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

Honourable Rebecca Schulz
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Government of Alberta
Sent via e-mail to: epa.minister@gov.ab.ca

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Dear Ministers,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide written feedback to inform *The Plan for Parks* (the Plan). AWA is an Alberta-based conservation group with more than 10,000 members and supporters across Alberta, Canada, and around the world. AWA seeks the completion of a protected areas network in the province and is mandated to ensure the good stewardship of Alberta's public lands, waters, and biodiversity so that future generations can enjoy the abundant benefits they provide.

Based on the draft plan and Phase 1 engagement summary, **AWA is concerned that the Plan does not reflect the full mandate of the *Provincial Parks Act* (the *Act*), nor the results from Phase 1 of the Plan for Parks Engagement.**

To help develop a final Plan consistent with the Act and the Phase 1 feedback, AWA has summarized our recommendations below:

- The Plan must better reflect the Phase 1 feedback of parks' users who,
    - highly value biodiversity and healthy ecosystems,
    - do not support increasing the availability of recreational opportunities inconsistent with the protection of biodiversity and ecosystems, and,
    - do not support increased commercialization or commodification of Alberta Parks.
- No changes to the *Provincial Parks Act* or associated regulations must be introduced in the final draft of the Plan, as consultation has not occurred regarding this process.
- Ensuring the lasting protection of Alberta's natural heritage and conservation of flora and fauna is the purpose of the *Act* and must be given the highest priority in the Plan.
- The Plan must show a stronger focus on the protection of biodiversity, ecosystem functions, ecological processes, and representative landscapes.
- Establishing new parks and prioritizing threatened and under-representative ecosystems are the most effective methods to support the Plan's overarching goals and should be the top priority for implementation".

- Not all types of recreation or accessible infrastructure (e.g. OHV trails) are appropriate for all parks, even if they increase accessibility for the public. Ecological integrity and connectivity must be the focus of the plan.
- Private recreational development, hunting opportunity expansion, and the creation of spaces for motorized vehicles and electric-powered equipment recreation in parks should not be supported within the final Plan.
- 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.
- The Alberta government must complete the remaining regional and subregional land-use plans under the *Alberta Land Stewardship Act* (ALSA).
- All conservation areas promised in existing land-use plans must be established.
- Albertans deserve strong and binding commitments to transparency, accessibility, and accountability.

Detailed recommendations

The *Act* (Section 3) states 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".

Out of these 5 guiding principles, only a), d), and e) are acknowledged within the draft Plan[1]. This omission misrepresents what the *Act* aims to achieve and leaves the conservation and management of flora and fauna, and 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, insufficiently addressed.

The four "Enduring Goals" (EG) proposed do not fully reflect the intent of the *Act*, do not capture objectives still relevant from the previous Plan for Parks, and place too heavy a focus on visitor

[1] The Plan for Parks , pg. 8.

use of and recreation within the parks system. The protection and preservation of natural areas is foundational to the Plan and should underscore all planning decisions. This is consistent with public opinion gathered during Phase 1 of the engagement, where "feedback emphasized the need to conserve natural environments and ecosystems"[2] to achieve the Plan's vision. Many participants suggested "additional guiding principles emphasiz[ing] a focus on conservation"[2].

The overall Plan does not include sufficient attention to maintaining ecological diversity and connecting landscapes, which is essential for the long-term health and well-being of our natural environment. The Phase 1 engagement summary showed that protection of biodiversity and representative landscapes and protection of ecosystem functions (e.g., water storage and filtration, food control, pollination) were the second and fourth (respectively) most valued aspects of Alberta Parks[3]. The final Plan must incorporate a stronger focus on these values in order to preserve our natural heritage and reflect the values of Albertans. The plan also needs to have a stronger focus on landscape integrity, with development for recreation and accessibility occurring only in areas that are well suited for it, when the ecological integrity of the area would not be compromised.

Enduring Goal 1: Parks are accessible and welcoming

The new Plan must effectively balance equitable access and ecological integrity. AWA agrees that everyone should have the ability to "experience the provincial parks systems in Alberta", but this cannot come at the expense of the species, habitat, ecological processes, and ecosystem services the Parks were established to conserve.

For the Supporting Actions listed for Outcome 1.1., the Plan should ensure there is an availability of information on education programs and scientific research taking place in the parks, as well as for "recreation, programs, and services" – the Parks should endeavor to be enjoyable and accessible, but also a place for learning about the natural world and expanding the public's knowledge and appreciation of it.

Information on Parks policies and regulations, particularly the reasoning behind them, should also be made more readily available. This would help address concerns identified in Phase 1 of the engagement, where the major barriers to the public's enjoyment were found to be "visitors being unaware of regulations", "a lack of regulations deterring undesirable and/or damaging visitor behaviors", and "insufficient education about and enforcement of current regulations"[4]. This information piece is important, as it can serve to increase understanding of why not all

[2] What we heard Alberta's Plan for Parks - Phase 1 engagement summary, pg. 6.
[3] What we heard Alberta's Plan for Parks - Phase 1 engagement summary, pg. 9.
[4] What we heard Alberta's Plan for Parks - Phase 1 engagement summary, pg. 19.

activities are appropriate for all landscapes, and in turn, support greater compliance and protection of the environment.

The Supporting Actions for Outcome 1.1 of "prioritize[ing] the development of rustic and/or un-serviced campsites that provide lower-cost camping", in combination with "establish[ing] new parks and expand[ing] existing parks" will better support the ecological health and integrity of the Parks system in a way that is both accessible and equitable for Albertans. This form of development was also more strongly supported by Albertans within Phase 1 of the engagement, which identified a "preference for basic and low-cost options for campsite development over higher-service levels"[5]. These types of accommodations should be prioritized over other forms of lodging development where expansion is needed and environmentally sustainable. Sites chosen must not place further stressors on the landscape, and priority should be given to developing these sites in already disturbed areas rather than existing parks or intact wilderness areas. There is a need to recognize when ecological limits for use and visitation have been reached, and effective processes in place to appropriately respond.

A Supporting Action that should be included under Outcome 1.2 is enhancing the range of opportunities available to the scientific community to research within Parks and engage with the public. This is a Supporting Action that would be beneficial on multiple fronts, as it would increase scientific knowledge and data within the Parks system to support better management outcomes (consistent with the intent of EG 4) and create additional ways in which the public can experience Alberta's Parks. This would also help retain some of the intent behind guiding principles in the original Plan for Parks, including environmental leadership, continuous improvement and innovation, and stewardship.

Additionally, it is critical that when "leveraging non-profit partnerships and volunteerism to enhance community connection with park initiatives", the government is not offloading their responsibility of Alberta Parks onto third parties who may not have the same level of resources or expertise as the Government of Alberta. 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 tourism investment discussed in Outcome 1.4 should not prioritize private sector involvement or commercial development in parks. Phase 1 of the engagement found that Albertans do not support increases in commercial development for tourism[6]. The expansion of "small-scale commercial development in high-demand visitation areas" was supported by only 29 percent of participants, and an overwhelming 84 percent were against "more large-scale

[5] What we heard Alberta's Plan for Parks - Phase 1 engagement summary, pg. 6.

commercial developments in high-demand visitation areas"[6]. Creating more opportunities for commercial development is inconsistent with upholding the value of maintaining intact and functional ecosystems, as increased human footprint in Alberta's Parks will reduce habitat availability, native vegetation cover, and connectivity, and increase edge effects[7]. Expanding commercial development within existing Alberta parks is also inconsistent with the goal of improving equity in our parks system, as additional barriers such as cost or privatized access will likely be introduced.

The diversity of opportunities offered in the Parks system should be focused on local guided adventures and education programs that do not require additional human footprint or development (ex., hiking guides or educational tours) and low-impact activities such as camping, hiking, biking, birdwatching, photography, and picnicking. Improving the diversity of recreation opportunities available in Alberta's parks should center around providing opportunities for quiet and mindful nature interactions. This was the most supported option for recreation expansion in Phase 1 of engagement, with 85 percent of respondents in support[8].

Enduring Goal 2: Parks conserve and share Alberta's natural and cultural legacy

During Phase 1 of the engagement, 75 percent of survey respondents indicated they valued parks for their protection of biodiversity and representative landscapes, while 68 percent valued the protection of ecosystem function parks provide[9]. This indicates that the prioritizing of the ecological health and integrity of Alberta's parks system has high public support. AWA appreciates the addition of EG 2 to reflect this public input but emphasizes that it must be given priority over the other 3 EGs in the final version of the Plan, as it is essential for the remaining EGs to be feasible.

Outcome 2.1 should be amended to state, "Parks conserve nature to maintain and/or improve biodiversity and ecological function", as the Parks system should aim to better the environmental outcomes for Alberta's conserved wild places. This is critical, as improving these metrics will increase the resilience and responsiveness of Parks (in alignment with Outcome 2.2), and better achieve the Plan's vision, which is that Parks will continue to provide ecosystem services for current and future generations. Further, removing the phrase "in-place" recognizes that the conservation of nature within parks supports nature outside of the parks borders as well – notably, wildlife and ecological processes don't recognize anthropogenic borders.

[6] What we heard Alberta's Plan for Parks - Phase 1 engagement summary, pg. 16.
[7] Liu, J. et. al. (2018). How does habitat fragmentation affect the biodiversity and ecosystem functioning relationship?. *Landscape ecology*, *33*, 341-352.
[8] What we heard Alberta's Plan for Parks - Phase 1 engagement summary, pg. 17.
[9] What we heard Alberta's Plan for Parks - Phase 1 engagement summary, pg. 9.

AWA supports the Actions listed under this Outcome, with some amendments. Collaboration on projects to improve landscape conservation outcomes and targeted park expansions for threatened and under-representative ecosystems must be prioritized within the final Plan and during implementation. These goals should additionally be expanded to include the protection of areas that support populations of at-risk species. Further, the need to "conduct assessments and monitor changes over time" must be done in combination with robust reporting, accountability, evaluation, and response frameworks. Albertans deserve to know the state of the Parks systems, including challenges and successes, and know how the government intends to respond to stressors and threats, including the efficacy of those responses. This is consistent with guiding principles from the previous Plan that are still of relevance, including accountability, citizen engagement, continuous improvement and innovation, environmental leadership, integrated management, and respectful and responsive.

The wording of Outcome 2.2 and its supporting actions could also be improved; "environmental change" is needlessly vague. While it seems to hint at the government's intent, it would be a significant oversight not to explicitly name anthropogenically-induced climate change as one of the key "stressors of ecological health" to plan and manage for within Alberta's park system. The Plan must acknowledge that the "severe weather" it anticipates, such as drought, floods, and wildfire will increase in intensity, frequency, and unpredictability due to climate change, and that parks must maintain strong ecosystem function to minimize their impacts.

Climate change interacts with existing environmental stressors like invasive species, diseases, and habitat degradation, fragmentation and loss, further exacerbating the negative impacts on the environment, economy, and society[10]. For example, the increase in average temperatures raises the temperature within watersheds, creating conditions more favorable to the spread of invasive species at the expense of native ones, like Alberta's coldwater trout[11]. This, in combination with decreased availability of native habitat and higher density of development on land, lowers infiltration and thermoregulation within the watershed, creating a negative feedback loop in the ecosystem[10,11].

Ensuring that our remaining natural and wild areas are as resilient to climate change as possible is essential not only for maintaining their ecosystem functions, but also for avoiding cumulative stressors and feedback loops. Maintaining ecosystem resilience is best achieved by supporting healthy and biodiverse landscapes and natural solutions[10]. Parks and protected areas serve to protect ecosystems like wetlands, grassland, and old growth forests, which in turn store carbon,

[10] Cook-Patton. et.al. (2021). Protect, manage and then restore lands for climate mitigation. *Nature Climate Change*, *11*(12), 1027-1034.
[11] Williams et. al.(2015). Cold-water fishes and climate change in North America. *Reference Module in Earth Systems and Environmental Sciences. doi: 10.1016/B978-0-12-409548-9.09505-1.*

regulate temperatures, and mitigate natural disasters[12]. This helps safeguard human health, infrastructure, and industry, and reduces the negative effects of climate change[13]. Outcome 2.2 should instead state "Parks are resilient and responsive to climate change and other environmental stressors".

Better stewardship of the areas surrounding parks that have lesser or no formal protection is vital for preserving ecological function within parks, maintaining park resiliency to environmental and climate change, and protecting investment into recreation infrastructure. Areas surrounding parks share ecological functions and support biological, chemical, and physical cycling between them and can provide a buffering effect from areas of higher human density and disturbance. AWA encourages the government to include a supporting action that formalizes buffer zones around parks, where the extent and types of land-use permitted are compatible with supporting the health and integrity of the Parks system.

Enduring Goal 3: Parks provide a diversity of nature-based experiences

The detailed description of Outcome 3.2, which "recognizes that visitors have different recreational needs and preferences whether they are looking to use their mobility device on an interpretive campground trail, access to land to hunt, [or] experience motorized trail networks" is inconsistent with the feedback obtained during Phase 1 of engagement.

Three-quarters of respondents do not support "recreation expansion of electric powered equipment", and 82 percent were against expanding "opportunities for motorized recreation"[14]. Two-thirds were against expanding hunting opportunities in the Parks system. In contrast, there was high support (85 percent) for "opportunities for quiet and mindful nature interactions"[14].

The low public support for electric powered equipment, motorized recreation, and hunting opportunities (8 percent, 8 percent, and 16 percent respectively), combined with the fact that the nature of these activities also can detract from others' enjoyment of the Parks system and degrade the ecological integrity and wildlife conservation the Parks were established to provide, indicates this Outcome must be amended. Instead, it should state that "Parks provide diverse recreational settings and experiences that are compatible with the long-term sustainability of the environment".

Further, AWA is concerned that despite decision-makers having these engagement results readily available, the government has implemented and maintained a series of policy changes in the past

[12] Melillo, J. M., Lu, X., Kicklighter, D. W., Reilly, J. M., Cai, Y., & Sokolov, A. P. (2016). Protected areas' role in climate-change mitigation. *Ambio*, *45*, 133-145.
[13] Duarte, G. T., Schuster, R., Edwards, M., Ouellet-Dallaire, C., Vári, Á., & Mitchell, M. G. (2024). Flood prevention benefits provided by Canadian natural ecosystems. *Ecosystem Services*, *70*, 101670.
[14] What we heard Alberta's Plan for Parks - Phase 1 engagement summary, pg. 17.

year that are not consistent with the public input they received, including but not limited to expanding the hunting of cougars into Cypress Hill Provincial Park[15], and the blanket designation that allows e-bikes on all existing cycling trails in provincial parks[16]. If these management decisions have already been pre-determined and public input is to be superfluous, then AWA questions why the government would choose to waste the time, money, and effort of the public to pretend otherwise.

AWA emphasizes that "enhanc[ing] trails networks and connections between trails and facility areas and connection to trail networks outside of parks boundaries" as a Supporting Action under Outcome 3.2 cannot be understood to mean expanding the amount and types of trails in the Parks system. Trail and access expansion, along with the recreation activities they facilitate, are not suitable for many places within the Parks system. Trails increase linear disturbance and human presence, which can have negative impacts on the environment through habitat fragmentation and edge effects if they are not first informed by the ecological realities of the landscape.

For example, in places like the Castle Parks, off-road highway vehicle (OHV) usage near or within waterways disrupts fish habitat and increases sediment runoff into streams, which is detrimental to the reproductive success, health, and survival of provincial species at risk such as Westslope Cutthroat Trout and Bull Trout[17]. The density and frequency of trail use was also identified as a stressor for Grizzly Bears, another threatened species in Alberta. These challenges were acknowledged within the Castle Management Plan[18], which had the stated goal to phase out OHV activities by 2021. OHV usage has been allowed to continue in the region since that time, compromising critical habitat for Grizzly Bears and Westslope Cutthroat Trout.

As is evident, high trail densities and inappropriate land uses already have negative impacts within Alberta's Parks system and must be addressed through clarification of this Supporting Action. Instead, the Supporting Action should express that all existing and future "trails networks and connections between trails and facility areas and connections to trail networks outside of parks boundaries must be evaluated based on local ecological constraints, and their development and type consistent with the maintenance of ecological integrity in the Parks system".

A Supporting Action that should be added for Outcome 3.3 is the need to evaluate the current extent and intensity of the human footprint within the Parks system, and ensure it is still appropriate and sustainable for the Parks system in the long term. If any existing developments or uses are no longer compatible with the maintenance of ecological integrity within the Parks,

[15] M.O. 37/2024 - Forestry and Parks
[16] Activities | Alberta Parks
[17] Birtwell IK. 2000. The effects of sediment on fish and their habitat. Fisheries and Oceans Canada.
[18] Government of Alberta. (2018). Castle Management Plan.

they must be addressed. Part of addressing this must also include reclamation requirements for disturbed areas that negatively alter ecosystem function.

Enduring Goal 4: Parks are effectively managed for long-term sustainability

Of particular concern to AWA is outcome 4.1 within the draft Plan, which includes the supporting action to "Modernize the *Provincial Parks Act* and its regulations to maintain protections, support effective management, and reduce red tape; with a priority focus on updating the Provincial Parks (General) Regulation (e.g., updating definitions to reflect current and future activities and technology)". No further explanation of what this will entail is given within the draft Plan.

"Eliminating and preventing unnecessary regulatory and administrative burdens", or reducing red tape as defined under the *Red Tape Reduction Act*, does not need to be a priority in the Plan, as evident from the findings of the Phase 1 Engagement, where the majority of participants indicated regulations were not "deterring or limiting visitor enjoyment" for "recreational activities in Alberta's provincial parks"[19]. Engagement has identified that there is not a need to remove red tape or modernize the *Provincial Parks Act*, but a need to enforce it. Further, any plans to amend the Act would require a rigorous and separate consultation period with all impacted stakeholders and rightsholders, including members of the public and the Indigenous Nations of Alberta.

Any reclassification of Parks "to reflect their management intent and existing uses" must be preceded by a robust public engagement process and backed by sufficient evidence and data to support the change.

Additional fees to access parks or utilize park services should be minimized, as financial costs reduce park accessibility. Fees must directly fund conservation efforts, rather than services such as fee enforcement or commercial development. Additional fees should not replace government funding for the parks system. Related to this, enforcement presence in parks (4.2) should be specifically targeted towards maintaining ecological integrity and public safety (ex., enforcing removal of campground attractants, enforcing restrictions on off-road vehicle use, hunting and trapping, and other land disturbances) rather than enforcement such as fee collection and registration, and this should be clarified within the Plan.

The description and supporting actions of Outcome 4.3 should be strengthened by stating that the management of Parks must be science-based, Indigenous-led, robust, locally relevant and continuously updated. Mechanisms should also be created to ensure management is not influenced by private or personal interest, but in the interest of all Albertans, particularly in light

[19] What we heard Alberta's Plan for Parks - Phase 1 engagement summary, pg. 19.

of recent freedom of information requests revealing that some ministerial decisions as of late have not been based on science and occurred outside of the formal process with minimal consultation[20].

Management must also establish specific indicators that serve to report on the ecological health and integrity of the Parks system. One such example could be biodiversity indicators developed in collaboration by the Alberta Government and the Alberta Biodiversity Monitoring Institute (ABMI), which report on the state and trends of Native Cover, Interior Habitat, Landscape Connectivity, and Stream Connectivity on public lands[21]. Additionally, use of these already established indicators would help facilitate "collaboration across governments to evaluate cumulative impacts within parks and across the broader Crown land interface"[22]. Any indicators developed must have well-defined triggers, limits, and timelines for action, so threats can be quickly identified and addressed.

Outcome 4.4 should be changed to state, "Management of parks is clear, transparent, and accountable". Accountability was a highly supported Guiding Principle in the first phase of engagement, selected by 83percent of participants, but is otherwise not reflected in the current draft. A supporting action to ensure accountability must be that the government commits to releasing annual reports on the ecological state and trends observed in Alberta's Parks system, as well as progress, barriers, challenges, and successes of the Plan's implementation.

In the spirit of this, AWA requests that the government publish their internal reports 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. Albertans deserve transparent, accurate, and readily available information on how their parks have and will be managed.

The Plan should include plans for environmental leadership and ambitious goals for energy and water efficiency, low-impact environmental design, and sustainable construction practices and products for any retrofitting or development that occurs within the Parks system, to support resiliency to environmental and climate change and long-term sustainability.

Implementation and Monitoring

Clear, binding processes and timelines must be established for the identification and establishment of new and expanded Parks and protected areas. A strategy for the improvement

[20] Alberta cougar hunting increases 'not based on science': docs | The Narwhal
[21] Biodiversity in Alberta
[22] The Plan for Parks, pg. 21

and expansion of protected areas under the Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands (WAERNAHR) Act must be developed concurrently, as these were included under the previous Plan.

In the immediate to near term (<2 years), all areas identified previously in existing land-use plans and other government policies for conservation purposes, including High Rock and Livingstone Range Wildland Provincial Parks, must be created, and new areas for protection identified.

The identification of new Parks must be based on the scientific framework and landscape-level conservation strategy employed by Alberta Parks, which has a stated goal to "to preserve, in perpetuity, a network of areas that represents the natural diversity of the province"[23]. The scientific framework includes 6 natural regions and 21 subregions and 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 2024, less than half of the conservation targets identified have been achieved[24]. Across 16 subregions, 107 gaps in protection are known and not yet addressed, concentrated largely in the Foothill, Grassland, and Parkland natural regions. Addressing these gaps, achieving the framework's representation targets, and increasing the total amount of land conserved in Alberta should be used as metric for monitoring the success of implementation and progress in next Plan for Parks. Key Biodiversity Areas (KBAs), species at risk critical habitat, and ABMI's biodiversity indicators represent readily available biological data that can further inform and define areas that should be prioritized first for protection.

New candidate parks and expansions identified through this process should be established in the mid-term (2 – 6 years). The number established could function as a metric for success in implementing the Plan. Each new park created should be accompanied by a robust management plan that describes the Park's baseline conditions, pressures, and conservation goals, so that their ecological health and integrity can be monitored, reported, and improved.

In the long-term (7 – 10 years), the Plan should have clear methodologies to evaluate the success, challenges, and lesson-learned through establishing new and expanded parks and protected areas to inform the next iteration of the Plan.

Conclusions

Alberta Parks recognizes that our provincial park system generates a "province-wide impact of $1.2 billion and sustains more than 23,480 person-years of employment"[25]. It is also

[23] Alberta Parks Scientific Framework
[24] Alberta's network of protected areas: progress toward achieving natural landscape targets
[25] Alberta Parks Scientific Framework

acknowledged that “humans benefit from many resources and processes that are supplied by natural ecosystems - collectively known as ecosystem services”. The financial benefit from these ecosystem services is hard to quantify, but they contribute directly to human health and well-being as well as the economy. Preservation of our Parks as functioning and intact landscapes is essential for retaining the direct and indirect benefits that parks provide, and for retaining the draw of tourism to our stunning natural areas. Our natural wonders are one of the main draws of the province, and degradation of these natural areas will directly impact tourism and recreation. The Plan must prioritize conserving and improving the existing ecosystems within Alberta parks and creating new parks as the primary method for expanding accessibility and creating new opportunities for current and future Albertans.

Creating more parks and protected areas to meet demand for outdoor recreation and ecological preservation is the best method to support the EGs of the Plan, as well as maintain the integrity of the Act. Improving equity of access and expanding ecologically compatible recreation opportunities in newly developed parks provides much greater overall benefit than expanding use within the current network. Increasing the number and type of campsites, trails, and recreation opportunities, especially high-impact private development, in existing parks that are already at or near capacity is not sustainable and will place further strain on already overused natural areas.

In order to ensure that “parks are not loved to death”, the focus of the new plan for parks must be on maintaining and improving the ecological integrity and connectedness of Alberta’s park and protected areas network.

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

Sincerely,
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