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

October 7, 2026
Alberta Parks, Government of Alberta
By email: parks.engagement@gov.ab.ca

Re: Marshybank Ecological Reserve Boundary Amendments

To Whom It May Concern,

Alberta Wilderness Association (AWA) is writing to express our comments on and concerns about the proposed changes to Marshybank Ecological Reserve. Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wilderness provides. We engage with communities in conservation initiatives that will ensure a legacy for future generations. With over 10,000 members and supporters in Alberta and across Canada, AWA is dedicated to conserving Alberta's wilderness and maintaining the health of our natural ecosystems

AWA objects to the redesignation of the west block of Marshybank Ecological Reserve to Brazeau Canyon Wildland Provincial Park. We also argue against the loss of protections for Marshybank Lake and the associated east side of the east block of the Ecological Reserve. We support the addition of an additional 40 hectares to the east block of the reserve, as well as the joining of boundaries between this and the borders of Brazeau Canyon Wildland Park as a way to increase the connectivity of these protected areas. However, we request that this addition be completed while maintaining the Ecological Reserve designation to its current eastern limits, creating a larger overall Ecological Reserve area and maintaining the designation for Marshybank Lake.

Proposal to shift the boundary of the east block to be continuous with the borders of the Brazeau Canyon Wildland Provincial Park

AWA is very supportive of the proposal to expand the boundaries of the east block of Marshybank Ecological Reserve to be contiguous with Brazeau Canyon Wildland Park, and to add an additional 40 hectares of protected land in this area by doing so. Connectivity between protected areas is an essential tool for ensuring that species have larger intact habitats that they can move through. Marshybank Ecological Reserve is located within the "Northern Rocky Mountain Foothills to Boreal Forest in Alberta" corridor, one of Parks Canada's national priority areas for ecological corridors[1]. Increasing connectivity between protected areas within this region, and increasing the overall footprint of the protected area, helps support biodiversity protection and climate change adaptation within a sensitive region.

[1] June 6, 2025. National priority areas for ecological corridors. Parks Canada.

However, shifting the boundaries westward effectively removes protections from the easternmost side of the Ecological Reserve. This area includes Marshybank Lake and its surrounding wetland areas, which would benefit greatly from continued protections. Lakes and other wetland areas are essential for maintaining local ecological services such as water filtration, recharging groundwater aquifers, providing habitat for aquatic and terrestrial species, and acting as carbon sinks[2]. AWA has concerns that this area will experience declines in ecological intactness and productivity if protections are removed. For instance, the Ecological Reserve falls within the R15 Forest Management Unit[3], and with nearby forestry activities already evident on the landscape, we have concerns that forestry activity could extend into this formerly protected area.

We would like to hear the justification for shifting the boundaries westward, rather than simply expanding the protected area. We would also be curious to know whether the eastern side of the eastern block will receive any other protected area status once it is removed from the Ecological Reserve.

We recommend that the current area of the east block of the Ecological Reserve maintain its status, alongside the expansion into the area between Marshybank Ecological Reserve and Brazeau Canyon Wildland Provincial Park. This would create a larger Ecological Reserve area than is currently being proposed, without requiring the designation of any new land that is not already slated for protection. Ideally, we also recommend expanding the east block to meet the west block within Brazeau Canyon Wildland Park, creating one continuous Ecological Reserve.

Proposal to deregulate the west block from Ecological Reserve and maintain its Wildland Provincial Park designation

Only 15 Ecological Reserves exist in the province, and these were carefully selected as areas with especially important ecological functions and properties to be preserved. Unlike Wildland Provincial Parks, which have a mission to protect natural heritage and provide low-impact backcountry recreation opportunities, Ecological Reserves are created primarily for the preservation of natural ecosystems[4]. Ecological Reserves are managed under the *Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act*, and provide protections that Wildland Provincial Parks do not.

Because of this, the west block of Marshybank Ecological Reserve currently has more restrictions on activities and how the area can be recreated than areas regulated under the *Provincial Parks Act*. There are currently no public roads leading into the reserve, and access is restricted to foot-access only. Altering the designation to be included in the Brazeau Canyon Wildland Provincial Park allows for activities that are not permitted within the Ecological Reserve, including overnight camping, hunting and

[2] Mitsch, W. J., Bernal, B., & Hernandez, M. E. (2015). Ecosystem services of wetlands. *International Journal of Biodiversity Science, Ecosystem Services & Management*, *11*(1), 1-4.

[3] June 15, 2026. Forest Management Units Map June 2026. Forestry and Parks, Government of Alberta.

[4] February 5, 2026. Legislation and Regulations. Alberta Parks.

fishing, and horseback riding[5,6]. This opens up the area, which was previously designated as particularly important ecologically, to additional strains from recreation and land use.

AWA firmly suggests that the west block of Marshybank Ecological Reserve retains its designation and associated protections.

Overall considerations

Marshybank was selected as an Ecological Reserve because it "provides good representation of till veneer/ moraine, organic, outwash, and non-patterned fen landscapes," and "provides an opportunity to manage this part of Alberta's natural heritage for future generations."[7] It was also shown to contain unique and sensitive ecological features, such as peatlands and sedge-dominated fens[8], species at risk such as grizzly bears, and rare species including the Greenland primrose (*Primula egaliksensis*) and the fungus *Spothularia flavida*[9]. The management strategy for this reserve is noted as "non-intervention" and was listed under the category of "strict nature preserve" upon its creation[10]. Based on these unique ecological features and the original intent of the Ecological Reserve designation, we believe the Ecological Reserve's original footprint should be maintained to limit disturbance, with changes made only if they expand the reserve's boundary.

As noted in our comments for the Reclassification of Kootenay Plains Ecological Reserve[11], there is a strong public interest in low-impact ecotourism and protection of natural areas. 90 percent of survey respondents indicated that environmental conservation is an important factor to consider in tourism decisions[12]. Maintaining strong protections in this area contributes to Alberta's image as a leading ecotourism destination, while also supporting public interest in protecting unique and intact natural areas.

Based on this, we are supportive of expanding the boundaries of the east block of Marshybank Ecological Reserve to meet the eastern boundary of Brazeau Canyon Wildland Provincial Park, but we disagree that the easternmost boundary of the park be shifted to no longer encompass Marshybank Lake. We also do not support the redesignation of the west block of Marshybank Ecological Reserve.

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[5] August 24, 2026. Information & Facilities | Brazeau Canyon Wildland Provincial Park. Alberta Parks.
[6] April 1, 2001. Facts on Brazeau Canyon Wildland Park. Alberta Parks.
[7] 1986. Marshybank Candidate Ecological Reserve. Handout from an open house held September 25, 1986, in Rocky Mountain House.
[8] 1994. Tenth Annual Report: Advisory Committee on Wilderness Areas and Ecological Reserves.
[9] December 7, 2000. Marshybank Ecological Reserve. Handout from Alberta Land and Forest Service and Parks Service.
[10] Ecological Area Data Sheet (Marshybank Ecological Reserve). Handout.
[11] Alberta Wilderness Association. 2026. Kootenay Plains Reclassification Comments.
[12] Rushton, B., Lemieux, C. J., Scott, D. J., & Rutty, M. (2026). On the path to regenerative nature-based tourism in Canada? Insights from the legacy of COVID-19 on Canadians' travel behaviours. Journal of Outdoor Recreation and Tourism, 53, 101003.

AWA would be interested in meeting to discuss the proposed changes to Marshybank Ecological Reserve. Thank you for considering our comments.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



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