

# WHAT YOU HAVEN'T BEEN TOLD

## About Alberta's Plan to "Optimize Alberta Parks"

Through a Freedom of Information and Protection of Privacy (FOIP) request, CPAWS obtained the official documents used by the Government of Alberta to inform their decision to delist 164 and close 20 provincial parks. The documents reveal that **the government has not been completely honest about their plan for Alberta's parks.**

### The Facts

- 1** The government's plan to delist Alberta Parks included removing their protected area status, selling lands to private operators or transferring them to vacant public land
- 2** The government was advised that this plan does not align with the overall intent of the parks system
- 3** There is insufficient data to understand the impacts these decisions will have on the budget
- 4** The government ignored advice to conduct broad public consultation and engagement on this plan

### What This Means

Despite the Minister's statements after the plan's release, selling parks land after it was delisted was part of the government's original plan. Private land owners or operators are not required to maintain environmental protections to the same standard and may not have the capacity to do so.

The government has yet to justify how this plan will help achieve Alberta Parks' goal to "conserve Alberta's landscapes for current and future generations."

The actual criteria used to select parks does not line up with the justification that the government is using. This decision was not made to save Albertans money, despite this being the only rationale provided for the decision. Some parts of the document indicate that divesting park assets may cost more in the end.

The Minister opted to exclude Albertans from this decision, despite being advised that public and stakeholder groups were likely to be concerned about the changes. It is more important than ever that we make our voices heard now.

### The Proof

In a briefing presentation to the Minister of Environment and Parks, a risk analysis for the parks plan was reported. The budget impacts of the plan could not be estimated due to lack of financial data.

The government was also advised of the risk that the changes "don't make sense or align with broader system outcomes."

The FOIP document clearly states that sale of lands was always part of the plan. Over 100 parks were never intended to be transferred to partners, but rather left as unprotected vacant public land.

Keep reading for a full summary of the FOIP document.



### What You Can Do

It is more important than ever that you raise your concerns about the "Optimizing Alberta Parks" plan to your local government representative and representatives of ridings where you visit parks. **Send a letter to your MLA at [bit.ly/DefendABParks](https://bit.ly/DefendABParks)** to let them know you do not agree with this plan!

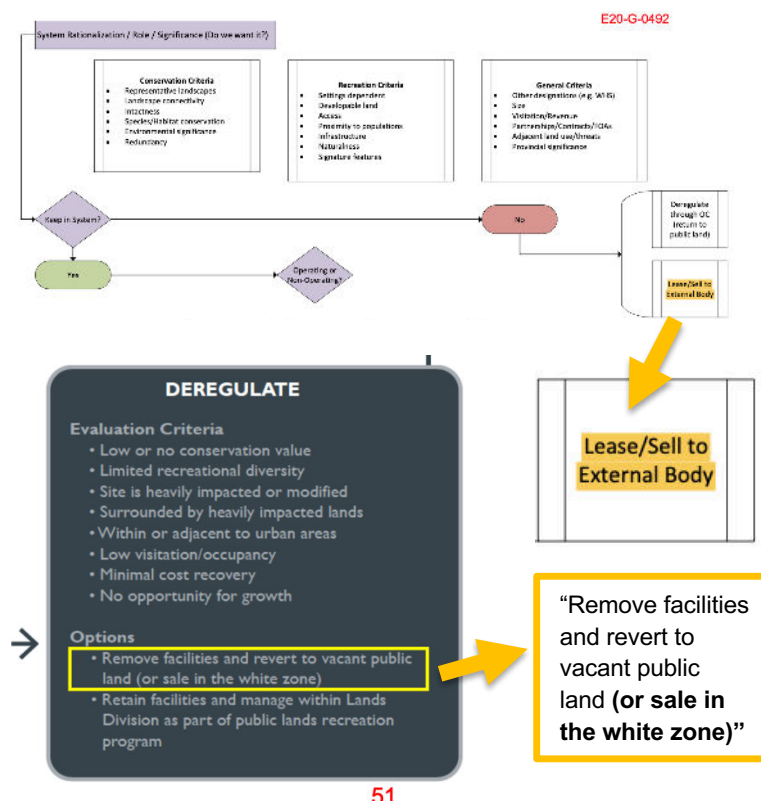
# WHAT YOU HAVEN'T BEEN TOLD ABOUT ALBERTA'S PLAN TO "OPTIMIZE PARKS"

## The Facts

## The Proof

## What this means

1. Alberta parks could be sold to private operators.



The Government has not been honest about their plans for Alberta's parks. After the original release of the plan which states that parks would be sold or transferred, government officials including the Minister of Environment and Parks, [stated that parks would not be sold](#). The FOIP document clearly states that for the parks being removed from the system, sale of lands was actually part of the original plan. Additionally, many parks were never intended to be opened for partnership, but rather left as unprotected vacant public lands, which would be left open to industrial use, instead of conservation.

## Remove from System: Divest

- Remove OC and transfer ownership of lands to 3<sup>rd</sup> party for management as park/recreation resource.
- Recommended for sites that have no significant conservation value, but provide important local/regional recreation opportunities.
- Financial assessment needed of grant/subsidy value.

<p>2. The Optimizing Alberta Parks plan does not line up with the overall intent of the parks system, which states that they aim to <a href="#">conserve Alberta's landscape for current and future generations</a>.</p>	<div> <div>E20-G-0492</div> <div>22</div> </div> <div> <div>Risks</div> <div> <ol style="list-style-type: none"> <li>1. RSAP changes don't make sense or align with broader system outcomes.</li> <li>2. Stakeholder concern about loss of / changes to sites and perceived loss of conservation focus.</li> <li>3. Uncertainty of political support at local level.</li> </ol> </div> <div> <div>CONFIDENTIAL - Advice to Minister</div> <div>Alberta</div> </div> </div>	<p>AEP had identified that one of the risks of the <i>Rightsizing Alberta Parks</i> (RSAP) plan (now <i>Optimizing Alberta's Parks</i>) was that it does not align with broader system outcomes</p> <p><i>Optimizing Alberta Parks</i> will threaten the steps taken in the last 10 years through Alberta's <a href="#">Plan for Parks</a> by removing protections for our natural landscapes and reducing recreational activities, we will see a greater stress on provincial and national parks, and public lands.</p>
<p>3. There is insufficient data to support these decisions.</p>	<div> <div>E20-G-0492</div> <div>23</div> </div> <div> <div>Risk 4 – Lack of detailed financial data</div> <div> <ul style="list-style-type: none"> <li>• Insufficient data to determine budgetary impacts of recommendations <ul style="list-style-type: none"> <li>– Work initiated to develop a financial model to assess cost/revenue at the site level</li> </ul> </li> <li>• Future Considerations: <ul style="list-style-type: none"> <li>– Some reduction in operating/capital costs</li> <li>– Potential loss of some revenue</li> <li>– Over time, compounding savings resulting from operational efficiencies</li> </ul> </li> </ul> </div> <div> <div>CONFIDENTIAL - Advice to Minister</div> <div>Alberta</div> </div> </div>	<p>The actual criteria used to select parks to be delisted and closed does not line up with the justification that the Government is using. AEP had identified that one of the risks of the plan was that there was a lack of financial data to inform these decisions and how it will impact Albertans.</p> <p>These sites may not actually save Albertans money, despite this being the only rationale provided for the decision in the first place.</p>
	<div> <div>E20-G-0492</div> <div>26</div> </div> <div> <div>Remove from System: Divest</div> <div> <ul style="list-style-type: none"> <li>• Remove OC and transfer ownership of lands to 3<sup>rd</sup> party for management as park/recreation resource.</li> <li>• Recommended for sites that have no significant conservation value, but provide important local/regional recreation opportunities.</li> <li>• Our experience suggests divestment comes with a price tag.(i.e. capital grant / operating subsidy).</li> </ul> </div> <div> <div>CONFIDENTIAL - Advice to Minister</div> <div>Alberta</div> </div> </div>	<p>The government recognizes that divesting sites (removing them from the system and/or selling) comes with a cost.</p> <p>Subsidizing the privatization of public lands could end up <b>costing</b> taxpayers money.</p>

The document does not detail any comprehensive visitation information to justify the claim the parks are underutilized.

There has still been no data released to support the claim that these parks are underutilized and raises questions regarding the criteria and decision-making process used by the Government of Alberta to select sites for closure or delisting.

4. There was no public consultation to ensure that Albertans interests and values were represented.

## Consultation / Engagement

- Options tested with Deputy Minister
- Recommendation to engage in broad, high level consultation/engagement first
- Second phase of consultation would be for site-specific recommendations.

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Public consultation was recommended but the Ministers Office **decided against it**. This decision is puzzling given the Minister's previous statements regarding and commitments to consultation on the topics of parks and public lands.

## Strategic Considerations

- Public and stakeholder groups are expected to be concerned with the reduction of available recreation and camping opportunities, as well as concern about the relative scope and scale of proposed change to the parks system.
- Indigenous groups are expected to express concern about the lack of their early involvement in decisions on land deregulation and divestment, particularly if they feel it will adversely impact traditional land uses, harvesting practices, and/or potential economic opportunities.
- Additionally, First Nations may express concerns about potential impacts to their treaty rights.
- Messaging will need to be clear that these actions will not weaken conservation management of existing sites, and that sites recommended for deregulation or divestment do not have significant conservation value.



The documents recognize that the public, stakeholders and Indigenous groups would likely be concerned about the loss of parks, potential impacts to traditional land uses and lack of involvement in the decision-making process. Concerns that the public will not support the decision is not justification for making a decision without public consultation.

## Potential Misalignment w/ Fishery Program

- AEP has engaged the public in enhancing fishing opportunities
- Many provincials parks serve as access points for fishing
- B20 and RSAP decisions could impact AEP's ability to enhance fishing, if parks are closed/divested
  - Even if third party operator is possible, will require time to set up properly
- Magnitude of impact currently unknown, analysis is underway for CR and B20 processes

CONFIDENTIAL - Advice to Cabinet



The document highlights the impact to angling opportunities and how it does not align with enhancing public fishing opportunities.



Conservation Criteria
<ul style="list-style-type: none"> <li>Representative landscapes</li> <li>Landscape connectivity</li> <li>Intactness</li> <li>Species/Habitat conservation</li> <li>Environmental significance</li> <li>Redundancy</li> </ul>

Recreation Criteria
<ul style="list-style-type: none"> <li>Settings dependent</li> <li>Developable land</li> <li>Access</li> <li>Proximity to populations</li> <li>Infrastructure</li> <li>Naturalness</li> <li>Signature features</li> </ul>

General Criteria
<ul style="list-style-type: none"> <li>Other designations (e.g. WHS)</li> <li>Size</li> <li>Visitation/Revenue</li> <li>Partnerships/Contracts/FOAs</li> <li>Adjacent land use/threats</li> <li>Provincial significance</li> </ul>

### Recreation Criteria

- Settings dependent
- Developable land
- Access
- Proximity to populations
- Infrastructure
- Naturalness
- Signature features

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Category	Tier 1 Signature Destinations	Tier 2 Classic Provincial Parks	Tier 3 Regional Parks	Devest to Third Party	Derogate
<b>Contribution to 4 Program Goals</b>	<ul style="list-style-type: none"> <li>SD Conservation: High</li> <li>SD Recreation: High</li> <li>SD Education: High</li> <li>SD Tourism: High</li> </ul>	<ul style="list-style-type: none"> <li>SD Conservation: High</li> <li>SD Recreation: Medium to high</li> <li>SD Education: Medium</li> <li>SD Tourism: Medium</li> </ul>	<ul style="list-style-type: none"> <li>SD Conservation: Low</li> <li>SD Recreation: Medium</li> <li>SD Education: Low</li> <li>SD Tourism: Low</li> </ul>	<ul style="list-style-type: none"> <li>SD Conservation: Low</li> <li>SD Recreation: Low to Medium</li> <li>SD Education: Low</li> <li>SD Tourism: Low</li> </ul>	<ul style="list-style-type: none"> <li>SD Conservation: Low</li> <li>SD Recreation: Low</li> <li>SD Education: Low</li> <li>SD Tourism: Low</li> </ul>
<b>Proposed Land Manager and Operational Model</b>	<ul style="list-style-type: none"> <li>Managed by Parks Operations Division</li> <li>Primarily operated by Parks Operations Division but will still have some areas of outsourcing to third parties via Facility Operating Agreements (FOAs), leases, partnerships or other contract models</li> </ul>	<ul style="list-style-type: none"> <li>Managed by Parks Operations Division</li> <li>Operations may be by Parks Operations Division or third parties via FOAs, leases, partnerships or other contract models</li> <li>Regardless of operational model, site remains within larger Alberta Parks Program identity</li> </ul>	<ul style="list-style-type: none"> <li>Most sites with Tier 3 type values are recommended for divestment or derogation</li> <li>Sites under consideration for retention by Alberta Parks Program could be operated by third parties through FOA, partnership or lease</li> </ul>	<ul style="list-style-type: none"> <li>Recommended for divestment to municipality or other partner and removal from Alberta Parks system</li> <li>May already be under lease or operation by municipality</li> </ul>	<ul style="list-style-type: none"> <li>No longer under Parks legislation</li> <li>Managed under Lands Act by ALP Lands Division</li> <li>May have facilities removed and sent to vacant public lands, or have facilities retained and managed by Lands Division as part of that public lands recreation program</li> </ul>
<b>Conservation Criteria</b>	<ul style="list-style-type: none"> <li>High conservation value and diversity</li> <li>Provincial or greater significance (international designations, ecologically representative or diverse, IOW, management effectiveness ranking)</li> <li>Preserving unique and/or exemplary features and landscapes</li> <li>Ecologically intact (intactness)</li> <li>Non-visitable</li> <li>High cultural or historical significance (BCH, I, L, C, historic expression of T3)</li> </ul>	<ul style="list-style-type: none"> <li>High conservation value (BCH Cat 1 or 2, IOW of regional or greater significance)</li> <li>Ecologically representative (contributes to 1 or more natural history themes)</li> <li>Provincial or regional significance</li> <li>Ecologically intact (intactness)</li> <li>Large size (1000ha)</li> </ul>	<ul style="list-style-type: none"> <li>Conservation value is limited to natural or near natural settings to facilitate nature-based recreation</li> <li>Sites under consideration for retention by Alberta Parks program have room to grow in terms of adjacency or connection with other recreation or conservation landscapes (potential for enhanced or evolving nature-based recreational opportunities)</li> </ul>	<ul style="list-style-type: none"> <li>Conservation value is limited to natural or near natural settings to facilitate nature-based recreation</li> </ul>	<ul style="list-style-type: none"> <li>Low or no conservation value; representation is easily replicable and undisturbed</li> <li>Site is heavily impacted or modified</li> <li>Surrounded by heavily impacted lands; integrity is unlikely to be maintained</li> <li>No opportunity for growth</li> </ul>
<b>Recreation Criteria</b>	<ul style="list-style-type: none"> <li>High recreation value and diversity (2+ settings, 40-60% of activity types)</li> <li>Nature-based recreation is central</li> <li>Existing or ability to accommodate a high level of infrastructure (campsites, IOW)</li> </ul>	<ul style="list-style-type: none"> <li>High recreation value and diversity (2+ settings, 40-60% of activity types)</li> <li>Nature-based recreation is central</li> <li>Supporting infrastructure (greenness to standard IOW, 50-85+ campsites)</li> <li>Contains some sites focused on backcountry recreation, where this site is intrinsically linked to an adjacent provincial park, or easy to access, with a higher intensity of use than sites in the wilderness category (Lands). These sites would require a similar need for facility development and permits to support recreation</li> </ul>	<ul style="list-style-type: none"> <li>Moderate to high recreation value (1 or greater setting)</li> <li>Infrastructure to enable recreation</li> <li>Sites under consideration for retention by Alberta Parks program provide a greater diversity of nature-based recreational opportunities beyond camping</li> </ul>	<ul style="list-style-type: none"> <li>Low to moderate recreation value and diversity (1 or greater setting)</li> <li>Infrastructure to enable recreation</li> </ul>	<ul style="list-style-type: none"> <li>Limited recreational diversity beyond camping</li> <li>Limited infrastructure (none, previously removed, or poorly maintained)</li> </ul>
<b>Education Criteria</b>	<ul style="list-style-type: none"> <li>Significant focus on programming (thermal education, interpretation or recreational) or ability to accommodate programming in future</li> <li>Personal delivery of programming available primarily through Parks Operations Division staff but may also involve partner organizations</li> <li>Existing education or interpretation infrastructure (interpretive displays, signs, and brochures, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Personal programming readily available through staff visit once per week and special events</li> <li>Non-personal programming available</li> <li>Mix of delivery through partner organizations and Parks Operations Division staff</li> <li>Moderate to low interpretation infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>Personal programming primarily through periodic staff visit</li> <li>Minimal to no non-personal programming</li> <li>Primarily delivered through partner organizations</li> <li>Minimal to no interpretation infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>Education programming does not need to be aligned with Alberta Parks standards, and can be planned and delivered by third party</li> </ul>	<ul style="list-style-type: none"> <li>Focus on general environmental education and awareness via other ALP Decisions and solutions</li> </ul>

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Tourism and Other Criteria	<ul style="list-style-type: none"><li>• High tourism value (provincial, national or greater tourism draw or potential)</li><li>• Auto access</li><li>• High awareness and visitation (adventure hits, eco-tourism)</li><li>• Potential connectivity to other services, sites or municipalities</li><li>• <u>Proximity to major urban centre or on-site accommodations</u></li></ul>	<ul style="list-style-type: none"><li>• Regional to provincial tourism draw</li><li>• Moderate to high visit (weekend occupancy 50-75%)</li><li>• Cost recovery of management (B0+ campsites)</li><li>• Within 200km radius of major Alberta population centres, with road access</li></ul>	<ul style="list-style-type: none"><li>• Local to regional draw</li><li>• East of access</li><li>• Moderate to high visit (weekend occupancy 50-75%)</li></ul>	<ul style="list-style-type: none"><li>• Local to regional draw</li><li>• East of access</li><li>• Moderate use (B0+ occupancy)</li></ul>	<ul style="list-style-type: none"><li>• Within or adjacent to urban areas</li><li>• Proximity to major urban centres or on-site accommodations</li><li>• Staging areas into adjacent public, private or private lands</li><li>• Remote and no operational feasibility</li><li>• Low visitation and tourism value</li><li>• Minimal cost recovery (20+ campsites, low occupancy)</li></ul>
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or municipalities

- Proximity to major urban centre or on-site accommodations

The document points to the desire to maintain parks that are close to urban centres. This does not reflect the importance of many of these parks to rural communities, and proves that rural communities will lose out through this plan.