four Themes for Consultation

AWA attended the focused consultation in Calgary on January 18, 2017 and believes that the four Themes provided for comment do not sufficiently allow us to address ongoing concerns with Parks Canada Agency's performance of responsibilities, as required by the Parks Canada Agency Act. AWA has written about specific issues in Alberta's National Parks throughout its history; this submission includes those issues that in our opinion have not improved.

Parks Canada Performance of its Responsibilities

Parks Canada must strive for a commitment to ecological integrity, greater transparency, accountability, and scientific rigour in its management. AWA requests that Parks Canada:

1. State a firm commitment to the true nature and intention of protecting ecological integrity as the first priority in ensuring biodiversity, landscape health and human health within our National Parks.
2. Ensure *State of the Parks Reports* are independently contracted or independently reviewed to provide transparency, consistency and comparison with targets set from year-to-year.
3. Increase the transparency of Parks Canada's science programs by making scientific research and monitoring data publicly available on a routine and ongoing basis.
4. Implement an independent review of Parks Canada's decision-making processes to improve adherence to the Minister's mandate of ecological integrity and Park Management Plans.

Responding to environmental changes in Parks Canada places

Factors "external" to National Parks, including climate change and other environmental changes, are threatening ecological integrity by affecting biodiversity, species at risk, and wildlife movement.

National Parks are important places of relative integrity and resilience and will be important climate change refuges in the future, if managed well today. AWA recommends Parks Canada:

1. Re-invest in science and research. The recently released 2016 CPAWS Parks Report¹ reported that there was 202.8 million budgeted for national park visitor experience in 2015/16, but only 99.3 million dedicated to national park conservation. The Environment Commissioner's 2013 recommendations to reverse resource reductions for conservation science must be met.²
2. Comply with development and population caps and, in places where there are none, determine what those population limits should be in the foresight that visitation will increase. The town of Banff exceeding its statutory limit for the permanent resident population is an example of non-compliance and ignorance of legislated and policy-directed development limits. The cap of 8,000 permanent residents has been exceeded by over 400 people, according to the Banff 2014 Census. During the time between the release of the census and the present, developments have been approved which would presumably increase the town's permanent resident population. This is contrary to the Management Plan and against the Banff Superintendent's duty under the Banff Management Plan.
3. Improve and provide dedicated interpretive services resources that build and improve strategies and education initiatives about the dangerous and illegal practice of wildlife feeding. 2016 was an unfortunate and fatal year for the Bow Valley wolf pack due to pack members becoming accustomed to human food. Other wildlife, including birds and small mammals, are similarly affected by illegal wildlife feeding and improper waste disposal.
 - a. Visitor education about wildlife feeding should be incorporated at all stages of visitor registration: before entering (for example, during online or phone reservation for campsites or accommodations); at the time of entering (at the park gates, verbally and

¹ Canadian Parks and Wilderness Society. Protecting Canada's National Parks: A Call for Renewed Commitment to Nature Conservation. July 2016.

² 2013 Fall Report of the Commissioner of the Environment and Sustainable Development. Retrieved from http://www.oag-bvg.gc.ca/internet/English/parl_cesd_201311_07_e_38677.html#hd3d

- written); and after entering (for example, providing large, clear, visual signs in campgrounds and accommodations or communicated during education programs).
- b. Focus on increasing multilingual messaging, especially at the intercept point of parks gates.
 - c. Consider targeted patrol “blitzes” at problem areas. Associated media coverage would help get the message out at times of high visitor use.
 - d. Use social media as an education tool, rather than solely a Parks Canada marketing tool. Use not only Parks Canada-controlled social media and websites, but engage by commenting and linking Parks resources on other websites, meet-up sites, and social media.
4. Prioritize low-impact recreation over commercialized recreation. Commercial developments scar the “unspoiled wilderness scenery” (Jasper National Park of Canada Management Plan) and “majesty and timelessness” (Banff National Park of Canada Management Plan) of the Parks that visitors come to expect. While private companies have a role to play in tourism and perhaps interpretive services, too many increasingly rely on high-impact “adventure tourism” operations that require infrastructure and increased accommodations that go above ecological limits of the Parks. AWA maintains that visitors come to our National Parks to ***see unique ecosystems and beautiful landscapes and truly wild life, not a built environment.***
- a. Interpretive tours, guided hikes, museums, and amphitheatre programs are some examples of engaging, educational, and enjoyable low-impact recreation activities that should be prioritized, encouraged and restored to include knowledgeable Parks staff as part of the fees already paid to enter the gates, not as an add on fee-for-service by private companies.
 - b. Develop and implement stewardship programs. Parks Canada reported in 2016 that almost half of parks are not in “good” condition,³ meaning those Parks with “fair” or “poor” assessments of ecological integrity require restoration. Involving visitors in organized stewardship programs is exciting, fun, and would help achieve Parks Canada's conservation, education, and low-impact recreation objectives. Stewardship programs like assisting in the collection of data, flora and fauna restoration, or assisting at environmental education in communities should be more organized and facilitated by Parks Canada.
 - c. Prioritize deficits in existing recreation infrastructure before investing in new infrastructure. Back country trails that are no longer passable because of non-existent maintenance should be cleared and routinely maintained to allow for back country experiences that our National Parks should provide. In our Mountain National Parks, too much attention is given to major attractions when there is more for visitors to learn about and enjoy if they could have access.
 - d. Assess the impacts of large-scale recreational activities of all types, including races. An independent review of the cumulative impacts of large-scale recreational activities is needed. AWA has consistently maintained that large crowds in the habitat of sensitive wildlife during cub and calving seasons do not align with the intent and priorities of National Parks. Such events are inappropriate in that they do not interpret park values and are incompatible with a mandate to protect and interpret natural systems.

³ Parks Canada. State of Canada’s Natural and Cultural Heritage Places. 2016.

5. Develop a strategy for alternative transportation in those parks being impacted by large visitor numbers. Include provinces, environmental organizations, developers, municipalities, and the Parks Canada Agency in a coordinated discussion about the challenges of vehicle capacity as well as the impacts of visitor transport to climate change.
6. Immediately restore rigorous environmental assessment processes in National Parks. National Parks should be subject to the highest standard of environmental protection and activities within them warrant rigorous environmental assessments, as they “shall be maintained and made use of so as to leave them unimpaired for the enjoyment of future generations” (Canada National Parks Act). AWA submitted comments to the CEAA Review Panel regarding cumulative effects assessment and we propose those recommendations apply to National Parks (December 16, 2016). AWA also recommends as a starting point, to immediately restore the CEAA 1992 comprehensive list for projects, until such time that CEAA is revised. University of Calgary Environmental Law and CPAWS (letter dated December 23, 2016) found through Freedom of Information that 1533 projects approved between January 2013 and October 2016 were determined unlikely to cause significant adverse environmental effects under section 67 of CEAA 2012, including Activities proposed in that time period such as the Maligne Lake Cabins proposal and Lake Louise Ski Resort expansion. Restoring a comprehensive list for projects as was under CEAA 1992 would include opportunities for the public to be involved, increase transparency and oversight, and ultimately improve ecological integrity.
7. Fund restoration of ecosystems and recovery of endangered species. AWA has seen indications that recovery strategies in National Parks, such as for mountain caribou, ***aim for maintenance instead of recovery; this is not sufficient for critically endangered species at risk***. Stronger timelines for recovery targets, pairing recovery strategies with sufficient funding, and implementing urgent measures are required. For example, Jasper’s southern mountain caribou herds are in serious decline, with the Maligne and Brazeau herds reported to have only a handful of individuals this winter. Abundant sustainable tourism and recreation opportunities exist in the Park that are compatible with endangered mountain caribou recovery and should be supported, while ***incompatible commercial activities must be reduced and prevented***.
8. Protect Wood Buffalo National Park (WBNP) from UNESCO de-listing by reducing external stressors, establishing a buffer from industrial development around the park, and increasing monitoring and management of cumulative industrial impacts on WBNP wildlife and habitat. AWA agrees that the threats outlined in the 2014 Mikisew Cree First Nation UNESCO petition are real and that there is likely a trend towards further degradation of habitat in WBNP and on river corridors upstream of WBNP, including major North American migratory bird flyways. We request that Parks Canada devote more efforts to reducing cumulative impacts of external stressors on WBNP, particularly the internationally significant Peace-Athabasca Delta. Upstream Peace River hydro development has greatly reduced beneficial flooding events in the Delta; we request that Parks Canada increase its efforts to reach an agreement with BC Hydro for strategic flows on the Peace to restore Delta habitat. Threats to WBNP water and wildlife from upstream oil sands development include: permanent loss of peatlands and old forests in mineable areas; fragmentation of hydrology and habitat elsewhere in the oil sands region due to increasing linear disturbances; water quality risks from emissions/depositions; water quantity risks from groundwater and surface water withdrawals; and tailings ponds hazards to wildlife.

Establishing national parks and national marine conservation areas

1. Parks Canada must prioritize improving the state of existing National Parks to ensure ecological value is maintained and/or improved, while considering dedicating areas of representative

landscapes in need of conservation and protection in order to meet the goals of our National Parks system.

2. Comply with international targets and commitments including the Aichi Target and UNESCO requirements in coordination with Provincial mandates.

All Canadians expect that the management of our parks will be done without compromising the protection and legacy of ecosystems and significant wildlife and landscapes that make our National Parks such magnificent places. We urge you to commit to the priorities set out in Canada's National Parks Act and to comply fully with the Parks' Management Plans, reviewing and improving those plans as required with stakeholder and public input.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in dark ink, appearing to read 'Andrea Johancsik', written in a cursive style.

Andrea Johancsik,
Conservation Specialist

cc: Wayne Stetski, Critic for National Parks
Email: wayne.stetski@parl.gc.ca