



ALBERTA WILDERNESS ASSOCIATION

*"Defending Wild Alberta through Awareness and Action"*

June 15, 2007

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Senior Area Forester  
SRD, Public Lands and Forests Division  
Clearwater Forest Area  
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Dear Mr. Gagne:

Re: R11 Draft Management Plan

Two years ago AWA participated in a preliminary invitational meeting regarding the R11 plan. We were part of what was called the "Environmental/Cultural (Aboriginal)" user group. At this meeting we made a decision to not participate further in the R11 public input process because we were convinced that the Forests Division's agenda was already set for the area, including commercial logging within the Bighorn. Further, we were convinced that the development of a fire plan in the absence of an overall management plan for the area was a regressive way of land planning. Our opinion remains the same. After reading the draft plan, we are extremely disturbed to learn our fears of commercial logging within the Bighorn may be realized.

While the R11 draft plan is exhaustive in ecological considerations that may or may never see the light of day in actual on-ground management, it is essentially a bully plan where forest management may be allowed to trump management of a whole range of priorities and resources. The lack of an overall management plan based on the Eastern Slopes Policy - which remains the overarching guide for Eastern Slopes Management (but is barely mentioned in the R11 draft plan), is a fundamental planning flaw. The Forests Division has developed a plan that threatens to set a narrow agenda for this large and increasingly important part of the province. AWA believes this is a recipe for management disharmony and even clashes as time goes on. It is our opinion that a fire plan should be sub plan to an overall management plan.

Under the Eastern Slopes Policy, watershed is the priority management directive for the Eastern Slopes, with aesthetic qualities and wildlife maintenance following suite. In fact, the draft R11 plan refers throughout, to the stunning beauty of the area and its high value for recreation and tourism. Although the plan fails to note that much of the Bighorn area was once included within the national parks system, and that the Bighorn Wildland was announced as a provincial park in 1986 and that its name appeared on provincial maps for the next 10 years, there can be little doubt that the Bighorn will be managed in the future for tourism, recreation, watershed and wildlife values. Therefore, any forward looking plan should be developed with these four compatible values at its core. Unfortunately, these are not the central values being addressed by the R11 plan.

These are AWA's primary concerns about the R11 draft plan.

Specifically, our initial fear that the R11 plan would be an elaborate disguise for even more commercial logging in the area west of Sundre-Rocky Mountain House-Nordegg than already is occurring is borne out in the R11 draft plan. The Alberta Forest Service had long sought to allow the east Sunkay-Shankland Creek area to be clearcut, and now it appears that its successor has found a way, by labeling the area as dangerous. The same thinking has been applied to the forests of the Ram and Clearwater, along the fringes of the Bighorn's eastern boundary. These forests too have been sought after by commercial operators, and have now been legitimized for logging by being labeled "dangerous".

AWA hereby opposes cutting in either of these areas within or adjacent to the boundaries of the Bighorn. As an organization we have long asked to curtail logging west of the Forestry Trunk Road because of the area's significant wildlife habitat, number of identified environmentally significant areas, its aesthetics, water generation and recreation considerations. It is very shortsighted to sacrifice all of these uses and values for short-lived commercial profit. We particularly oppose cutting in the Sunkay-Shankland Creek area for any reason.

Other shortcomings of the draft plan, or areas where AWA has concerns are:

- Oldgrowth forests – no mention of their value, except as caribou habitat in table 13. The Alberta Forest Service has failed to value these forests in recent decades, yet the public holds them in high regard and wants what is left of them retained. The very fact that they exist means they have some inherent resistance to fire, pests and disease. There is no reason for foresters to regard them as dangerous elements that must be eliminated.
- Lapland rose-bay – the plan refers to "protecting it" from fire plans. We wonder why this would be necessary as this rare plant occurs in the subalpine, right at treeline. Why would any fire plans include such areas?

- Cutting the forest to save it from pine beetles is a scientifically questionable practice that could induce the farther and faster long-range spread of beetles and that can result (see the information coming out of B.C. now, especially for areas denuded by salvage operations) in vast watershed and flooding problems. Rushing into forest rescue by cutting it is a dangerous practice that is not founded in sound science.
- Cutting forests to save them from fire is likewise full of ecological and downstream pitfalls that should not be undertaken without knowing the full range of consequences.
- While AWA has never been opposed to the use of prescription burns for wildlife habitat enhancement or to rejuvenate certain forest areas, we would like to see any fire plan for a large wild area as the Bighorn, be developed along with a wildfire plan. What part of the Bighorn is going to be allowed to burn through wildfire? If a wildfire starts within the Bighorn, will it be allowed to burn to the national park boundary (and beyond) or to the Bighorn's east side? The role of wildfire needs addressing.
- While AWA is not opposed to burns within the Wapiabi-Blackstone FLUZ, our organization has adopted and maintained the historic Bighorn Trail through this area for the past 15 years. If large sections of our trail are to be burned, we wonder if continued maintenance will be futile. AWA would like more details regarding these burns, at your earliest convenience. We would also oppose any reopening of roads into these areas for burning purposes.
- The plan's stated goal is cumbersome and unconvincing.
- We wonder why 20% of limber and whitebark pine forests, both of which are rare in the Bighorn, is willingly sacrificed in this plan?
- AWA disagrees with any salvage logging or salvage after fire within the Bighorn, for ecological and watershed reasons.
- Throughout the Bighorn, such species as the grizzly, wolverine, fisher, lynx, caribou, barred, pygmy and boreal owls, harlequin duck and fish species like the cutthroat and bull trout have become noticeably fewer to rare within only about the last 15 to 20 years. At their present rate of decline, these animals face extirpation from the Bighorn in another decade or two. There are no recovery plans for these creatures within the R11 plan.
- AWA remains skeptical that the primary purpose of a fire plan for the Bighorn is to protect the interests of adjacent commercial operators and other human developments. The draft R11 plan only increases our skepticism. Why not a fire plan for the areas covered by the three adjacent FMA's that is designed to protect Bighorn watersheds?

- AWA is also skeptical of the plan's call for no new access to be created, especially in light of statements on pages 219-220 to the effect that new industrial roads may be necessary to conduct logging and that these "will be temporary whenever possible".
- If Shankland Creek is to be cut, why not truly live up to the spirit of the plan and have it done with no roads – have the FMA holder who will get this timber take it by helicopter. This could be a real test of the validity of need for the R11 plan.

AWA thanks you for the opportunity to make comments on the R11 draft fire management plan. We see it for its considerable shortfalls though – its failure to be built around established priorities for managing the Eastern Slopes and that as a fire plan, it must not take precedence over an overall management plan. An overall management plan must set the direction for area management, and must not be preempted by a sub plan.

Yours sincerely,

ALBERTA WILDERNESS ASSOCIATION



Vivian Pharis,  
AWA Board of Directors

cc: Mr. Bruce Cartwright, Clearwater Lands Division