



Minister Todd Loewen
Ministry of Forestry and Parks
Government of Alberta

Minister Grant Hunter
Ministry of Environment and Protected Areas

October 16, 2026

Sent by email to parks.engagement@gov.ab.ca

Dear Honourable Ministers Loewen and Hunter,

Protection must remain in place for Kootenay Plains and Marshybank Ecological Reserves

We appreciate the opportunity to comment on the 2026 Proposed Ecological Reserve Changes which will impact Kootenay Plains and Marshybank Ecological Reserves. Ecological Reserves (ER) have been established specifically to preserve and protect representative, rare and fragile natural heritage features in an undisturbed state. Redesignating these areas as a Provincial Park and Wildland Provincial Park, respectively, will reduce the level of protection afforded to them, introducing the possibility of further degradation to these ecosystems. In the case of the eastern portion of Marshybank, it is completely unacceptable that a large portion of the Ecological Reserve will lose protections completely to allow for commercial logging. We urge the Government of Alberta to reconsider the proposal to make these designation changes.

Kootenay Plains Ecological Reserve and Provincial Recreation Area

This area was initially designated as an Ecological Reserve to protect “one of the most significant micro-ecosystems within the Parks system, representing a rare montane subregion of the Rocky Mountains. As one of the few environments of its kind in North America, the ecological reserve is protected to preserve its incredible diversity, including rare plant species, wildlife, and sensitive cryptogamic soil. Beyond its biological importance, the area holds deep cultural significance, making it a truly unique destination for visitors.” The proposal would merge the Kootenay Plains Ecological Reserve, adjacent Recreation Area and additional bed and shore lands into a new Kootenay Plains Provincial Park, shifting management from the Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act to the Parks Act. While we appreciate the additional lands that will receive protected area status, we have serious concerns about the risk of reducing protection from an Ecological Reserve to a Provincial Park for this fragile and unique landscape.

Alberta Parks explained that this change is to accommodate existing uses (e.g. mountain biking and equestrian trails) that are “typically prohibited in ecological reserves”. The change will inherently weaken legal protections. Ecological reserves are explicitly created “primarily for the preservation of natural ecosystems,” whereas provincial parks have a broader mandate to balance recreation and conservation. Under the Parks Act, many activities now strictly limited (e.g. intensive recreation in sensitive habitats) could be permitted or harder to enforce. We acknowledge that some recreational uses are already occurring and that visitation is much higher than envisioned when the area was designated but maintain that these could be managed under

the current ER status through careful planning and increased enforcement and point out that the Management Plan for the ER does allow biking and equestrian use in some areas.

If redesignation is pursued, we urge Alberta Parks to apply special protection zones within the new park to ensure that the rare and fragile ecological values for which the Ecological Reserve was created are adequately protected. The Parks Act allows zoning to “provide more protection to areas of special ecological or cultural significance within the park”. This tool should be used to maintain the core ecological values of the Kootenay Plains. For example:

- **Retain a Strict Nature Zone:** Reserve the heart of the old ER (prime wildlife habitat, rare plants, cultural sites) as off-limits to bikes, horses, and other mechanized use, mirroring existing ER restrictions. Camping and open fires should remain prohibited in these core areas.
- **Buffer for Recreation:** Allow mountain biking and equestrian use only on designated trails in the former recreation area, as proposed.
- **Enforcement Capacity:** We note Alberta asserts that Parks Act regulations offer “better management” for high-use areas. We support enhancing enforcement, but if that is the goal of this designation change, we urge the Government to allocate more enforcement capacity to this area and ensure that activities that could harm the ecological values for which the area was initially protected are eliminated from the sensitive habitat.

By zoning appropriately, the government can reconcile recreation with preservation. Without such measures, the new park risks substantially weaker protection. CPAWS Northern Alberta are willing to work with Alberta Parks as well as local groups, including the West Country Sustainability Coalition, to help guide where these special protection zones should be located.

Marshybank Ecological Reserve

The Marshybank proposal would remove the west block of the Marshybank Ecological Reserve from ER status, incorporating it into Brazeau Canyon Wildland Provincial Park. This “double-designation removal” is presented as a technical fix, but in effect it downgrades protection: Wildland Parks permit camping, hunting, fishing and horseback riding. These are all uses banned in an ER. In the long term, if these uses are permitted, this will increase disturbance in sensitive and important ecological areas. We note that Wildland Provincial Parks can also, in about 50% of the WPPs in the province, allow motorized recreation. We acknowledge that this is not included in the designation change and expect to see that motorized recreation will continue to be prohibited in the area.

Beyond this reduction in protection for the west block, we are extremely concerned that the complete removal of protection for the eastern extent of the current ER is to allow for commercial logging. This is completely unacceptable, particularly for an area that was afforded the province’s highest level of protection, with an intention of this protection being permanent, due to its rare species, incredibly diverse plant communities, and importance for ecological connectivity. It has been brought to our attention that forestry stakeholders pushed to open parts of the ER to logging. It is wholly inappropriate for the protected area status of an area to be removed as a result of lobbying from industry. This will not only impact the rare and fragile species and ecosystems currently protected within the Marshybank ER, but sets a worrying precedent for the role that industry can have in redrawing protected area boundaries to their liking.

We support the addition to connect the existing Brazeau Canyon Wildland Park with the east block of the Marshybank Ecological Reserve, but not at the expense of protection for other areas, and

certainly not as compensation for the forest that will be lost if the easternmost section is allowed to be harvested. This area is already under a high level of pressure from forestry and oil and gas development. The cumulative impacts of disturbance on the surrounding landscape make the need for protection of this area even higher. We strongly recommend that the eastern expansion proceed, but that the original ER boundaries of the east block (including Marshybank Lake and adjacent wetlands) be retained intact. This approach increases connectivity and protection without ceding any ground to industry pressures.

Conclusion and Recommendations

Ecological reserves like Kootenay Plains and Marshybank were established because of their exceptional natural values, warranting the highest protection available in Alberta. Converting them (even partly) to parks or wildland parks risks irreversible loss of those values. We therefore recommend:

- **Maintaining ER Protections:** Retain the strict legal status over the most sensitive areas. If reclassification occurs at Kootenay Plains, create special protection zones to uphold ER-level restrictions (no camping/fires, no resource extraction, limitations on intensive recreation).
- **Oppose Logging in ER Lands:** Explicitly exclude the current ER lands from any forestry tenure or harvesting and maintain ER designation. The fact that these boundary changes have been advanced to satisfy industry demands is inappropriate, particularly without extensive public consultation and broader dissemination of this plan; public trust requires prioritizing conservation over short-term industrial interests.
- **Greater Transparency & Inappropriate Process:** The process by which these changes are proceeding does not match their ecological impact. Broader dissemination of the announcement of this change should have been conducted and an official public engagement process should have been launched. A period of longer than 30 days for feedback should have been implemented. More broadly, as the David Thompson Subregional Plan is currently being drafted, it would have been much more appropriate to include these proposed changes within the draft subregional plan. The changes should be considered within the broader landscape conditions and be part of a proper public consultation process.

Protected areas can only be defined as such if the protections are expected to be permanent. Changes to boundaries and designations should therefore only be considered as a last resort in response to exceptional circumstances, which in these cases are not present, and only if they result in continued or improved protection of the landscape. The amendments proposed do not achieve that goal.

Thank you for considering these comments. We urge the government to retain the integrity of Alberta's ecological reserves and resist any changes that would degrade their protection. In addition, we reiterate our desire to work with Alberta Parks and local land user groups in the region to help in defining special protection zones within the Kootenay Plains region.

Sincerely,



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