



Alberta Wilderness Association

### **UPDATED: AWA's Companion Guide to the Castle Management Plan Survey**

On January 20<sup>th</sup>, the Government of Alberta released the draft management plan for the Castle Parks, which was updated on March 2017. In the consultation process, the government has developed a survey which asks questions about specific sections in the management plan. We know you may not have the time or interest to read a 166 page document so we've created a guide of excerpts that relate to each question. We've also included AWA's responses with our rationale.

**The deadline for public participation is April 19, 2017**

**Information** about the Castle Parks planning process and your opportunity for public comment here:

<https://talkaep.alberta.ca/CastleManagementPlan>

**Survey:** [https://talkaep.alberta.ca/CastleManagementPlan/survey\\_tools/CMPSurvey-N](https://talkaep.alberta.ca/CastleManagementPlan/survey_tools/CMPSurvey-N)

**Note: if you have already completed the survey once before**, there is a new link for your additional comments on the revised plan:

[https://talkaep.alberta.ca/CastleManagementPlan/survey\\_tools/CMPSurvey-Y](https://talkaep.alberta.ca/CastleManagementPlan/survey_tools/CMPSurvey-Y)

Skip to Question 21 (page 13 of guide) to see what has changed with the management plan revised on March 10.

**Parks map:** [https://www.albertaparks.ca/media/6493917/mgmtplan\\_castle\\_overview\\_final.pdf](https://www.albertaparks.ca/media/6493917/mgmtplan_castle_overview_final.pdf)

Page numbers (in brackets) throughout this document refer to the page on which the information in this document can be found in the management plan.

#### **1. To what extent do you agree or disagree that the objectives and strategies protect biodiversity, connectivity and species at risk found in these parks?**

##### *2.2.1 Biodiversity Management (Page 32)*

" Evidence-based decision making and clear management principles will guide the biodiversity or species-specific management within Castle Provincial Park and Castle Wildland Provincial Park. [...] Biodiversity management will include using the best tools and models available. These tools help determine appropriate levels of human activity to conserve and, where appropriate, enhance biodiversity. Areas demonstrating environmental degradation will be evaluated and prioritized for restoration or reclamation."

##### *2.2.2 Connectivity (Page 33)*

"The varied landscape creates abundant microhabitats that support specialized species that live in [the Castle Parks]. Many species found in the Castle region require large home ranges and/or are niche specialists. [...] The Castle area is bordered to the west by the Continental Divide of the Canadian

Rockies, which is an important wildlife corridor[...] A range of species migrate in and out of the Castle area, including mountain goat, bighorn sheep, grizzly bear, wolverine (Weaver 2013) and elk."

### 2.2.3 Species at Risk (Page 34)

"Within the Castle area, there are many conservation concerns including species that may be at risk or species at risk designated under federal or provincial endangered species legislation. [...] Some species, such as the vagrant (wandering) shrew, are found only in the Castle area in Alberta, while others such as grizzly bear are more widespread. [...] In the Castle area, to date, there is federally designated critical habitat identified for westslope cutthroat trout. Alberta Parks will work to protect species of conservation concern by incorporating known requirements into planning processes, implementing recovery plans and strategies, protecting critical habitat and collaborating with resource managers for activities such as monitoring, action implementation and assessments."

**AWA response:** Strongly Agree

**Comments:** *AWA is supportive of statements to develop linear disturbance threshold targets, establishing connectivity priorities and other appropriate linkages. The Castle is critical for many species with large home ranges. We are pleased that restoration is recognized as a priority for maintaining and restoring biodiversity values on the landscape.*

*We support commitments in the plan to protect current and future species at risk, and to protect and restore critical habitats. There is significant potential for the Castle to assist in the recovery of Species at Risk, for example threatened bull trout and westslope cutthroat trout. We recommend the inclusion of clearly outlined strategies to align all management decisions with recovery strategies.*

## **2. To what extent do you agree or disagree that the protection of the headwaters of the Oldman River Watershed should be a high priority in the management of these parks?**

*Note: This question provides sufficient information to answer the question without reading the recommended sections of the plan. However, here are some notable quotes from the sections that the survey guides you to:*

Page 4: "By protecting the important headwaters of the Oldman basin and the water resource within the area, the parks will contribute to the 'overall health and wellness of our population' (*Plans for Parks* 2009)."

Page 14: "This incredible diversity of habitats also forms the headwaters of the Oldman River and accounts for one third of the entire Oldman River watershed."

Page 24: "The quality of the air, water and soil is essential to the living things that inhabit the region, and the protection of these components is a critical part of the conservation mandate of [the Parks]."

Page 40: "The importance of protecting and maintaining headwaters is recognized in the *South Saskatchewan Regional Plan*. These special areas provide clean and clear water for humans and wildlife. Recent studies have highlighted the value of functioning headwaters as part of ecosystem services in providing clean drinkable water and protection from flooding events and erosion (Odell 2011)."

Page 41: "Riparian areas and wetlands frequently have an abundance of wildlife and biodiversity"

**AWA response:** Strongly agree

**3. Although hunting is typically not permitted in Provincial Parks, page 95 of the Management Plan states: "A broader suite of hunting opportunities is permitted within Castle Provincial Park to address the management of some species within the park and to minimize negative impacts on adjacent private land." To what extent do you agree or disagree that hunting should be used within the Provincial Park as an effective wildlife management tool?**

Current management of hunting (Page 97) "Licensed hunting is a permitted and managed land use within both park areas. Currently, Castle Provincial Park and Castle Wildland Provincial Park are fully contained within Wildlife Management Unity 400 (WMU 400)". Within Provincial Parks, "hunting is not typically permitted, with the exception of hunting that is used as a specific species management tool (e.g. the Cypress Hills Provincial Park elk hunt). A broader set of hunting opportunities is permitted within Castle Provincial Park to help manage some species within the park and to minimize negative impacts on adjacent private land".

Page 97 sets out that there will be regulatory requirements in the Provincial Park including: discharge buffers, game processing and carcass storage, and the requirement for hunters to obtain a parks discharge permit. For public safety reasons, hunting will be prohibited in a 183 metre no-discharge buffer around facility zones, roads, designated camping and day-use areas. Hunting may also be prohibited where it is not compatible with other recreational activities.

**AWA response:** Disagree

**Comments:** *AWA has outstanding concerns about the reasoning for allowing hunting in the Castle Provincial Park, but we support hunting within the Wildland Provincial Park as a compatible use. The only hunting currently allowed in an Alberta Provincial Park is the Elk management hunt in Cypress Hills Provincial Park. This is an exception that exists for a specific documented reason; we would request that analogously that any reasons are explained for the Castle Provincial Park. One of the cited reasons is that adjacent private land may be impacted by not allowing hunting within the PP. We would request that any information be disclosed about any documented negative impacts on landowners adjacent to other Provincial Parks before this reasoning guide the management of the Castle PP. AWA remains concerned about the reasoning for allowing hunting within the Provincial Park and the precedent it may set for future parks. We therefore request that hunting not be allowed in the Castle Provincial Park.*

**4. To what extent do you agree or disagree that a transition period is necessary for the elimination of recreational off-highway vehicle use in Castle Provincial Park and Castle Wildland Provincial Park to adjacent public lands?**

Information regarding the proposed phase-out of recreational off-highway vehicles:

Page 105: "Analysis of environmental data, reports and published science (including research related to biodiversity, critical habitats, linear thresholds, species at risk, riparian areas, erodibility and noise disturbance potential) confirms that recreational off-highway vehicle use at current or substantially reduced levels is incompatible with conservation goals of the park. OHV use is also incompatible with

quiet recreation experience and other-non-motorized recreation.”

“Castle Provincial Park and Castle Wildland Provincial Park have high levels of biodiversity, important headwaters that are highly susceptible to damage and critical habitat for species at risk, including genetically pure westslope cutthroat trout (a species that has a federal critical habitat order). To protect these ecosystems, landscapes and water resources, recreational off-highway vehicle use will not be permitted in Castle Provincial Park or Castle Wildland Provincial Park.”

A transition of off-highway vehicles is being proposed to allow "time to identify more suitable areas, and to make decisions around the types of engineered trails and funding sources required to allow recreational OHV use on other public lands."

By the fifth year of the transition period, OHV use will be discontinued on all remaining trails within Castle Provincial Park and Castle Wildland Provincial Park.

**AWA Response:** Strongly Agree

*This question is ambiguously worded - for example, you might answer that you 'strongly disagree' with a transition period if you believe that off-highway vehicles should be out of the parks immediately, OR if you believe that off-highway vehicle use is a compatible use.*

*AWA has chosen to use “strongly agree” as our response as we agree that OHV use is incompatible with parks values, but this not mean that we support a 5 year phase-out. We used the comment sections on questions 7, 15 and 21 to clarify and would encourage you to do the same.*

**Comments:** *AWA strongly agrees that OHV use is incompatible with Conservation Goals of the Parks and we are supportive of eliminating motorized use. However, plans to allow off-highway vehicle (OHV) use in the Provincial Park and Wildland Provincial Park for up to five more years constitutes a significant concern. The Castle encompasses an extensive network of trails used for OHV recreation – some designated and some not – that far exceeds linear disturbance density tolerances recommended in the recovery plans for species at risk that are found in the area, such as those for the grizzly bear and the westslope cutthroat trout. The elimination of logging, mineral extraction and new surface access to petroleum and natural gas commitments is a helpful step, but is not sufficient so long as the trail network remains in place. One without the other seriously limits the effectiveness of stopping the abuse.*

## **5. To what extent do you agree with the designation of rustic group camping areas in the provincial park?**

The rustic group camping areas are intended to encourage a more informal method of camping in order to accommodate "small to medium sized groups that prefer a group experience with little to no amenities provided." (p. 90) The intent of these opportunities is to accommodate the random camping experience that was permitted prior to the designation of the parks. These group camp areas will be hardened off and will have picnic tables, fire rings, a central washroom and garbage, and spots will contain between 3-6 RV units (p. 156).

Here's a link to download a copy of the rustic group camping concept diagram:

<https://talkaep.alberta.ca/CastleManagementPlan/documents/5328/download>

**AWA Response:** Strongly Agree

**Comments:** *AWA generally approves of random camping. However, random camping is a privilege often abused. Consistent management and enforcement must be in place. Fourteen day limits on random camping are appropriate and offer ample opportunity to hikers and campers to explore and enjoy the surrounding wilderness areas. In the Castle and elsewhere on the Eastern Slopes these limits are being ignored; some campers are simply squatters, setting up semi-permanent camps that last over the course of the season and often over several years. Random camping, if unchecked, often places particular pressure on riparian habitat which is by far the most important for most forms of wildlife. Therefore, we are supportive of the proposal to provide “rustic group camping” opportunities in order to accommodate this need, stressing the need to avoid sensitive areas when creating these opportunities. We believe that these opportunities should be provided at a low cost and available on a first-come, first serve basis in order to accommodate local communities. We support the management of human waste at these sites through the installment of washrooms and garbage receptacles.*

## **6. Conservation and Protection**

Section 2 is a broad section that addresses how conservation will be achieved within both parks. Some notable objectives and sections include commitments to protect the headwaters of the Oldman River (p. 41), manage Species at Risk (p. 35), and to reintroduce wildfire onto the landscape (p. 47). Discussions of how grazing will be managed are also addressed in this section, with commitments to maintain fescue grassland, minimize user conflicts, and reduce livestock impacts to riparian areas and alpine regions (p. 49).

*We have included the objectives of Section 2 below, along with the page where the objective and strategies are located (in brackets) so that you can easily navigate to the page you are interested in.*

- Protect the unique geological and geomorphological features and resources in the Castle area (27)
- Allow natural geological and geomorphological processes to occur in areas where they do not impact facilities, infrastructure or species of special concern (27)
- Maintain and protect the natural visual integrity within the Castle area (30)
- Encourage the protection of viewscapes of surrounding lands not managed by Alberta Parks (30)
- Develop thresholds and targets to manage biodiversity values across the landscape (32)
- Ensure connectivity corridors and identified and maintained (33)
- Identify and protect rare and globally significant ecosystems, rare and globally significant plant species and areas of special ecological concern (35)
- Protect, maintain or enhance habitat for species of concern (35)
- Protect current and future species at risk identified through the federal *Species at Risk Act* and the *Alberta Wildlife Act* (35)
- Maintain native forests and grasslands to conserve their extent, health and biodiversity (37)
- Maintain the sustainability of native plant communities within the Castle Parks (37)

- Protect the diversity and abundance of fauna and their habitat (38)
- Protect the headwaters of the Oldman River Watershed (41)
- Maintain and enhance water quality and quantity in the Castle area (41)
- Protect and enhance the integrity of riparian and wetland systems (41)
- Develop a Vegetation Management Strategy with the primary objective of conserving natural biodiversity (43)
- Manage and monitor invasive species, insect and pathogen infestations according to Government of Alberta policies, legislation and best practices (45)
- Explore the use of fire as a vegetation management strategy (47)
- Enhanced conservation and management of native grasslands will be achieved through sustainable grazing and range management practices that support the overall conservation intent for both Castle Provincial Park and Castle Wildland Provincial Park (50)
- Align management practices with provincial climate change strategies (52)
- Identify and protect historic resources for the purposes of scientific study and visitor education and enjoyment (55)
- Protect or enhance sites identified as important for practicing First Nations traditional uses (56)
- Encourage conservation efforts and initiatives on adjacent public and private lands that optimize conservation practices and enhance wildlife corridors and habitat (57)

**AWA response:** Agree

**7. Please provide any specific comments related to the Conservation and Protection section.**

*We encourage you to use this box to clarify any of your statements, but especially the response to question 4. This is also a good opportunity to provide any comments on feedback related to Section 2.*

**Comments:** *AWA is supportive of statements to develop linear disturbance threshold targets, establishing connectivity priorities and other appropriate linkages. AWA is supportive of restoration being recognized as a priority for maintaining and restoring biodiversity values on the landscape.*

*AWA supports commitments in the plan to protect current and future species at risk, and to protect and restore critical habitats. We recommend the inclusion of clearly outlined strategies to align all management decisions with recovery strategies.*

*We remain concerned with the proposal to allow OHV use for up to five more years in the Castle. Trails and motorized activity in areas outside the designated critical habitat, such as hill slopes paralleling the stream outside the buffer, or upstream of the critical reaches, still cause siltation that flows downstream and becomes a threat to that habitat. We would like to reiterate that it is illegal under SARA to damage critical habitat. Recovery of westslope cutthroat trout cannot take place in the presence of ongoing motorized activity. AWA respectfully requests that all motorized recreation be banned from the Castle Provincial Park and the Castle Wildland Park immediately.*

*AWA agrees with the emphasis of this section on the importance of headwaters protection and acknowledging the potential of the Castle to restore threatened fish species. We are supportive of the*

*objectives and strategies within this section and suggest that specific goals for restoring hydrological function of this landscape are included.*

*AWA is supportive of reviewing grazing and range management practices to ensure they are managed in a manner that prioritizes conservation and are consistent with protected areas. The establishment of the Castle Parks provides an opportunity to rectify past management practices for cattle grazing and to restrain the invasion of non-native species. Wherever intensive livestock grazing has occurred in the Castle over the past several decades, plant communities have been converted from native species to a combination of non-native grasses, native forbs and shrubs, and non-native weedy species. By removing competing herbaceous species, grazing may also have contributed to the invasion of woody plant species. We maintain that cattle impacts to riparian areas, the upper alpine and the alpine need not only be reduced but eliminated, which will mean curtailing livestock grazing throughout the Castle. Past calculations of stocking rates included areas that cattle won't use, such as steep slopes and other areas away from riparian corridors. This resulted in an artificial inflation in the number of AUM's available and has resulted in overgrazing in the areas cattle actually use. It is also essential to avoid grazing where competition with wildlife will occur, in order to restore populations of native grazers such as elk. AWA believes a more holistic approach where due attention is also paid to environmental and wildlife issues is required. This means that reducing the stocking rate in some areas will be necessary.*

## **8. First Nations**

*We have included the objectives of Section 3 below, along with the page where the objective and strategies are located (in brackets) so that you can easily navigate to the page you are interested in.*

- Develop an effective and practical model for the cooperative management of Castle Provincial Park and Castle Wildland Provincial Park (62)
- Identify opportunities to recognize and share First Nations culture and history (62)
- Develop cultural sensitivity and awareness training for provincial park staff (62)
- Protect First Nations ceremonial and cultural sites (62)
- Consult First Nations when vegetation management activities are proposed that may adversely affect traditional use activities (62)
- Ensure the protection of traditional use sites where materials for cultural, ceremonial and historical practices are located (62)
- Enable access to traditional use sites (63)
- Identify and name natural, cultural and historic sites or features using Indigenous names (63)
- Ensure that First Nations can hunt, fish and trap for food in both parks (63)
- Protect and/or enhance areas that are important for First Nations hunting, fishing and trapping for food (63)
- Explore opportunities for First Nations to participate in Castle Park operational activities (63)

**AWA Response:** Strongly agree

## **9. Please provide any specific comments related to the Conservation and Protection section.**

**Comments:** AWA is highly supportive of active engagement and collaboration with First Nations, including cooperative management of the Castle PP and WPP.

## **10. Tourism and Community**

*We have included the objectives of Section 4 below, along with the page where the objective and strategies are located (in brackets) so that you can easily navigate to the page you are interested in.*

- Ensure that visitor facilities provide a wide range of services that support nature-based recreation and tourism and are consistent with the conservation objectives of the park (67)
- Develop infrastructure that will encourage and support multi-day visits and that is complementary to opportunities in the region (67)
- **Provide accessible infrastructure to facilitate experiences for all park users (67) \*NEW\***
- **Ensure access to the Castle Parks from the north (Crowsnest Pass) and from the east (Beaver Mines and Pincher Creek) (67) \*NEW\***
- Support the creation of mutually beneficial and complementary tourism facilities, services and development opportunities within the Castle region (69)
- Support local, regional and provincial tourism developments that will encourage multi-day stays within the region (69)
- Foster a sense of community stewardship for the Castle area along local communities and encourage community engagement (71)
- Engage in local communities (71)
- Maintain open and productive dialogue with local communities regarding the management of the Castle area (71)

**AWA response:** Agree

## **11. Please provide any specific comments related to the Tourism and Community section.**

*Consider including any details regarding what your vision is for the Castle area: would you like to see more opportunities for backpacking, horseback riding, tent camping, berry picking, mushroom picking, wood cutting etc.*

**Comments:** AWA generally agrees with the intention of this section, however, we believe that increasing motorized access of any kind is contrary to the goals of restoring wilderness. AWA believes that highway-side regions inside the park boundaries are best left undeveloped and gateway community development should be encouraged. We agree with providing opportunities for recreational activities and wilderness experiences, as long as they are compatible with the overarching conservation objectives of the parks. The proposal to build a visitor centre along the main roadway south of Beaver Mines seems appropriate, given that this area is already developed and contains retail services. This will build on existing services in the area and will provide positive additions to the economy of the regions without creating new disturbances. We agree that facility development within the WPP should be minimal, not encourage urbanization and focus largely on opportunities for backcountry use, and that responsible and sustainable wilderness experiences will serve as a critical component of the success of these parks.

## 12. Visitor Services

*We have included the objectives of Section 5 below, along with the page where the objective and strategies are located (in brackets) so that you can easily navigate to the page you are interested in.*

- Develop a Visitor Services plan (75)
- Take an active role in developing, enhancing and managing visitor experiences in the park (75)
- Prepare a marketing plan (77)
- **Provide accurate, relevant, consistent, timely and current information for clients throughout all phases of the visitor experience cycle (79) \*NEW\***
- **Provide opportunities for public to connect with park staff directly and through phone, email and social media tools (79) \*NEW\***
- Conduct outreach activities to educate, inform and promote (81)
- Enable opportunities for guided park experiences (81)
- Provide non-personal interpretation material throughout the park (81)
- Provide opportunities for local communities and First Nations to share their stories (81)
- Position the Castle area as a prime location for outdoor skills development and nature-based programming (81)
- Where appropriate, ensure effective reservation service are available for park-managed accommodations and experiences (83)
- Develop an Events Strategy (83)
- Consider the feasibility and structure of a volunteer program that will encourage individuals and communities to engage with the park system and build stewardship (85)
- Explore strategic partnerships to encourage external engagement and support park mandates (85)
- Develop mechanism for managing citizen science (85)

**AWA Response:** Strongly agree

## 13. Please provide any specific comments related to the Visitor Services section.

**Comments:** *AWA is supportive of interpretive, educational and experiential programs being provided in the park. This includes the provision of interpretive kiosks, signs and pamphlets, as well as supporting youth participation in outdoor education. We believe this is an important way for visitors to learn more about their natural environment and promotes stewardship and use of the area. AWA is concerned about the proposal to allow larger scale events such as music festivals and sporting competitions into not only the Castle parks, but other protected areas throughout the province. AWA is concerned these events lead to the commercialization or urbanization of these parks and parks should primarily uphold the natural wilderness values that are expected in protected areas.*

## 14. Outdoor Recreation and Healthy Living

This is another broad section that addresses a wide range of issues, some (like hunting and off-highway vehicles) having been addressed in their own separate questions. Notable objectives and proposals include: details on what is being considered for camping (backcountry, front country, "comfort-

camping") (p. 90), trail development (p. 92), extreme sports (caving, mountaineering; p. 94), and sport fishing (p. 102).

*We have included the objectives of Section 6 below, along with the page where the objective and strategies are located (in brackets) so that you can easily navigate to the page you are interested in.*

- Provide a wide range of recreational activities and visitor experiences that are consistent with the conservation objectives of the park (88)
- Provide a range of high-quality camping experiences that are consistent with the Castle Provincial Park and Castle Wildland Provincial Park classifications and the overall conservation intent of the parks (91)
- Develop trails within Castle Provincial Park and Castle Wildland Provincial park to accommodate a wide variety of high-quality experiences for current and future park users (93)
- Develop and implement a "Share the Trail" Communications Strategy (93)
- Manage the impact of trail development and types of use to be consistent with biodiversity thresholds (93)
- Develop a network of trails that provide a range of high-quality visitor experiences and contribute to the development of tourism in the region (93)
- Identify opportunities, issues and concerns around extreme sports such as caving, climbing, mountaineering, slack-lining and base-jumping (94)
- Assess, manage and develop opportunities for commercial and guided recreation experiences (95)
- Assess, maintain and enhance opportunities for water-based recreation activities (96)
- In Castle Wildland Provincial Park, manage hunting according to the current hunting regulations and allocation process (99)
- In Castle Provincial Park, Alberta Parks will work collaboratively with Alberta Fish and Wildlife to manage hunting (99)
- **Collaborate with fish and wildlife associated groups to determine best practices and develop guidelines to allow for limited use of Off Highway Vehicles for the purposes of game retrieval (99) \*NEW\***
- Manage existing Registered Fur Management Areas within Castle Provincial Par and Castle Wildland Provincial Park in collaboration with Fish and Wildlife (101)
- Maintain sportfishing opportunities in the Castle Parks (103)
- **To respect and protect the exceptional conservation values of the Castle area, ~~off highway vehicle (OHV) use (winter and summer)~~ summer recreational off-highway vehicle (OHV) use will not be permitted (106) \*NEW\***
- Defragment habitat and landscapes that have been disturbed by off-highway vehicle and industrial use (106)
- **Winter Recreational Off Highway Vehicles (107) \*NEW\***
- Alberta Parks will respond to initial public safety incidences and will partner with local authorities and agencies for larger or more complicated responses (108)
- Manage human-wildlife interactions for conservation purposes and visitor experience (108)

**AWA Response:** Neither agree nor disagree

**15. Please provide any specific comments related to the Outdoor Recreation and Healthy Living section.**

*Use this opportunity to provide your support for and/or any concerns regarding the outlined recreation proposals. This is also a good opportunity to provide information on any expertise you may have on specific recreation opportunities in the area (do you know any good hiking trails? biking trails?).*

**Comments:** *Camping - AWA has concerns about proposals to build hostel style accommodation within the parks. We believe that highway-side regions inside the park boundaries are best left undeveloped and gateway community development be encouraged instead.*

*Rustic Camping – See question 5 (above) for AWA’s comments on the rustic camping proposal.*

*Hunting – See question 3 (above) for our submission prior to the March changes in the plan. See question 21 for AWA’s additional comments on the revised changes to the plan.*

*OHVs - Motorized recreation is not compatible with ecosystem protection, let alone ecosystem restoration. Plans to allow off-highway vehicle (OHV) use in the Provincial Park and Wildland Provincial Park for up to five more years constitutes a significant concern. We would like to reiterate that it is illegal under SARA to damage critical habitat and that recovery of westslope cutthroat trout cannot take place in the presence of ongoing motorized activity.*

*We understand the phase out of off-highway vehicles has been proposed in order to allow time for the government to identify more suitable areas and to determine appropriate sites to allow OHV use on other public lands. This work by the government could be completed in much less time than the currently proposed 3-5 year window and AWA believes is not sufficient reasoning to delay sound decision making for our parks. AWA respectfully requests that all motorized recreation be banned from the Castle Provincial Park and the Castle Wildland Park immediately.*

**16. Research, Monitoring and Adaptive Management**

The objective of Section 7 is to "encourage research in and about the Castle area (p. 110)", with an outlined system of providing permits to researchers.

**AWA Response:** Strongly Agree

**18. Provincial Park Zoning Framework**

"Zoning is a tool for managing Provincial Parks and Wildland Provincial Parks that have multiple objectives and management priorities. Zoning works by dividing each park into spatial units based on coarse ecological values, consistent management objectives and permitted uses. Once set, zones require public consultation to amend or change; this process is designed to offer security and transparency in terms of large changes to park management intent." (p. 115)

Page 116 of the plan outlines the four types of zones that are allowed in park management:

1. *Natural Landscape Zone*: The conservation of nature is the primary objective, allowing for a range of nature-based, low-impact outdoor recreation, tourism and learning opportunities. Incorporates most of the natural or near-natural landscape outside of a Wilderness Zone. Includes wilderness areas that do not meet criteria for Wilderness Zone due to industrial commitments.

2. *Wilderness Zone*: Large remote areas that are free of industrial activities, are relatively undisturbed by human activities and where there are no roads. Typically >10,000 hectares, but smaller areas that may exemplify remoteness and distance from road access may justify inclusion. Conservation of biodiversity is a primary focus where natural forces and processes predominate. Public access must be managed to a level that maintains remoteness and wilderness qualities. Backcountry/wilderness setting and few if any facilities and designated trails kept to a minimum.

3. *Facility Zone*: Outlines and confines development and facility footprint to a strictly bounded area. Minimizes extent of impact on natural values by curbing "development creep". Facility-oriented and focused on infrastructure related to visitor experience. Facility zones are best limited to areas with current facility footprints or areas identified in approved or publicly developed plans that have undergone environmental review

4. *Special Protection Zone*: These zones are designed for the conservation or showcasing of superlative, sensitive, unique or rare features or areas such as natural and cultural features of provincial or greater significance. Uses in each Special Protection Zone will be prescribed for each site on an "as needed" basis. Access and/or use may be restricted or prohibited in the zone in either space or time. Facilities are limited to those necessary to safely experience the site, but may be entirely restricted otherwise.

Zoning proposal:

*For facilities*: Interim (2-5 years) facility zones have been proposed to allow the use, maintenance and upgrading of existing infrastructure. The facility zones "will formalize areas for rustic group camping opportunities, visitor services and park operations. The facility zones will also capture areas where there is existing camping and day use development". The facility zones that encompass proposed rustic group camping areas were primarily placed in areas that have been previously disturbed.

The proposal for the interim facility zone locations is available here:

<https://talkaep.alberta.ca/CastleManagementPlan/documents/5297/download>

*The rest of the park*: other zones will not be formally established at this time; the default zone for Provincial and Wildland Provincial Parks is the natural landscape zone. In the future, the wilderness zone and protection zone may be considered where there are areas or features that are compatible with the intent of these zones.

**AWA response:** Agree

**19. Please provide any specific comments related to the Provincial Park Zoning Framework section.**

**Comment:** *AWA believes that the Natural Landscape Zone being used as a default should be amended as soon as possible as we believe the Wilderness Zone is more suitable to conserve the larger undisturbed wilderness landscape of the Wildland Provincial Park. We look forward to more protective zoning being placed inside these parks.*

**21. Please share any further thoughts and opinions you may have on the modifications to the revised Draft Management Plan – March 10, 2017**

The revised Draft Management Plan includes the following:

**Grazing:** This section has explicitly clarified that existing grazing allotments and preference quotes that have been previously established for the Castle area will be honored. Grazing allotments within the Castle Area will be managed under the Forest Reserves Act and the Rangeland Agrologist will be the primary point of contact. There are commitments within the plan for range management plans to be informed by range and riparian health assessments, conservation objectives for critical habitat, protection of critical fish habitat and the vegetation management strategy. There are also commitments to apply best management practices to minimize the impacts of livestock grazing in sensitive areas such as riparian areas and alpine sites.

**Park Facilities and Infrastructure:** Accessibility to the Castle Parks for persons with limited mobility, including the elderly will be explored. A fully accessible pathway around Bathing Lake will be constructed with accessible fishing platforms, and Alberta Parks will explore opportunities “to reach select back country locations in Castle provincial Park, using trails or roads specified for that purpose”. There are also new commitments within the management plan to maintain key road access into the Castle Parks along the Adanac and Sartoris roads, as well as along highway 774.

**Hunting:** A major change in the revised management plan is that off-highway vehicle use, such as quads may be permitted for the retrieval of game on a network of access trails specifically designated for those purposes.

A new objective was added, “Collaborate with fish and wildlife associated groups to determine best practices and develops guidelines to allow for limited use of Off Highway Vehicles for the purposes of game retrieval”. An added strategy outlines that the government will review best practices and will develop guidelines for the use of OHVs for the purposes of retrieving game.

**Recreational Off-Highway Vehicles:** There are no longer commitments to discontinue recreational off-highway vehicle use south of highway 774 immediately or to transition out remaining OHV use by the second year. The plan has committed to the ‘transition’ out of summer use of off-highway vehicles in a 3-5 year window. There are additional considerations being made as to whether winter recreational OHVs are a compatible park use, the plan suggests that a review of the impacts of snowmobiling is underway.

**Comments:** *Grazing – See AWA’s comments on question 7.*

*Park Facilities and Infrastructure - AWA requests that a review be conducted to determine the amount of linear disturbance within the Castle Parks and their potential impacts on the environment, given that the plan has committed to keeping these access roads open.*

*Hunting – AWA has outstanding concerns with permitting hunting in the Castle Provincial Park, but we support hunting within the Wildland Provincial Park as a compatible use (see question 3 for details). The science is clear that the use of off-highway vehicles is not compatible with the conservation objectives of these parks, and we do not support the use of off-highway vehicles within these parks for game retrieval. Keeping motorized trails open explicitly for this use will not alleviate the soil compaction problems that the trails themselves cause and will not allow the parks to act as a wildlife refuge if motorized access in the backcountry is permitted. Additionally, there has been no scientific review conducted to determine what the linear density within the Castle Parks will be when these trails are left open. AWA believes that more traditional forms of game retrieval (by horsepack) are a more compatible use with parks values. This will have the additional benefit of supporting local outfitters and guides in the area.*

*Recreational OHVs - Snowmobiles also cause widespread impacts on the environment. Winter is a particularly stressful time for many animals as they cope with lower food availability and higher metabolic demands. Snowmobiles can cause increased stress levels, displacement and changes in animal behavior. The disturbances caused by snowmobiles can increase stress levels and increase energy output, placing additional demands on wildlife. The snowmobile trails themselves also cause impacts. Compacted snowmobile trails are used readily by coyotes, which means that they are able to hunt in areas normally not accessible to them and increases inter-specific competition with other predators such as Canada Lynx. Compacted snow by snowmobiles also severely limits movement under snow for small mammals and invertebrates. Even moderate snow compacting can cause widespread deaths of small mammals, reducing their ability to burrow in snow for insulation.*

*AWA supports the decision to remove OHVs from the Castle Parks. However, we believe that the decision to continue OHV use for up to five years may delay building a positive and loyal visitor base for many years, therefore delaying providing benefits to adjacent communities. We understand the phase out of off-highway vehicles has been proposed in order to allow time for the government to identify more suitable areas and to determine appropriate sites to allow OHV use on other public lands. This work by the government could be completed in much less time than the currently proposed 3-5 year window and AWA believes is not sufficient reasoning to delay sound decision making for our parks.*

**22. Please provide any additional comments on the draft management plan:** *Please indicate any additional thoughts on the proposed plan and proposal to protect the Castle*

**28: Please identify your primary activities in the Castle area:** *Please complete this question so that there is an indication of what activities you have participated in the Castle area or what you will anticipate participating in the future. If you have not been to the Castle, check the activities you enjoy in other parks and protected areas in Alberta.*