

What We Heard

Consultation to Enhance Protection of the Castle Area in the South Saskatchewan Region

March 2016

Table of Contents

Overview	3
Consultation Process.....	3
Online Survey.....	4
Public Submissions.....	12
Stakeholder Submissions.....	14
Indigenous Consultation.....	23

Overview

On September 4, 2015, the Government of Alberta committed to enhancing protection of the Castle Special Management Area (the Castle). To achieve this, government announced plans to amend the South Saskatchewan Regional Plan (SSRP) and designate the Castle under the *Provincial Parks Act* as a mix of Wildland Provincial Park and Provincial Park. The following classifications of parks were proposed:

- Expansion of the Castle Wildland Provincial Park - this expansion would include the most critical and sensitive wildlife areas and habitat, major valleys and front canyons and two major wildland movement corridors along the continental divide northwards to Crowsnest Pass.
- Creation of a new Provincial Park - the new Provincial Park would encompass the existing Provincial Recreation Areas:
 - Castle Falls Provincial Recreation Area
 - Castle River Bridge Provincial Recreation Area
 - Syncline Provincial Recreation Area
 - Beaver Mines Lake Provincial Recreation Area
 - Lynx Creek Provincial Recreation Area

The Provincial Park would provide a range of nature-based outdoor recreation opportunities while still maintaining the ecological health of the larger area.

The new designations will support conservation management objectives and differentiate and diversify the recreation and tourism opportunities within the region. The planned designation would not include the Castle Mountain Resort lease or private land. West Castle Wetlands Ecological Reserve will remain in place and is unaffected by the commitment.

Consultation Process

To designate the Castle under the *Provincial Parks Act* an amendment to the SSRP is required. The *Alberta Land Stewardship Act* (ALSA) set outs the legal authority for regional land-use planning in Alberta, which includes making, amending and reviewing regional plans. According to ALSA, appropriate public, stakeholder and Indigenous consultation with respect to a proposed amendment is required before a final decision is made by Cabinet.

All Albertans were invited to participate and provide input to the proposed plan for the Castle. A 30-day public input period was held from September 4 to October 5, 2015. Input was provided to government in a variety of ways including an online survey, written and email submissions, phone calls and meetings. There were approximately 3,400 responses to the online survey (Appendix 1 – Summary of Public Online Survey Results). Meetings with stakeholder groups were also held with the Land Use Secretariat and with Alberta Environment and Parks representatives upon request.

Separate Indigenous consultation was held from September 4 to November 9, 2015 as per the *Government of Alberta's First Nations Consultation Policy on Land Management and Resource Development* and associated guidelines. On September 4, 2015 notifications were sent via email and mail to the 13 First Nation Chiefs and consultation technicians who participated in the consultations for the South Saskatchewan Regional Plan.

Notifications were also sent to the Métis Nation of Alberta Region 3. The notifications included details regarding the proposal, information brochures, and maps about the proposed Castle boundary.

First Nations included:

Blood Tribe, Piikani Nation, Siksika Nation, Stoney Nations (Bears paw Nation, Chiniki Nation, Wesley Nation), Tsuu T'ina Nation, Ermineskin Cree Nation, Louis Bull Tribe, Montana Band, O'Chiese First Nation, Samson Cree Nation and Sunchild First Nation.

Online Survey

The online survey and supplementary information pieces were available on the Alberta Parks and the Alberta Land Use websites from September 4 to October 5, 2015. There were 14 questions included in the survey. The first question included the following preamble with an accompanying question:

The Government of Alberta is acting on its intent to enhance protection of the Castle area. To achieve this, the government will amend the South Saskatchewan Regional Plan and designate the Castle under Parks' legislation as a mix of Provincial Park and Wildland Provincial Park.

This designation will protect important wildlife populations and habitat as well as important headwaters. This will also enhance the tourism and recreation potential of the area, and help to diversify the economy into the future.

Question 1: To What extent do you agree with the above statement on a scale of 1 to 5?



3,379 Albertans responded to this question. Fifty-two per cent somewhat or strongly agreed with the government intent to designate the Castle under Parks' legislation, while 31 per cent said they somewhat or strongly disagreed with the government intent to designate the Castle under Parks legislation, leaving 17 per cent neutral.

Questions 2 - 12

The remainder of the questions in the survey asked Albertans to indicate their level of support for various services and facilities in the Castle area to inform future management planning, capital planning and potential tourism development.

For each question, the responses were tabulated and weighted based on the level of support indicated to calculate a relative level of support metric. The closer the bar in the graphic is to the right (full support), the more support there is among respondents, while closer to the left shows weak support. The mid-point indicates a balance among respondents who indicated weaker support with those that indicated stronger support.

<p>Question 2: Designated “unserviced camping areas” in the new Provincial Park</p>	<p>2,910 Albertans responded to this question. The survey responses revealed a high level of support for unserviced camping areas in the new Provincial Park, which was higher than for limited service (question 3), and significantly higher than serviced campgrounds (question 4).</p>	
<p>Question 3: Designated “limited service camping areas” in the new Provincial Park.</p>	<p>2,907 Albertans responded to this question. The survey responses revealed a high level of support for limited service camping areas in the new Provincial Park, though not as high as for unserviced (question 2), and significantly higher than serviced campgrounds (question 4).</p>	
<p>Question 4: Serviced campgrounds in the new Provincial Park that could include concessions, power/water hookups, RV waste transfer stations, etc.</p>	<p>2,912 Albertans responded to this question. The survey responses revealed a medium level of support for serviced campgrounds in the new Provincial Park, significantly lower than the support for limited or unserviced service camping areas (questions 2 and 3).</p>	
<p>Question 5: Backcountry off-highway-vehicle camping areas in the new Provincial Park.</p>	<p>2,902 Albertans responded to this question. The survey responses revealed a medium level of support for backcountry off-highway vehicle camping areas in the new Provincial Park, significantly lower than the support for backcountry non-motorized camping areas (question 7).</p>	
<p>Question 6: Backcountry off-highway-vehicle camping areas in the expanded Wildland Provincial Park.</p>	<p>2,907 Albertans responded to this question. The survey responses revealed a medium level of support for backcountry off-highway vehicle camping areas in the expanded Wildland Provincial Park, significantly lower than the support for backcountry non-motorized camping areas (question 8).</p>	
<p>Question 7: Backcountry non-motorized camping areas in the new Provincial Park.</p>	<p>2,903 Albertans responded to this question. The survey responses revealed a high level of support for backcountry non-motorized camping areas in the new Provincial Park, significantly higher than the support for backcountry off-highway vehicle camping areas (question 5).</p>	
<p>Question 8: Backcountry non-motorized camping areas in the expanded Wildland Provincial Park.</p>	<p>2,895 Albertans responded to this question. The survey responses revealed a high level of support for backcountry non-motorized camping areas in the expanded Wildland Provincial Park, significantly higher than the support for backcountry off-highway vehicle camping areas (question 6).</p>	

<p>Question 9: High service accommodations or services such as hotels, restaurants, etc. along the Highway 774 corridor within the new Provincial Park.</p>	<p>2,904 Albertans responded to this question. The survey responses revealed a low level of support for high service accommodations in the new Provincial Park.</p>	 <p>Weak Support Full Support</p>
<p>Question 10: Outdoor Adventure Tourism opportunities.</p>	<p>2,894 Albertans responded to this question. The survey responses revealed a medium level of support for outdoor adventure tourism opportunities.</p>	 <p>Weak Support Full Support</p>
<p>Question 11: New outdoor adventure concepts like via ferrata, (Italian for "iron road," this is a steel cable which runs along a climbing route and is fixed to the rock that climbers can secure themselves to as an aid) in the new Provincial Park or expanded Wildland Provincial Park.</p>	<p>2,891 Albertans responded to this question. The survey responses revealed a medium level of support for new outdoor adventure concepts like via ferrata in the new Provincial Park or expanded Wildland Provincial Park.</p>	 <p>Weak Support Full Support</p>
<p>Question 12: Hut to hut backcountry travel opportunities in both the new Provincial Park and expanded Wildland Provincial Park.</p>	<p>2,888 Albertans responded to this question. The survey responses revealed a high level of support for hut to hut backcountry travel opportunities in both the new Provincial Park and expanded Wildland Provincial Park.</p>	 <p>Weak Support Full Support</p>

Questions 13 & 14

Question 13: Are there any other facilities and services that should be considered in either the new Provincial Park or the expanded Wildland Provincial Park?

Question 14: Additional comments.

Due to the nature of responses received for questions 13 and 14, these text answers were compiled and analyzed together. Question 13 and 14 responses were consolidated and organized by theme. Provided below is a summary of question 13 and 14 survey responses by theme:

Camping

- Many people support limited or un-serviced camping and do not want backcountry camping opportunities restricted, but there was general agreement that backcountry camping needs to be managed carefully with increased enforcement of rules and regulations.
- Many people also support restricting or banning random camping. Multiple responses expressed frustration with people who appear to leave their campers beyond the 14-day limit and random camping more generally.
- Ideas that were shared to regulate, reduce, and/ or hold random campers more accountable include:
 - Purchase mandatory license with an expiry date displayed at campsite;
 - Administer a yearly park pass, yearly permit or pay a daily user fee;
 - Provide minimal cost camping in areas or encourage the use of existing campgrounds;
 - Increase the number of designated group camping areas by providing large fenced in compounds that are serviced;
 - Permit random camping exclusively for tents and access to the backcountry by foot or horse; and
 - Designate sites, camping nodes or backcountry access with assigned numbers and zero services that appeal to random campers and are free.
- Some people agree with more campgrounds and/or high service campgrounds to protect the area and better control of camping activities.
- Many people provided comments about affordable camping and believe camping fees limit who can enjoy the area. Some people do not want to pay to camp in a designated site and/or cannot afford the designated sites. There were requests to ensure camping remains accessible to low income families or seniors.

Cattle Grazing

- Support limits or cut backs to cattle grazing in the Castle area.
- Cattle grazing removed as a permitted activity in the area.
- Significantly improved grazing rules, management systems and/or monitoring to restrict cattle grazing impacts to water quality, protect fish habitat and prevent spread of invasive species and manure pollutants.
- Many identified cattle grazing as a significant issue in the Castle area for the following reasons:
 - Cattle grazing's perceived damage to riparian areas, vegetation, trails, water ways, wetlands and fish populations;
 - Negative impact to rare plant species, water ways, and wetlands in the Castle area through the spread of non-native plants and invasive species;
 - Negative impact to headwaters as large numbers of cows can be found in the highest altitudes at some of the most sensitive areas;
 - Negative impact to bank erosion and insect and fish populations; and
 - Aesthetic issues – some people mentioned they do not want to go to the wilderness to see cows.

- Support for protecting continued use of Castle area by grazing associations. There are concerns that removing cattle grazing as a permitted activity will have impact the livelihoods of ranchers and their families as it may be difficult to find different grazing land.
- Support for continuing cattle grazing as an important part of the ecosystem and the benefits it serves for plant species, biodiversity as well as a fire prevention tool.

Enforcement

- Enforcement issues or concerns were consistently raised in relation to permitted activities in the Castle, including random camping, cattle grazing, OHV use and hunting and fishing.
- Questions were raised about how the new rules and regulations under Parks' legislation will be enforced.
- Comments indicated that people currently feel there is limited to no enforcement of rules and regulations in the Castle area.
- Many people support additional funding to hire additional staff to patrol, educate and enforce rules and regulations with regard to concerns with permitted activities. Requests for increased on the ground support or presence of conservation or fish and wildlife officers were common.
- A few people believe designating the Castle area under Parks' legislation will be for nothing without adequate enforcement.

Forestry

- Many people would like to see the forestry industry continue logging in the Castle area and mentioned the various benefits of logging when managed responsibly. The benefits shared are outlined below:
 - Forestry is considered an essential renewable industry that diversifies the Alberta economy away from non-renewables such as oil and gas. Additionally, concerns were raised that without this industry skilled, high-paying jobs will be lost and/or replaced with low wage employment opportunities;
 - Some people feel that the forestry industry was unfairly excluded, while current oil and gas operations were allowed to persist;
 - Many people are concerned about forest health, the forests natural succession and the build-up of fuel in the absence of logging. Many people who raised concerns about forest fires support sustainable forestry practices and/or selective logging to prevent forest fires; and
 - Similar to cattle grazing, a few support forestry practises as required to maintain a healthy and diverse ecosystem and promote wildlife habitat since prime habitat can be overgrown.
- Alternatively, many people welcomed news that commercial forestry will be stopped in the Castle area.
- Some local residents have permits for gathering firewood to heat their homes. Requests to continue allowing personal firewood harvesting were also a concern.

Hunting and Fishing

- There were requests for a complete ban on hunting and fishing in the Castle area to protect wildlife and fish species. Others suggested a temporary fishing ban, no-angling sanctuaries, catch and release only regulations (or ban) and/or annual stream closure rotation to support healthy fish populations and habitat.
- Many people were concerned about the health of specific fish species including westslope cutthroat trout and bull trout. These concerns generally included requests for increased protection of these fish populations and habitat.
- With regard to safety, a few people questioned how they would feel safe in a Provincial Park that allows hunting.
- Some people would like to see fishing guides and/or outfitters removed or the implementation of increased restrictions in the Castle area, including restrictions on setting up camps and the number of allowable clients.

- There were also comments that strongly support access to hunting opportunities in the proposed parks. A few people do not want to see hunting opportunities limited or impacted by competing activities such as tourism. Hunting was described as an important conservation tool and a subsidy for food costs.
- Some people support walk-in-only hunting in designated areas, while others would like to continue using OHVs because walk-in-only is increasingly difficult for elderly people or the retrieval of larger game.
- A few people would like to see a complete ban on trapping. A few others support trapping and questioned why trapping was not mentioned as a permitted activity within the proposed parks.

OHVs

- Many people want to limit or ban OHV use (including snowmobiles) in the Castle area. Concerns regarding OHV and motorized access include:
 - Some people question OHV users commitment to following enhanced rules and regulations in the proposed parks considering similar rules may not have been followed in the past;
 - Many responses agree OHV use is incompatible with the conservation intent and ecological integrity of the proposed plan – some people worry allowing motorized access in the proposed parks will set a precedent for future parks;
 - Issues were raised related to the damage OHVs have on plant and species habitat, waterways, and streams, including threatening fish habitat and species at risk;
 - Significant noise from OHVs was cited as causing habitat fragmentation as well as a reason people may not return to the area, including tourists and locals who worry about being run over when on the land. It was mentioned that OHV use disrupts the wilderness experience and destroys the landscape in the area such as the compaction of soil along trails and cut lines. Similar to these comments, people would like to see non-motorized activities promoted; and
 - Some people insist that OHV use does very little for tourism and the local economy and would like to see the area managed to attract tourists with a variety of interests and not just tourists who come to the area to use their OHVs.
- There were also many requests to ensure that OHVs (including snowmobiles) have a place in the new parks. OHV use was described as an important activity accessible for years with minimal restrictions to people including many locals.
 - OHV use and camping is a huge industry in the area and people feel that it would be a shame to lose access to such a beautiful place or face additional restrictions causing a decrease in the area's usage and possibly pushing people to overcrowd other areas.
 - A few people indicated they are concerned the number of trails for OHVs will decrease.
- Feedback also focused on trails, enforcement and designating OHV use to specified areas and OHV clubs.
 - Trails – many people agree efforts to ensure OHVs remain on designated trails are a must. This includes requests for development of a designated trail system that consider wildlife habitat and migration patterns, infrastructure, maintenance and enforcement to ensure compliance. Other people believe the dense trail network and linear disturbances should be limited due to negative impacts on native species habitat.
 - Enforcement – many people agree that enforcement in the Castle area is lacking and question how it will be possible for government staff to enforce enhanced OHV rules and regulations. There was a significant number of requests for additional staff to monitor and enforce rules. To fund additional enforcement and maintenance of trails, some people recommended implementing user fees or monthly/ yearly permits. There were also requests to greatly increase penalties for illegal use of motorized transport.
 - Designated Areas – recommendations include designating specific areas for OHV use away from environmentally sensitive areas (such as waterways or streams), and banning use in the rest of the

proposed parks. A few people believe OHV and snowmobile access should be limited to the Provincial Park with no access into the Wildland Provincial Park.

- Clubs – requests to ensure local OHV and snowmobile clubs have access and a role in maintaining or improving trails.

Oil, Gas and Coal

- Responses related to the oil and gas theme ranged from requests to stop all oil and gas extraction to disappointment that existing surface extraction will be allowed to significant concern that new oil and gas developments will not be permitted.
- Many people do not see oil and gas (or other resource extraction) activities as compatible with the protection intent of the proposed plan. Other people questioned how families supported by the oil, gas, forestry or other industries will find alternative employment.

South Saskatchewan Regional Plan (SSRP) and Consultation Process

- Many people expressed concern with the proposed amendment of the SSRP and the perceived disregard for the Land- use Framework regional planning process.
 - There is a perception that the LUF regional planning process is meaningless in regard to setting long-term management direction for the province. More specifically, since extensive, complex and thorough consultation for the SSRP identified the Wildland Provincial Park boundary, concerns were raised regarding the apparent ease government is able to change what was approved through the LUF regional planning process.
 - Disappointment with ignoring the SSRP and concerns about the precedent this process will set for future regional plans was expressed. There were many concerns related to the perception of government's ability to open up a cabinet approved document as well as requests to respect LUF and the *Alberta Land Stewardship Act* in land-based decision-making.
 - Many people are frustrated that significant time and resources went into the SSRP consultation including participating in sessions, filling out workbooks, reviewing drafts and providing written feedback. They feel that the SSRP as a multi-stakeholder process honoured all Albertans and this input will be abandoned or disregarded, while the Castle plan and associated consultation excludes the interests of some user groups.

Castle Consultation Process

- Perceived lack of consultation – many noted the consultation period (30 days) to amend the SSRP is inadequate as compared to the five to six year consultation period implemented for SSRP development.
- Some people expressed appreciation for the opportunity to provide input. Others raised concerns about the lack of information provided, which impacted their judgement and quality of the answers provided.
- Some argued that priority should have been given to local residents who have a close relationship to the land, for example some local residents rely on the land to support their family.
- There was a perception that the initial announcement regarding government's plans to enhance the protection of the Castle area indicated a final decision was made without consultation. With regard to the initial announcement, people feel that the local municipalities, local residents, and generally a more diverse group of stakeholders should have been invited or made aware of government's plans.

Tourism and Recreation

- Some people want to see limited to no commercial operations (hotels, restaurants etc.) as it will take away from the natural state of the area. People feel that recreation, tourism facilities/services and encouraging additional people to visit the area are incompatible with the protection intent of the proposed parks. Others

support tourism, but are concerned about large scale commercial development. They do not want to see the area overdeveloped.

- A few individuals who agree with building additional facilities/services favour low-impact recreation and tourism due to the ecological importance of the area or would like to see facilities and services in one central/designated location such as outside the park boundaries.
- Many support industry jobs in sectors such as forestry or oil and gas as compared to seasonal tourism and recreation jobs.
- A few comments request a paved road to the Castle Mountain Resort (CMR) and suggest the CMR and the Beaver Mines area should be the centre of the proposed parks commercial activity. Others indicated the ski area is not sustainable in itself due to poor weather conditions and low number of visitors.
- There were many requests to ensure activities such as yearly ultramarathons or endurance races continue.

Trails

- Some people are concerned that the current trail density in the Castle area does not support meaningful protection and would like to see a reduction in the trail network as well as close monitoring and enforcement. Others do not want to see any trails closed and view the trail system as an important part of the Castle area.
- Support and/or requests for mountain bike trails were commonly raised. It was noted that mountain bike trails could further attract tourists, and have a similar ecological footprint to hiking. While it was mentioned by others that although mountain bike users do not cause as much disruption as compared to other activities, users still have the potential to damage the land.
- Some people would like to see resources to support the development of designated trails for specific activities such as mountain biking, hiking or OHV use, while others support multi-use trails for hikers, horses, OHVs and mountain bikes.
- Many comments indicate people would like to see sustainable trails and/or more resources to repair trails (damaged by users such as OHVs), trail maintenance, restoration, and enforcement. Some input indicates there is support for trail user fees.
- In regard to motorized access, input ranges as some people, such as the OHV industry and users, rely on trails being open, while others would like government to re-examine the presence and extent of motorized recreation in the Castle as a whole.
- Some comments focused on ensuring trail rules and regulations are clear through signage. These signs could also provide information on history of the area and sensitive areas including various animal and plant species.

Public Submissions

In addition to the online survey, written submissions regarding the enhanced protection of the Castle area were received via email and mail. This section provides a general overview of the public written submissions, including those that may not be reflected in the online survey summary.

Camping

Similar to the online survey, people are concerned with potential random or backcountry camping restrictions, while others support more restrictions, designated campgrounds and/or more organized random camping. Recommendations from the public submissions include banning random camping except in controlled areas and only in the Wildland Provincial Park, or restricting access to sensitive areas. It was suggested that habitat destruction in the Castle area may be linked to OHV usage close to random camp sites. Additionally, insufficient enforcement, fines and patrolling have allowed random campers to stay beyond the 14-day limit.

Cattle Grazing

In addition to the concerns shared in the online survey, some people believe that cattle grazing is contrary to the needs of recreation users and that if allowed water, habitat and wildlife protection will be compromised. However, it was stated that if properly regulated, grazing may be appropriate in a Wildland Provincial Park, but should be banned in the Provincial Park. If cattle grazing continues, people would like government to ensure grazing is sustainable to prevent damage to threatened wildlife, plant species and fragile ecosystems.

Another important consideration is the notion that cattle grazing has replaced what bison grazing did for hundreds of years. In order for ungulates to remain in grassy areas, the forage needs to be lightly grazed so the stands of grass regrow greener and stronger. If not, grass becomes old, dry, and root bound unpalatable for game and an extreme fire hazard.

Enforcement

Similar to the online survey many people agree degradation in the Castle area is due to a lack of management/enforcement. To address this issue, recommendations include enforcement with heavy fines and seizure of equipment or ensuring future guidelines for the new parks is very clear and enforceable.

Forestry

Some people do not support the elimination of forestry as it is an important tool for managing forest health and feel the industries contribution to the economy has been ignored. Others shared their concerns related to the environmental impacts of commercial and/or clear-cut logging. A number of submissions request an extension of the three year moratorium on clear cutting until government has had a chance to look at all the ways logging could negatively impact wildlife. A submission also requested a review of the approved C5 Forest Management Plan. Some support continued logging if it is done in a more sustainable low-impact way. Concerns related to personal firewood harvesting restrictions were also raised.

Hunting and Fishing

Support for hunting in both parks was expressed. A submission indicated the appreciation for acknowledging a broad range of user groups, including hunters and fishermen, in the proposal. Another submission suggests that possibly too many hunting areas have been lost to urbanization and commercial development. Moreover, there is fear that the proposed plan is a way of removing traditional activities from public land. Alternatively, others indicated hunting should not be permitted in a provincial park or wilderness area.

OHVs

Some people worry OHV users will be shut out of the park. There were requests to ensure the new park is balanced with land for OHV use. Some people worry this important past time will be taken away. Others support a ban on OHVs in the entire Castle area, limiting OHVs to designated trails in the Wildland Provincial Park exclusively and/or implementing additional restrictions and enforcement. A recommendation to address OHV issues include an education campaign to ensure users are aware of the damage they may cause. Concerns were raised regarding OHV damage to the watershed and potential impacts to water quality.

Oil, Gas and Coal

Some people agree it is a sensible approach to permit existing petroleum and natural gas commitments with no new surface access, while reducing existing access to sensitive areas would be an enhancement to the protection plan. Other submissions indicate people feel the only way to truly protect this wilderness is to eventually stop all petroleum leases, all grazing leases, all OHV use and all hunting in this sensitive area. Additionally, it was stated that the recreational value of the Castle may be threatened by logging and mineral extraction activities, which should be banned and the area's touristic value be promoted.

South Saskatchewan Regional Plan (SSRP) and Consultation Process

While noting the SSRP's shortcomings, particularly in regard to the Castle's protection, some people agree government currently has an opportunity to use the leverage provided in the SSRP to achieve Alberta's shared goals for watersheds, wildlife and wilderness recreational values in the Castle. A number of fairly similar submissions requested government protect all 1,020 square kilometers of the Castle including the more biologically important watersheds, watercourses, valleys and foothills. Similar to the online survey, written submissions requested government consider all interests in the area.

Tourism and Recreation

There are submissions that state if properly protected, the Castle area has the potential to provide outdoor heritage, recreation and tourism opportunities, such as eco-tourism or motorized activities. Other input indicates true protection means human activity is reduced to a minimum. Some people believe tourism development should be avoided inside the park boundaries. Additionally, if the area becomes a large tourist destination or too commercialized the natural beauty of the surroundings will be negatively impacted. A number of submissions recommend providing the Castle Mountain Resort (CMR) with additional support to improve infrastructure and operations, thus attracting more people to the area. Some submissions suggest that tourist infrastructure and operations could be focused in the CMR and Beaver Mines area. According to a few submissions, it appears the Castle area is used by base jumpers, paragliders, speed flyers and/or hang gliders. These submissions requested these activities continue to be allowed under the proposed changes as it is difficult to find appropriate locations for these activities.

Trails

Some people believe there are currently too many off-road trails in the Castle area to sustain threatened native fish and grizzly bears and that some trails should be designated for non-motorized access. The specific trail damage caused by OHVs was noted, including trails that are larger, deeper, braided, wider and/or trails where soil is compacted and wetlands are damaged. There were requests to close trails and reclaim trails particularly in sensitive areas. Support for designated trail systems was also indicated as well as the role a designated trail system and associated infrastructure can have in converting this area to a tourist destination.

Stakeholder Submissions

This section provides a general overview of the written stakeholder submissions from environmental non-government organizations, tourism and recreation groups, resource users and municipalities. These submissions were collected via mail and email as well as through meetings between organizations and the Land Use Secretariat.

Environmental Non-Governmental Organizations

Concern

- Expressed concern that the designation exemplifies “when a park is not a park,” and believes that the protection outlined in early September is more symbolic than substantive.
- Support restoration of the area as a primary goal to achieve full protection as promised during the original announcement.

Camping

- Random camping can be an appropriate and a supportive recreational use of a wilderness landscape. However, it must be managed carefully with enforcement to prevent abuse. Consistent management and enforcement (14 day limits on random camping) must be in place.

Cattle Grazing

- Wherever intensive livestock grazing has occurred in the Castle, plant communities have been converted from native species to a combination of non-native grasses, forbs and shrubs and weed species.
- Livestock grazing diminished the quality of the area as a site for recreation.
- Livestock grazing needs to be curtailed throughout the Castle, and eliminated from the upland sub-alpine and alpine areas. Reduced stocking rates may be required and should be disallowed in the Provincial Park.

Enforcement

- Sufficient resources must be available to enforce both new and existing regulations related to all activities within the protected areas.

Forestry

- A 2011 survey of Lethbridge and Coaldale residents supervised by Dr. Faron Ellis of the Citizen Society Research Lab at Lethbridge College related to the Castle Wilderness was provided as input. Results indicated opposition to the logging plan approved by the Government of Alberta and support for protection of the Castle watershed and wildlife habitat over recreation. It also favoured support for the establishment of a Wildland Park.
- Another 2011 survey by the Praxis Group using the same questions was also provided as input. This survey was conducted within the Municipal District of Pincher Creek, Village of Cowley, Municipality of Crowsnest Pass, Town of Pincher Creek, Pikani First Nations’ Reservation, and Fort Macleod. It indicated support for the importance of habitat protection and watershed protection over recreational use, support for the establishment of a Wildland Park and opposition to commercial logging.

Note: Not all stakeholders are in agreement with the interpretation of these survey results. While the surveys are statistically valid and the questions are neutrally worded so as to not introduce bias, the questions do not get to

the heart of the matter, specifically the trade-off between resource extraction and conservation. None of the questions pose a trade-off scenario such as how much of an impact to economic revenues and jobs are respondents willing to accept to protect the Castle area and prohibit resource extraction. If respondents were specifically informed of the economic impacts and job losses associated with each level of protection, the results would likely be very different. In short, it is easy to vote for protection and to prohibit resource extraction if the social impacts remain intangible.

- The 2012 Community Values Assessment for the Municipal District of Pincher Creek was provided as input and indicated the following:
 - Survey participants supported setting aside land in an undisturbed state for habitat protection, increasing alternative economic opportunities (jobs in the green, knowledge and digital economies), and increasing the opportunities for non-mechanized recreation.
 - Opposition among residents was for increasing opportunities for motorized recreation, allowing clear cutting of the Castle Special Management Area, and subdividing land currently used for agriculture.
 - Economic development activities considered to be least appropriate were mining, clear cut logging and oil and gas/sour gas.

Hunting and Fishing

- There are concerns about allowing hunting in the proposed parks as it may set a precedent for future parks.
- Hunting should not be allowed in the Provincial Park.

OHVs

- A poll by The Praxis Group, commissioned by Canadian Parks and Wilderness Society Southern Alberta, regarding recreation and nature values in Alberta was provided as input. The poll indicates that a small percentage of outdoor recreationalists in the South Saskatchewan Region participate in OHV use. The poll also states that mechanized recreation use, such as ATVs, dirt bikes and OHVs, detracts from the experience (second most mentioned response after seeing garbage).
- OHV use should not be allowed in provincial parks. It sets a dangerous precedent opening other parks to such use. In the Wildland Provincial Park, OHV use should be limited to designated trails specifically planned and designed to avoid ecologically sensitive areas and create areas for non-motorized users and wildlife away from the sensory disturbance of OHVs.
- In similar areas, such as the Bighorn Backcountry, some ENGOs state that monitoring and research projects have revealed the establishment of a designated trail network is insufficient to prevent motorized recreation from damaging watersheds.
- Headwaters need meaningful protection from excessive linear access and from motorized recreation. Headwater protection within the Castle is a crucial component of securing clean and clear water for downstream communities.
- A major vector for the introduction of invasive weeds such as Timothy, Kentucky Bluegrass, and the Canada Thistle, and Tall Buttercup is by motor vehicles, carried along roads and other human-disturbed lands. Thus restoration of native flora is likely impossible without removing those roads.

Oil, Gas and Coal

- Existing disturbances must be reconsidered and life cycle plans implemented with buffers targeted for any new disturbances. Propose a transition zone be established around the park boundaries where reduced impacts are allowed to occur in order to facilitate full protection and restoration within the park.

Tourism and Recreation

- Urbanization of wilderness must be avoided. Fixed roof structures of any kind, or associated adventure tourism experiences are not appropriate within the Wildland Provincial Park.
- Any recreation trails, camping areas and facilities within the region should be developed only where ecologically appropriate and associated activities must be adequately enforced.
- Commercial and retail developments within the park are not appropriate beyond basic facilities such as campgrounds, which allow people to connect with nature. The development of sustainable eco-tourism in the towns of Beaver Mines and Crownsnest Pass should be encouraged.
- In regard to highway-side and retail services, Beaver Mines and towns further afield such as Pincher Creek or the Crownsnest Pass are ideally situated to become gateway communities for the parks, and to service park visitors.

Trails

- Studies of linear densities in the Castle indicate that in many areas linear disturbances are far above thresholds for species at risk in Alberta such as grizzly bear, cutthroat trout and bull trout.
- Recommend significant reductions in the trail network, and close monitoring and enforcement of OHV activity.

Tourism and Recreation Groups

Support

- Support the Government of Alberta's recent decision to protect the Castle Wilderness Area through the establishment of two new provincial parks.
- Agree that the Castle area is one of the most biologically diverse areas in Alberta with over 200 rare or at risk species.

Concern

- Do not support the proposed plan for the Castle area. Expressed worry that their way of life will be taken away from them and concern that the aspirations of other groups are being considered over local people.

Camping

- Concerned about the number of random campers who are driving motorized vehicles (campers and quads) and damaging the area. This includes concerns about the size and weight of the motorized vehicles and the damage caused to roads or bridges.
- Support enhanced random camping control and enforcement, designated camp spots and enforcement of the 14-day turn around.

Consultation Process

- Feel that it was disrespectful the original press conference notification was provided late, or not at all.
- Encourage the Government of Alberta to commit to the SSRP as a tremendous amount of work went into compiling the SSRP document that reflects the interests of all stakeholder groups. Feelings that all stakeholders are not being listened to.
- Requested information on how feedback from the SSRP consultations informed this decision.
- Requested clarity regarding permitted uses in the park areas and boundaries of the Wildland Park and Provincial Park.
- Unhappy with the lack of effective consultation regarding the process as well as the survey method.

- Requested information on decision-making process and timelines for plan approval. Expressed the 30 days for public input as insufficient.

Cattle Grazing

- Identified cattle grazing as an issue for recreation users.

Hunting and Fishing

- Concerned about the impact or limitations on hunting and fishing in the area if the proposed plan goes forward since both areas are widely used by a vast range of user groups.
- Fear an erosion of rights. If the Castle area falls under Parks' legislation, it will be easier to eventually take land away from hunting and other activities.
- Request strong wording regarding rights to hunting, fishing and motorized access in the area.

Enforcement

- Strictly enforce camping, both front and backcountry. Issue permits for each camp site and fine those who do not have one and have them vacate the area.
- Policing and enforcement are under resourced – request significant enforcement staff.
- Agree there is overuse in the Castle area. However, the Castle area does not need additional rules and regulations (proposed under Parks' legislation), but rather effective enforcement of the current rules.
- Questioned how government will enforce now what they could not before.

Forestry

- Concerned that additional loss of part of the tenured wood supply would result in a reduction of mill production and reduced revenues and income. Also concerned about less money flowing back into the local economy and area.
- Requested prescribed burns and prescriptive forestry harvesting.
- Questions were raised about inability to get firewood permits.
- Discussed where applicable converting former industry roads to trails.

OHVs

- Reasonable motorized access for people with limited mobility.
- Allowing activity is a radical departure from historical management of Provincial Parks and is contrary to the top three legislated primary preservation and conservation purposes of Provincial Parks.
- Concerned that by indicating support for permitting off-highway vehicle activity in the Provincial Park, a dangerous precedent would be set to allow OHVs in any of Alberta's Provincial Parks.
- Support getting a handle on OHV abuse.
- Recommend that government increase the cost of registration for off-road use. Suggested that the extra revenue could be set aside to be used for grant monies for organizations to apply for use in maintaining trails or building emergency shelters.

Tourism and Recreation

- Agree that the proposed decision will help manage recreation and tourism opportunities and thus supplement the SSRP and potentially enhance the local economy and businesses.
- Do not want to see development along waterways and extensive development.
- Concerns were raised about access fees.

- Concerns were raised about the Castle Mountain Resort sewage system. Additionally, there were requests for information about a paved road to the ski hill.
- Concerned about displacing the pressure and shifting it to other areas in the province.

Trails

- Welcome the fact trail system will still be accessible.
- Ensure the maintenance of trails and that different trails are constructed to meet the needs of various trail users: cross-country ski trails, snowshoeing/walking, horse riding, skating rinks, snowmobiles, dirt bikes and quads.
- Want some type of plan put in place to ensure trail continuity/replacement when impacted by industrial development.
- Looking for a realistic and usable trail design – nothing fancy or extensive.
- Accessibility is important for all ages and abilities etc.
- Trail development needs to include experience, engineering, education, enforcement and evaluation.
- Will Parks' designation impact to overnight horseback riding, guiding etc.?
- Would like to be part of the planning process for trails.
- Proposed trails tie into Waterton National Park trail network.
- Requested information about available funding for management planning (trail development), entry point signage and gates in the proposed parks.
- Raised questions about a user fee system and, on designated areas/ trails, where could a horse not go?
- Looking for opportunity for designated trail review as there are no current designated equestrian trails.
- Support trails that meet the watershed and wildlife conservations goals.

Resources Users

Concern

- Expressed concerns about what appears to be government's surprise announcement to turn the Castle into Wildland Provincial and Provincial parks.
- Those organizations with members who graze their cattle in the Castle allotment of the Alberta Forest Reserve have numerous concerns about the proposed Castle Wildland/Provincial Park designation.

Support

- Support the proposed boundaries and the initiative to further protect natural areas.
- Applauds the government's expansion of the proposed amendment to include more meaningful protection to the area other than to just the mountain tops.

Camping

- Would like to see random camping eliminated.
- Concerns that fencing required around riparian areas and campgrounds will decrease viability of grazing and requested information regarding compensation.

Cattle Grazing

- The promotion of tourism and recreation at the expense of rangeland health goes against the SSRP's own goals. Noted there is a huge cost (financial and environmental) attached to exceeding the carrying capacity of human activity on the landscape.

- Need assurance that Alberta Environment and Parks rangeland agrologists will continue to be the authority in the development of grazing plans because of their expertise and experience.
- Would like confidence there will not be any adverse economic impacts. Need to know how the proposed change will affect the industry of various organizations.
- The *Forest Reserve Act* provides for grazing. Will this be guaranteed in the changeover to Parks stewardship?
- Move parts of the *Forestry Act* into the *Provincial Parks Act* – forest reserve grazing permits are currently issued for a term of up to 10 years. Parks only offers a five-year renewal with annual recertification – will it be changed? Recommend a 10-year grazing plan.
- Grazing allotments have to be managed as a whole, but now with the two parks, allotments will be broken into two parts. How will this be managed?
- Concerned the initially proposed Wildland Provincial Park boundary had very few cattle within it, while the new proposed boundary has a lot of cattle.
- There is concern about the potential loss of Animal Unit Months (AUM).

South Saskatchewan Regional Plan (SSRP) and Consultation Process

- Supports the SSRP content as it relates to the Castle area because it included input from the public and provides long-term certainty for investments and businesses.
- Expressed frustration that the announcement took place with no consultation from cattle grazing permit holders in the Castle. This is significant as the SSRP acknowledges that direct consultation with stakeholders is necessary before changes are introduced.
- Requested information about what kind of facilities will be included in the proposed parks.
- Requested clarity on the consultation process for the boundary and for management plans.
- Concerned that since there are many respondents online, some of their input will be drowned out or not valued.
- Recommend the boundary should follow forestry reserve boundary.
- Will sufficient time been provided to fully understand the potential implications of expansion to all potential land users in the Castle area?
- When industry purchased coal interests, the consultation process for the SSRP was well underway. Industry relied on the SSRP, including the consultation process.
- Considers the recent announcement to create a park over the entirety of the Castle area represents a monumental shift in the original SSRP policy direction.
- Request for clarity on what the proposed plan means for their existing operations and future development plans.
- Request for information on the decision process, timing of implementation for the new parks and opportunities for future participation in process.

Enforcement

- Parks stewardship for designated trails – how will Parks improve trail enforcement? Can they assess penalties?
- How will Parks track trail users? Registration? How would you know who/how many are using the trails?

Forestry

- Indicated any further expansion of the Wildland Park could result in the closing of a shift at the Spray Lakes Sawmill in the mid-term and the loss of up to 100 jobs.
- Support burning and commercial forestry as a good tool for fire management as well as for the creation of new grazing areas.

- Requested information about the length of time for the firewood moratorium.

OHVs

- Concerned cattle and quads often use the same access points and many random camping areas are on primary grazing areas, which get pounded down as staging areas for OHVs.

Oil, Gas and Coal

- Industry holds mineral rights in the Castle area where the new Provincial Park and expanded Castle Wildland Park will be located. These resources are currently being developed and there is potential to allow for continued development of subsurface resources in the area without sacrificing the environmental value of the surface.
- Although the most economically and environmentally effective method of increasing production will be the use of existing surface access to develop shallower previously bypassed zones, it is an area with an opportunity for additional development activity.
- How will industry balance getting product out with no new oil and gas surface access?
- A small area held under Crown lease that overlaps the northwest corner of the planned Provincial Park sterilizes roughly two million tonnes of coal resources and removes the associated potential Alberta crown royalties.
- Relative to the total resource of 44 million tonnes, Industry is of the opinion that the amount sterilized is a reasonable concession for the merits of a new park designation.
- If the plan goes forward, industry may seek compensation from government for coal interests that will be sterilized in and adjacent to the Castle area.
- If coal resources are sterilized, there will be significant lost socio-economic benefits, including short and long term employment opportunities, provincial and federal tax payments, provincial royalties and potential First Nation Impact Benefit Agreement.
- Would like industry side roads to remain.
- Concerns with oil and gas assets near to or within proposed park designations. The assets discussed include the Duvenay Play, Waterton.
- Looking to the future, if the exploration work yields the needs for additional/increased pipelines, would this still be allowed in the park?
- Industry is happy to meet annually to provide Parks staff with updates and discuss how to be creative with facilities and reclamation.
- Requested information regarding how industry continues to maintain existing pipelines through existing right of ways – how does industry get a Temporary Field Authorizations (TFAs) and continue to operate in the new park? Who will issue the TFAs?
- Concerns regarding access (and a safety plan) for First Nations, grazing leases and random camping in the area and evacuation. How do we notify people when we do not know who or where they are? How to manage access, safety, and grazing leases?
- Currently some gas sites are being closed and reclaimed, but some still have 15 to 20 years of active use.
- Industry is working with environmental stakeholders and strengthening the relationship.
- Welcome Parks staff to do a field visit with industry staff to see what infrastructure is required and why – site visits can demonstrate what a full life cycle looks like, particularly after industry is no longer active.

Hunting and Fishing

- If limitations are placed on current trapline borders, the ability to maintain current sustainable harvest model will be lost.
- Request provisions to ensure trapping can continue to occur unimpeded in both the newly proposed Provincial and Wildland Park.
- Concerned that the expansion of the Wildland Park and the creation of the new Provincial Park will fully encompass registered traplines.

Trails

- Would like to see designated trails implemented.

Municipalities

Camping

- Request for campsites to be isolated (from the highway) so that RV and trailers are more hidden and aesthetically pleasing.
- Is random camping in the Wildland Park non-motorized? In a provincial park, is there a cap on how many units are allowed?"

Cattle Grazing

- What is a grazing suitability exercise?
- Will grazing leases be renewed? Logging and grazing work well together, but a balance is needed.

Enforcement

- How can current capacity be dealt with? Have there been considerations for the influx of people to peripheral areas? The volume of people will be shifted and the problems occurring the Castle area will move somewhere else.
- Many people would welcome an annual fee with the proceeds being reinvested into resources and upgrades.
- Would money be specifically allocated to enforcement? Where is the money coming from? Users pay? Licensing/registration?

Forestry

- How is logging shut down when the new park designation is announced?
- Will Christmas trees and firewood removal be allowed? Can people cut their own Christmas trees?
- Forest fire concerns were raised – the type of ecosystem in the Castle area and vegetation management (timber fire loading) and fuel load must be considered in Parks' forest management.

OHVs

- Raised questions about OHV registration and use.
- Monitoring and managing OHV use in wilderness areas – how up to date is the trail inventory? How will new/informal trails be managed? Trails cannot end on a roadway.
- Do not want engineered trails, but will need to ensure trails are built to conditions for longevity.
- What kind of resources for building, maintaining, and enforcing trails? Will province provide this funding? Is it up to municipalities?

South Saskatchewan Regional Plan (SSRP) and Consultation Process

- Did government already make a decision on the park boundaries and whether the Castle Access Management Plan will be considered?
- The initial announcement regarding government's plans to enhance the protection of the Castle area seems as if a final decision was made without consultation.
- Concerns were raised with the lack of consultation (30 days) as compared to five to six year consultation process to develop the SSRP.
- Will the October consultation deadline for input be extended? Requests for more engagement time to provide input. A reasonable extension for engagement should be four to five months more and involve some public open houses.
- Requests for information about relationship between other planning process (Porcupine Hills, Livingstone, etc.) and the Castle management planning process.
- Plan amendment should adjust the purple boundary to incorporate canyons, West Castle, etc.
- What is the rationale behind the Wildland and Provincial Park? Why located where they are versus somewhere else? Is this science-based?
- Need to clarify and/or educate the public about what the park usages will allow and not allow.

Tourism and Recreation

- Requests for more infrastructure in the Castle area.
- Noted the Castle Mountain Resort has significant impacts to the Town of Pincher Creek.
- The Castle Mountain Resort (CMR) is a major economic driver, which desires year-round access and needs improved services, such as three phase power, a paved access road, natural gas, sewage treatment plan, access to water for snow making and ability to control their own taxation destiny.
- Will the CMR be the focus of tourism efforts?
- Municipality needs to develop a current Area Structure Plan for the CMR, which needs to be in sync with the SSRP and other regional documents and provincial planning work.
- 1999 Energy Resources Conservation Board report on how to provide water to the resort. The government does not need to waste two years developing a new report as it is already done.
- Parks could be used in the winter time. Government is missing opportunities to use the town's facilities better and more productively.
- Support the creation of a tourist destination in the area.
- Must have balance between tourism and wildlife. Cannot have both growing tourism and wildlife habitat preservation. They are competing users and the balance is elusive.
- Will Parks be responsible for the roads, or will it stay with the municipality? Highway #774 could be the focus of development.
- Do not want the Government of Alberta in competition with local industry in the development of tourism opportunities.
- Three years ago there was an agreement with Alberta Transportation regarding improvements. This needs to be part of the considerations.

Hunting and Fishing

- Are the proposed hunting and fishing practices typical to comparable parks or is it a one off?

Oil, Gas and Coal

- Will the reduction in industry activity (oil and gas) have an impact concerning the value of linear assessments for the area, and thus its financial resources? Would be good to know what conditions, limitations, and terms are.
- How can oil and gas exploration continue if no new access is permitted?

Indigenous Consultation

On September 10, 2015 LUS representatives attended the SSRP First Nation Sub-Table meeting to inform the 13 participating First Nations of government's plan to enhance the protection of the Castle area. During the September 4 to November 9, 2015 Indigenous consultation period, LUS to set up initial meetings with consultation technicians, community members and Chiefs and council. LUS and the Alberta Parks Division met one-on-one with each of First Nations consultation staff participating in the SSRP except for O'Chiese First Nation.

A meeting was organized for November 9, 2015 with the 13 participating First Nations to validate and confirm the input received during the consultation period, but only six First Nations attended. These six First Nations requested suspension of the current consultation process so that their concerns with the process could be addressed. These First Nations also requested an additional 90-day consultation period. In their opinion, government had not fulfilled its duty to consult and, as such, could not legally move forward with implementing the Castle plan. Validation of First Nations' input was not received.

At this meeting the participating First Nations raised the following concerns regarding the consultation process:

- Not meaningful or adequate;
- Government does not accommodate First Nations own internal processes;
- Must be amended to honour each First Nations consultation process;
- Short timelines;
- Requests for capacity to support a traditional land use study (TLU) before the boundaries are established; as well as a capacity for a TLU during management planning; and
- Lack of information:
 - Questions were raised about how Parks' legislation will impact treaty rights and land use. Additionally, how will government mitigate those impacts if any.
 - Requests for data on occupied Crown land and unoccupied Crown land in the Castle area.

This is a general overview of input collected from First Nations during consultation on enhancing the protection of the Castle area.

South Saskatchewan Regional Plan (SSRP) and Consultation Process

- During consultation the following concerns were heard:
 - The process is a requirement of bureaucracy and not genuine in its intent;
 - Timelines for consultation were too short;
 - Better financial support is needed for communities to effectively engage in the process;
 - Funding for field assessments is needed to fully understand impact of proposed changes;

- Consultation/engagement needs to be more frequent with more continuation and more community depth (e.g. include Elders); and
- Translation to Indigenous place names to make the information sharing more useful.

Impacts to Treaty Rights and Traditional Land Use (TLU):

- Concerns about switching to management under Parks legislation and the impact regarding Indigenous land uses or treaty rights.
 - **Acknowledgment and education of First Nation rights and land uses:**
 - Requests for improved education of Parks staff and provincial enforcement officers.
 - Desire for increased awareness of Indigenous and treaty rights and sensitivity towards TLU activities (such as in-field ceremonies).
 - Wishes for limits to access and/or recreation and developments on areas of high cultural value.
 - Clear acknowledgment of rights and traditional practices through signage, allocation/demarcation of exclusive ceremonial areas inaccessible to the public.
 - **Hunting:**
 - Concerns that the proposed protected areas would mean the end of hunting.
 - Questions were raised regarding activities of licensed hunters and whether this would be permitted under the proposed plan.
 - Concerns were raised regarding the use of firearms for hunting and concerns with visitor safety.
 - Off-Highway Vehicle (OHV) use may change wildlife movement patterns, damage plant communities used for ceremonial or medicinal purposes or disturb ceremonial and/or camping sites.
 - **Participants feared that non-Indigenous land uses may:**
 - Crowd them out.
 - Diminish the availability of the land based resources.
 - Diminish the quality of the TLU experience in proximity to tourists or recreationalist.
 - Are incompatible within the same space. For example, tourists and recreation activities and the use of firearms for hunting.
 - **Métis rights and Métis historical settlements:**
 - Questions were raised referring to potential for Métis to have harvesting rights in order to practice legally protected traditional hunting within the area and elsewhere in Alberta.
 - Most referenced their disagreement with the current legislation that does not recognize historic Métis settlements in the south of the province, thus precludes them from enjoying their Indigenous privileges within 160 kilometres from these historic communities.

Traditional Ecological Knowledge (TEK)

- **Incorporation:**
 - Some participants feel that they have strong knowledge to offer, but it is often ignored over western science-based knowledge/management.
 - Concerns related to how TEK is collected and acknowledged before a Crown decision.
 - Concerns related to how government receives TEK, and the process of including TEK to inform Land-use Framework regional planning processes or Alberta Environment and Parks initiatives. For example, proposed management plan for the Castle area.
- **Language:**
 - Indigenous naming in the Castle area.
 - Prior to any management plans, requests for a ceremony to take place on the land.
 - TLU studies need to be completed prior to implementation and management plan.

Permitted Park Activities

- Concerns were raised regarding proposed permitted activities, including motorized recreation, hotels, camps, tourist centres, car-access front country campgrounds and backcountry campgrounds.
- Questions were raised about the intent to conserve the Castle area while also promoting recreation and tourism.
- OHVs - questions about how trails systems would be managed and designed – will OHV's be better managed/regulated or limited?
- Random camping – most seem to think that better regulation and management of the status quo was long overdue, while others thought that the proposed concepts were over regulated or would not be enforceable.
- A common concern was that regulation of camping and OHV use would push these activities into adjacent areas.
- A few believed that campsites should be accessible to the public and not made difficult to access by backcountry travel only.

Industry

- Requests to see spatial data for current mineral exploration and rights.
- Questions about compensation for potential losses for those engaged in mineral exploration in the area.
- Many participants were largely in agreement with proposed limits regarding industrial activity and halting of new developments in the Castle.
- Participants were largely in agreement with limiting energy and forestry developments and had concerns about the recent history of industries in the region and impacts this had to water quality, wildlife, soil condition and other cumulative effects.
- Some were curious to know how Spray Lakes Sawmills would supplement their shortfall in timber under this plan. Additionally, some mentioned that they did have interests in sustaining logging at some level and were interested to know if limited logging opportunities could persist.

Tourism and Recreation

- Concerns about too much activity and infrastructure in the area – “we don't need another Banff.”
- Some interest in Indigenous tourism opportunities and interest in support from government to support tourist businesses.

Environmental Conditions

- Some participants wanted to know what the ecological condition was in the areas to be established as parks.
- Some were curious about the status of wildlife, including grizzly bear and species at risk, and requested a list of the species.
- Concerns with water and air quality.

Legislation and Management Intent

- **Enforcement:**
 - Concerns about how land users and recreationalists would be more effectively enforced under the new proposal.
 - Concerns related to the training of enforcement staff that often harass traditional land users – desire to see better awareness and sensitivity in the future.
- **Government of Alberta decision-making process:**
 - Perception of unilateral government decision-making process – government is making decisions and plans before consulting and the consultation process is a veiled way to imply transparency.

- Some participants feel that the decision for Castle is already made – government will make the decision it desires regardless of feedback.
- **Future treaty land entitlement (TLE):**
 - There was some mention that Alberta has a number of TLE claims to settle.
 - If these two parks are established under Parks' legislation, how will they affect future TLE claims in this area?