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Hon. Shannon Phillips  
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## **Re: CPAWS Comments on Castle Designation and Management Planning**

Dear Minister Phillips,

CPAWS Southern Alberta would like to congratulate the Government on its intention to amend the South Saskatchewan Regional Plan (SSRP) and build on Alberta's parks and protected networks by fully protecting the Castle as a Wildland and Provincial Park. This is an integral step to preserve clean water for downstream communities, safeguard our province's biodiversity and provide habitat to important wildlife such as grizzly bear and cutthroat trout. Filling in this key piece of the Crown of the Continent ecosystem and the Y2Y corridor will also provide an integral connection for wildlife to move securely through the landscape and ensure natural processes function across international and provincial borders. It is also an important step towards reaching Canada's international targets for protected areas by 2020.

The creation of the Castle Wildland and Provincial Park sets the framework for protection; however for meaningful conservation to actually occur, management and enforcement for this area need to put nature first. Ecological integrity needs to be the top priority and must guide the planning and reality of what happens on the ground in the Castle. There is more work to be done. A diverse economy focusing on tourism that boosts local business must be based on intact healthy wilderness in this region. A plan for sustainable and responsible recreation is also critical for moving forward. CPAWS Southern Alberta would be pleased to work with the Government in creating a plan that prioritizes conservation outcomes for the Castle. As part of the public consultation process for the region, the following must be considered:

### **Ecological integrity needs to be THE first priority**

The Castle management plan must place conservation and ecological integrity as the first priority in both planning and implementation. Protected areas are a vital part of conserving natural areas and biodiversity as populations grow and resources become scarcer. Protected areas also offer opportunities for recreation and spiritual renewal, protection of ecosystem services such as drinking water and protection of the genetic potential of wild species.

Protected areas can act as habitat for plant and animal source populations. Habitats in protected areas can produce surplus offspring that disperse to less productive areas and allow persistence of the plant or wildlife species outside of protected areas. Thus activities that affect species within a protected area could also affect populations outside of protected areas. For example, the Alberta Grizzly Bear Recovery Plan identifies many of the existing resource development and recreational activities in the Castle as a

threat to maintaining a viable population of grizzly bears in the area. It is therefore important that activities in the Castle such as industrial use, off-highway vehicles, grazing, and hunting, which may affect the ability of the area to act as a source for plant and animal populations, be restricted to only areas where it is ecologically appropriate. CPAWS Southern Alberta believes that these activities are not appropriate for the Provincial Park and should be restricted and monitored in the Wildland Park.

Protected areas, like the Castle, also act as a benchmark for measuring the effectiveness and sustainability of land management outside of protected areas. All uses in both the Wildland and Provincial Parks must be well designed, highly regulated and enforced to protect the ecological values of the area. All uses should also be monitored to measure potential impacts. Allowing intense human uses in the Provincial Park will make it harder to measure what impacts these land-uses are having on water sources, vegetation and wildlife beyond natural changes. This is particularly important in the face of a changing climate where the past can no longer be used to predict the future and ecosystems change in response to new conditions. Thus, it is integral that management of the Castle restores and improves natural functions and prioritizes maintenance of ecological integrity.

### **Recreation where ecologically appropriate**

We are fortunate to live in a province where people have access to amazing natural areas and can easily connect with Alberta's wilderness. However, for these natural areas to be around and in good repair into the future, we have to create a plan for sustainable recreation. Any recreation trails (motorized and non-motorized), camping areas and facilities within the region should be developed only where ecologically appropriate and associated activities must be adequately enforced. This means considering ecological values of the region first and looking at ecological thresholds as well as having baseline scientific data and ensuring ongoing monitoring. If sufficient science and enforcement is not available and resourced, activities with the potential to cause environmental damage should not be allowed.

In the new Wildland and Provincial Park, nature needs to come first. Commercial and retail developments within the park are not appropriate beyond basic facilities such as campgrounds which allow people to connect with nature. As gateway communities to the park, we encourage the development of sustainable eco-tourism in the towns of Beaver Mines and Crowsnest Pass by developing a brand that focuses on nature and stewardship. A healthy park is vital to long-term health of businesses in the region.

If we don't plan accordingly, with these principles in mind, we can literally love our parks to death. Prioritizing ecological integrity ensures that the things people are there to experience will be preserved now and in the future.

### ***Off Highway Vehicles***

The information provided on the Alberta Parks website on Enhancing the Protection of the Castle area indicates that off-highway vehicle (OHV) use will be permitted in the provincial park. There are no other provincial parks in Alberta where OHV use is permitted and the Alberta Parks website states that "Operating OHVs is not permitted in provincial parks."

A recent poll conducted by The Praxis Group, commissioned by CPAWS Southern Alberta, on recreation and nature values in Alberta (soon to be released) indicates that only approximately *two percent* of outdoor recreationalists in the South Saskatchewan region participate in off-road motorcycling, OHV use or snowmobiling. While this activity can have huge environmental impacts, it is practiced by only a small percent of the Southern Alberta population. However, when asked what, if anything, takes away from the people's recreation experience, the second most mentioned response (after seeing garbage) was mechanized recreation use, such as ATVs, dirt bikes and OHVs.

The vast majority of Albertans (88.4%), regardless of recreation preference, feel it is important that more land be set aside in Alberta and left as wilderness where human activities are minimal. It is evident from this study that Albertans want wild places conserved for nature.

CPAWS Southern Alberta strongly believes that OHV use is NOT an appropriate use in the provincial park. We recognize that OHV use occurs on public land in Alberta and that recreation planning and a system of specifically designed designated trails are needed to accommodate this land-use and protect Alberta's important ecological values. However, their potential to disturb waterways, wildlife and other recreation users, should preclude their use in provincial parks in Alberta. As stated above, protected areas act as ecological benchmarks and, like any other land-use, it is important to have areas without OHV activity to measure against management on public lands. Allowing OHVs in the provincial park also creates a dangerous precedent for opening other provincial parks to this land-use. OHV use should not be allowed in the Provincial Park.

In the Wildland Park, OHVs should be limited to designated trails specifically planned and designed to avoid ecologically sensitive areas and create areas for non-motorized users and wildlife away from the sensory disturbance of OHVs. This would include re-assessing the current access management plan and restricting the total number of trails, in some cases closing current trails, and reclaiming areas where unregulated OHV use has already caused damage to the area. This process would consider thresholds, assess ecological values, cumulative effects and adaptive management to ensure that designated use would not damage the area over the long-term. If damage cannot be avoided or there are insufficient resources for enforcement, this land-use should not be allowed.

### **Permanent ban on logging and mining**

The announcement that logging will be prohibited in the new protected area is a very positive step for land and water conservation in southern Alberta. However, the amendment of the SSRP and the legal designation of the Castle as a wildland and provincial park must explicitly include bans on logging, mineral extraction and new oil and gas leases. The potential environmental damage caused by these activities compromises the premise of the Parks Act to preserve and conserve park lands and water. To ensure that these inappropriate activities are permanently excluded from the Castle, it is important to specifically include these provisions.

While a permanent ban on logging, mineral extraction and new oil and gas leases in the Castle is immensely important, the cumulative effects of these land uses, as well as OHV use, needs to be addressed for the entire landscape of southern Alberta, particularly the Eastern Slopes. Land use pressures are already too high and water, wildlife and recreation are being affected throughout this area of the province. Moving timber quotas or other land uses to another region in this landscape does not address the key overarching issues and only transfers the problem to another area. CPAWS Southern Alberta has been doing research on ecological based forest management specific to the Eastern Slopes and a sustainable solution for the region. We would welcome an opportunity to share this research and would like to be involved in any discussions on transfer of land use or timber quotas to other areas as a result of the new Castle designation.

### **Restoration**

While much of the Castle remains as wilderness, there are many areas that have been damaged by the cumulative effects of intensive land uses such as oil and gas, forestry, grazing and off-highway vehicle use. Studies of linear densities in the Castle indicate that in many areas linear disturbances are far above

thresholds for species at risk in Alberta such as grizzly bear, cutthroat trout and bull trout<sup>1</sup>. Many roads, trails, staging areas, well sites, clear-cuts and other disturbed features will have to be reclaimed in order to protect our waterways and species at risk.

This presents a great opportunity to engage local communities in a restoration economy. There are working examples of successful forest management reform in North America. For example, in western Montana several multi-stakeholder groups of conservationists, motorized recreational vehicle users, outfitters, loggers, mill operators, state government and the U.S. Forest Service have developed systems of collaborative restoration.

These innovative approaches to forest management attempt to rejuvenate and recover natural structure, function, and process in a landscape context by using adaptive management and a flexible and open approach. These groups collaboratively create scientifically-defendable, socially-appropriate principles or objectives for a new type of forest management in the region, which prioritize management of social and ecological objectives. Local businesses are then employed in the restoration work.

### **Enforcement and Resources**

While a good management plan is essential for protecting the Castle, it will also be imperative that sufficient funds are allocated to implement the management actions and enforce the plan. We also need ongoing science and monitoring for effective and adaptive management. We encourage the Government to allocate sufficient resource to create, implement, enforce and monitor the management plan for the Castle.

Thank you for the opportunity to comment on the designation of the Castle as a wildland and provincial park and on the creation of the management plan for the area. We look forward to discussing our recommendations with you further and working towards a conservation outcome for this region in the future.

Sincerely,



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<sup>1</sup> Lee, P.G. and M. Hanneman. 2011 Castle Area Forest Land Use Zone (Alberta) – Linear disturbances, access densities and grizzly bear habitat security areas. Edmonton, Alberta Global Forest Watch Canada 1<sup>st</sup> Publication for International Year of Forests. <http://www.globalforestwatch.ca/publications/20110309A>