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“Draft Parks Planning Framework”
Parks Resource Management Coordination Branch
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Re: CPAWS Northern Alberta written feedback on the August 2008 Draft Parks Planning Framework

To whom it may concern:

The following package represents CPAWS Northern Alberta’s written feedback on the August 2008 Draft Parks Planning Framework. In summary, the following pages will describe why we feel that the August 2008 Parks Framework *requires a major revision (if not a completely new start) in order to accommodate what polls, the Alberta public and the recent stakeholder forum (September 25, 2008) has told the department.*

As strong supporters of Alberta’s Parks and Protected Areas Network we wish to express our deep concern that, if continued in its current direction, the proposed Framework will have long term negative consequences for the protection of Alberta’s biodiversity and wilderness for generations to come. We wish to convey our disappointment with the document which is poor in providing policy and planning direction and will do little to empower the department which is entrusted with the establishment, protection and management of Alberta’ natural heritage. Let us be clear: we feel this draft is off track.

The draft Parks Planning Framework as a whole:

- The intent to have a Parks framework and plan is laudable. A Protected Areas & Parks policy is long overdue.
- We are very supportive of development of framework/policy & plan concurrent with LUF instead of after LUF is completed.
- As outlined here, and in previous communication with Minister Ady’s office, we feel the August 2008 draft is not in line with the priorities of Albertan’s.
- The draft Parks Planning Framework carries little of the existing policies and planning framework which are very functional (see Managing Parks and Recreation planning documents 2005-2007)
- There needs to be greater clarity when it comes to the definition of “conservation.”

- The framework does not articulate in a clear and precise manner the role current parks legislation or policy would play in the principles of the proposed Provincial Land Use Framework (LUF); instead the document immediately jumps to the regional level of planning without outlining the overall provincial strategy for parks.

Key concerns and recommendations:

a) The primary purpose of parks in environmental protection and conservation should be at the core of the Provincial Parks Framework

- a. The draft Parks Planning Framework does not recognize that a completed and fully networked Parks and Protected Areas system in Alberta is central to land use planning (this is also missing in the draft Land Use Framework).
- b. The draft Parks Planning Framework does not build on the strengths of previous consultations (1993 onward) and public polling (Appendix A) which outline environmental protection is important to Albertans.
- c. The vision & mission outlined in the draft are contrary to department's existing Vision, Mission & Goals.
 - i. Of utmost concern to us is that the mission and vision statements outlined in the document are not consistent with the existing approved mission, vision and goals of the park system (Appendix B). These approved policy objectives, which were clearly stated on the department's web site as of September 2008, are completely absent from this draft.
 - ii. The Department's current Vision, Mission & Goals came from extensive public consultation – this was confirmed at the September 17, 2008 technical briefing.
 - iii. The Department's current Vision Mission and Goals are consistent with public input on the Land Use Framework (LUF). The Draft vision & mission is contrary to public feedback on LUF.
 - iv. The draft documents vision, etc., has no public input that indicates the original Vision, Mission & Goals are no longer workable or desired by the public. If this polling data does not exist then the original Vision, Mission and Goals should be returned to – anything less would be a broken promise to the people of Alberta who helped create this vision through government consultation.

Recommendations:

- i. The Park Framework's fundamental tenet should be that of protection and conservation of Alberta's natural ecosystems
- ii. This draft should return to the existing Vision, Mission & Goals

b) 4% is not enough to protect Alberta's biodiversity: complete the Parks system

- a. The Parks Planning Framework does not provide policy direction to create new protected areas or complete Alberta's Parks Network.
- b. The draft framework does not outline that a world class parks network is the very foundation and source of healthy thriving landscapes. The commitment to parks and protected areas in the Department's policy should go beyond the need to address recreation needs but rather include recognition of the need to conserve fully functioning ecosystems on large landscapes with ecological connectivity,

such that large wide-ranging species (such as caribou, migratory waterfowl, and grizzly bears) can be sustained and the effects of climate change mitigated.

Recommendations:

- i. The draft Parks Planning Framework needs to identify the parks department as lead for completing and expanding Alberta's Parks and Protected Areas system (not solely as a manager of the current system).
- ii. The draft Parks Planning Framework should set the completion of the Alberta parks system as a key outcome. This outcome will guide protected areas planning/creation in Alberta's six land use planning regions.
- iii. Parks & Protected Areas should be appropriately written into the Government of Alberta's Land Use Framework as a core tool for delivering the "healthy ecosystems & environment" outcome and that:
 - o It is important that within each planning region the amount of protected area be maximized (for a current working example of this see the Cumulative Environmental Management Association's management framework for NE Alberta. This framework recommends 20-40% protection for the Regional Municipality of Wood Buffalo. This increase in protected area is supported by indigenous peoples, industry and conservation groups. Similar requirements should be strived for in each planning region.)

c) Alberta's growing demands for recreation and open spaces by growing population CANNOT be met on 4% of the province:

- a. Recreation organizations emphatically state that the quality of their recreation depends on protection of the ecological integrity of the protected areas and parks. Therefore it would be important to *increase the supply of protected areas*, NOT *increase the density of use within them*.
- b. The draft framework fails to address the need for a spectrum of recreational activities and modes of access for the various parks depending on their natural heritage values and the sensitivities to meet local and regional recreation, education and conservation objectives.
- c. Albertan's recreational needs will be best met if the Department works to utilize all provincial public lands and works in collaboration with municipal governments.

Recommendation: In addition to the Parks Planning Framework the Department also needs to be the lead on developing a Recreation Framework to deliver on "liveable communities & recreational opportunities" on Alberta's public lands outside of the Protected Areas Network.

Moving Forward

- a) We believe the Department needs a strong mandate and the necessary resources to
 - complete the protected areas system,
 - expand it to meet growing demands, and
 - protect and effectively manage Alberta's system of Protected Areas & Parks.

- b) We believe it is imperative the Minister confirm her commitment to the protection and conservation mandates of the Parks and Protected areas of Alberta as a basic tenet going into the next Parks Framework draft.
- c) Prior to future consultations the background materials, polls, surveys, plans, studies and background materials used to produce the next draft of the Framework Document should be publically released.

Appendix A:

Recent polls outlining Albertan's support for environmental protection

Survey	Year and source	Pertinent Results
The Oil Sands Survey Albertans' Values Regarding Oil Sands Development	Cambridge Strategies 2007	Attributes Driving Albertans' Values: <ul style="list-style-type: none"> • #1 Protection of wildlife habitat concerns 18% • #2 CO2 Capture and GHG emission concerns 17% • Tied at #3 Use of Water and Reclamation Policy 14% • Tied at #5 The priority for Land Use and Royalty issues 10% • #7 The role and application of technological solutions 9% • #8 The determinants of the pace of oil sand development 7%
Land Use Framework	Government of Alberta 2007	74% Alberta too focused on economics and growth About 70 % would accept limits to energy and forestry development in favour of protected areas, watershed protection and habitat protection 88% agreed the gov. Should expand its efforts to conserve natural spaces on public land 83% are concerned or very concerned about loss of biodiversity and wildlife habitat
Albertans' Perceptions of Oil Sands Development: Poll	Pembina Institute 2007	83% There is strong support for increased government investments in environmental protection in the oil sands.
Alberta Forest Usage Survey	Alberta Forest Products Association 2006	84% Access and use of forests should be based firstly on preserving and protecting the environment and sustaining wild life habitat at the expense of sustained economic benefits and jobs

B) Mandate of the Alberta Parks Division: Current Vision, Mission and Goals

Vision

"Alberta's parks and protected areas preserve in perpetuity landscapes, natural features and processes representative of the environmental diversity of the province."

Mission

"As stewards of our environment, the Government of Alberta preserves, protects and enhances the province's natural heritage within a network of parks and protected areas. Many of these areas are also tourist attractions, providing a range of outdoor recreation opportunities where Albertans and visitors to the province experience, enjoy and learn about our natural and cultural heritage."

Goals

The Alberta Parks Division also has four goals, the primary one being that of preservation 'of the province's natural heritage". However, this goal must be balanced with three goals catering to human activities; these are referred to as "heritage appreciation", "outdoor recreation", and "heritage tourism".