



ALBERTA WILDERNESS ASSOCIATION

*"Defending Wild Alberta through Awareness and Action"*

**Submission by Alberta Wilderness Association (AWA) to the Clearwater County  
Subdivision and Development Appeal Board  
May 4<sup>th</sup>, 2004**

**Position**

AWA supports the County of Clearwater Municipal Planning Commission (MPC) in their decision to refuse the application of the development permit for the Abraham Glacier Wellness Resort in the Whitegoat Development Node. We ask that the Subdivision and Development Appeal Board (SDAB) uphold the MPC's decision.

AWA supports low impact tourism development that does not compromise the ecological integrity of wilderness. Large-scale tourism developments are not compatible with wilderness values and experience. Development of the Abraham Glacier Wellness Resort would place unacceptable pressure on surrounding Wilderness Areas and Ecological Reserves. The proposed resort is not an appropriate development for the area, and the impacts on the environment, water, and wildlife have not been adequately addressed.

**I. The scale and type of the development compromises the wilderness value of the area**

The proposed Abraham Glacier Wellness Resort does not complement the wilderness characteristics of the Whitegoat Development Node. Although the Whitegoat Development Node supports tourism development, it does not mean that all remaining wilderness should be developed. While the resort as proposed is too large, the type of the development and location is not appropriate for a wild space, its wildlife, important watersheds and traditional wilderness experience. Tourism and recreational development in the Node should be limited only to small and medium sized development reserved for sustainable, long-term, low impact tourism development. Such statements are supported within the Municipal District of Clearwater Whitegoat Lakes Development Node Concept Plan (1999) which states, "...the Whitegoat Lakes Development Node is set within a majestic mountainous setting..." "The node is considered appropriate for... small to medium sized accommodation facilities..." "The node is not considered appropriate for large-scale resort development..."

**Wilderness Value**

Alberta is known for some of the most outstanding landscapes, wildlife, watersheds and wilderness in the world. In Alberta, wilderness degradation, alteration, development, and conversion is occurring at increasing rates. Land use and development activities encroach upon wilderness, resulting in a fragmented landscape and interference with natural processes. The rate and quantity of loss of wilderness indicates that what remains in Alberta is too little, too isolated and too fragmented to support current levels of native biodiversity in Alberta. With Alberta's economic growth, our public



**ALBERTA WILDERNESS ASSOCIATION**

*"Defending Wild Alberta through Awareness and Action"*

lands and wilderness is threatened by the degradation of natural ecosystems and the ultimate loss of biodiversity. Alberta needs more wilderness protection.

The advantages of maintaining wilderness include:

- Conserving provincial landscapes to maintain native biological diversity,
- Protecting habitat for vulnerable, threatened or endangered species,
- Watershed conservation,
- Economic incentives,
- First Nation's legacy- spiritual and cultural benefits,
- Outdoor recreation potential,
- Scientific and education benefit,
- Health benefits.

Polls and surveys undertaken in Alberta have shown that an overwhelming number of Albertans want to protect wilderness and the value and opportunities it holds. When it comes to protecting wilderness, Albertans overwhelmingly associate wilderness positively with their quality of life. The 2004 Alberta survey, conducted by the University of Alberta's Population Research Laboratory, asked a random sample of 1200 Albertans for their views on different aspects of wilderness and protected areas in Alberta. Seventy-six percent of respondents strongly agreed with the statement that protecting wilderness makes a positive contribution to the quality of life in Alberta. Less than one percent of respondents strongly disagreed with this statement. Similarly, a 2003 Canada West Foundation poll showed that 94% of western Canadians rated protecting the environment as either high (65%) or medium (29%) priority.

The results of other polls taken indicate that Albertans appreciate and value and the recreational opportunities afforded to them by wilderness. A poll conducted in 2000 by Alberta Community Development indicates that 42.6% of people enjoy overnight camping in wilderness, 39.1% picnic in the wilderness, 16.9% enjoy bird watching, while 3.1 % enjoy day hiking, and 6.8% go wilderness backpacking.

## **II. The Impacts of the Abraham Glacier Wellness Resort on Surrounding Wilderness**

The Eastern Slopes of Alberta play a critical role in preserving Alberta's natural/native biodiversity that ensures the integrity of the natural environment, spectacular scenic and aesthetic resources, outstanding backcountry opportunities, critical habitat for wildlife species including grizzly bears, elk and harlequin ducks, and critical water ways that produce/provide clean, quality drinking water and ensure water quantity downstream and in neighboring provinces. The proposed resort development would place unacceptable impacts; visual, ecological, and recreational, on adjacent wilderness



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

including the Bighorn Wildland Recreation Area, the Whitegoat and Siffleur Wilderness Areas, Kootenay Plains Ecological Reserve, and Banff and Jasper National Parks.

### ***Bighorn Wildland***

Most of Alberta's montane valleys, such as the Yellowhead and Banff-Bow Valley corridor, have been heavily impacted by roads and tourism development. In what little intact wilderness remains along the Eastern Slopes of Alberta, lies the Bighorn Wildland. The proposed resort lies on the immediate boundary of the Bighorn Wildland. This area is of significant ecological importance because it represents one of the few remaining montane and foothill habitats on the eastern slopes that has not been heavily impacted from excessive commercial development.

The Bighorn Wildland is a largely intact and relatively pristine 4000km<sup>2</sup> area of rolling slopes, mountain peaks, and meadows. In a landscape littered with oil and gas operations and infrastructure, forestry operations, and high human development, the Bighorn Wildland supports unique wilderness values. These values will be compromised with roads, increased access, and high visitor numbers that a large-scale resort development would bring. The Bighorn:

- supports irreplaceable habitat for grizzlies and other wildlife;
- is an important transition zone, movement corridor, foraging and over wintering for wildlife from Banff and Jasper National Parks;
- supports intact forest and soils that support major headwaters of 5 major rivers and form watersheds and provide clean drinking water to central Alberta; Manitoba, and Saskatchewan;
- provides backcountry recreation opportunities that are among the best in the province;
- is an important first Nations cultural resource, with traditional use sites and gravesites;
- supports sustainable economic activities, including outfitting and backcountry tourism;
- has many Environmentally Significant Areas identified by the Government of Alberta;
- holds outstanding scenic and aesthetic value.
- an integral component of the Yellowstone to Yukon(Y2Y) conservation initiative, an international effort to preserve the biological diversity, natural processes, and recreational opportunities of the Rocky Mountain corridor.

### ***Water***

Close to 90% of the water in the vast Saskatchewan River System, which provides clean water to the residents of Alberta, Saskatchewan, and Manitoba, originates along the mountains and foothills of the Eastern Slopes of Alberta. With the onset of climate change and demand for its use in industrial development, water quality and supply is an important resource issue. With a development as large as the Abraham Glacier Wellness Resort, there will be increased pressure on the watersheds through contamination, use, and disposal. The County has an obligation to ensure the quality and quantity of



ALBERTA WILDERNESS ASSOCIATION

*"Defending Wild Alberta through Awareness and Action"*

this valuable resource. These watersheds must be kept free from further negative impacts of development.

### ***Wildlife***

The Bighorn provides habitat for many wildlife species including grizzly and black bear, wolf, bighorn sheep, mountain goat, and elk. The foothills, meadows, and the expansive sub alpine grasslands of the Bighorn form critical habitat and migration corridors for wildlife, particularly large carnivores and ungulates.

The proposed resort development would significantly impact the wildlife, their habitat and movement potential through the area. Habitat fragmentation from infrastructure including roads and increased highway traffic, along with the noise, dust, and high visitor numbers associated with a large resort, will have a negative impact on area wildlife. Major gaps in information regarding wildlife and their movement exist for this area since few studies have been conducted. Field survey data is required. No development should proceed without full knowledge of the impacts on wildlife. The area must therefore be protected to preserve wildlife opportunities.

### ***Recreation and Tourism***

Included among the primary attractions to the area is that it is clean, quiet, undeveloped, and wild. This magnificent wilderness provides a place where it is possible to escape from hectic city life. Approving a project of this scale would diminish the value and opportunity of the wilderness that people come to see and experience and eliminate the opportunity for long-term, responsible, and low-impact tourism development in the future.

The wilderness of the Bighorn provides a diversity of traditional recreation opportunities including hiking, camping, and biking. New economic studies indicate that more people are choosing to live away from urban centers, and are moving to communities near large wilderness areas because of the range of lifestyle opportunities and the stability created by a high-quality environment. This trend can be observed in Bighorn gateway communities such as Rocky Mountain House, Sundre, Caroline and Nordegg.

The Abraham Glacier Wellness Resort would be more appropriate if constructed in one of the surrounding gateway communities such as Nordegg, Caroline and Rocky Mountain House which are all situated within an acceptable distance of the proposed area. These communities have the established infrastructure needed to support the resort including waste and water facilities. The community and other operators would still reap the economic benefits of the resort while maintaining the ecological integrity of the region.



ALBERTA WILDERNESS ASSOCIATION

*"Defending Wild Alberta through Awareness and Action"*

### **III. Environmental impacts and cumulative effects on the site and surrounding area have not been adequately considered**

The areas surrounding the Abraham Glacier Wellness Resort are considered ecologically significant as they support areas of prime protection and are provincially significant. The Alberta Government's refusal to carry out an Environmental Impact Assessment (EIA) for such a major development in a sensitive area is inappropriate and irresponsible.

Under the Whitegoat Development Node Concept Plan, "The vision for the Node... is to encourage appropriate tourism and commercial recreational development that recognizes the environmental sensitivity of the area." "Any development that would create significant negative impacts on the environment...will not be considered appropriate."

In direct contradiction to the Concept Plan, the negative environmental and cumulative impacts have not been considered and are unknown since no EIA was undertaken for the project. Studies need to be conducted on the development site and surrounding areas to address and assess short-term environmental and long-term cumulative effects.

The primary concern is the large footprint of the development at the site and surrounding areas. The increase in traffic flow and access to wilderness will undoubtedly increase with the establishment of the resort. With high resort occupancy, resort visitors will be encouraged to undertake activity outside of the resort boundary. Encouraging even a small portion of the approximately 200,000 visitors to visit these surrounding sensitive and ecologically important areas will have a significant impact. Increased access would lead to exploration and exploitation of these areas, wildlife and their habitat. Increased degradation is foreseen in areas already deficient in enforcement and management.

### **Conclusions**

The Clearwater County Subdivision and Development Appeal Board must uphold the MPC's decision to refuse the development application for the Abraham Glacier Wellness Resort. Protecting the wilderness values of the surrounding Bighorn Wildland would preserve opportunities for water quality and quantity, viable wildlife populations and habitat and outstanding wilderness recreational opportunity and experience.