

July 24, 2024

Hon. Todd Loewen  
Minister of Forestry and Parks  
323 Legislature Building  
10800 97 Ave  
Edmonton, Alberta T5K 2B6

**Subject: Alberta Plan For Parks Engagement Survey**

Dear Minister Loewen,

The Tourism Industry Association of Alberta (TIAA), is pleased the Ministry of Forestry and Parks for taking the time to consider the strategic direction of Alberta Parks as a deeply important public service that holds a prominent place in the Alberta narrative and in our quality of life.

TIAA has a number of recommendations and observations to offer with respect to the aims of outdoor recreation and tourism. This submission captures those perspectives, our specific responses to the Plan for Parks survey, and, a summary of some important historical facts that contextualize Alberta's initial path to support the development of its outdoor recreation and tourism assets. This is where our commentary begins.

## **Outdoor Recreation and Tourism: History's Role in Informing Future Choices**

Following World War II, Alberta invested heavily in infrastructure to support its vision of becoming a prosperous resource-based economy and a desirable destination. Road construction surged, facilitating both transportation and resource access. To cater to the growing urban population, Alberta Parks was tasked with developing affordable, auto-accessible campgrounds near water, offering convenient recreational opportunities for residents.

Concurrently, the Alberta Forest Service identified that the most cost-effective way to combat wildfires along Alberta's new roads was prevention. This led to the creation of over 200 small, no-cost, auto-access Forest Recreation Areas (FRAs) throughout the Forest Protection Area, consolidating most campgrounds into known locations. Together with the numerous Alberta Transportation highway campgrounds and the significant investment in Kananaskis, these services effectively supported domestic outdoor recreation and tourism for over 40 years.

However, changes in the mid-90s initiated shifts that had cascading and ongoing effects on Alberta's outdoor recreation and tourism economy. Alberta Parks' mandate moved towards a stronger emphasis on preservation. This shift deprioritized structured recreational activities, nature access and the investments needed to sustain them, ultimately diminishing the quality and availability of outdoor experiences for Albertans.

## **Resource Reallocation: Erosion of Service Quality and Access**

As Alberta Parks concentrated on conservation and preservation, mandates for the Alberta Forest Service and Alberta Transportation shifted to prioritize the province's resource industry and motor vehicle infrastructure. This led to the decommissioning or transfer of hundreds of outdoor recreation sites to Alberta Parks.

Faced with a 40% budget reduction and the responsibility of managing over 200 additional sites, including many Forest Recreation Areas (FRAs), Alberta Parks was forced to close assets, cut services, introduce new fees, and focus primarily on maintaining existing auto-based camping facilities. These reductions in service quality and accessibility led many campers to abandon managed sites in favor of unregulated public lands in ditches, meadows, near pipelines, or to travel to other provinces for better camping and recreation experiences.

As recreational use and tourism surged on its lands, but without an explicit recreation or tourism service mandate, Public Lands struggled to understand, adapt, and equip itself for active recreation and tourism management.

## **Shift in Focus: Undermining Recreation and Tourism Mandates**

Alberta Parks consolidated its resources to focus on conservation and preservation, particularly through initiatives like Special Places 2000. Although the vision of Special Places 2000 included goals for outdoor recreation, heritage appreciation, and tourism, the emphasis on protection led to the de-prioritization of recreation and tourism mandates. Without clear strategies for integrating sustainable human use, Alberta Parks defaulted into a preservationist approach, focusing narrowly on maintaining a limited range of auto-based camping options at existing sites. Success was measured primarily by camper satisfaction among the few who continued to visit, further distancing the agency from broader recreation and tourism trends.

This approach created a growing disconnect between the supply of outdoor activities and the diverse interests of Albertans, resulting in fewer, less varied, and less engaging recreational opportunities. In contrast, British Columbia expanded and diversified its outdoor recreation offerings during the same period, actively managing these activities while also enhancing ecological conservation. BC's balanced strategy allowed it to become a leader in both sustainable tourism and environmental stewardship, showcasing a successful model where recreation and conservation coexist.

## **Failed Policy Integration: Missed Opportunities for a Cohesive Recreation and Conservation Strategy**

Alberta's early land-use planning efforts failed to fully integrate outdoor recreation and tourism as key land-use priorities. Provincial planning struggled to incorporate these values as important resource-dependent land uses. While some policy gaps were recognized, several efforts to enact overarching change were unsuccessful. For example, early 2000s efforts by the Alberta Recreation Corridor Coordinating Committee to develop a provincial trails plan and trans-Alberta trail alignment were not realized. Similarly, the 2009 Land Use Framework recommendations to develop a comprehensive provincial recreation policy by 2012 were never implemented.

Grounded in outdated land management practices, rather than forward-thinking, experience-driven recreation and tourism strategies, Alberta Parks and Public Lands have developed in relative isolation, with little acknowledgment of their complementary roles. This disjointed approach has resulted in minimal coordination between the two and a glaring lack of integration with broader tourism planning and development efforts.

While significant outdoor recreation infrastructure investment is now occurring on both Public Land and in Alberta Parks, the planning process remains unclear and opaque. Alberta Parks' Master Development Plan process, which guides infrastructure investment, is internal and not transparent, lacking involvement from communities, recreation user groups, or the tourism ecosystem. It's uncertain whether these plans are guided by specific goals, accountable for service levels, quality, or diversity, or if they align with Travel Alberta's tourism development zone processes.

## **The Path Forward**

TIAA believes Albertans are fortunate that the government is now recognizing the importance of outdoor recreation and tourism. We applaud recent efforts, including Travel Alberta's expanded development mandate, the Trails Act, a more visitor-focused Parks Operations Division, and the beginning of concerted outdoor infrastructure investment. These are promising developments, and we fully support a public dialogue on the future of Alberta Parks.

However, TIAA believes there is an opportunity to improve how a renewed Plan for Parks is framed and integrated with the broader array of outdoor recreation and tourism services.

## **Prioritizing Outdoor Recreation and Tourism Opportunities**

TIAA, among others, have long been vocal proponents of elevating both the quality and quantity of outdoor recreation opportunities for quality-of-life, environmental, and economic benefits.

Alberta has recently passed through 25+ years where outdoor recreation and tourism was viewed as a low priority, where recreation management occurred without a clear champion, without a cohesive vision, with few plans, limited accountability, limited investment, and often with disjointed (and sometimes counterproductive) efforts.

Recent developments are positive, but Alberta is far behind where some key competitive north American jurisdictions are and, despite being blessed with so many remarkable outdoor spaces, we are not evolving the way we could be.

TIAA encourages the Alberta government to make a very intentional effort to bridge this gap by positioning itself as an integrated catalyst and facilitator of a diverse suite of high-quality outdoor experiences that invigorates communities, attracts and retains visitors, stimulates the provincial tourism economy.

## TIAA Recommendations

- 1. Adopt an intentional, coordinated, and whole-of-government approach to outdoor recreation and tourism services.**
  - *Closely related initiatives such as trails, parks, land-use planning, tourism development planning, and other significant land-use initiatives must not continue occurring in isolation of each other or without efforts to align them with overarching provincial plans, goals and objectives. Quite simply, Alberta will never realize its full potential or become leaders in outdoor recreation and tourism without this.*
  
- 2. Set clear accountabilities with high expectations for delivery of relevant outdoor recreation and tourism services.**
  - *While legislative accountabilities for land management exist in Alberta, service level accountabilities for the quality, quantity, relevance, or effectiveness of outdoor recreation and tourism efforts have been ambiguous for over 25 years. (i.e. These are not defined in the Provincial Parks Act, Public Lands Act, or associated regulations. This raises questions such as: Is Alberta Parks responsible for facilitating auto-camping? Non-auto camping? Trails? Mountain Biking, Road Cycling? Climbing? Via Ferrada? Other services? If so, how much, with whose involvement and, how well?)*
  
- 3. Conserve and foster the quality and integrity of Alberta's high-value recreation resources and settings.**
  - *Outdoor recreation and tourism are wholly dependent on the quality of our natural assets, and the ability to responsibly, and sustainably, access and support them. Like other scarce and valuable resources, land-use policy and practices should contextualize where these assets exist, strive to retain and leverage their value, minimize impacts to them, and restore their utility and efficacy where possible.*
  
- 4. Focus on improving quality, sustainability, accessibility, diversity, and connectivity of outdoor visitor experiences.**
  - *While recreation can still occur with poor recreation planning and infrastructure, poor sites have little practical value for residents and they have no value for the tourism ecosystem and economy (e.g. 200 km of rutted cutline routes may entertain a small number of local trail enthusiasts, but they are unlikely to attract the visitation or provide the same community benefits as 50km of quality, intentional trail that links key destinations and points-of-interest). Alberta Forestry and Parks (not just Alberta Parks) should see itself as a facilitator of "top-drawer" outdoor opportunities.*
  
- 5. Be guided by industry-leading approaches to develop systematic planning, policy, standards, operations, and monitoring.**

- *Modern approaches, such as the Visitor Use Management Framework, allow for transparent and constructive navigation of contentious issues that have sometimes polarized and paralyzed previous efforts (e.g. motorized activities). The province should be actively using approaches that have been shown to work well.*
- 6. Nurture internal recreation and tourism management expertise and sustain a core staff of recreation and tourism professionals.**
- *Like other industries, professional competencies and expertise exist for trails, visitor use, tourism development, outdoor recreation management, and other related areas. For ongoing efficiency, continuity, effectiveness, and credibility, these skillsets should be present and leveraged in related government structures.*
- 7. Actively foster and sustain involvement and relationships with municipal, non-profit, and private partners throughout outdoor recreation and tourism planning and implementation.**
- *For maximum impact, all significant parks, outdoor recreation, and tourism development processes should be transparent and have on-ramps for involvement. Some current processes, such as Alberta Parks Master Development Plans, are internal, do not involve communities, do not involve recreation user communities, are not accountable for levels or quality of services, do not involve the tourism ecosystem, nor do they transparently connect to Travel Alberta's tourism development zone processes.*

Many of the above recommendations are not new; a number are referenced in TIAA's "Alberta's Crown Land Outdoor Recreation Study" (<https://www.tiaalberta.ca/cpages/recreation-study>).

As TIAA understands that the Government of Alberta and Travel Alberta recently cooperated on a report that explores ways to improve provincial policy, planning and legislation related to recreation and tourism in Alberta Parks and other Crown Land, we encourage a careful consideration and actioning of key recommendations in these reports.

## Specific Responses to the Parks Engagement Survey

The Plan for Parks survey presented many points for engagement and TIAA wishes to offer the following observations in-line with the survey's structure.

### Alberta's Parks

#### *Frequency of Visits*

- While very few of our members currently conduct business within parks, all benefit from the recreation activities that occur within them.

#### *Value*

- Our membership views a healthy and vibrant parks system as an essential public good. Parks are a barometer of mature society's commitment to honouring its natural and cultural heritage.
- Albertans are passionate about their natural spaces. Even if they are not regular users, parks are an implied benefit of living in society. They are part of the province's social trust and better connect us to places and our sense of regional identity. Albertans deserve an opportunity to protect, preserve and actively enjoy these spaces as a fundamental right.

### Vision

#### *Vision*

- TIAA has no objection to the updated vision statement but maintains that service level accountabilities are an imperative to support and achieve it.

#### *100-Year Outlook*

- Alberta's Park system has functioned as an integrated component of a suite experience-focused outdoor recreation and tourism services for decades. It is highly connected to communities, its services are highly relevant to outdoor user communities, it attracts and facilitates responsible visitation from around the world, it has adapted to welcoming more visitation with a much smaller vehicle footprint, and local communities are thriving and highly supportive of parks because of the benefits they offer residents and businesses.

### Principles

#### *Accountability*

- Albertans have likely been too complacent with the degree of accountability offered by the Alberta government in the outdoor recreation and tourism sector. Without specific service accountabilities and transparent processes, Alberta Parks' relevance to many outdoor interests has been severely eroded.
- In addition to clear milestones, TIAA recommends adopting industry leading practices such as the Visitor Use Management Framework approaches to clearly state the issues and opportunities it hopes to address with planning efforts, articulate future desired conditions,

establish targets, present pragmatic management actions to achieve them, and report on progress.

- As stated earlier, the outdoor recreation and tourism accountability lens should be expanded beyond parks to include closely related services (e.g. trails, regional tourism development zone planning).
- To truly support the province's ambitious goals for sustainable outdoor recreation and tourism, Alberta Parks must significantly improve its collaboration with industry, recreational groups and Travel Alberta. The ministry needs to actively engage with these partners to develop products that effectively meet the needs of Albertans and future visitors. Without this focused effort, Alberta Parks will fall short of supporting province's tourism strategy and fail to invest in nature-based experiences and recreation activities that Alberta's growing population seeks.

### ***Equitable Access***

- Less than 0.01% of Albertans (fewer than 30000 people) can access a provincial *or* national park for an overnight experience without using a road. Provincial parks, in policy and practice, do not incent lower impact access and its sites are rarely connected to communities, to trail systems, or to each other via trails. At a fundamental level, all auto-based park systems face inevitable sustainability and accessibility challenges, and a continued focus on high-impact and high-cost access seems to be at odds with the Plan for Parks vision.
- While enhanced internet and cellular access may be helpful for some users within the front-country (eg. for safety reasons), it remains somewhat at odds with the Parks' vision and overall needs in the back-country, with the continued advent of other solutions (e.g. Satellite messengers, Starlink, cell phone satellite connectivity).
- Primary parks messaging should be available in official languages and commonly used languages in the province.
- A diverse range of site-appropriate accommodations—including commercial lodging, hotels, basic hiker/biker campsites in front and back-country, comfort camping, and inclusive lodging options—must be widely available. These should be strategically planned and developed in close collaboration with Travel Alberta and user communities, staying ahead of or inline with demand. By proactively expanding these offerings, Alberta Parks can effectively shift a proportion of visitor use away from higher-impact areas. Additionally, actively involving commercial partners in the development and service provision is crucial to maximizing the potential of these accommodations and ensuring they meet the evolving needs of visitors.
- Alberta's future park system should not be managed as a static patchwork of isolated sites offering seasonal services. New sites, new campgrounds (lower impact as much as possible), new seasonal services, and new connections (e.g. linear parks and trail) should always be on the table to help Alberta Parks achieve its vision.

### ***Reconciliation***

- TIAA believes that the most important factors in reconciliation are to actively invite participation at different scales, to nurture relationships, to listen to Indigenous perspectives, and be open to adapting parks operations to support deeper and more meaningful involvement.
- Additionally, it's crucial to build a meaningful pathway to entrepreneurial opportunities for Indigenous communities, ensuring their economic empowerment and participation in park management and development.

## Sustainability

- Many of the factors that contribute to accessibility also contribute to sustainability (e.g. vehicle-free access, trails, simpler infrastructure).
- All campsites and other amenities offered should always be guided by the Parks' vision, but a full range of options and price points should be offered.
- There must be a better process for supporting evolving recreation infrastructure needs in parks, including the development of experiences, such as campgrounds and glamping, and should be considered in collaboration with Travel Alberta and the private sector.
- Fees and pricing should reflect the costs of providing that service, align with fair market values, be transparent to consumers, and, should have some relationship with the relative footprint and impacts of the activity.
- As a guiding principle, and following the leadership example set by Parks Canada, all fees collected within a park should be wholly dedicated for reinvestment in the park where those fees were generated, whether this is for infrastructure build (or renewal), conservation programming, ecological restoration, trail development, or other.
- Government references to "user fees", which can be interpreted as opportunistic revenue opportunities with no correlating service of benefit, should be reframed to correlate with pricing principles to help cement the relationship between the cost of access and the cost of experiencing place in a sustainable manner. Messaging around the Kananaskis Conservation Pass (KCP), for example, should more clearly communicate connection to vehicle-related impacts, footprint and costs. *"Welcome! We have lots of room for you and your new boots ... it's your car that we're having trouble squeezing in."* Albertans deserve full transparency in the accounting of how KCP revenues are applied to the conservation, restoration, education and infrastructure aims of the region.
- "Friends of" groups, volunteers, and other partnerships should be actively cultivated and recognized, but not at the expense of eroding the continuity, brand, and system as a whole. There's immense value, pride, and cohesive forces in having a provincial parks system with common threads of continuity, familiarity, and connection. Voluntary contributions should be, on balance, supplementary rather than core.

## Increasing Access

- It is important that Alberta Parks comes to view tourism as something not separate or distinct from its core mandate and vision. All of Parks' people-focused services are tourism services. Parks is an important part of the national and provincial tourism ecosystems, and it is already part of *dozens* of local tourism ecosystems.
- Building an internal foundation and culture rooted in facilitating remarkable, high-quality, connected experiences consistent with its vision should underpin all operations.
- Concerted efforts should be made to:
  - Build relationships with local, regional, and provincial tourism ecosystems, including those organizations that could be involved in the product and service delivery continuum.
  - Physically connect parks to communities via a provincial trail system.
  - Purposefully invite and expand Indigenous opportunities
  - Greatly improve social science, relationships with user communities, visitor information, experience design and visitor use management capacities, and related internal capacities.
  - Invite tasteful, authentic participation and site-appropriate services and commercial development.

- Carefully, but purposefully, consider larger scale commercial development as alternatives to the mountain parks where footprint, wildlife, vehicles, user conflict, and other issues can be managed.
- Building themed signature routes to an international standard with on-route amenities and itineraries (e.g. river paddling routes, epic mountain bike routes, long-distance hiking, running and cycling loops etc.)

### Recreation Opportunities

- A transparent, consistent and systematic approach should be used to gauge compatibility and appropriateness of activities within parks. Activities with attributes such as low-noise, low-speed, low-wildlife displacement, and low-physical footprint should be pursued.
- Activities with high-footprint (*including* motorized vehicles), high-noise, high speed differentials, and high propensity to displace wildlife should be evaluated based on accepted management approaches employed in other high use tourism and recreation areas.
- To ensure advancement of Alberta's outdoor tourism and recreation economy, modern trail planning and Visitor Use Management Framework approaches should be purposefully implemented.
- Priority policy gaps, including modern electrified conveyances (e.g. e-bikes) should be addressed and communicated.
- Trail connectivity within parks and to communities should be prioritized.
- Low-impact, vehicle free travel should be incentivized through welcoming policies (e.g. no turn-away overnight areas), route-building,
- Where appropriate, both spatial and temporal zoning options should be used to achieve separation between incompatible activities or values.

### Nature-Based Experiences

- Creation of more provincial parks, which is an imperative in Alberta as population growth continues to lead the country, is an investment in the health, connectivity, and resilience of our environment, and in creation of public areas for protection and enjoyment. This is a laudable public goal and should endure through any future economic cycles.
- Interpretive and education program should continue to be a foundational part of park programming. It should be strategic, fun, nuanced, thought provoking, inspiring, and empowering. It should invite participation, offer strategies for responsible and low-footprint visitation, be memorable and remarkable, and cultivate a new generation of ambassadors that will promote and protect these special places.
- Parks strategic planning should consider how the department interfaces with school curriculum development (e.g. elementary school and outdoor education curriculums).
- Capital planning should ensure facilities are developed to support school visitation, and park programming operations invite and welcome active school participation.
- Volunteer opportunities should always be available at all levels of park operations. These should not be limited to front-facing visitor services. Opportunities should be available in social and natural science research, planning, operations, social media, program coordination etc.

### Improving Legislation

- With the exceptions of direction around Indigenous use and tourism, TIAA believes the Provincial Parks Act functions sufficiently, but efforts should be made to explicitly include tourism and indigenous use as a legitimate use of Alberta Parks.

- The Provincial Recreation Area classification is a hidden gem, holds remarkable potential, and is massively underutilized. Many, many remarkable recreation-focused, highly desirable outdoor destinations could be built, developed and marketed with this designation.
- Regulatory deficiencies include:
  - The ability to objectively regulate and prohibit in-park activities on objective, measurable attributes (e.g. noise, speed, wildlife displacement, physical footprint).
  - Modern electrified conveyances.
  - Tourism dispositions must be completely overhauled for functionality.
  - Enablement of Indigenous cultural activities.
  - More nuanced abilities to manage dogs and related impacts.
- While it's true that user literacy around regulations can be low, it is critically important that park users are first grounded in the why parks exist, what purposes they are trying to serve, and what role park users have in stewarding them. Rules without context are empty and easily forgettable. Rules without enforcement is simple sabre rattling. In the wise words of world-renowned biologist and broadcaster, David Attenborough: "No one will protect what they don't care about; and, no one will care about what they have never experienced."
- Achieving voluntary compliance and/or alignment with Parks' vision should always be the primary goal.

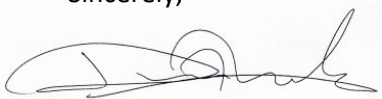
## In Closing

TIAA thanks your ministry for opening this important dialog on the future of Alberta's Parks system. As unfamiliar as it may be to the ministry, we strongly encourage Alberta Parks to fully embrace a role as outdoor experience facilitators and as a key player in western Canada's outdoor recreation and tourism economy.

Through welcoming community connections and through inspiration of visitors to be responsible stewards and travelers, we feel you will achieve your legislated conservation responsibilities and more.

And we encourage the ministry to not retreat to traditional land management approaches, site-by-site management plans, or a narrow focus on auto-based services and camping. We believe Alberta, and the world, is ready for bold and novel approaches to outdoor recreation and tourism leadership.

Sincerely,



Darren Reeder  
President and CEO

cc:

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