

December 11, 2009

Dave McDonough
Waterton Lakes Field Unit Superintendent
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Re: Comments on Draft Updated Park Management Plan for Waterton Lakes National Park

Dear Mr. McDonough and Ms. Smith:

On behalf of the Canadian Parks and Wilderness Society – Southern Alberta Chapter (CPAWS SA), please accept this letter on the aforementioned subject. As you may be aware, CPAWS SA is part of a national non-profit organization dedicated to protecting Canada’s wilderness. CPAWS SA was formerly known as the Calgary Banff Chapter, originally established in 1965. The name was changed to better reflect the geographic area where the majority of our conservation and education work occurs.

CPAWS currently has campaigns running for the Castle Special Place and Flathead Valley regions bordering Waterton-Glacier International Peace Park. Together, these areas are integral pieces of much larger ecosystem, the Crown of the Continent, and have vital corridors and habitat for species such as the grizzly bear. Being the only Canadian protected area within this region, Waterton's management has far ranging implications. The Crown of the Continent is likely one of North America's best opportunities to ensure ecosystem resiliency in the face of climate change, providing that it secures a core of connected protected areas. Any management objectives in Waterton need to be place-based and measureable, while being planned within this larger context.

CPAWS SA has primarily approached the review of the Draft Updated Park Management Plan for Waterton Lakes National Park (hereafter referred to as “the Plan”) through the lens of the *National Parks Act*, which maintains that giving “first priority to the maintenance or restoration of ecological integrity” should be the focus of park management. Our submission is organized into three sections: overall comments; specific recommendations for strengthening the Plan; and additional comments in the attached Appendix.

Overall Comments

CPAWS SA strongly supports the emphasis Parks Canada placed on maintaining and restoring ecological integrity in the Plan’s vision and context. The content and essence of the Plan has a solid foundation and is ambitious and innovative. Additionally, CPAWS SA is pleased with the participatory methods of engaging and involving stakeholders and the emphasis on building an informed and supportive public. While it is recognized that the Plan is designed to provide strategic direction, the Plan requires the inclusion of specific and measurable ecological benchmarks for success. There also appears to be inconsistencies between and sometimes within sections (such as the six key strategies and six area concepts) of the Plan. Although the ‘monitoring and reporting’, ‘summary of strategic environmental assessment’, and ‘summary of priority actions’ have yet to be developed, CPAWS SA believes these are integral parts of the Plan and should be made public prior to the finalization of the Plan. The Plan’s

priorities should ideally be congruent with ecological, cultural, and visitor experience concerns and deficiencies identified in the recently completed State of the Park Report (SOPR).

Recommendations for Strengthening the Plan

Specific Long-Term Measurements for Accountability

CPAWS SA strongly believes that the Plan needs specific benchmarks of ecological success and that these should be the first indicators of success in all of the Plan's strategies. We encourage Parks Canada to use a precautionary approach to the Plan within the context of an adaptive management^[1] framework that would enable plan flexibility and amendments to the objectives and implementation tactics as required. For example, in the Best Practice Protected Area Guideline on the Management and Planning of Protected Areas by the International Union for Conservation of Nature and Natural Resources^[2], eight elements for expressing objectives were identified. They identified that the park management plan should have objectives that: 1) are precise/specific; 2) are achievable and realistic; 3) are measurable; 4) rare effective of park purpose, significance and exceptional values; 5) spell out the ends desired, but not the means to those ends; 6) adequately address the issues; 7) are accompanied by a rationale; and 8) written in priority order. **It is recommended that the Plan include specific long-term measurements and accountability with the results focusing on the fundamental tenet of ecological integrity.**

Park Visitation and Ecological Integrity

CPAWS SA supports increasing visitation to our National Parks, providing it is designed to keep people connected to nature and foster an ethic of environmental stewardship and awareness of park values. Although the Plan is designed to integrate the three elements of Parks Canada's mandate (heritage protection, education and visitor experience), it has an emphasis on increased visitation, education and visitor satisfaction. **It is recommended that a greater link to the maintenance and restoration of ecological integrity be detailed in these visitation objectives.** For example, the Plan falls short of defining a robust rationale for increasing visitation at the stated 5.3% by 2012^[3].

Greater Emphasis on Regional Ecosystem

According the United Nations Environment Program and World Conservation Monitoring Centre, the Park is "too small to be a self-contained ecological unit" and is "at risk of becoming an ecological island."^[4] As noted in the Plan and the SOPR, there are numerous existing and proposed threats^[5] in the surrounding or greater ecosystem to the long-term ecological integrity of the Park. We were pleased that the Plan identifies "approaching conservation challenges as opportunities to engage a variety of stakeholders" and that there is a focus in maintaining a high level of cooperation with surrounding land managers and owners. Specifically, we were pleased to see cooperative efforts and prioritization of large carnivore and ungulate research, reintroduction of fire, managing non-native plants, protection of riparian and alluvial fans, addressing non-native fish populations, and restoring and protecting species at risk. **We recommend that Parks Canada put a greater emphasis on: a) promoting connectivity of existing and proposed protected areas (such as the Flathead Valley Protected Area Proposal, enhanced protection in the Castle Special Place), and b) preventing or mitigating negative impacts from resource and other development in the regional ecosystem to the Park's ecological integrity through such processes as land use planning, environmental assessment and regulatory processes.**

Plan Consistency and Prioritization

The Plan reads inconsistently between and sometimes within sections (such as the six key strategies and six area concepts). **CPAWS SA encourages Parks Canada to consider greater consistency and clarity throughout the Plan.**

Although the ‘monitoring and reporting’, ‘summary of strategic environmental assessment’, and ‘summary of priority actions’ have yet to be developed, CPAWS SA believes these are integral parts of the Plan. **Therefore, it is recommended that a revised Plan which includes detailed sections on ‘monitoring and reporting’, ‘summary of strategic environmental assessment’, and ‘summary of priority actions’ be made public prior to the finalization of the Plan.**

Linking Plan Actions and Strategies with Identified Deficiencies and Concerns in SOPR

While the bulk of the concerns and deficiencies identified in the 2008 SOPR have been included in key strategies and actions in the Plan, there are additional deficiencies that should be included in the Plan. For example, the effectiveness of communication of cultural resource management was rated as poor with information not available. Additionally, influencing attitudes was unable to be rated as there was no information available. **It is recommended that the Plan be better integrated with the SOPR, with specific attention to the concerns or deficiencies that have been rated poor, fair or where information is not available.**

Ecosystem Based Management

We appreciate the importance of setting ecosystem priorities and encourage Parks Canada to use more detailed success indicators to influence the Plan in the long term. Parks Canada research has focused on both ecological (species resource requirements, habitat composition) and social (visitor satisfaction and expectations) factors for several years. We applaud the diversity of these research efforts. **It is recommended that Parks Canada take defined measures that integrate these bodies of research to effectively implement ecosystem-based management objectives that maximize visitor satisfaction without impacting ecological integrity.**

Integration of Climate Change

CPAWS SA views the purpose of parks and protected areas is beyond representing the diversity of Canadian ecosystems. Parks and protected areas play an integral role in mitigating the impacts of climate change. Parks provide expanses of core habitat and wilderness areas. For parks and protected areas to effectively address climate change, they must be effectively connected to prevent an island effect. Connectivity must be planned for within the boundaries of parks (e.g., highway over/under passes) and outside of park boundaries (e.g., wildlife corridors that connect protected areas). Connectivity also needs to be reflected in the management plan activities of adjacent lands. **It is recommended that Parks Canada play a leadership role in Canada’s climate change adaptation strategies by enhancing the importance of climate change and connectivity in park planning both inside and outside its boundaries.**

Request for Additional Informal Review

Lastly, given the short three-week period for which the Plan was open to public review and comment, **we would kindly request another informal opportunity to review the next draft prior to the submission for Ministerial approval.**



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Thank you for providing CPAWS SA this opportunity to comment and for the continued long-term collaborative relationship that CPAWS SA has had with Parks Canada. We look forward to working with you to strengthen the Plan and collaborating on its implementation. Please contact me (403-232-6686 or amsyslak@cpaws.org) if you would like to discuss any of these comments in further detail.

Sincerely,

Anne-Marie Syslak
A/Executive Director CPAWS SA

cc. Janice Smith, Waterton Lakes/Bar-U Field Unit, Parks Canada
Eric Hébert Daly, CPAWS National Executive Director
Katherine Thompson, Executive Director, CPAWS Northern Alberta Chapter
Chloe O'Loughlin, Executive Director, CPAWS British Columbia Chapter

Appendix – Detailed CPAWS SA Comments on the Draft Updated Park Management Plan for Waterton Lakes National Park

Areas of Support

- Parks Canada's efforts to build and strengthen the involvement of local and regional Aboriginal peoples.
- Creating educational opportunities for youth, urban Canadians and new Canadians is a wonderful way to introduce people to parks and foster awareness of the significance of National Parks and protected areas. CPAWS SA looks forward to the possibility of collaborating with Parks Canada on this educational initiative.
- Coordination and integration of Park Management Planning with adjacent and surrounding National Parks.
- Parks Canada's efforts to work cooperatively with jurisdictions and regional stakeholders to decrease fragmentation of surrounding areas and ensure habitat security at the regional scale.
- Education for stewardship and protection of Waterton's ecological and cultural resources.
- Enhanced electronic/internet information on the Park.

Purpose of New Activities and Events

- CPAWS supports activities and events taking place in parks that meet the main purpose of a National Park.
- Following the Guiding Principles and Operational Policies of Parks Canada, "Only outdoor activities which promote the appreciation of a park's purpose and objectives, which respect the integrity of the ecosystem, and which call for a minimum of built facilities will be permitted."
- Providing an additional variety of recreational opportunities does not necessarily equate to enriching visitors' connections to the Park.
- CPAWS does not support increasing access in any areas heavily used by grizzly bears.
- It is suggested that Parks Canada consider using detailed guidelines for the purpose of new activities and events to ensure long-term accountability in the management of the Park.
- Parks Canada should demonstrate that all new developments, activities and events will improve visitor satisfaction and appreciation for National Parks, not just get more people into the Park.
- Marketing the park with products and promotions to give visitors "value of money" and "good personal service" should NOT compromise the inherent integrity of the park's ecology.
- CPAWS cautions against promotion of the park using wildlife viewing as a selling feature to increase visitation.

Science and Ecosystem Management

- We applaud Parks Canada's continued efforts in citizen-based science as a means to create learning opportunities about parks and wilderness.
- Any monitoring programs that engage citizens should not compromise the scientific integrity of the studies nor replace robust, professionally executed scientific research as an aspect of park monitoring and adaptive management.

Zoning and Wilderness Area Declaration

- CPAWS SA supports the rezoning of the Blakiston Fan to zone II to protect habitat.

- The first sentence on page 40 under section 7.2 is inconsistent with the proposed change to Blakiston Fan.
- It is recommended that a zoning map (even as an appendix) be included in the next version of the draft Plan.

Best Management Practices and Innovation

- CPAWS SA was pleased to see that Parks Canada will be working closely with the Waterton Community to “work towards the community being a model of sustainability.”
- It is recommended that Parks Canada consider promoting or supporting specific environmental best management practices that minimize impacts to ecological integrity and promote visitor awareness and education in coordination with the Waterton Community.

Other Comments

- Ideally, the language of the Plan should be consistent between and within sections so that it appears as one voice and not several separate authors.
- The Plan would also benefit from a detailed proofreading to catch grammatical, spelling and punctuation oversights, with specific attention to the last 15 pages. For example on p. 24, under 5.4.2, the sentence on fescue grasslands needs rewording.
- It is recommended that the Plan consistently reference Aboriginal peoples as defined by the Canadian Constitution.^[6]
- CPAWS SA encourages further transparency in park planning including ongoing public monitoring and reporting.

[1]CPAWS views ‘adaptive management’ as a circular form of management whereby monitoring programs assess how effectively tactics are meeting management objectives. Results from monitoring programs are used to amend tactics to ensure the management objectives are being met over the long term. This carefully planned management approach is not simply ‘trial and error’ or ‘learn as you go’ but requires advance preparation and needs to be explicitly stated as the management approach to be effective.

[2] Thomas, Lee and Julie Middleton. 2003. Guidelines for Mangement Planning of Protected Areas. World Commission on Protected Areas. Best Practice Protected Area Guidelines Series No. 10. Series Editor Adrian Phillips. International Union for Conservation of Nature and Natural Resources. <http://data.iucn.org/dbtw-wpd/edocs/PAG-010.pdf>

[3] As identified on page 22 of the Plan by increasing visitation from 380,000 to 400,000 individuals.

[4] United Nations Environment Programme and World Conservation Monitoring Centre. 2006. Waterton-Glacier International Peace Park, Alberta, Canada & Montana, United States of America. www.unep-wcmc.org/sites/wh/pdf/Waterton%20Glacier.pdf

[5] For example, an additional threat the proposed open pit coal mine 35 km upstream of the Park and existing mineral exploration in British Columbia.

[6] Aboriginal peoples are defined as the descendants of the original inhabitants of North America. The Canadian Constitution recognizes three groups of Aboriginal people - Indians, Métis people and Inuit. These are three separate peoples with unique heritages, languages, cultural practices and spiritual beliefs.