



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

July 7, 2021

Hon. Jonathan Wilkinson
Minister of Environment and Climate Change Canada
Via e-mail: ec.ministre-minister.ec@canada.ca

2021 Jasper National Park Draft Management Plan

Dear Minister Wilkinson:

Alberta Wilderness Association (AWA) appreciates the opportunity to provide comments on the Draft 2021 Jasper National Park Management Plan.

AWA, founded in 1965, 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. With 7,500 members and supporters in Alberta and across Canada, AWA remains committed to ensuring protection of wildlife and wild places in Alberta for all Canadians.

There are some positive aspects of Jasper's draft Plan, including:

- conservation Objectives in Strategy 1 for invasive species and aquatic ecosystems;
- the Target to maintain or improve grizzly bear habitat security in each bear management unit; and
- commitments to extend Indigenous knowledge and participation in planning, conservation actions and education.

However, in many places, the Plan needs clearer and stronger Targets to support ecological integrity priorities, including:

- more precautionary and specific land-use management Targets within the 'Managing Development' and Visitor Experience ('True to Place Experiences') strategies, to prevent them from undermining the Conservation Objectives for ecological integrity;
- stronger Targets for high impact environmental education, delivered by Parks Canada, to reach a higher proportion of visitors and residents; and
- stronger precautionary access management decisions in caribou ranges to avoid the approaching caribou extirpation catastrophe.

As well, more of the specific indicators used to monitor key biodiversity parameters should be identified in this Management Plan, and there should be a commitment that annual public reports will include more detailed reporting of them.

Clear Targets and indicators will greatly improve the Plan's ability to fulfill its purpose of "outlining how park management will achieve measurable results in support of the Agency's mandate." (p. 1)

AWA offers the following more detailed comments:

Ecological Integrity

AWA supports the Plan's acknowledgement that "maintaining and restoring ecological integrity is the first priority in park management" (p. 11), a paraphrase of s. 8.2 of the *Canada National Parks Act*.

We also appreciate this strong core statement in Strategy 1 on Conservation: "Knowing that uncertainties exist, Parks Canada's ecosystem management, conservation and restoration initiatives will be built on the best available science and Indigenous knowledge in support of a precautionary, adaptive approach that provides for evolution of management policies and practices based on the monitoring of outcomes."

Backcountry Management Areas and Environmentally Sensitive Sites

AWA strongly supports the continued management of the Maligne Lake outlet and mid-Maligne River corridor to support harlequin ducks, including seasonal closure of the mid-Maligne River to instream recreational activity, and managing human activity and development in the vicinity of the outlet.

AWA strongly supports the consolidation of human activity in Edith Cavell Meadows to benefit vegetation communities and caribou.

AWA supports the concept of a Management Area. However, the Tonquin Valley is insubstantial as drafted: the two drafted Targets are vague and slow in relation to the imminent extirpation threat to Tonquin caribou.

Maligne Valley could benefit from a Management Area emphasis, to secure and improve its important diverse habitat values. We recommend setting Maligne Valley Targets including:

- improving grizzly bear habitat security in Maligne Valley;
- maintaining and improving harlequin duck habitat security by managing human activity and development in the Maligne Lake outlet and mid-Maligne River;
- prioritizing access management for Maligne caribou range re-occupation, including ending winter road plowing; and
- prohibiting new overnight commercial visitor accommodation in the Maligne Valley.

Accountability through Indicators

Public transparency and accountability for Parks Canada's ecological integrity results appears to be markedly declining. We do not support the decision to place almost all performance metrics outside the 10-year Management Plan. There were considerably more, and more specific, indicators identified in the 2010 Management Plan, and this accountability should be re-instated in this Management Plan.

Transparent, timely reporting of these indicators should also be enhanced. Recent Annual Reports have been very high level, with little to no time series graphs for important biodiversity indicators. The 2018 State of the Park report is also very high level and qualitative.

We request that the main indicators to track key biodiversity and ecological processes (e.g. species at risk populations and mortality, mammal occupancy, aquatic connectivity, aquatic invertebrate communities) as well as key human use pressures upon biodiversity be clearly identified in an Annex of the finalized Management Plan. For greater public accountability, there should also be a commitment that annual reports will include these key data in time series, as well as summary qualitative Index and

Trend ratings. This national park ecological information should be easily available to the public, not just upon request or in forum presentations.

Southern Mountain Woodland Caribou

Jasper National Park has failed to meet caribou targets in the 2010 Management Plan and 2017 *Multi-Species Action Plan for Jasper National Park of Canada*, (the Action Plan), including the Action Plan's population objective of "stable to increasing numbers to a minimum of 100 animals". Instead, as the draft Plan notes, Maligne caribou are extirpated and "the Tonquin and Brazeau herds in southern Jasper are at imminent risk of dying out due to their small numbers." (p. 5).

In many respects, AWA supports Objective 1.5 to "Maintain or restore natural wildlife distribution, abundance and behaviour, with a focus on human-wildlife coexistence." (p. 13) Species at risk such as caribou are an exception and should be recognized as such: they are critically imperilled and have no other secure habitat, whereas people have ample recreation and economic opportunities outside Jasper caribou ranges.

Jasper has not achieved the Action Plan's Desired Outcome to "maintain safe and secure high quality habitat, without human-facilitated predator access". The Management Plan's caribou Targets must reduce current human use impacts, not only predator access to ranges, but reducing risks of caribou stress and habitat displacement from human presence. In Tonquin, caribou preferred habitat areas are highly transected by trails and are within the zone of influence of several backcountry lodges and campgrounds (Czetwertynski and Schmiegelow, 2014).

The following caribou-related guidance points indicate a concern, but they are far too vague and lack completion dates:

- 'mitigate' caribou threats - Target 4 in Objective 1.3 (p. 12)
- 'consider' adjusting overnight backcountry operations - Development Guidance (p. 22)
- Tonquin Management Area targets (p. 29)

In the face of impending caribou extirpation, AWA requests these precautionary Targets:

- stop winter human-facilitated predator access and stressors by ending Tonquin backcountry access for the whole snow season, starting this winter;
- revoke the approval of the Tres Hombres downhill ski runs in Tonquin caribou range, starting this winter;
- by summer 2022, review and reduce impacts of current intensive summer-fall backcountry access in Tonquin; and
- prioritize managing the prime, recently occupied Maligne caribou range for caribou re-occupation, by ending the winter plowing of the Maligne Road past Maligne Canyon.

AWA appreciates that Parks Canada recently conducted and released results of a technical evaluation by external experts of a conservation breeding program for Jasper caribou. Parks Canada should set an earlier target than 2025 to make a decision on this (p. 12), while as many caribou as possible remain in these ranges. To be both viable and ethical, the dire approach of conservation breeding must be preceded by the above stringent precautionary access management measures.

For A La Pêche caribou:

- AWA supports Objective 1.3, Target 6 (p. 12); it is a good example of a specific time-bound action to assess and adjust backcountry visitation patterns to protect caribou, in this case the A La Peche population which is more secure than the Tonquin and Brazeau;
- For Objective 4.3, we ask that Parks Canada specifically state its intention to contribute to Alberta's upcoming sub-regional planning process for A La Peche caribou; this is an important opportunity to improve connectivity and reduce cumulative land use impacts.

Grizzly Bears

We appreciate that habitat security for grizzly bears has improved over the past ten years due to land use and visitor management, according to Jasper's 2018 State of the Park report. However, it is still rated as in only Fair condition. Visitation pressure on grizzly habitat is very concerning. As the State of the Park report notes, there was a four-fold increase in grizzly/black bear-human interactions in the five years up to 2017, compared to the period prior to 2010, indicating increasing risk of stress and mortality for bears.

AWA strongly supports the second Target in Objective 1.1 that 'Grizzly bear habitat security is maintained or improved in each bear management unit'.

In addition, we strongly urge including a Target or Guidance to 'Prohibit new overnight commercial visitor accommodation in the Maligne Valley' to secure grizzly habitat there.

Like the 2010 Management Plan, the 2020 Plan should include specific measurable population indicators for grizzlies.

Traditional Knowledge and Land-Use

AWA strongly supports increased involvement of Indigenous communities in the management of Jasper National Park. We are encouraged by the objectives described in the draft Plan, to further consult with local Indigenous peoples and incorporate traditional knowledge, land use and language into Park management.

Managing Development

Ecological integrity of the Park relies on restoring and maintaining wilderness attributes in the Park's front country and backcountry areas. As drafted, Objectives and Targets in Strategy 5 are too weak, and could be applied to erode ecological integrity. AWA requests a specific commitment that human footprint outside Jasper will not be expanded and that actions will be taken to reduce current footprint on a prioritized basis.

AWA is concerned the Commercial Development Guidance is too weak outside Jasper townsite, and that commercial interests and visitor number objectives will over-power ecological integrity concerns, for:

- Marmot Basin ski area development reviews;
- development or redevelopment proposals within leasehold agreements of other commercial lessees outside Jasper townsite; and
- Jasper SkyTram potential leasehold reconfiguration and related adjustments to zoning and declared wilderness area boundaries.

We do not trust the current assessment of footprint re-allocation or development outside Jasper townsite. For example, in our view, the best available evidence is that the approved Marmot Basin leasehold land swap was not a net ecological gain. A commissioned expert concluded that the proposed

Marmot Basin expansion of Tres Hombres downhill ski area would further degrade the Whistlers Creek critical habitat of Tonquin caribou (Czetwertynski and Schmiegelow,2014). Yet Parks Canada approved it.

Instead, in assessing leasehold changes and footprint redevelopment outside Jasper townsite, AWA requests these stronger safeguards and assurances:

- publicly transparent, timely and independent assessment of impacts;
- clear net ecological gain; and
- reduced visitor impacts to sensitive species and their habitat.

We support the review and closure of the Jasper airstrip, which is inappropriate in the sensitive montane grassland area.

Visitor Impacts, Experience, Education

In addition to the 'species at risk' consideration noted above, AWA has these suggestions for maintaining and restoring wildlife distribution through managing human-wildlife coexistence, under Objective 1.5 (p. 13):

- strengthen ambiguous language so as to clarify that actions will be taken to reduce elk and bear railway and highway mortality
- commit to increased resources for high quality Parks Canada-delivered education of visitors and residents even while the implementation plan for visitor-wildlife coexistence is being developed between now and 2025;
- give examples of the "innovative strategies and tools [to] reduce wildlife habituation and more effectively manage visitor wildlife interactions." (p. 13)

For Jasper visitor use management:

- AWA strongly supports the development of a visitor use management framework (Objective 2.2, p. 15);
- the visitor use management framework Target should be to reduce ecological impacts through changes to transportation, parking and commercial operations;
- deadlines should be added for developing the framework and implementing it;
- the Jasper Plan should include the following statement that has been added to Banff and Waterton Lakes National Parks' draft management plans: "Research has shown [...] that building more parking and pull-offs is, at best, a temporary solution"; and
- we support the review of e-bike impacts, and we underline that 'ecological integrity' should be the first priority.

For visitor education, AWA would like to see:

- clearer support for expanding delivery of non-commercialized education on the Park's wilderness values and for people to take actions in the best interest of wildlife; we do not see clear Targets that will necessarily achieve that in the learning opportunities outlined in Objective 2.4;
- stronger Targets to reach a higher proportion of visitors and residents by a certain time; and
- establishing a short, online training program for backcountry users before receiving a camping permit. This program should include information on health and safety, wildlife interactions, reducing pathway and site erosion, and respecting other backcountry users.

In conclusion, while AWA recognizes that there are commendable elements to Jasper's draft Management Plan, there are also many commitments that need to be strengthened to deliver on the primary mandate of maintaining and restoring ecological integrity.

AWA looks forward to hearing what changes will be made to the Plan before it is finally completed.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION



Carolyn Campbell
Conservation Director

cc: Ron Hallman, President and CEO, Parks Canada
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Reference: Czetwertynski, S. and Schmiegelow, F. (March 2014). *Tonquin Caribou Risk Assessment Final Report*. Commissioned for Parks Canada's assessment of Marmot Basin Ski Area Guidelines and Development.