

September 10, 2010

Via email to: elkisland.plan@pc.gc.ca

Alan Fehr
Field Unit Superintendent
Elk Island National Park
Site 4, R.R. #1
Fort Saskatchewan, AB T8L 2N7

Dear Mr. Fehr,

Re: 2010 Elk Island Management Planning Process – Stage 1

The Environmental Law Centre (ELC) is pleased to provide comments for Stage 1 of the 2010 Elk Island Management Planning Process. The ELC is a charitable organization incorporated in 1982 as a public source of information on environmental and natural resource law. Its current mission is to ensure that laws, policies and legal processes protect the environment.

The ELC commends Elk Island for demonstrating the elements of good management planning as set out in the Parks Management Guide. The materials provided to the public in support of the 2010 planning process show a clear cycle of goal setting, monitoring, reporting and consultation. We found this information easy to access and interpret.

Elk Island can also be commended for meeting its performance expectations as provided by the 2005 Management Plan. We understand current challenges include confusing messaging, unsatisfactory visitor experience, weak urban and Aboriginal relationships, a decline in indigenous species, and biotic succession. Elk Island is simultaneously experiencing declining use and increasing environmental stresses.

In addressing these challenges, the new plan must uphold the *Canada National Parks Act (NPA)*. To do so, it must foster public benefits today while leaving the park unimpaired for future generations. The plan must also meet the Parks Canada mandate of protecting heritage resources, facilitating opportunities for visitor experience, and providing public education. The components of this mandate are to be reached synergistically, but they are often in tension with each other and the *NPA*. Public comments on the recent Banff-Jasper plan exposed the significant tension between facilitating visitor experience opportunities and conserving heritage resources. This tension should be resolved in accordance with section 8(2) of the *NPA*, which provides that the priority management consideration is maintaining and restoring ecological integrity. From this perspective, we offer the following comments on Elk Island's proposed Key Strategies:

1. “Welcome One and All”

The ELC supports visitor experience opportunities that are accessible to urban residents, new Canadians, and new park users.

The ELC does not consider active marketing and branding campaigns as necessary to meet the Parks Canada mandate or uphold the *NPA*. National Parks are dedicated for the use of all Canadians, but this does not require active selling to every conceivable audience. Overly broad marketing could aggravate Elk Island’s issue with confused messaging. For example, Elk Island’s website and the Draft Vision emphasize dramatic landscapes, which might cause users to draw unfavorable comparisons with the mountain parks. We recommend highlighting that which is unique, for example the Dark Sky Preserve.

The ELC is opposed to building fully serviced campgrounds to attract highway travelers or to meet the expectations of some visitors. The Parks Canada Guiding Principles provide that:

“Public demand alone is not sufficient justification for provision of facilities and services . . . services and facilities must be considered essential, take account of limits of growth, not compromise ecological integrity or quality of experience”.¹

Full service camping is not essential as such facilities exist along the Yellowhead corridor. Elk Island’s small size limits growth and raises concern about ecological integrity and quality of experience. Full service camping could create noise and light pollution, detract from a sense of place, and reduce the park’s value as a refuge of tranquility.

A synergistic approach requires that a visitor experience strategy support the heritage protection mandate and educational mandate. We propose a strategy based on increased staffing, interpretation, and educational programs rather than increased infrastructure. Elk Island is a favorable teaching park due to its proximity to Edmonton, confined space, and accessible terrain. The park may require educational intervention to produce user appreciation because much of its natural history is subtle rather than dramatic. Inexperienced park users in particular benefit from interpretation. The State of the Park Report suggests that user enjoyment and learning are increased by interaction with park staff.

If visitor experience strategies are driven by other considerations, for example revenue generation, then these considerations should be expressed to participants in the planning process.

2. “Inviting Participation”

The ELC supports active citizen participation in parks management and heritage protection as a Key Strategy.

¹ Parks Canada Guiding Principles and Operational Policies, Guiding Principle 7: Appropriate Visitor Activities.

Providing for purposeful visitation can create a sense of place for users and counter the decline in use by urban residents.

Aboriginal participation should be realistic in form. The 2005 Plan suggests that Elk Island does not have established relationships with Aboriginal Peoples because Aboriginal Peoples ceased using the area prior to the creation of the park. This history is distinguishable from park-reserves that incorporate current Aboriginal use. If Elk Island or other users of the Beaver Hills did displace Aboriginal Peoples then this history should be recognized.

The Planning Newsletter implies that the Aboriginal partnership initiative is connected to the urban marketing and branding initiative. This could be a powerful synergy, but the two initiatives should not be integrated if it would be artificial or contrived to do so. Adding Aboriginal elements to a park landscape for the purpose of tourist attraction is a controversial practice. An example is the debate over reinstating “Indian Days” in Banff National Park.

Elk Island may have a particular advantage in incorporating Aboriginal Peoples in park management. Elk Island does not purport to be wilderness or to present an image of nature ‘untrammeled by man’. The park acknowledges its human management, which is compatible with Aboriginal perceptions of humans as part of the ecosystem rather than apart from it. Elk Island is philosophically well positioned to recognize past Aboriginal uses and imagine future ones.

3. “Conservation Legacy”

The ELC supports showcasing Elk Island’s conservation legacy as a Key Strategy. Our support extends to the preservation and restoration of heritage buildings so long as ecological integrity remains the priority management consideration. One might say that the Elk Island itself is a “cultural resource”, “a human work or place that gives evidence of human activity”. One particularly unique feature is the park’s origin as a fenced ungulate project.

This Key Strategy should promote biodiversity conservation. Biodiversity conservation is a core principle of the Beaver Hills Initiative while Parks Canada’s Vision for Parks includes adherence to the Convention on Biodiversity. The fact that 2010 is the International Year of Biodiversity makes this focus all the more appropriate for the 2010 Management Plan.

4. “Beyond the Fence”

The ELC strongly supports a Key Strategy of taking action outside the park boundaries. Elk Island’s small size makes it vulnerable to outside developments, which warrants outside action. The two greatest development threats to Elk Island are population growth in the greater Edmonton area and the expansion of Alberta’s ‘industrial heartland’ in the adjacent county. The presence of a National Park in Alberta’s Beaver Hills will continue to be a significant factor in maintaining the region’s ecological integrity.

The materials provided suggest involvement in regional air quality monitoring. Federal government monitoring can contribute to a more complete picture of the region, but with development well underway, monitoring alone will not be sufficient to maintain regional ecological integrity.

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3

The allocation of Elk Island's resources outside of the park should go towards actively protecting the greater Beaver Hills area from unsustainable development. Options include:

- Providing financial support to land trusts and conservation organizations seeking to acquire land in the area;
- Participating in the development of the North Saskatchewan Regional Plan under the *Alberta Land Stewardship Act*. Elk Island should seek enhanced participation opportunities based on Parks Canada being a listed contributor to Alberta's Land Use Framework.
- Participating in provincial energy development processes. Parks Canada should consider intervening on the authorization of projects from which Elk Island may be directly and adversely affected. The Agency can make a unique and helpful contribution to provincial decision-making on energy development by representing broader public interests.
- Participating in federal environmental assessment processes under the *Canadian Environmental Assessment Act*. As an example, we draw attention to the Enhance Energy carbon capture pipeline, which is to travel from industrial facilities north of the park to oil fields south of the park.
- Providing regional monitoring information and a regional overview as part of the park's educational and interpretive programming. This regional information could be provided in advance of scheduled education programs or directed at general park users. Regional information should be made available online and on-site.
- Exploring an integrated approach to recreational use of the Beaver Hills region. Connected trail access and consolidated user fees could open new markets, enhance user satisfaction, and increase public understanding of the region's ecological and cultural significance. We recognize that park fees and access may be legislated and therefore beyond the discretion of local managers, whether provincial or federal. Elk Island is a unique park that warrants special legislation and agreements where necessary for effective management.

Please do not hesitate to contact the ELC if you have any questions about the above comments. We look forward to future stages of the Elk Island management planning process.

Sincerely,

Adam Driedzic
Staff Counsel