



Alberta Wilderness Association

"Defending Wild Alberta through Awareness and Action"

Honorable Rebecca Schulz
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Government of Alberta
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Honorable Todd Loewen
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Dear Ministers,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide written feedback to inform the new *Plan for Parks* (the Plan). Based on the engagement guide and online survey currently open for public input, **AWA is concerned that the ongoing consultation for the Plan does not reflect the full mandate of the *Provincial Parks Act* (the Act)**. Considering the Plan is meant to outline Alberta's strategic direction for recreation and conservation of sites managed under the *Act*, this omission threatens to produce a guiding document that is inconsistent with existing legislation and limited in scope, ill-suited to support and grow Alberta's provincial park system.

The online survey overwhelmingly focuses on gathering input on just one of the purposes of parks, namely "their use and enjoyment for outdoor recreation, education and the appreciation and experiencing of Alberta's natural heritage". Questions regarding accommodations, park access, recreation and tourism opportunities, and commercial development dominate the document. **Critically absent is any chance for input on how the Plan should work to protect Alberta's natural heritage.**

To help develop a Plan consistent with the *Act*, AWA has summarized our recommendations below:

- Ensuring the lasting protection of Alberta's natural heritage and conservation of flora and fauna is the purpose of the *Act* and must be prioritized in the Plan.
- The ministry must retain the intent of the 2009-2019 Plan's 12 guiding principles within the new Plan and provide the public opportunities to improve upon previous definitions.
- Improving the equitability of access cannot come at the expense of ecological integrity and connectivity. Alberta parks are public spaces, and increasing commercial development is inconsistent with improving equitable access.
- The government must not delegate their responsibility for the management of Alberta protected areas.
- Prior to publication of a new Plan, Albertans deserve transparent information and accountability on the successes and challenges of the 2009 – 2019 version.

- A strategy for the improvement and expansion of protected areas under the *Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands (WAERNAHR) Act* must be developed concurrently, as these are no longer included under the proposed Plan.
- The Alberta government must complete the remaining regional and subregional land-use plans under the Alberta Land Stewardship Act (ALSA) prior to making any land-use decisions.
- All conservation areas promised in the existing land-use plans need to be established.

Detailed recommendations:

Defined within the *Act* as the “natural landscapes and features and the ecosystems, ecological processes and biological diversity and the related cultural attributes that those landscapes and features include”, Alberta’s natural heritage is both staggeringly diverse and worryingly under-protected. As you are aware, the [scientific framework](#) and landscape-level conservation strategy employed by Alberta Parks has a stated goal to “to preserve, in perpetuity, a network of areas that represents the natural diversity of the province” which includes “6 natural regions and 21 subregions”. The scientific framework has identified a number of targets for each subregion, of which a percentage must be represented and conserved within protected areas in the province.

As of 2022, [less than half of the conservation targets identified have been achieved](#). Across 16 subregions, 107 gaps in protection are known and not yet addressed. Progress on meeting targets for each region is also not equal; while the Rocky Mountains and Canadian Shield regions are well protected, less than 2% of the Foothill, Grassland, and Parkland natural regions are conserved within protected areas.

The new iteration of the Plan must work to advance this goal. It also must acknowledge the entire purpose of the *Act* (Section 3), that “parks are established, and are to be maintained,

- a) for the preservation of Alberta’s natural heritage,
- b) for the conservation and management of flora and fauna,
- c) for the preservation of specified areas, landscapes and natural features and objects in them that are of geological, cultural, historical, archeological, anthropological, paleontological, ethnological, ecological or other scientific interest or importance,
- d) to facilitate their use and enjoyment for outdoor recreation, education and the appreciation and experiencing of Alberta’s natural heritage, and
- e) to ensure their lasting protection for the benefit of present and future generations”.

AWA does not believe the four guiding principles proposed in the new Plan are sufficient to address challenges and navigate decisions within Alberta parks. In the previous version of the Plan, 12 guiding principles were chosen. All these principles are still important, yet some would no longer be represented should the proposed guiding principles be adopted.

While 'Accountability', 'Equitable access', 'Reconciliation', and 'Sustainability' are necessary, their definitions have become less comprehensive and do not effectively capture existing principles like 'Continuous improvement and innovation', 'Environmental leadership', 'Knowledge-based decision-making', and 'Stewardship'. Using the best available science and Indigenous Knowledge to inform decision making within Alberta parks would result in continuous improvement and innovation and make the province environmental leaders in protected area management and effective stewards, which is what Alberta should be striving to do.

The proposed change of 'Sustainability' from "Parks decisions reflect a commitment to sustainability and the long-term viability of ecosystems" to "Current and future generations can visit, be inspired by and support continued conservation and access to parks" is particularly concerning, as it takes away emphasis on maintaining and improving ecological integrity in Alberta parks, and instead focusses on the sustainability of Park finances and infrastructure, which serve no function should the environment be degraded.

Preserving areas surrounding parks is also vital for protecting investment into recreation infrastructure. Recently, [significant upgrades at Crescent Falls Provincial Recreation Area](#) were completed to address increasing use, but the area remains surrounded by coal leases. Should these areas be developed, the investment into these upgrades represents a waste of taxpayer dollars. These coal leases must be cancelled immediately, especially given the Ministerial order that prohibits coal mining in the Eastern Slopes. Additionally, it is counterintuitive to charge a \$90 annual fee for infrastructure and recreation development in Kananaskis Country while allowing industrial logging in the same area. While not all of Kananaskis is protected under Parks legislation, these surrounding areas are vital for headwater integrity and habitat connectivity in the area as a whole. Industrial logging decreases the recreational value of Kananaskis and does not reduce wildfire risk. Kananaskis, and many other headwaters forests, must be removed from forest management agreement areas.

The new Plan must effectively balance equitable access and ecological integrity. AWA agrees that everyone should have the ability to "discover, value, protect, and enjoy" Alberta's natural heritage, but this cannot come at the expense of environmentally important and sensitive areas. Recreation opportunities must be evaluated on their compatibility with the maintenance of ecological values. The Plan must recognize and reinforce that not all types of recreation or related infrastructure are appropriate for all parks, even if they increase accessibility. For

example, Off-Highway Vehicle (OHV) use is incompatible with the conservation objectives of Castle Provincial and Wildland Parks, as identified in the [2018 Castle Management Plan](#). Supported by substantial scientific evidence, phasing out motorized recreation in this location is necessary to protect critical Westslope cutthroat trout and grizzly bear habitat, and would reflect knowledge-based decision making. Other places ill-suited for motorized recreation include areas identified as critical habitat for species at risk, headwaters and headwaters adjacent ecosystems, [Eastern Slopes' prime protection zones](#), and regions where human disturbance is currently minimal, like the backcountry. The sensitive alpine areas surrounding Whitehorse Wildland Provincial Park, for example, must be better protected from soil erosion due to OHV activity. Motorized trails in the surrounding area also provide opportunities for illegal OHV access into the park, which harms the ecological integrity and biodiversity of the area.

The Plan should reflect the need for Parks' management to be evidence-based; changing hunting quotas and techniques for various species and regions must be backed by the best-available science and Indigenous Knowledge. Trail expansion is not appropriate for many intact ecosystems protected within the parks system, as linear features on the landscape are known to disrupt ecosystem function. Effective protected areas management is increasingly recognizing that effective conservation means protecting large areas of high-quality habitat AND ensuring connectivity across the larger landscape to facilitate movement of wildlife.

AWA supports expanding and enhancing equitable access in front country parks. Expanding commercial development within Alberta parks is inconsistent with improving equability of access, as privatization introduces additional barriers, particularly financial ones, to those looking to experience Alberta's natural heritage. Alberta parks are inherently public spaces and must be managed as such.

AWA is wary that through expanding the role of volunteer partners, the government is offloading their responsibility of Alberta Parks onto other groups, who may not have the same resources or expertise. Collaboration cannot be top-down – communication and coordination between the government and partner groups must be ongoing and multi-directional, with checks and balances in place to ensure management of Alberta parks is consistent with the purpose of the *Act*.

The previous Plan encompassed the protected areas under the *WAERNAHR Act*, as protected area management was still the sole responsibility of Alberta Environment and Parks at the time. As the new proposed Plan focuses only on protected areas under the *Provincial Parks Act*, AWA emphasizes the need for a strategy to improve and expand these protected areas concurrently.

The new Plan must continue to be aligned with Alberta’s land-use framework; new conservation areas promised under existing regional plans, like [High Rock and Livingstone Range Wildland Provincial Parks](#), must be established. As a nomination process for new protected areas was never realized under the previous plan, the government must establish one – if it is to continue through the *Alberta Land Stewardship Act* regional planning process, the government needs to complete the remaining regional and subregional plans, so the creation of new protected areas is not delayed.

Finally, AWA requests the government publish a report evaluating the 2009-2019 Plan for Parks. Annual reporting on the previous Plan’s progress ended after 2018, and no 5-year progress or final performance report were ever released. Multiple outcomes identified in the plan were never achieved, including a Parks Advisory Council and a nomination process for new parks, both of which would be welcome additions for the new Plan. As ‘Accountability’ is a guiding principle of both Plans, Albertans deserve transparent, accurate, and readily available information on the previous Plan. This report will offer keen insight into the successes and challenges of the first iteration, with which to inform and improve the new Plan.

Alberta parks are special and prized because of their ecological integrity. The province’s natural heritage is what draws visitors to parks – the services available within become irrelevant if the landscape is degraded. The Plan, and the guiding principles within, must prioritize conserving and improving the existing ecosystems within Alberta parks, and protecting more area representative of Alberta’s biodiversity for the many generations to enjoy.

Thank you for the opportunity to provide feedback as part of this engagement. AWA hopes to see this feedback reflected in the next Plan for Parks.

Sincerely,
Alberta Wilderness Association



Kennedy Halvorson
Conservation Specialist