

Castle Special Place

Conceptual Proposal for Legislated Protected Areas

Castle Special Place Citizens' Initiative
October 2009



Castle Special Place Working Group

<http://www.castlespecialplace.ca>

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Castle Special Place

Conceptual Proposal for Legislated Protected Areas

Executive Summary

This conceptual proposal from the Castle Special Place Citizens' Initiative focuses on the 1,041 km² Castle Special Place as mapped (Map 1) and designated by the Alberta Government as a protected area (Appendix I), with the exception of the lands held by the Castle Mountain Resort (CMR) and ski hill (a private development for which there is a municipally approved Area Structure Plan). The size is 1,035 km² (400 mi²) without the resort lands.

It is submitted to the Minister of Tourism, Parks and Recreation and her department in response to:

1. Broad, local and regional concern for achieving better short and long-term protection of the Castle Special Place.
2. The September 2007 announcement that the ministry hopes to see locally-driven citizens' initiatives put forward proposals for protected areas and parks. It was an announcement made in conjunction with the successful citizens' initiative for a new Provincial Park and Recreation Area at Drayton Valley, and emphasized again with the Minister's April 2009 release of the Alberta Government's *Alberta's Plan for Parks* as the new policy for provincial protected areas and parks.

The Citizens' Initiative proposes that the present types of recreational uses, including hunting and fishing, and summer grazing permits continue within the ecological limits of the Castle Special Place. Oil and gas activities will continue in conjunction with the existing leases in accordance with the September 2003 agreement¹ between the provincial departments responsible for energy and legislated protected areas. The Citizens' Initiative proposes legislating the entire protected area (except the CMR lands) within the province's current protected areas and parks legislation. In effect, we are recommending Phase III for implementing the Alberta Government's protected area designation. We recommend that approximately 99 per cent of the Castle Special Place be a Wildland under the province's wildland parks legislation. That legislation also accommodates zoning for management purposes within Wildlands. We are recommending special protection zones within the Wildland for the Big Sagebrush site, Front Range Canyons/Castle Headwaters, and the Vision Quest sites. Zoning is recommended instead of categories other than Wildland, because other categories have one or more inappropriate limitations of specific uses, such as hunting, fishing, summer cattle grazing or First Nations cultural and spiritual uses.

The remainder of the Castle Special Place is the existing West Castle Wetlands Ecological Reserve and the five current Provincial Recreation Areas (PRAs), which with our recommendations total about 12 km² (4.5 mi²) or one per cent of the Castle Special Place. We recommend that the Ecological Reserve remain with its current boundaries. Beaver Mines Lake, Castle Falls, Lynx Creek and Syncline would be upgraded to provincial parks, with some expansion in the boundaries of Beaver Mines Lake (to about 4.5 km² or 2 mi²) and some minor expansion of Castle Falls and Lynx Creek. Castle River Bridge is recommended to remain as a PRA and Syncline Cross-Country Ski Area is recommended as a PRA. Syncline and Castle River Bridge would be linked with a small provincial park in between, giving a total land area of about 4 km² for the entire unit of Syncline, Castle River Bridge, the cross-country ski area and the link in between.

We concur with the province's original reasons for designating the Castle Special Place as a protected area. Furthermore we have updated those with new information and in the context of the Alberta Government's current priorities and policies, particularly *Alberta's Plan for Parks*, the *Land Use Framework* and *Water for Life Strategy*. With legislated protection as a Wildland along with an existing Ecological Reserve and four small Provincial Recreation Areas and parks:

1. This premier water source is secured, protected and restored. Urgent action is needed, considering water allocations in the Oldman River Basin exceed supply. Castle Special Place provides an unsurpassed 1/3 of the annual water flow for the Oldman Basin.
2. Quality, equitable opportunities are provided for outdoor recreation (including hunting and fishing), education, interpretation and First Nations' cultural uses associated with the natural environment and cultural heritage of the Castle Special Place.
3. The natural ecosystem, including the scenery, plants and animals upon which outdoor recreation, summer cattle grazing, guiding and tourism depend, are sustained, protected and restored. The Castle is Alberta's most biologically diverse area, and is of national and international significance.
4. Gateway communities could begin to share in the additional economic benefits that accrue from provincial legislated protected areas. This includes what the province calculates are an annual total of 23,480 person-years of employment and \$2.7 billion in economic activity directly generated by public and visitor use of the total provincial protected areas and parks.
5. Ecological goods and service, such as protection of soils, clean air and buffering from floods, which also have economic value, are restored and provided.
6. A sound legislative framework for the protection and management of this protected area is needed. The framework should achieve a designated protected area that is implementable and enforceable for that purpose.

Participants in the Citizens' Initiative were self-selected. User, interest and community groups, disposition holders, adjacent landholders, First Nations, businesses and municipal governments with an active interest in the Castle Special Place were all invited to develop the initiative. They participated at the level of their choice, with the most time-consuming level being the Working Group. Work kicked off with a June 2008 workshop in Pincher Creek. All on the Working Group are businesses representatives, residents or groups with members resident in the Livingstone-Macleod constituency or Lethbridge. (Lethbridge residents are the largest user group of the Castle.)

The Working Group includes people, companies and organizations in the following sectors:

Adjacent landholders & landholder groups	Guides and Outfitters
Commerce	Municipal Governments
Community leaders & groups	Recreation Groups
Conservation Organizations	Recreation/Conservation Organizations
Disposition holders	Researchers
Environmental Organizations	Stewards
First Nations	Watershed Groups

This broad-based Working Group met every three to four weeks through the past year. It sought and shared information, drafted the principles and proposal for the Castle Special Place, and sought and incorporated feedback from the whole Citizens' Initiative and beyond. Meetings were run by an independent, professional facilitator and decisions were reached through consensus. Throughout the process, an open invitation for participation was communicated through letters, www.castlespecialplace.ca, articles and letters in local newspapers, and in person.

Castle Special Place Conceptual Proposal for Legislated Protected Areas

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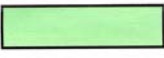



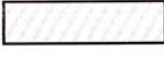



SPECIAL PLACES PROGRAM

FINAL STATUS - July 24, 2001

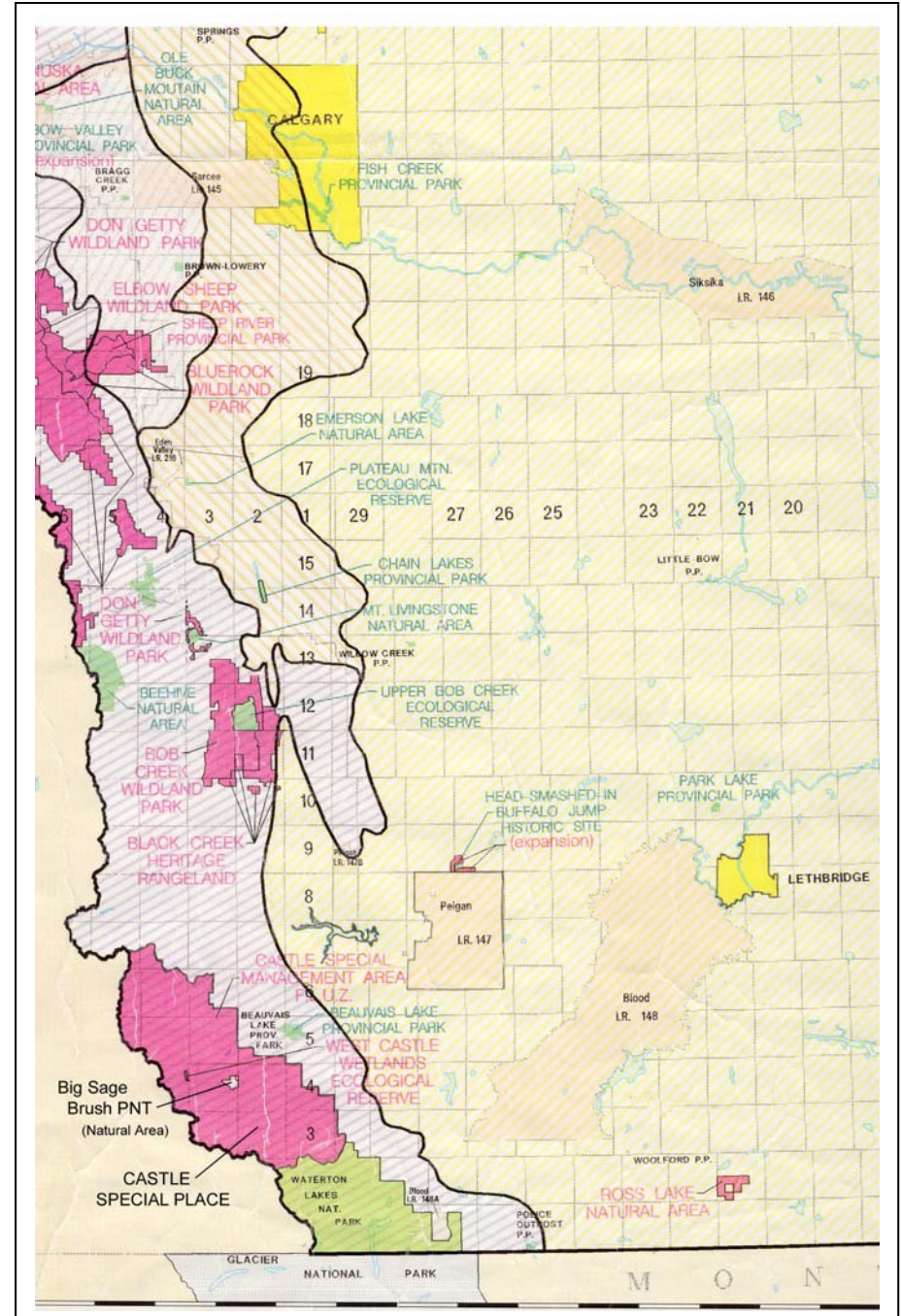
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The Special Places program concluded on July 24, 2001. This map therefore is the FINAL map in the series of maps produced to provide the status of the Special Places program. The map identifies the protected areas (eg. Provincial Parks, Wildland Provincial Parks, Ecological Reserves, and Natural Areas) designated under the Special Places program. This map is intended for display purposes only and should not be used for analysis.

For information on the Special Places program visit the Parks and Protected Areas website at <http://www.cd.gov.ab.ca/preserving/parks/index.asp> and link to the Special Places site. A map of all the protected areas in Alberta can be downloaded from the Parks and Protected Areas website by linking to the Land Reference Manual at <http://www.gov.ab.ca/env/parks/lrm/index.html>.

-  Protected Areas Designated Under the Special Places Program
-  Provincial Protected Areas
-  National Protected Areas
-  Boreal Forest Natural Region
-  Rocky Mountain Natural Region
-  Foothills Natural Region
-  Canadian Shield Natural Region
-  Parkland Natural Region
-  Grassland Natural Region

Map 1. Excerpts from Alberta Government map showing Castle Special Place (Castle Special Management Forest Land Use Zone)



Conceptual Proposal Castle Special Place – Legislated Protected Areas

1. Area of Focus

The focus of the Castle Special Place Initiative is the Castle Special Placeⁱⁱ as mapped (Map 1) and designated by the Alberta Government as a protected area (Appendix I), with the exception of the lands held by the Castle Mountain Resort and ski hill (a private development). The Government's highlights of its decision, including the goals of preservation, heritage appreciation, outdoor recreation and economic development that the Castle designated protected area is to meet, and its news release are attached (Appendix I).

The Castle Special Place is all public land (Crown land) located entirely within Alberta's Rocky Mountain Forest Reserve. Much of it (all of the West and South Castle drainages) is currently under Crown Reservations for future designation as legislated protected areas (CNT, Name: Castle River, Type: Provincial Park; and PNT, Name: Big Sagebrush, Type: Natural Area). It is bounded on the south by Waterton Lakes National Park, the west by the provincial border, the north by the divide between the Castle and Crowsnest watersheds (i.e. the summit of the Adanac Road) and the east by the Forest Reserve Boundary. The northern boundary is south of the Forest Reserve boundary and by public road is about 11 km south of Blairmore, 10 km south of Hillcrest and 9 km west of Beaver Mines. It encompasses headwater tributaries of the Castle, Oldman and Waterton Rivers. It does not include the lands drained by the Crowsnest River. Thus, for example, it does not include Tent Mountain and the Ptolemy, North and South York and Byron Creek valleys.

2. Focus of the Citizens' Initiative

The focus has been to develop through a broad-based, citizen-led process, a conceptual proposal for protecting the Castle Special Place within the province's current protected areas and parks legislation. Alberta's protected areas and parks legislation consists of three Acts: Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act; Provincial Parks Act (which includes Wildland Parks); and Willmore Wilderness Park Act. The Willmore Wilderness Park Act does not provide for any new Wilderness Parks.

3. Who is Involved in the Initiative

Participants in this citizens' initiative were self-selected. An open invitation for participation was communicated throughout the process for user, interest and community groups, disposition holders, adjacent landholders, First Nations, businesses and municipal governments with an active interest in the Castle Special Place and not currently involved to join and participate at the level of their choice.

The process involved three overlapping circles of participation based on the preference of the participant, with communication between each circle and the volunteered time commitment increasing from the outer, largest circle to the inner. The inner most Working Group circle involved 35 organizations, businesses, disposition holders, community leaders and adjacent landholders, and 2 observers. It met monthly, with work also done between meetings. The next was those who wanted to participate in general meetings with the Working Group in addition to receiving updates from it (an additional 9 different organizations, businesses, disposition holders and adjacent landholders). The outermost is those who simply wanted updates on the work by email or mail (an additional 25). With update letters by email and mail, all were given opportunities to comment on the drafts developed by the Working Group. The final draft was circulated to an additional 102 interests for comment, including the municipal governments and all comments considered in finalizing the proposal.

This conceptual proposal is a product of the Working Group; developed and written through a broad-based, consensus process. It was developed through thirteen months of extensive dialogue and information sharing, during which the Working Group discussed and weighed alternative approaches and trade-offs. For the list of people who participated in the Working Group, identified by their sector, organization or interest, and the nature of their involvement, see Appendix II.

The Working Group includes people, companies and organizations in the following sectors:

Adjacent landholders & landholder groups	Guides and Outfitters
Commerce	Municipal Governments
Community leaders & groups	Recreation Groups
Conservation Organizations	Recreation/Conservation Organizations
Disposition holders	Researchers
Environmental Organizations	Stewards
First Nations	Watershed Groups

All on the Working Group are:

- a) residents of Livingstone-Fort Macleod constituency or are representing groups that have members resident there; or
- b) representing businesses operating within the Castle Special Place; or
- c) Lethbridge residents. (The largest user group of the Castle Special Place is the residents of Lethbridge, as determined by earlier visitor surveys.)

No one sector dominated the makeup of the Working Group. For example, conservation and environmental organizations in total comprised a third of the Working Group.

4. How the Citizens' Initiative and Conceptual Proposal Came About

In early 2008, an extensive database (over 260 entries) of user, interest and community groups, disposition holders, adjacent landholders, First Nations, businesses and municipal governments with an active interest in the Castle Special Place (137 individual organizations or stakeholders) was developed by the secretariat for the Citizens' Initiative. All were invited in writing to a full-day workshop June 2008 in Pincher Creek, with follow-up by phone to all non-attendees regarding their interest in participating. This first step was the outcome of a November 2007 meeting hosted by Royal Dutch Shell Canada and chaired by the Southwest Alberta Sustainable Community Initiative (SASCI) to which representatives of Alberta Tourism, Parks, Recreation and Culture were invited to explain the protected area and park establishment process, including the Drayton Valley model. Along with the host and chair, councillors of four municipal governmentsⁱⁱⁱ and representatives of some locally active, conservation organizations and of a prior Wildland Park initiative participated.

Castle Special Place Citizens' Initiative formally began with the June 2008 workshop. The initiative's objective was to prepare and submit to the provincial minister responsible for protected areas and parks, a conceptual proposal for designating the Castle Special Place as a set of legislated protected areas, along with endorsements and broad support of the proposal from the communities. The initiative is in response to the Minister of Tourism, Parks, Recreation and Culture's September 2007 announcement that he is interested in such citizen initiatives bringing forth proposals. This was reiterated by the current Minister for Tourism, Parks and Recreation upon announcing the Alberta Government's new policy for protected areas and parks – *Alberta's Plan for Parks*.

Initial work focused on determining the proposal boundary and developing a set of principles guiding how we worked together and our discussion of what boundaries and categories of legislated protected areas to recommend for the Castle Special Place.

5. How the Citizens' Initiative Worked

The Citizens' Initiative reached a consensus on a principles document to guide:

- a) operations of Working Group, and
- b) its recommended classifications of legislated protected areas and parks for the Castle Special Place.

Principles for Functioning of the Castle Special Place Working Group

1. The Castle Special Place Working Group is an open and broadly inclusive, public interest proponent sharing a common purpose to protect the Castle Special Place.
2. The Working Group functions through a transparent, consensus-building process, led by a neutral facilitator to draft and recommend a conceptual proposal for protecting the Castle within the current provincial system of Parks and Protected Areas.
3. Invitations for participation include those with an active interest in the Castle Special Place, regardless of location of residence.
4. Decisions of the working group are made by consensus. If consensus cannot be reached, decisions can be made by following the majority opinion, but with allowance for recording and reporting of minority opinions.
5. Communications within the working group and with the larger committee include the use of internet tools and a website to report meeting notes, and circulate information and ideas.
6. Other user groups, the general public, and the municipal, provincial and First Nations governments within the region of the Castle Special Place are informed of the group's work, including the principles and conceptual proposal it drafts.
7. The principles and conceptual proposal written by the Working Group will be publicly accessible.

Working Group meetings were run by the independent facilitator, who also provided advice on process for the initiative and its working group. An internal website and email list was developed to aid the Working Group in its own communications and sharing of information and ideas. A secretariat coordinated and arranged for the resources needed by the initiative to function, including funding, information needed by the Working Group, maintaining and updating the database and websites, coordinating meeting dates and locations, secretarial work and communication functions, such as meeting notes and circulation of update letters from the facilitator. Funding for the citizens' initiative was raised by participant organizations and through in-kind contributions.

From June 2008, the Working Group met every three or four weeks, and since November, using the principles to draft this conceptual proposal. Along with its regular meetings, the Working Group has held four background information meetings to inform its discussions on what types of legislated protected areas to recommend, two of which were open to the general public. Resource people were invited to share their expertise, including information on the watershed, the natural environment and cumulative effects, the details of the protected areas establishment process, and the legislation and management of each type of protected area.

The Working Group, through letters from the facilitator, circulated and sought comments from the outer two circles on the draft principles document. Delegations of the Working Group also made presentations on the initiative and principles document to the four municipal councils, the City of Lethbridge Council, the MLA for Livingstone-Macleod, other organizations' annual public events (e.g. *Holding the Reins* held annually by the Rural Team of the Oldman Watershed Council), and a Feb. 9, 2009 meeting convened by the Assistant Deputy Minister of Alberta Tourism, Parks and Recreation with his counterparts in the Energy, Environment, Aboriginal Affairs and Sustainable Resource Development (Land Use Secretariat and Public Lands) Departments. They shared information and sought comments at the presentations. A similar

communications and outreach process was followed for the draft conceptual proposal. Once the Working Group considered the feedback from that outreach and a final draft was completed, it was posted on the public website and circulated (by mail, or where no address was available, by email) for comment to the outer two circles and to all on the database, but not currently part of any one of the three circles of participants (Appendix V, a total of 102). That feedback was considered by the Working Group in finalizing the conceptual proposal before it was submitted to the Minister of Tourism, Parks and Recreation.

Through the secretariat, the Working Group has maintained a website www.castlespecialplace.ca with information about the initiative and the open invitation to participate, as well as outcomes of this citizen initiative's work. The general public is kept in touch with the initiative and the existence of the website through letters to the editor, columns and articles in the daily and weekly newspapers of the southwest region. In update letters from the Working Group's facilitator, all on the database and not currently participating were reminded of the website and the open invitation to participate.

6. Proposed Boundary

Boundary for the set of proposed legislated protected areas is the same as that which the Alberta Government designated as a 1,041 km² protected area (Castle Special Place, 1998, Appendix I), with the exception that the lands of the Castle Mountain Resort are not included in the proposed legislated protected areas.

- Castle Mountain Resort lands total 611 ha or 0.6% of the Castle Special Place.
- Total size of the proposed legislated protected areas is 1,035 km²

In addition to the gateway communities, Castle Mountain Resort (CMR) provides roofed accommodation and associated facilities for the Castle Special Place, as well as downhill skiing. Although it is not included within the proposed legislated protected areas, it is important to note for management purposes of both that the 611 ha site does encompass environmentally significant lands, as noted in the province's Environmentally Significant Areas assessments and its Natural Resources Conservation Board's findings. Rationale for not including the four-season resort lands held by CMR Inc. are:

- Municipal District of Pincher Creek approved, following local consultation, a boundary and Area Structure Plan for those lands.
- It is up to CMR Inc. and the shareholders whether they would like to be part of the province's protected areas network, e.g. as per Elkwater & Hidden Valley Ski Area (Cypress Hills Provincial Park), Canmore Nordic Centre Provincial Park or Kananaskis Village & Nakiska (Evans Thomas Provincial Recreation Area).

7. Principles for the Castle Special Place

The Working Group used the following principles in its deliberations of what legislated protected areas classifications to recommend for the Castle Special Place. The Citizens' Initiative encourages the province to adopt these same principles in making its decisions on our conceptual proposal and implementing legislated protected areas for the Castle.

The following principles are inter-related and the order of the listing does not convey a set order of priority. Rather, the ordering is for ease of reading.

1. The current provincial system of designated Protected Areas and Parks is adopted as the basis for obtaining legislative protection for the Castle Special Place.
2. Land and resources remain as public property within the Castle Special Place (excepting the current private lands of the Castle Mountain Resort).
3. The rights of the existing disposition holders^{iv} are honoured^v as long as those uses conform to the other principles herein.

4. The ecological integrity is not harmed by human activity. The three main objectives for maintaining ecological integrity are:
 - a. Key natural processes are sustained within normal ranges of variation,
 - b. Viable populations of native species (including rare species) are maintained or restored in natural patterns of abundance and distribution, and
 - c. Human uses compatible with the maintenance of ecological integrity are allowed.^{vi}
5. The watershed is protected from activities and facilities that could be harmful or unsustainable.^{vii}
6. The underlying causes of invasive, non-native plant species within the Castle Special Place are addressed. The removal of these species is a high priority.
7. Human use is managed so that it does not compromise ecological integrity.
8. Jurisdictions^{viii} effectively work together for the purposes of maintaining ecological integrity and managing human use within the Castle Special Place.
9. Traditional subsistence and recreational uses are maintained as long as those uses conform to the rest of the principles herein.
10. Access^{ix} for recreational use is maintained where such use is demonstrated to be ecologically sustainable and appropriate.
11. Aboriginal places^x, their cultural use^{xi} and their history are protected.
12. All management policies are enforceable, properly resourced and enforced.
13. Public education and information is available and disseminated, including about the values of the Castle Special Place and its regulations.
14. New residences and roofed, visitor accommodation are not compatible within the Castle Special Place^{xii}.
15. Principles from the province's Vision, Mission and Goals for protected areas are applied:
 - a. The area is valued as a natural landscape that protects from harm and degradation the environmental diversity of the Castle Special Place.
 - b. The Castle Special Place is protected from harm and degradation, in perpetuity as an example of the diversity of Alberta's natural heritage and related cultural heritage.
 - c. The primary goal of protecting from harm and degradation in perpetuity is balanced with three other goals: heritage appreciation, outdoor recreation and heritage tourism.
 - i. Opportunities are provided for heritage appreciation; to explore, understand and appreciate the area's natural heritage, and to enhance public awareness of our relationship to and dependence upon the natural world.
 - ii. A variety of natural landscape-dependent outdoor-recreation opportunities, including wilderness and opportunities for solitude, and related facilities and services are provided where these are consistent with the rest of the principles for the Castle Special Place.
 - iii. Alberta residents and visitors are encouraged to discover and enjoy the area's natural and cultural heritage through a variety of nature-based, outdoor recreation and tourism opportunities and services, where these are consistent with the rest of the principles for the Castle Special Place.

8. Why a Legislated Protected Area

- a) Alberta Government has designated the Castle Special Place as a protected area and the other 80 Special Places it likewise designated as protected areas have since been legislated.
- b) This conceptual proposal, in effect, recommends Phase III of the implementation of that decision (Appendix D): legislated protection within the provincial system of protected areas and parks (Principle 1).
- c) Recent Alberta Government surveys of Albertans found that a large majority believe the province should establish more protected areas and parks to balance residential growth and industrial

development in the province^{xiii} and that Albertans' top priority for investment by the Tourism, Parks and Recreation Department is the setting aside of more land in an undisturbed state as new protected areas and parks^{xiv}.

- d) Albertans' interest in protection of the Castle Special Place, including the nominations and interest of local Albertans, was one of the reasons the province gave for designating it as a protected area. That interest was stated as being "considerable" by the Minister responsible for protected areas in 2007.
- e) Through the provisions of the Public Lands Act, the province has placed much of the Castle Special Place under Crown Reservations for legislated protected areas (CNT, Name: Castle River, Type: Provincial Park; and PNT, Name: Big Sagebrush, Type: Natural Area). However, the reservations are an interdepartmental referral tool. They have expiry dates and are not designed to deal with protecting the natural environment, special features, cultural sites and over the long-term, protecting the area from harm and degradation. The protected areas and parks legislation is designed for that.

9. Why a Legislated Protected Area Instead of "Special Management"

- a) Very broad, local and regional consensus supports the need for legislated protection of the Castle Special Place and that "special management" of multiple resource development, commercial development and public use is not adequate.
- b) Needed protection cannot be achieved through continuation of the current special management and associated Forest Land Use Zone (FLUZ) regulation under the Forest Act. With legislated protection of the Castle Special Place within the province's protected areas and parks legislation, instead of "special management:"
 - This premier water source receives security, protection and restoration. Urgent action is needed, considering water allocations in the Oldman River Basin exceed the supply. Castle Special Place provides an unsurpassed 1/3 of the annual water flow for the Basin.
 - Quality, equitable opportunities are provided for outdoor recreation (including hunting and fishing), education, interpretation and First Nations' cultural uses associated with the natural environment and cultural heritage of the Castle Special Place.
 - The natural ecosystem, including the scenery, plants and animals upon which outdoor recreation, summer cattle grazing, guiding and tourism depend, are sustained, protected and restored. The Castle is Alberta's most biologically diverse area, and is of national and international significance.
 - Gateway communities could begin to share in the additional economic benefits that accrue from provincial legislated protected areas. This includes what the province calculates are an annual total of 23,480 person-years of employment and \$2.7 billion in economic activity directly generated by public and visitor use of the total provincial protected areas and parks.
 - Ecological goods and service, such as protection of soils, clean air and buffering from floods, which also have economic value, are restored and provided.
 - A sound legislative framework for the protection and management of this protected area is needed. The framework should achieve a designated protected area that is implementable and enforceable for that purpose.
- c) Through the past 11 years, application of "special" integrated resource management and the FLUZ regulation have not met the goals specified in the Alberta Government's decision designating the Castle as a protected area and in its associated *Special Places 2000: Alberta's Natural Heritage Policy and Implementation Plan*. The goals stated in the protected area decision and policy were:
 - **Preservation** – to designate natural landscapes that preserve the full range of environmental diversity and special natural features of Alberta.

- **Heritage Appreciation** – to include landscapes that ensure, for all Albertans and visitors, the opportunity to explore, understand and appreciate the full range of Alberta’s natural heritage.
 - **Outdoor Recreation** – to include natural landscapes throughout Alberta that ensure opportunities for a variety of resource-based, dispersed recreation pursuits.
 - **Tourism and Economic Development** – to include areas capable of supporting tourism infrastructure and sustaining long-term economic viability of adventure travel and ecotourism, including extended tours in unspoiled natural landscapes.
- d) Since the Government’s decision designating the Castle as a protected area, Sustainable Resource Development has clarified that the FLUZ regulation does not provide for protection of FLUZ lands as a designated protected area.
- e) The FLUZ regulation only addresses one type of use, motorized recreation, and as a regulation under the Forest Act, it does not set as a purpose for the Castle Special Place the maintenance of its ecological integrity (Principle 4) and its overall protection, including as the “water tower” for the whole of the Oldman River Basin and as Alberta’s most biologically diverse area (Principles 5 and 15). It does not:
- Provide any protection regarding sale or lease of public land for resource extraction or commercial development purposes. (Does not meet Principles 1, 2 and 14).
 - Address Principle 7, *Human use is managed so that it does not compromise ecological integrity*.
 - Address any other type of recreation, education or heritage appreciation.
 - Address protection of aboriginal places, their cultural use and history. (Principle 11)
- f) It is important to use the legislative tool kit designed for protected areas that makes the province’s protected area decision implementable, fundable and enforceable (Principle 11). Protection through a regulation under the Forest Act, the primary purpose of which is a sustained yield of timber, instead of through legislation designed for designated protected areas has resulted in cumulative and unsustainable environmental and social impacts. It has resulted in degradation of the protected area instead of its protection and restoration. For example, compare the state of Bob Creek Wildland Park, previously part of the north end of the Crowsnest Forest (C5 Forest Management Unit), Rocky Mountain Forest Reserve and associated Black Creek Heritage Rangeland (the Whaleback Special Place) designated a year after the Castle to that of the Castle Special Place.
- g) Adverse impacts predicted by the province’s Natural Resources Conservation Board (1993), if legislated protection was not put in place, are today occurring.
- h) Alberta Government Boards (e.g. Alberta Energy & Utilities Board, 2000) and independent scientific assessments (Arc Wildlife Services Ltd., 2004) have concluded that the ecosystem health and sustainability of the Castle Special Place have seriously diminished as a result of the cumulative impact of human activities. The most recent report again emphasized that legislated protection is needed. Examples of the cumulative impacts:
- At one time recorded as one of the best sport fisheries in Alberta, second only to the Oldman River, adult numbers for all three sport fish have diminished.
 - Once an area that produced world-trophy bighorn sheep rams, the long-term viability of the bighorn sheep herd now remains tenuous.
 - Densities of roads and other linear disturbances open for motorized use exceed the thresholds for sustaining viable populations of bull trout, moose, elk, wolves and grizzly bears.
 - Cumulative damage has weakened low-elevation riparian zones, in turn adversely affecting watershed health, including water quality, aquatic species and capacity to buffer floods.
 - Introduction of agronomic species and weeds is now wide-spread, reducing the ecological integrity of the Castle Special Place and its natural productivity.

10. Why the Castle Special Place

We concur with the earlier reasons given by the Alberta Government for the Castle Special Place being a designated protected area. In addition to the government's own reasons stated below in italics, we have used new information to update those where appropriate (updates are underlined) and have added some reasons (in regular font).

- a) Alberta's premier source of flowing water and the "water-tower" for much of southern Alberta (Oldman River Basin) provides a third of the annual water flow for the entire Basin.
 - Legislated protection as protected area/park recommended by international Rosenberg Forum on Water Policy (2007).
- b) Profound cultural and sacred value to the Nitsitapii, Piikani [Peigan], Siksika, Kainaiwa [Blood] and Blackfeet First Nations, as well as the Nakoda [Stoney] and K'tunaxa [Kootenay] First Nations.
 - Relatively intact remnant of the wildlands the Nitsitapii have occupied for more than 1,000 years and whose culture is interpreted at the Head-Smashed-In Buffalo Jump World Heritage Site.
 - Archeological and spiritual sites of continental significance.
 - Ancient trails and mountain passes.
 - Spiritual sites still in use today including significant cultural values directly associated with the water, plants and animals.
- c) Outstanding opportunities for heritage appreciation and outdoor recreation, including wildland recreation in all seasons.
 - Montane grasslands were part of the foundation for early cattle ranching in Alberta and one of the oldest stock associations. Summer grazing continues today.
 - Rich guiding, outfitting, fishing, hunting and wilderness heritage, including historic trails.
 - Popular, year-round outdoor recreation area.
- d) *A unique abundance of plant and animal species.*
- e) *Highest biological diversity in Alberta.*
 - Half of all the vascular plant species recorded in Alberta can be found here; 145 of them are rare.
 - The majority (135) of the 174 species of butterflies recorded in Alberta can be found within the Castle.
 - Endangered and rare species lists include a total of 187 plant species (vascular and non-vascular), 6 plant communities, 14 mammals, 44 birds, 3 reptiles, 5 amphibians, 2 fish, 10 butterflies and spider species that reside in the Castle Special Place.
- f) Encompasses Alberta's second largest^{xv} montane landscape, which is the most biologically productive natural sub-region of the Rocky Mountains. One quarter (about 260 km² or 100 mi²) of Castle Special Place is Montane.
- g) Crucial to the state and health of the Crown of the Continent Ecosystem and the greater chain of Rocky Mountain ecosystems by virtue of its strategic location.
- h) Encompasses Alberta's second largest montane landscape. (Largest is the Whaleback – North Porcupine Hills unit. The Montane is the most biologically productive natural sub-region of the Rocky Mountains.
- i) *Rare landforms and climatic patterns.*

j) *Unique features, including:*

- Wind-swept Front Range Canyons where the grassland meets the alpine; a landscape unique in Canada.
- *Accessible hiking and ridge-walking with breathtaking scenery.*
- *Bighorn Sheep habitat of extremely high quality. The area holds 7 per cent of Alberta's wintering Bighorn Sheep.*
- *Viable populations of Golden Trout found nowhere else in Alberta.*
- *Vegetation transition zone from southern to northern Rocky Mountain flora.*
- *Outstanding huckleberry production provided by large stands of tall huckleberry.*

k) *Outstanding features that include:*

- *33 alpine lakes, nine of which contain introduced trout.*
- *26 headwaters streams, 23 of which contain native and/or introduced trout;*
- *Alberta's most extensive stands of alpine larch and white-bark pine.*
- *Highest plant species diversity in Alberta outside of Waterton Lakes National Park, including 145 species of rare vascular plants (four times as many as Banff National Park), and more than one-third of the rare plant species in Alberta.*

l) *Greater diversity of alpine and sub-alpine communities.*

- *Big Sagebrush is a known, specific plant "hotspot," with rare plant communities and 82 rare species.*
- *Graminoid and herbaceous alpine communities not found further north – about 100 species commonly found here are rare or absent further north.*
- *Surviving populations of all Alberta species of large carnivores.*
- *Critical migration corridor for large carnivore populations.*
- *Rare mammals and those with limited distributions (wandering shrews, red-tailed chipmunks).*
- *Disproportionately important for butterflies and contains species found nowhere else in Alberta (Roadside skipper, Clodius Parnassian, Two-tailed swallowtail, Olympia marble).*
- *Over one-third (480) of the 1,400 species of spiders known in Canada occur in the Castle Special Place.*

11. Types of Protected Areas Proposed and Rationale

We put forward the recommendations below with the intent that:

- Our children and grandchildren inherit a Castle Special Place that is largely an undeveloped natural landscape that retains its primeval character, including its irreplaceable capacity to capture the snows and rain and release quality water to residents of the Oldman River Basin.
- The Castle Special Place's wild scenery and respite from the developed landscape, natural abundance and diversity of plants and animals, First Nations cultural and sacred sites, and our collective histories and outdoor adventures associated with that natural landscape are preserved.

In the context of population growth, climate change, development and ever-changing outdoor recreation technology, this and the principles (section 7) confer that there are social and ecological limits to a potentially ever-expanding and currently unsustainable use of the Castle Special Place. If we are not mindful of and planning based on the limits now, we and our children will lose the Castle as a special place.

Map 2 depicts the current designations and Map 3 our recommended category of protected areas for the Castle Special Place. The principles listed under section 7 above provide the overall rationale for the categories of protected areas and parks recommended below.

The categories of protected areas and parks considered in detail, along with abbreviations used in the table of recommendations below are illustrated in Figure 1.

In keeping with Principle 1, we are not recommending any of the Castle Special Place as a national park.

We propose that the present types of recreational uses, including hunting and fishing, and the summer grazing permits continue within the ecological limits of the Castle Special Place. Oil and gas activities will continue in conjunction with the existing leases in accordance with the September 2003 agreement^{xvi} between the provincial departments responsible for energy and legislated protected areas.

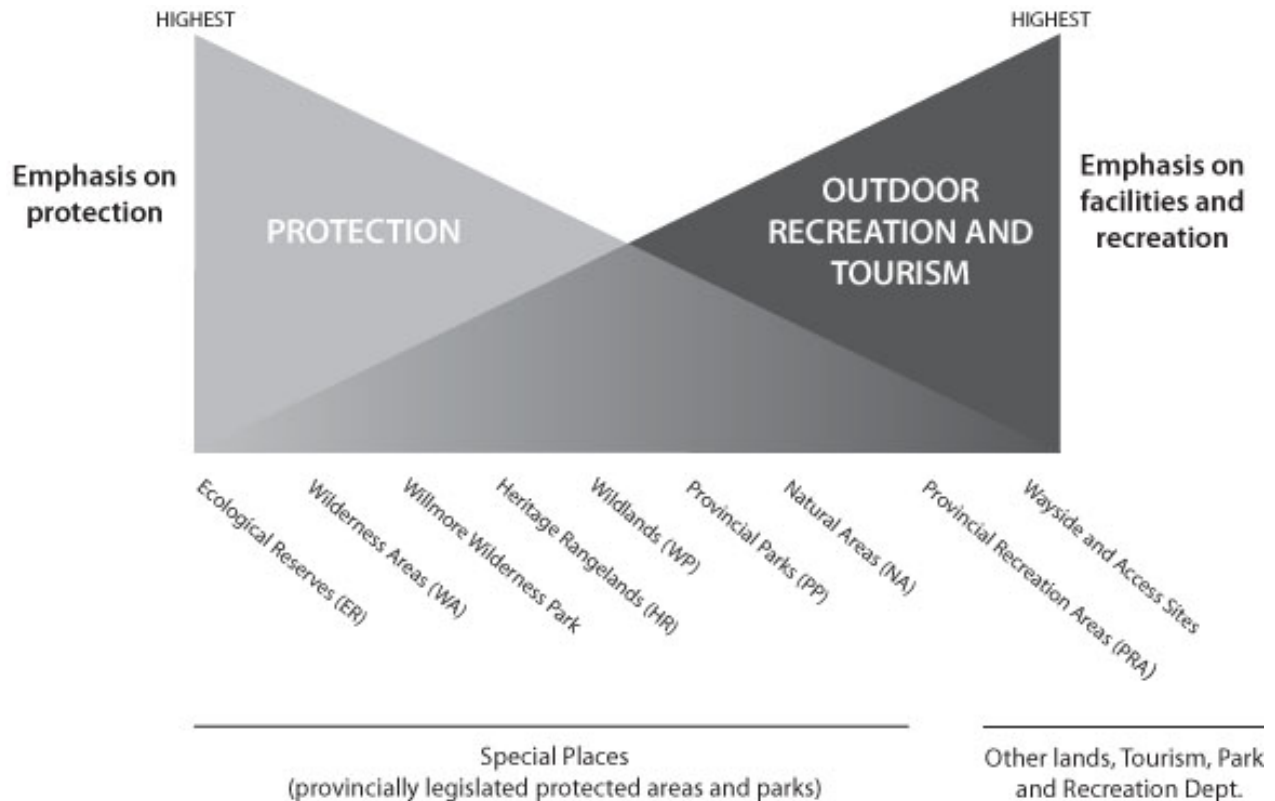


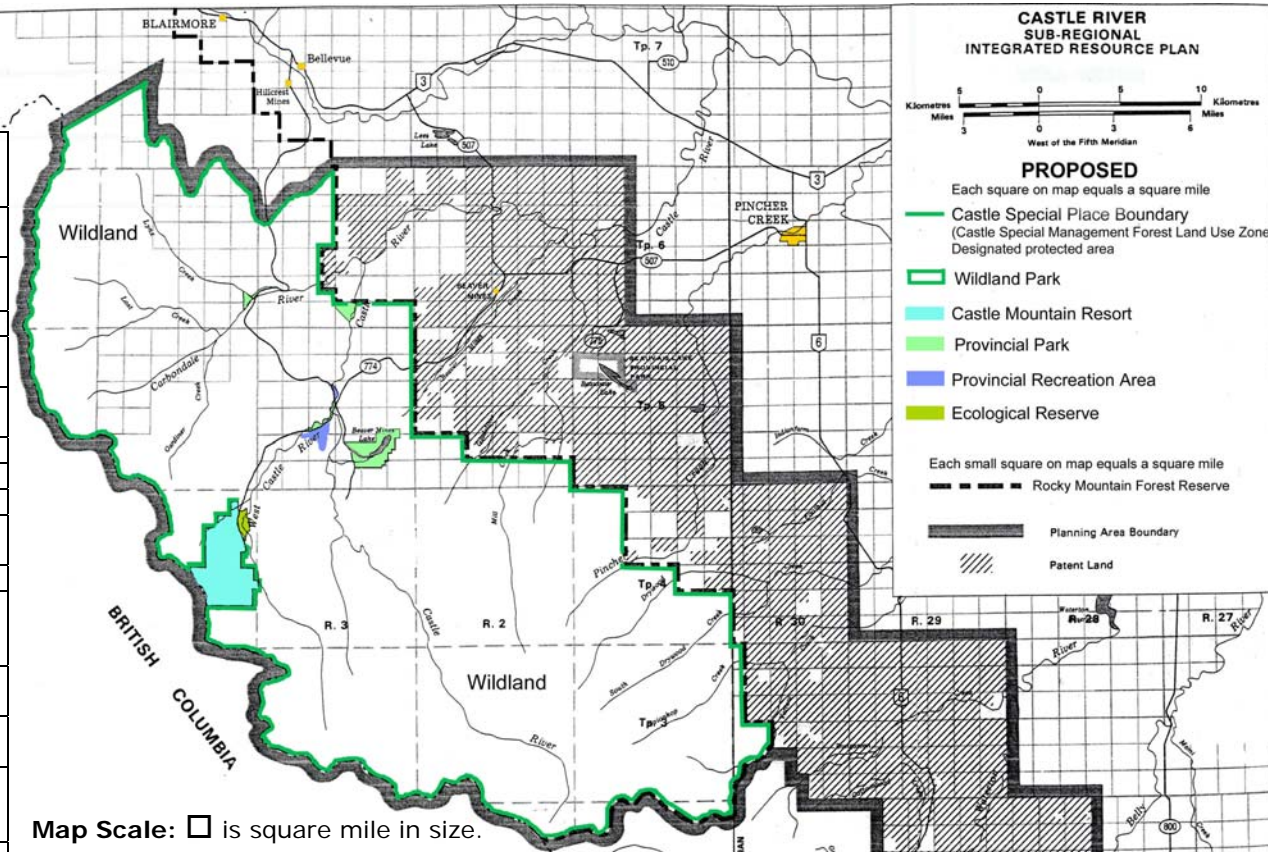
Figure 1. Spectrum of Provincial Protected Areas and Parks

We are recommending that the vast majority of the Castle Special Place, 99 per cent, 1,023 km² or 395 mi², be Wildland under the Wildland Parks legislation. That legislation also provides for zoning within Wildlands. We are recommending special protection zones within the Wildland for the Big Sagebrush site, Front Range Canyons/Castle Headwaters, and the Vision Quest sites. Zoning is recommended instead of categories other than Wildland, because those other categories in the context of these sites have one or more inappropriate limitations regarding specific uses, such as hunting, fishing, summer cattle grazing or First Nations cultural and spiritual uses.

Summary of Protected Area Classifications

(Summary only. Check with TP&R for complete descriptions.)

	Wildland Park	Provincial Parks (4)	Provincial Recreation Area (2)	Ecological Reserve
Approximate Size	1,023 km ² (395 mi ²)	7 km ² total (3 mi ²)	4 km ² (1.5 mi ²)	0.9 km ² (0.4 mi ²)
Recreation				
Access Fee	none	none	none	none
Use by Foot, Paddle	Y	Y	Y	Y
Camping - Backcountry	Y	Y	n/a	X
Horse use	M*	M*	Y	X
Fishing	Y	Y	Y	X
Hunting	Y	E	M	E
Cycling, Mountain Biking	M*	M*	Y	X
Power Boating	Y	Y	M*	X
Off-Road Vehicles & Snowmobiling	E	X	M*	X
Motor Vehicles & Auto Touring	E	Y	Y	E
Outdoor Recreation Facilities	X except primitive	Y	Y	X
Camping - Auto Access Campgrounds	X	M	Y	X
Aircraft Landing	X	X	X	X
Resource Use				
Trapping	Y	X	Y	X
Livestock Grazing	M	M*	Y	E
Oil & Gas Exploration, Development	E	E	E	X
Commercial Tourism Facilities	X	M	Y	X
Mining – Subsurface Minerals	E	E	E	E
Cultivation	X	X	X	X
Timber Harvesting	X	X	X	X
Mining – Surface Minerals	X	X	X	X
Roads & Utility Corridors	E	E	E	X
Telecommunication Towers	E	E		E
Mainline Pipelines	E*	E*	E*	X



Map Scale: □ is square mile in size.

Wildland - Purpose

Alberta's Wildland Park legislation defines the purpose of designated Wildlands: ...are established, and are to be maintained,

- for the preservation of Alberta's natural heritage,
- for the conservation and management of flora and fauna,
- to facilitate their use and enjoyment for outdoor recreation, education and the appreciation and experiencing of Alberta's natural heritage,
- for the preservation of specified areas, landscapes and natural features and objects in them that are of geological, cultural, historical, archeological, anthropological, paleontological, ethnological, ecological or other scientific interest or importance,
- to ensure their lasting protection for the benefit of present and future generations.

Table

- Y = Permitted.
- E = Exception – that in existence at the time of designation of the protected area is permitted to continue.
- M = May be permitted.
- M* = May be permitted on specific routes or waters designated for this purpose. Or grazing permitted as part of ongoing management for lands in Montane, Parkland or Grassland Natural Regions.
- E = Not permitted except for wildlife management purposes or where already existing may be permitted on designated routes.
- E* = Discouraged or permitted with strict conditions when no alternatives exist.
- X = Prohibited, except free hold mineral rights.

Map 3. Castle Special Place – Proposed

The remainder of the Castle Special Place is the existing West Castle Wetlands Ecological Reserve and the five current Provincial Recreation Areas (PRAs), which with our recommendations total about 12 km² (4.5 mi²) or one per cent of the Castle Special Place. We recommend that the Ecological Reserve remain with its current boundaries. Beaver Mines Lake, Castle Falls, Lynx Creek and Syncline would be upgraded to provincial parks, with some expansion in the boundaries of Beaver Mines Lake (to about 4.5 km² or 2 mi²) and minor expansion of Castle Falls and Lynx Creek. Castle River Bridge is recommended to remain as a PRA and Syncline Cross-Country Ski Area is recommended as a PRA. Syncline and Castle River Bridge would be linked with a small provincial park in between, giving a total land area of about 4 km² for the entire unit of Syncline, Castle River Bridge, the cross-country ski area and the link in between. Associated with these designations should be appropriately located (in terms of use and ecological protection) staging areas for backcountry equestrian, hunting, fishing and designated motorized trails.

The primary goal of the principles and recommended protected areas is protection of the natural environment and ecological integrity (including the watershed health) of the Castle Special Place from harm and degradation in perpetuity. That primary goal is balanced with other goals for nature-based recreation (including hunting and fishing), education, heritage appreciation and honoring the current dispositions consisting of the oil and gas leases, annual permits for summer cattle grazing, trap lines and recreation leases.

The working group considered a variety of information in developing the recommendations. One piece of information it was interested in unfortunately has not yet been completed by the Fish and Wildlife Division, Sustainable Resource Development Department; that being the new Fish and Wildlife Land Use Referral Map.

The principles in section 7 above and the recommendations honour the constitutionally protected Treaty rights and Aboriginal rights of First Nations and Métis peoples.

The recommendations are made with the understanding that the roads listed below (and depicted on Maps 2 and 3) are currently maintained as public roads by municipal and provincial governments – some with appropriate seasonal closures – and hence, that those would continue to be maintained as public roads.

- Secondary Road #774 (Hamlet of Beaver Mines to Castle Mountain Resort), all-season road.
- Beaver Mines Lake Road (from #774 to Beaver Mines Lake), all-season road.
- Castle Falls Road (from #774 to Castle Falls Provincial Recreation Area/Provincial Park), closed in winter, wildlife winter range.
- O'Hagan Road (from #774 to Lost Creek Road), closed in winter, snowmobile trail.
- Lynx Creek Road (from #507 to Lynx Creek Provincial Recreation Area/Provincial Park), closed in winter within Castle Special Place, part of it is a snowmobile trail.
- Adanac Road (Hillcrest to Lynx Creek Road), closed in winter, snowmobile trail.
- Sartoris Road (Blairmore to Lynx Creek Provincial Recreation Area/Provincial Park), closed in winter, snowmobile trail.
- Lost Creek Road (Lynx Creek Provincial Recreation Area/Provincial Park to Lost Creek), closed in winter.

Categories of Protected Areas Recommended, Location and Rationale

Backcountry of the Castle Special Place

This totals 99 per cent or about 1,023 km² or 395 mi² of the Castle Special Place (SP).

Backcountry is all of the Castle Special Place, except the Castle Mountain Resort lands and the following Front Country areas:

- West Castle Wetlands Ecological Reserve (ER), 0.94 km².
- Beaver Mines Lake Provincial Recreation Area (PRA): proposed Provincial Park (PP) (current PRA, Beaver Mines Lake and Boy Scouts of Canada, Camp Impeesa, about 4.5 km² or 2.5 mi².
- Castle Falls PRA: proposed PP, about 1.3 km² or 0.5 mi².
- Castle River Bridge PRA, Syncline PRA as proposed PP and Syncline Cross-Country Skiing Forest Recreation Trails proposed PRA with PP between current Syncline and Castle River Bridge PRAs, about 4 km² or 1.5 mi²
- Lynx Creek PRA; proposed PP, about 1 km² or 0.4 mi².

Table 1. Backcountry - Protected Area Recommendations and Rationale

Recommendation	Rationale
<p>1. Wildland & MOU Continuing Grazing Permits</p> <p>All as a Wildland based on Wildland Park legislation, along with a Memorandum of Understanding (MOU) and Letter of Understanding continuing the current, annual summer grazing permits similar to that done for Bob Creek Wildland.</p>	<p>1. Wildland</p> <ul style="list-style-type: none"> • Best fit for applying the principles (section 7 above) to Castle SP. • Wildland Parks are large, undeveloped natural landscapes that retain their primeval character. Similar to Willmore Wilderness Park, but with a key distinction of also providing for designated trails and staging areas for off-road, motorized recreation where ecologically sustainable. • HR designation would invoke uncharted legal waters regarding public use of the road-accessible valley bottoms and backcountry use (e.g. designated motorized trails, First Nations cultural and spiritual use, camping by foot, horse or mountain bike access, which are all acceptable in Castle SP) and would pose difficulties as a precedent for other HRs.
	<ul style="list-style-type: none"> • ERs provide the highest level of protection and are suitable in some Castle locales, but not all in regards to recreation values (such as hunting and fishing). However, we are not recommending any additional parts of the Castle SP as ERs (beyond the existing West

Recommendations for Backcountry	Rationale
	Castle Wetlands ER), lest the Castle Special Place lands outside the ERs become regarded and managed as less significant than what is in an ER. The whole of the Castle SP is culturally and environmentally significant provincially or nationally.
<p>2. Grazing MOU & Letter of Understanding</p> <ul style="list-style-type: none"> • Memorandum of Understanding between Sustainable Resource Development (SRD) and Tourism, Parks & Recreation as per Bob Creek Wildland Park MOU for continuation of grazing permits and day-to-day management of those under Lands Division, SRD. • Letter of Understanding between SRD, TP&R and grazing permit holders. • In lieu of part or all of the Castle SP being HR, the role of summer cattle grazing and that heritage needs to be addressed in visitor management and interpretive services, and possibly through the name the province chooses for the Castle SP protected areas. 	<p>2. Grazing MOU & Letter of Understanding</p> <ul style="list-style-type: none"> • Retains existing security of seasonal grazing permits. • Principle 3 (honour existing dispositions) & 4 (protect ecological integrity, particularly of the Montane grasslands). • Unlike the words “heritage rangeland”, the word “wildland” doesn’t convey to the visitor that the summer grazing permits will continue, or the role of cattle grazing in maintaining the ecological integrity of the montane grasslands.
<p>3. Special Protection Zones within the Wildland</p> <p>Sites that require special management consideration within the Wildland through zoning.</p>	<p>3. Special Protection Zones</p> <p>Each is in lieu of a particular protected area category other than Wildland, because an aspect of that other category was not workable from a particular recreation perspective, such as keeping the area open for hunting.</p>
<p>3.1. First Nations Cultural Sites – Special measures needed to provide culturally sensitive protection of the vision quest sites and their use (including protection of the view from and to the site).</p>	<p>3.1. First Nations Cultural Sites Special Protection Zone</p> <ul style="list-style-type: none"> • These sites are of profound cultural significance to the First Nations. Many are still in use by them today. • Principle 11 (protect aboriginal places).
<p>3.2. Big Sagebrush (PNT) Site</p> <ul style="list-style-type: none"> • Extension of the site/zone to (but not including) the South Castle River. • Provide protection for the vegetation comparable to an ER. 	<p>3.2. Big Sagebrush Special Protection Zone</p> <p>Currently under Crown Reservation for protection, it contains a concentration of a number of rare plants and includes a rare plant community.</p> <ul style="list-style-type: none"> • Ecologically warrants an ER, but hunting not permitted in ERs and it is suitable for hunting to continue through the site. • Zone proposed to provide the other protective measures (other than closure to hunting and fishing) available with an ER. • Expansion to river to better encompass concentration of rare plants and rare plant communities.

Recommendations for Backcountry	Rationale
<p>3.3. Front Range Canyons and Castle Headwaters – For the headwaters of the West and South Castle Rivers currently closed to public motorized use and the Front Range Canyons.</p> <ul style="list-style-type: none"> • Front Range Canyons - Provide for protection of the vegetation and reclamation of the natural gas operations there comparable to ER criteria, including closure and reclamation of all the industrial roads back to a natural landscape when roads no longer needed by company under their License of Occupation. • Front Range Canyons - Provide for study of reclamation to a state comparable to that of an ER. • Provide for wilderness recreation opportunities by continuing current closures to motorized recreation. • Address concern that there is no area in the Castle SP greater than 10 km (6 mi.) from a designated motorized trail or industrial road in use. Average person can backpack 16 km (10 mi.) in a day in mountain terrain and equestrian users can travel farther than that. Thus, no wilderness opportunities today remain in the Castle. Wilderness^{xvii} is defined as tracts of land or water that are not visibly altered by human activity – remnant pieces of the primeval. Its definition has both ecological and cultural components. Perceived overcrowding or the lack of opportunities for solitude, and the evidence of human impacts or developments on the natural environment are agreed upon by users as the two main factors that degrade wilderness. 	<p>3.3. Front Range Canyons & Castle Headwaters Special Protection Zone</p> <p>Proposed instead of a Willmore Wilderness Park like designation and an ER designation for the Front Range Canyons due to some limitations of those designations.</p> <ul style="list-style-type: none"> • Front Range Canyons are a landscape that is ecologically unique in Canada. (E.g. Foothills Grassland extends to Alpine.) • Ecologically warrants ER status, including serves as an example of an ecosystem that has been modified by humans and that offers an opportunity to study the recovery of the ecosystem from that modification (part of Royal Dutch Shell Canada's mature gas field). But suitable for hunting and fishing to continue (uses not permitted in ERs). • Shell's roads in canyons (except S. Drywood Ck.) are closed to public vehicles to assist with recovery of bighorn sheep. • Long history (dating back to 1909) of the cultural and ecological wilderness values in the Castle SP. • No protected area designation is available that is equivalent to Willmore Wilderness Park in protecting a wilderness landscape while providing for wilderness (non-motorized) recreation, particularly hunting, fishing, equestrian use and commercial guiding and outfitting. Wildland Parks are open to motorized use on designated trails, which is contrary to the cultural and ecological values of wilderness. Zone proposed so area managed comparable to Willmore Wilderness Park.

Front Country of the Castle Special Place

This totals 1 per cent or about 12 km² (4.5 mi²) of the Castle Special Place (SP).

The following comprises the Front Country of the Castle Special Place.

- West Castle Wetlands Ecological Reserve (ER); (0.94 km²).
- Beaver Mines Lake Provincial Recreation Area (PRA); proposed Provincial Park (PP) (current PRA, Beaver Mines Lake & Boy Scouts of Canada, Camp Impeesa; about 4.5 km² or 2.5 mi²).
- Castle Falls PRA; proposed PP (about 1.3 km² or 0.5 mi²).
- Castle River Bridge PRA, Syncline PRA as proposed PP and Syncline Cross-Country Skiing Forest Recreation Trails proposed PRA with PP between current Syncline and Castle River Bridge PRAs, about 4 km² or 1.5 mi².

- Lynx Creek PRA; proposed PP (about 1 km² or 0.4 mi²).

With the exception of backcountry trails (non-motorized & designated motorized trails), this Front Country and the adjacent four-season Castle Mountain Resort (CMR) encompass the recreation facilities for the Castle Special Place and the most intensive public use.

Table 2. Front Country - Protected Area Recommendations and Rationale for Whole Front Country

Recommendations	Rationale
<ol style="list-style-type: none"> 1. Provide quality recreation experiences and minimize human impact. Achieve ecologically-sustainable recreation use by planning appropriate locations and having predictability of use in space and time. 2. Plan based on social and ecological limits, rather than continually facilitating increasing numbers. 3. Reduce cumulative impacts of all human use to ecologically sustainable levels. 	<p>To improve quality of experiences and minimize impact.</p> <ul style="list-style-type: none"> • Principles 4 (protect ecological integrity), 5 (protect watersheds), 7 (manage human use) and 15 (preservation, outdoor recreation, heritage appreciation & tourism). • Much of this Front Country (roads and camping) is along water courses or at Beaver Mines Lake, which requires particular planning and care to protect and restore the watershed. Virtually all of it is located in the Montane, which requires particular care as a unit in the Castle Special Place as it is: <ul style="list-style-type: none"> ○ The most popular for road-accessed, outdoor recreation. ○ The most biologically productive landscape of the Rocky Mountain region (e.g. includes diverse bird habitat & critical winter & riparian habitat for wildlife). ○ Important for summer cattle grazing. ○ Includes important riparian habitat, in turn key for health of the watershed. ○ Alberta Environment has stipulated, "<i>It is important that the ecological integrity of montane landscapes not be compromised or severely modified through inappropriate or incompatible development or other land uses.</i>"
<ol style="list-style-type: none"> 4. Apply Principles (in section 7), particularly: <ul style="list-style-type: none"> • #2 - keep as public land open to public. • #5 - protect watershed, particularly riparian habitat, streams and stream beds, including ephemeral streams, wetlands, and lake and its shores. • #14 - no new residences or roofed accommodation. 	<ul style="list-style-type: none"> • Public land not allocated to private- sector use (commercial or industrial) is scarce in southern Alberta and the total population continues to increase. • Castle SP is a premier, headwater source of water in Alberta. Current watershed health and water quality will continue to deteriorate without legislated protection. • Assists the gateway communities (Crownsnest Pass, Pincher Creek,

Recommendations For Whole Front Country	Rationale
	Beaver Mines, Brocket, Burmis, Cowley and Lundbreck) and Castle Mountain Resort, where such development is more appropriate.
<p>5. Organized Random Camping</p> <p>Consider options and provide environmentally-appropriate, designated areas for road-accessed, organized random camping within the proposed PPs and PRAs below.</p>	<ul style="list-style-type: none"> • Water and sanitation needed for campers. • During the hunting seasons, these sites could be used as campsites for hunting; ones which permit hanging of game. • Principles 15 (preservation, outdoor recreation, heritage appreciation & tourism), 4 (protect ecological integrity) & 5 (protect watershed, particularly riparian habitat).
<p>6. Number of Campsites</p> <p>Not sure that more campsites are needed at this time or appropriate. Plan numbers based on social and ecological limits.</p>	<ul style="list-style-type: none"> • Recommendation 5 (designated areas for organized random camping) and the large number of empty sites in the campgrounds, including the most popular campground (Beaver Mines Lake).
<p>7. Upgrade Campgrounds</p> <p>Upgrade water supply, access to trails and suitability of sites for a spectrum of campers (tents to large RVs, and equestrian and OHV / snowmobile campers) in campgrounds.</p>	<ul style="list-style-type: none"> • Will assist in alleviating pressure for random camping and problem of people sneaking in to use facilities at Camp Impeesa (e.g. showers).
<p>8. Provide Additional Staging Areas</p> <p>Provide appropriately located staging areas for backcountry use (equestrian, hunting, fishing and off-road motorized recreation) in conjunction with PPs and PRAs, and as stand-alone staging areas, such as in the vicinity of the end of the Lost Creek road.</p>	<ul style="list-style-type: none"> • Tourism, Parks & Recreation has indicated that SRD and Parks & Protected Area regulations both prohibit hanging of game in campsites, but that TP&R knows it is common sense that this needs to be amended to, in a practical way, provide staging areas for hunting in the Castle SP. Is possible in AB protected areas & parks system to have staging areas for backcountry use, designed for equestrian and hunting use, associated with existing road access in or along a Wildland Park or as part of a Provincial Park. • Principles 15 (preservation, outdoor recreation, heritage appreciation and tourism), 4 (protect ecological integrity) and 5 (protect watershed, particularly riparian habitat).

Table 3. Front Country - Protected Area Recommendations and Rationale for Provincial Recreation Areas & Ecological Reserve

Recommendations	Rationale
<p>1. West Castle Wetlands ER Maintain as an ER (0.94 km²).</p>	<ul style="list-style-type: none"> • Contains critical trout spawning area, rare plants and animals, including a rare mammal. • Downstream of ER is also important spawning habitat. Ecological integrity of ER depends on intact forest, health of the West Castle River watershed, and management of cattle, motorized recreation and Castle Mountain Ski Resort (located immediately upstream). • Regarding the three points above and Principle 9 (traditional recreation use), rather than expanding the ER (which would close more of the river to fishing), the ER surrounded by Wildland should accomplish protection needed within ER (e.g. close OHV use off current designated trails and random camping in riparian habitat. OHVs currently trespass along river bed.) Principles 4 (protect ecological integrity) and 5 (protect watershed). • ER and surroundings is a priority management issue. Principles 7 (manage human use) and 15 (preservation, outdoor recreation, heritage appreciation and tourism).
<p>2. Upgrade protection status and in some cases expand PRAs</p> <p>2.1 Beaver Mines Lake, Castle Falls, Lynx Creek and Syncline would be upgraded to provincial parks, with some expansion in the boundaries of Beaver Mines Lake (to about 4.5 km² or 2.5 mi²) and minor expansion of Castle Falls and Lynx Creek. Castle River Bridge is recommended to remain as a PRA and Syncline Cross-Country Ski Area is recommended as a PRA. Syncline and Castle River Bridge would be linked with a small provincial park in between, giving a total land area of about 4 km² for the entire unit of Syncline, Castle River Bridge, the cross-country ski area and the link in between.</p> <p>2.2 Public roads are not included in the PPs to avoid conflict with use of roads by hunters and snowmobilers.</p> <p>2.3 Concept includes linkage with trails in the adjacent Wildland for day-use, as well as backcountry use.</p>	<ul style="list-style-type: none"> • Department policy regarding PRAs in Alberta does provide flexibility to permit off-road motorized use, carrying of firearms and hunting inside the PRAs. This flexibility is recommended for the proposed PRAs in the Castle. (The existing PRAs in the Castle are currently managed the same as PPs where these activities are not permitted.) • PPs protect our natural heritage from degradation and harm, while providing the facilities to support outdoor recreation. <i>“They are distinguished from Wildland Parks by their greater range of outdoor recreation facilities, the extent of road access, and the interpretive and educational programs and facilities that are available”</i> for the public. Protection has a higher priority than in PRAs^{xviii}. PRAs are established and <i>“managed with outdoor recreation as the primary objective”</i> instead of protection of the ecological integrity of the natural environment. • Principles 4 (protect ecological integrity), 5 (protect watersheds), 7 (manage human use) and 15 (preservation, outdoor recreation, heritage appreciation and tourism).

Recommendations for Provincial Recreation Areas & Ecological Reserve	Rationale
<p>3. Beaver Mines Lake PRA</p> <p>3.1 Expand (include lake, Scouts of Canada, Camp Impeesa), but do not include public road and designated motorized trail up South Castle R.</p> <p>3.2 Establish as PP. (Total size about 4.5 km² or 2 mi².)</p> <p>3.3 Principle 14 applies to visitor accommodation and as such does not apply to Camp Impeesa, which is a private camp. Upgrade of camp facilities and a residence as needed for operation of the Camp is acceptable within the proposed park.</p>	<ul style="list-style-type: none"> • PP provides higher level of and more emphasis on protection of natural environment and the Lake (maintain ecological integrity of Lake) than PRA. • PP would provide increased level of protection and quality of visitor experience; providing day-use, overnight camping and staging areas for backcountry use to the southward side of Secondary Road #774. Throughout Alberta, lakes are the most popular camping destination and popular for day-use. • Park proposed to stay on eastward side of S Castle road/designated trail in order to retain S Castle R corridor as much as possible in Wild-land for wildlife movement. • Road and designated trail not included so hunters don't have to encase fire arms for short mile through park to staging area for backcountry. • Suitable staging location for wilderness block of the South and West Castle R. headwaters, Front Range Canyons, and beyond into north Waterton. • Principle 3 (honouring existing dispositions) regarding Camp Impeesa.
<p>4. Castle Falls PRA</p> <p>4.1 Expand to encompass adjacent area used for random camping.</p> <p>4.2 Establish as PP. (Total size about 1.3 km²)</p>	<ul style="list-style-type: none"> • Higher level of protection than PRA. • Expansion includes area used for random camping and as PP provides for recommendation 5 regarding whole front country (designated area for organized random camping). • No designated motorized trails (summer or winter) in area and public road ends at campground.
<p>5. Castle River Bridge & Syncline PRAs</p> <p>5.1 Expand to encompass appropriate areas for organized random camping and also by linking the two PRAs with PP in between along Castle and West Castle River valley and including Syncline Cross-Country Skiing Forest Recreation Trails as a PRA. Upgrade Syncline to a PP as part of the PP along the rivers. (Total size about 4 km² or 1.5 mi²)</p> <p>5.2 Apply Principles 4 (protect ecological integrity), 5 (protect watersheds), 7 (manage human use), 11 (protect aboriginal places).</p> <p>5.3 Ideally, keep facilities (other than existing public road), to eastward side of Castle R, except at Castle R Bridge campground and</p>	<ul style="list-style-type: none"> • Initially, all PRAs proposed as PPs to place more emphasis on environmental protection due to importance of river corridor. However, PPs are not open to OHV and snowmobile use. Thus, propose retaining Castle R Bridge as a PRA and then linking this by PP to and including Syncline campground. (Area of Syncline and proposed park along the rivers does not include designated motorized trails.) Cross-country ski area as a PRA. This links Castle River Bridge campground and future designated areas for organized random camping with designated motorized trails. Also provides for non-motorized trail between campgrounds. • Planned and managed as a unit would provide increased level of protection and quality of visitor experience. Provides for day-use (non-

Recommendations for Provincial Recreation Areas & Ecological Reserve	Rationale
<p>southeastward side of W Castle R. (I.e. no facility development extending along both sides of the river valleys).</p>	<p>motorized trails), overnight camping and staging areas for motorized and non-motorized backcountry use to the northward side of Secondary Rd #774, and non-motorized to the southward side.</p> <ul style="list-style-type: none"> • A wildlife movement corridor, grassland for wildlife and cattle, gathering location for fall cattle roundup, habitat for species listed as “sensitive” (e.g. Northern Pygmy Owl), and at Castle River forks (junction of W and S Castle Rivers) includes potential archeological sites of provincial significance. Facility development kept to west and north sides of Castle and W Castle R downstream of Syncline, south side of W Castle R at Syncline and away from S Castle R corridor to junction with W Castle R. • Applies to principles 4, 5, 7 and 11. • Principle 15 (preservation, outdoor recreation, heritage appreciation and tourism).
<p>6. Lynx Creek PRA</p> <p>6.1 Expand downstream along Carbondale R, on north side of road to include area used for random camping. Between river and road proposed as part of the Wildland.</p> <p>6.2 Establish as PP, with exception of the road. (About 1 km² in total)</p> <p>6.3 Keep facilities (other than existing public road) to southwest side of Lynx Creek and north side of road downstream of Lynx Creek.</p>	<ul style="list-style-type: none"> • Higher level of environmental protection than PRA. • Expansion includes area used for random camping and as PP provides for recommendation 5 above (designated area for organized random camping). • Not including the public road in the PP means hunters don't need to encase firearms for short mile through park and continuance of winter use of road as a snowmobile trail. • Principles 4 (protect ecological integrity), 5 (protect watersheds), 7 (manage human use) and 15 (preservation, outdoor recreation, heritage appreciation and tourism). • Nature of terrain limits keeping camping to one side of the Creek and River. Wildlife habitat and movement needs to be considered.

12. Additional Recommendations

Although different categories of protected areas are recommended for different parts of the Castle Special Place, we recommend that one management plan be done for the entire unit of protected areas. We recommend that the management plan be completed within a two year period. We also recommend that it contain specific, measurable goals and timelines for restoring and protecting the ecological integrity of the Castle Special Place.

The Working Group is very concerned that legislated protection for the Castle Special Place within Alberta's protected areas and parks system is fully implemented in a timely manner. In particular, sufficient resources and enforcement capability need to be provided to ensure that the entire spectrum of allowed uses complies with management objectives and regulations for protecting the ecological integrity of the Castle Special Place. To assist in that regard, we recommend that as soon as the Castle is legislated under the protected areas and parks legislation, the province establish and resource an advisory group consisting of user groups, businesses, interest groups and disposition holders active in the Castle Special Place, as well as adjacent landholders to provide ongoing advice and monitor that management planning, implementation of the management objectives, and enforcement of regulations by the responsible authorities is sufficiently resourced and carried out in a timely and diligent manner.

Sacred Paint Site

Located adjacent to the northeast boundary of the Castle Special Place, outside of the protected area designated by the province is the Sacred Paint site. The Sacred Paint Site (10 km² (4 mi²)) is under a Crown Reservation (PNT, Protective Notation) by the province (Culture and Community Spirit Department) and is part of a (km² or mi² in size) that in addition to the paint (ochre), encompasses plants of medicinal and ceremonial importance, which may be naturally disjunct occurrences or historic/pre-historic introductions by the Piikani. This area is also located entirely within year-round grazing leases.

For the Piikani, Siksika, Kainaiwa and Blackfoot First Nations, this internationally significant, sacred site is an integral part of the whole Castle Special Place and is the root of the name in the Blackfoot language for the lands of the Castle Special Place – *I'tai sah kòp* [Where We Get the Paint]. We recommend that Alberta Tourism, Parks and Recreation, and Culture and Community Spirit jointly take a lead on working with the Piikani First Nation and the grazing lease holders to ensure appropriate, legislated long-term protection of the site.

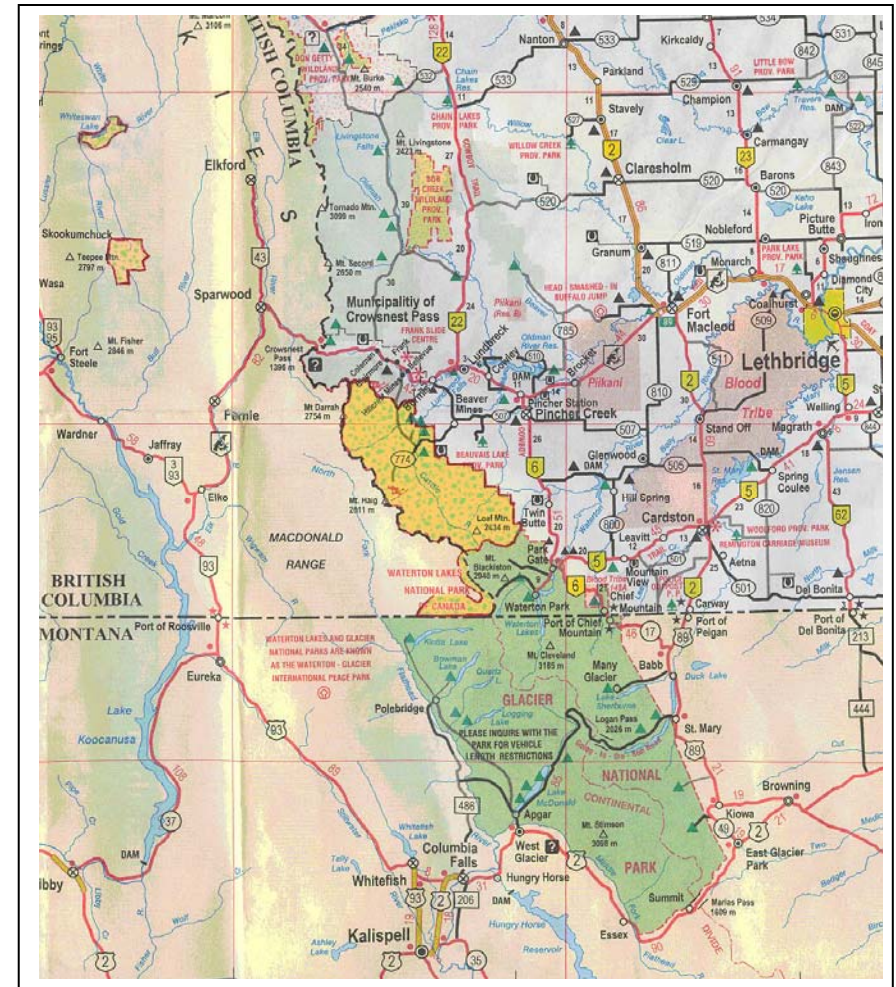
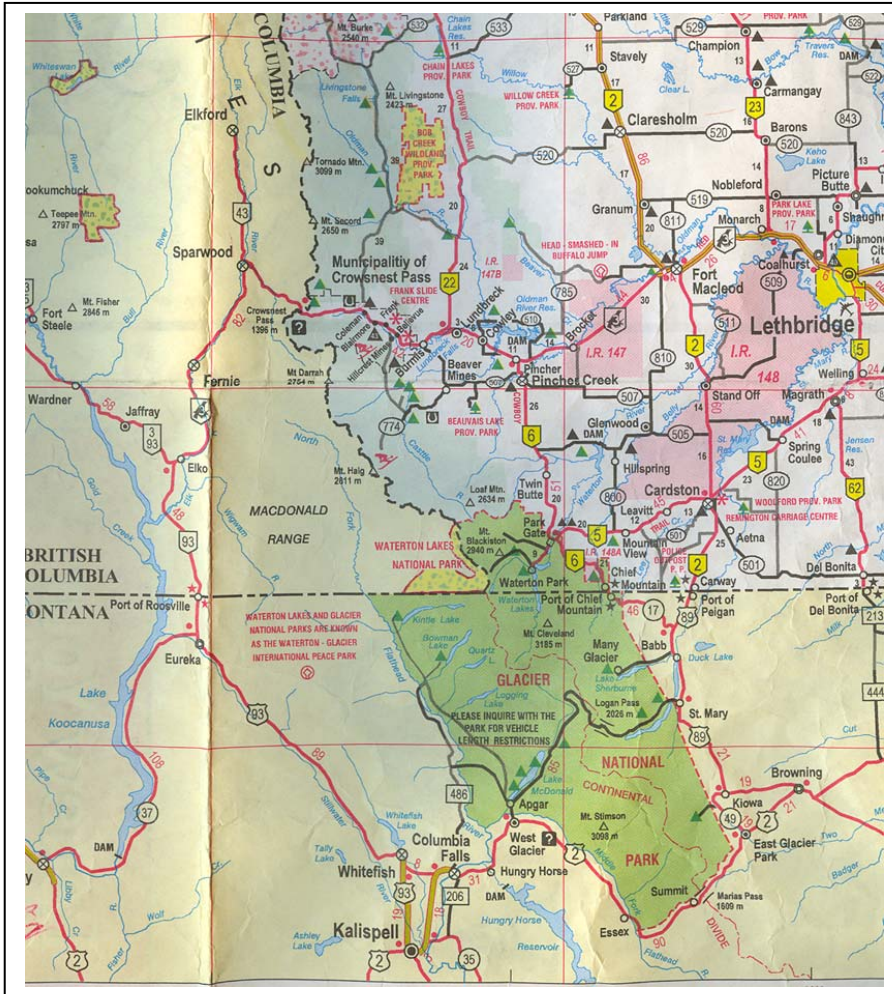
13. Benefits to Communities (At the big, conceptual level)

Benefits are outlined under headings that correspond with the stated desired outcomes of three of the Alberta Government policies and strategies (*Water for Life*, *Land Use Framework* and *Alberta's Plan for Parks*), as those desired outcomes are also statements of desired community benefits. Plus, we have also outlined some under the additional heading of A Sense of Place. Map 4 provides a graphic depiction of some of the benefits.

Water for Life (*Water for Life Strategy*)

Across the full spectrum of interests affected by or interested in the Castle, none disagree with the importance of legislated protection of the Castle for its irreplaceable value as the key water source. It has been known for several years that water allocations in the Oldman River Basin exceed the supply. Residents and holders of water licenses in the Basin place a priority on ensuring the quality and quantity of water can be naturally supplied. That entails timely protection of the source. Securing and protecting the Castle Special Place – southern Alberta's "water tower" – under Alberta's protected areas and parks legislation

Map 4. The Alberta Road Map



Today

- Largest water source without protection. Average summer flows in Oldman system at 40% of what they were 100 years ago.
- Castle Special Place no longer ecologically sustainable due to cumulative impacts.
- Shortfall of wildland and outdoor recreation areas in southern Alberta.

Tomorrow with Castle Protected Area Legislated



- Water tower of Oldman River Basin secure & protected.
- Beaver Mines, Bocket, Burmis, Cowley, Crowsnest Pass, Lundbreck & Pincher Creek benefit as gateway communities.
- A major destination for the Cowboy Trail and Trail of the Great Bear travel themes.



- Internationally significant Wildland for southwest Alberta.

will be a decisive action to meet this expressed priority and the government's desired outcomes in the Renewed Water for Life Strategy.

a) Reliable, quality water supplies for a sustainable economy

- Alberta Government policy has identified the area of the Castle Special Place as a “very important water producing area”^{xxix}
- A recent international forum on water policy^{xxx} in which the Environment Minister and Department participated, recommended protecting the Oldman River basin headwaters, noting the value of establishing the proposed Wildland Park.
- One of the two most threatened river basins^{xxxi} in the entire Saskatchewan River system is the Oldman, for which the Castle Special Place provides almost a third (30 per cent) of the annual flow, capturing the highest amount of annual precipitation of any location in Alberta and releasing it downstream into the Waterton, Oldman and Castle Rivers.
- Other jurisdictions in North America have protected their headwaters in legislated protected areas. This includes, for example, the capitol of Alaska and in Alberta, the Town of Slave Lake (Grizzly Ridge Wildland Park) and the City of Calgary, historically with part of its headwater supply protected in Banff National Park and the Ghost River Wilderness Area, and more recently in the Elbow-Sheep Wildland Park.
- Source water protection is a key element in not only securing safe water supplies, but also in preparing for the impacts of climate change, through better watershed management to mitigate the effects of lower snowfall, greater rainfall delivered more quickly and lower base flows in later seasons.

b) Safe, secure drinking water supply

- Legislating the designated protected area within the protected areas and parks system would secure the largest single source of water for the drinking water supply for more than 96,600 Albertans and significant livestock populations directly downstream of the Castle Special including the Town of Pincher Creek and City of Lethbridge.
- It would provide the necessary legislation and management framework for addressing cumulative impacts with a focus to restoring the quality of water flowing from the Castle Special Place.

c) Healthy aquatic ecosystems

- Legislating the Castle Special Place within the protected areas and parks system provides the implementable and enforceable framework necessary for protecting and restoring aquatic ecosystems, particularly for protecting and restoring intact forests and riparian vegetation, and reducing the amount of unvegetated linear disturbances.
 - Linear disturbances (seismic lines, roads, pipelines, etc) are the primary physical, human disturbance in the Castle Special Place.
 - One third of the designated protected area would naturally be old growth forest, which in this area requires 250 years before developing old-growth characteristics. However, due to clear-cut logging, less than nine per cent of the Castle is old-growth, having a direct impact on aquatic ecosystems such as redds for trout, and the timing of water flows from the Castle.
- Maintenance and recovery of bull trout and west-slope cutthroat populations (fish provincially listed as species of concern) will be facilitated by a legislated protected area.

People-friendly communities and recreational opportunities (*Alberta's Plan for Parks*)

People-friendly communities with ample recreational and cultural opportunities (*Land-Use Framework*)

Legislated protection of the Castle Special Place within Alberta's protected areas and parks legislation would:

- Noticeably increase the quality of public experiences in the Special Place (including motorized and non-motorized recreation), provide equitable opportunities for outdoor recreation (including hunting and fishing), and protect the integrity of the ecosystem upon which all those experiences depend, as a result of protected area legislation and planning that by design is focused on protection and outdoor recreation.
- Provide for historic outdoor recreation activities and the associated businesses that cannot be accommodated in national parks, particularly guiding and outfitting, hunting and the more recent off-road motorized recreation.
- Help protect additional supply to assist with meeting the current demand. For many years now, Waterton Lakes National Park located next door to the Castle, is full each peak season. Demand for intact natural environments and quality outdoor recreation in protected natural environments annually exceeds the capacity of that park. To meet the demand, and realize the economic benefits from that, this conceptual proposal would protect more supply.

A Sense of Place

Southwest Alberta has a long history of local conservation voices and action for the protection of what is now the Castle Special Place. (See Appendix VII for a short chronology). Historian Graham MacDonald in *Where the Mountains Meet the Prairies* wrote of the late 1880s, "*The importance of the nearby mountains as a source of headwaters, fish and wildlife brought together apparently disparate individuals in a discussion of public reserves and their ideal nature.*" Those reserves included today's Castle Special Place from 1914 through 1954. Today, such people have again come together with the same common purpose, this time seeking to achieve the Castle's protection within the province's current protected areas and parks legislation.

- With legislated protection of the Castle Special Place, communities would gain a place for in situ heritage appreciation and interpretation of our cultures associated with this remnant piece of Alberta's original wilderness landscape.
 - An important part of defining today's character and sense of place for the southwest communities.
 - Of profound prehistoric, historic, cultural and spiritual significance for the Nitsitapii (Blackfoot speaking First Nations): the Siksika, Kainaiwa [Blood Tribe], Piikani [Peigan] and Blackfoot First Nations. At least 1000 years of continuous occupation and use by the Piikani and their ancestors.^{xxiii} Also of importance for the Nakoda [Stoney] and K'tunaxa [Kootenay].
 - Stone cairns, more than 300 years old, still mark some of the ancient trails.^{xxiii}
 - Recorded European exploration in the Castle starts in the late 1700s with K'tunaxa guides taking La Bossi and Le Blare, assigned by David Thompson, across what is believed to be Middle Kootenay Pass, and includes the better known exploration of Thomas Blakiston of the Palliser Expedition in 1858.
 - The landscape that provided settlers of the adjacent plains with water, wild game, sport fishing, logs for homes and a sanctuary from the summer heat and dry winds of the adjacent plains (settlement on adjacent lands began late 1800s and early 1900s).

- Some of Alberta's earliest livestock grazing associated with Montane grasslands and part of the range of the early stock associations still in existence today (e.g. Pincher Creek Stockmen's Association, 1933).
- Remnant part of the wilderness that was the base for commercial guiding and outfitting, which began here in 1909.
- Would protect and provide the framework for the restoration of the ecological integrity upon which outdoor recreation and research in this popular Special Place depends.
- Would protect the backdrop of the landscape that defines the region and entices residents and visitors alike into its wilds.
- A destination for the Cowboy Trail and Trail of Great Bear travel themes.

Sustainable prosperity supported by our land and natural resources. (*Alberta's Plan for Parks*)

Healthy economy supported by our land and natural resources. (*Land Use Framework*)

- Wildlands, wilderness and other such natural environments like the Castle Special Place are the products of centuries of natural processes. As such, more cannot be built to meet needs and demands now or in the future. This basic principle underscores the importance of protecting enough of today's existing supply to meet current and future needs.
- Economic benefits from legislated protected areas are sustainable for local and regional economies over the long-term, assist communities and businesses with diversifying, and help them weather the boom-bust cycles of resource extraction and global commodity markets. All such benefits would accrue to southwest Alberta with the Castle protected area legislated.
- When compared on an equivalent land area basis, person-years of employment and economic activity annually generated by the provincial legislated protected areas are comparable to that of the logging and agriculture sectors^{xxiv}.
 - Legislating the Castle Special Place would provide a tangible boost for sustainable diversification of local economies.
 - The Castle is not suitable for agriculture, other than the annual, summer cattle grazing permits, which would remain in place with the Castle as legislated protected areas.
 - There are no commercial sawmills operating in southwest Alberta.
- The Municipality of Crowsnest Pass, Municipal District of Pincher Creek, City of Lethbridge, Town of Pincher Creek, and other gateway communities in those municipal jurisdictions will have the opportunity to begin to share in the additional employment and economic activity currently generated by legislated protected areas and parks elsewhere in Alberta.
- Beaver Mines, Brocket, Burmis, Cowley, Crowsnest Pass, Lundbreck and Pincher Creek would directly benefit as gateway communities.
 - The gateway communities would have the key land-base needed to retain and attract new residents through amenity migration, enabling them to compete favorably with other North American communities along the Rocky Mountains^{xxv}. (Amenity migration is the movement to rural or smaller towns of people whose employment or income does not require they live in a specific location.)
 - Of particular importance to Crowsnest Pass where the resident population has declined as much as 24 per cent from that of 1982, including a decline of 8.2 per cent between 2001 and 2006.
 - Would become centres for providing additional public and visitor services for the proposed Castle Wildland, Provincial Recreation Area and parks.
- Increased tax revenues for the province are expected, in keeping with the \$461 million currently received annually through public and visitor use of all of Alberta's legislated protected areas^{xxvi} and in regards to the national and international significance of the Castle Special Place within the Canada-

US Crown of the Continent Ecosystem. The Crown was a focus of National Geographic's geo-tourism mapping project.

- A recent international forum in which the Alberta Environment participated on water policy^{xxvii} noted that establishing the proposed wildland park would pay for itself over and over again in the economic value of the ecological services it provides alone.
- Ecological goods and services, such as wildlife, soils and clean air would be secured and restored for communities of southern Alberta, including the enhanced protection from flood and drought that comes with protection and restoration these unsurpassed, headwater streams of the Oldman, Castle and Waterton Rivers.

Healthy ecosystems and environment (*Alberta's Plan for Parks and Land-Use Framework*)

- Castle Special Place is a key part of the international Crown of the Continent Ecosystem, both in its outstanding biological diversity and its role in the health of that ecosystem, including as habitat for wildlife with large or trans-boundary home ranges (e.g. carnivores, bighorn sheep, elk and mountain goats). It is Alberta's largest designated protected area within that ecosystem.
- Legislating the Castle within Alberta's protected areas system provides the necessary implementable and enforceable legislation for mitigating and reducing cumulative impacts and for managing the intensity, location and timing of use.
- The provincial and international significance of the Castle Special Place is outlined under section 10, Why the Castle Special Place.

14. How Proposal Relates to Alberta Government Priorities

With the province's new Alberta Plan for Parks, the Alberta Government has given the Tourism, Parks and Recreation Department a leadership role in the establishment of legislated protected areas and parks. However, given the nature of the Castle Special Place and its cultural and environmental significance at a provincial and national scale, legislating the Castle protected area within the province's system of protected areas and parks would also directly assist five additional Ministers in meeting their priorities.

Listed in Table 4 are the relevant priorities quoted from the December 2006 and March 2007 mandate letters Premier Ed Stelmach gave the Ministers, and how legislating the designated protected area within the current protected areas and parks Acts would help deliver on those priorities.

Table 4. How the Proposal Relates to Alberta Government Priorities

Alberta Government Priority	Legislating the Castle Protected Area Would Deliver
Environment	
<ul style="list-style-type: none"> • Manage Alberta’s water resources to ensure the province has the quality and quantity of water needed now and into the future to support population and economic growth. 	<ul style="list-style-type: none"> • Security, protection & restoration of one of Alberta’s premier headwater sources of water for one of the driest regions. <ul style="list-style-type: none"> • Castle Special Place receives and captures the most annual precipitation of any location in Alberta; releasing it to the environment and communities down stream. Although less than 4% of the land area of the Oldman River Basin, it provides almost a third (30%) of the annual water flow for the entire Basin^{xxviii} and beyond into the Saskatchewan River system. • Water allocations in the Oldman River Basin exceed supply. Plus, climate change is altering and reducing supply. Both further accentuate the urgent importance of legislating the Castle as protected areas. • The health of the watershed, particularly timing of flows (directly affected by commercial logging of intact forests) and water quality, is presently below what it could be with legislated protection of the Castle. • Oldman River Basin encompasses much of southern Alberta; from the Town of High River to the St. Mary River headwaters in the US and from the BC border to downstream of Taber and including Lethbridge. More than 600,000 Albertans reside there.
<ul style="list-style-type: none"> • Address the impacts of development on land, air, water and biodiversity, at a regional level, through a cumulative effects management system that is integrated with Alberta’s Land-use Framework. 	<ul style="list-style-type: none"> • A necessary component for achieving cumulative effects management at the regional scale of the South Saskatchewan region. E.g. in terms of security and protection of the main water source, wildlife habitat, protection of soils, and recovery of species at risk on public lands. <ul style="list-style-type: none"> • A recent independent report^{xxix} reviewing the current state of ecological knowledge for the Castle Special Place and the province’s Energy Utilities Board^{xxx} and Natural Resources Conservation Board (NRCB)^{xxxi} have all concluded that the status quo, cumulative use is <u>not</u> sustainable within the Castle Special Place. • The NRCB ruled that a legislated protected area for most of the Castle Special Place was needed as the primary mitigation measure for the impacts of developing a four season resort at the West Castle site. That development has been built without the mitigation measure concurrently being in place, resulting in the predicted, unsustainable cumulative impacts of today. • Sufficient legislated protected areas are a basic component of sustaining ecological integrity at the regional or landscape scale.

Alberta Government Priority	Legislating the Castle Protected Area Would Deliver
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Energy	
<ul style="list-style-type: none"> Ensure Alberta's energy resources are developed in an environmentally sustainable way. 	<ul style="list-style-type: none"> Management of all cumulative impacts in the designated protected area, so that current environmental management efforts by the energy sector (located on the eastern edge) are more effective in the over-all goal of rectifying the currently, unsustainable cumulative use^{xxxii}. An opportunity to showcase the decommissioning & full reclamation of a natural gas field at the end of its lifespan, and located within an environmentally significant area of national significance. <ul style="list-style-type: none"> Eastern edge (78 ¼ mi² or 19%) of Castle Special Place is leased, primarily as the western part of Royal Dutch Shell Canada's Waterton Gas Field, which is a mature, natural gas field. As the primary disposition holder of mineral rights in the Castle, May 2008, Shell provided a letter stating they are not opposed to the creation of a park,^{xxxiii} are committed to full participation in a process engaging all stakeholders in the proposal, and that they need to understand how establishment will affect their interests in the area. They have been an active part of this citizen's initiative's working group. As per free-hold mineral rights (old Burns Coal Mine) located in the middle of Elbow-Sheep Wildland Park, legislated designation of the Castle would not affect the 10.5 mi² of free-hold mineral rights located in the northeast section, in the areas of Hastings Ridge, Willoughby Ridge and Jackson Creek.
Aboriginal Affairs	
<ul style="list-style-type: none"> Continue to implement the Aboriginal Self-sufficiency strategy to improve Aboriginal participation in the economy and economic development in Aboriginal communities. 	<ul style="list-style-type: none"> Economic opportunities for the Piikani First Nation in particular by virtue of: <ul style="list-style-type: none"> Brocket being one of the gateway communities to the Castle Special Place as a legislated protected area. The Castle being a comparatively intact remnant of the wilderness that sustained the ancient cultures interpreted at Head-Smashed-In Buffalo Jump World Heritage Site (i.e. protection of the land base and significant cultural sites associated with the culture interpreted at the World Heritage Site). The continental, cultural and spiritual significance of sites encompassed by the Castle Special Place; includes sites still used today. Alberta's Plan for Parks commitment to: <ul style="list-style-type: none"> Encourage aboriginal participation in protected area/park planning. Partnerships for development and delivery of interpretive programs.

Alberta Government Priority	Legislating the Castle Protected Area Would Deliver
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Sustainable Resource Development	
<ul style="list-style-type: none"> Develop a Biodiversity Strategy to conserve biological diversity and enable sound management on Alberta's natural resources on a sustainable basis. 	<ul style="list-style-type: none"> Effective protection of what the province has assessed as Alberta's most biologically diverse area. The legislative framework needed to sustain and restore the ecological integrity of this site, including the habitat for a large number of species listed as being rare or at risk of extirpation in Alberta. Implementation of habitat protection for two-thirds of the focal species in the Department's Southern Headwaters Species at Risk Project (SHARP). SHARP was initiated in order to protect the increasing number of species at risk and to prevent others from becoming at risk of extirpation in the headwater region of the Oldman River Basin. E.g. Wolverine, Long-Toed Salamander, Pileated Woodpecker, Harlequin Duck, Vagrant Shrew and Grizzly Bear. <ul style="list-style-type: none"> SRD lists Alberta's protected areas and parks system at the top of its list of key actions by the government to conserve biological diversity. http://srd.alberta.ca/fishwildlife/biodiversity.aspx Endangered and rare species lists include 187 plant species, 6 plant communities, 14 mammals, 44 birds, 3 reptiles, 5 amphibians, 2 fish and 10 butterflies, as well as spider species that reside in the Castle Special Place. Legislating the designated protected area would be a marked contribution for implementing the province's Grizzly Bear Recovery Plan.
<ul style="list-style-type: none"> Address competing use of land through planning and decision-making directed by the completion and implementation of the Land-use Framework. 	<ul style="list-style-type: none"> Enhanced public trust in the new, regional land-use planning process by completing the phased implementation of the primary land-use decision made for this site (designated a protected area) as a part of the lengthy, prior regional planning process^{xxxiv}.
Tourism, Parks & Recreation	
<ul style="list-style-type: none"> Develop a plan for provincial parks and recreation areas to accommodate population growth and improve quality of life opportunities. 	<ul style="list-style-type: none"> A significant increase in the supply of designated wildlands & outdoor recreation areas to meet the substantial population growth that has occurred in southwest AB. Increase in that supply with the very site the Alberta Government has recognized has having considerable interest from Albertans in its establishment^{xxxv}. <ul style="list-style-type: none"> 1982 – Minister responsible wrote there is a shortfall of wildland and recreation areas in southern Alberta. Since 1982 - Population within 1 ¼ hours drive of Castle Special Place has increased by 21%. (Total Alberta population grew 10.6% during 2001-2006.) Largest single user group of the Castle Special Place is the residents of Lethbridge, where the population has grown by 44% since 1982. Implementable and enforceable legislative framework to mitigate and manage the currently unsustainable, cumulative impacts within the Castle Special Place. This in turn restoring

Alberta Government Priority	Legislating the Castle Protected Area Would Deliver
	the quality of public experiences in the area (including motorized and non-motorized recreation), equitable opportunities for outdoor recreation (including hunting and fishing), and the integrity of the ecosystem upon which all those experiences depend.
<ul style="list-style-type: none"> Lead the development of a culture policy encompassing Alberta's cultural, historical and natural heritage. 	(Addressed below under the current Ministry.)
Culture and Community Spirit	
<ul style="list-style-type: none"> Lead the development of a culture policy encompassing Alberta's cultural, historical and natural heritage. Promote and support culture in Alberta by working with partners to implement <i>The Spirit of Alberta: Alberta's Cultural Policy</i> and establishing a Premier's Council on Arts and Culture. 	<ul style="list-style-type: none"> Addresses the keystone of access to cultural experiences and opportunities by protecting a provincially and internationally significant land-base and in situ pre-history and history associated with: <ul style="list-style-type: none"> The Nitsitapii: Piikani [Peigan], Siksika, Kainaiwa [Blood] and Blackfoot First Nations, as well as the Nakoda [Stoney] and K'tunaxa [Kootenay] First Nations. European exploration. Alberta's early guiding and outfitting. By protecting a significant piece of the original wilderness land-base for those cultures, legislating the Castle Special Place provides opportunities for interpretation and for experiencing those cultures in situ, as well as for the First Nations to continue cultural and spiritual practices there.

15. How Proposal Relates to Alberta Government Policies and Strategies

How the proposal relates to the *Water for Life* strategy and *Alberta's Plan for Parks* is addressed above in section 13, Benefits to Communities. Each of the desired outcomes of that strategy and policy are used as headings categorizing the Community Benefits in section 13.

Land-Use Framework

The primary, regional land-use decision has been made by the Alberta Government regarding this site. It designated the 1,041 km² Castle Special Place as a protected area. Implementing that protected area decision through Alberta's protected areas and parks legislation is consistent with and supports the province's land-use planning policy – the Land Use Framework. Other sites designated as protected areas the same day as the Castle, including Marguerite Wildland Park (larger than the Castle at 1,963 km²) in the Lower Athabasca planning region, have all been legislated within the current protected areas and parks legislation. Legislation and continuance of the Castle Special Place as a designated protected area is needed if the desired outcomes of the Framework are going to be met for the South Saskatchewan region.

Implementing the protected area designation through the protected areas Acts^{xxxvi} would meet the Framework's three desired outcomes of regional land-use planning as described in section 13 under each desired outcome. *Alberta's Plan for Parks* is one of the government's policies providing strategic direction to regional land-use planning and is aligned with the Land-Use Framework through the same desired outcomes and the same commitments to work with Aboriginal peoples and address gaps in protecting biological diversity.

Legislating the Castle protected area provides the province with a cornerstone for achieving an integrated land-use plan for the South Saskatchewan region, one that sustains water, land, air and biological diversity. The Framework defines conservation as "*The responsible preservation, management and care of our land and of our natural and cultural resources.*" For public lands in the region, it would help deliver the preservation part of a conservation strategy as sought through the Framework's Strategy #4: "*Develop a strategy for conservation and stewardship on private and public lands.*"

16. Others Commenting on the Proposal

The Castle Special Place Working Group mailed the draft proposal along with a letter inviting comment and a Frequently Asked Questions document to 102 organizations and interests beyond those on the Working Group, including the five municipal governments. These documents, including the invitation to comment were also posted on the Working Group's public website. In addition to written communication, representatives of the Working Group presented the proposal at the council meetings of the following municipalities for the purpose of sharing information and maintaining ongoing dialogue about the process and proposal: Municipal District of Pincher Creek, Town of Pincher Creek, Municipality of Crowsnest Pass and the City of Lethbridge. On October 19, 2009 the City of Lethbridge passed a formal resolution supporting the conceptual proposal in principle (Appendix VI).

Edwin Small Legs and Margaret Plain Eagle who participated in the Working Group regarding First Nations' concerns also reported that the Assembly of Treaty Chiefs in Alberta (Treaties No. 6, 7 and 8) at their spring assembly passed on May 13, 2009, Resolution Number 011R regarding the Castle Special Place.

Comments written to the Working Group included the following who specified they agree with the conceptual proposal in principle and the recommendations; specifically section 7, Principles for the Castle Special Place and section 10, Types of Protected Areas Proposed and Rationale. There were no negative comments received.

Sector	Organization or Interest	Name
Adjacent landholder	Grazing lease & landholder, MD Division # 3	Stewart McDowall
Adjacent landholder	Landholders, Gladstone Valley, MD Division #3	Karin & Hans Buhrmann
Adjacent landholder	Landholders, MD Division #3	Arnold Janz Jeryn Janz Keith Allison Gwen Allison Don Quapp Charlotte Quapp Harley Berg Esther Berg Rick Janz Laurie Janz
Adjacent landholder	Landholders, MD Division #3	Dave & Jean Sheppard
Environment	Alberta Wilderness Association	Nigel Douglas, representative
Environment	Bert Riggall Foundation, Pincher Creek	Nancy Tripp, representative

17. Future Involvement

The Castle Place Citizen's Initiative formed from the outset for a specific purpose: to undertake development of a conceptual proposal for protecting the Castle Special Place within the province's current protected areas and parks designations.

It is not the intention of the Citizen's Initiative to reconvene to undertake the task of management planning. As with all new protected areas and parks, it is the Tourism, Parks and Recreation Department that undertakes management planning and the public consultation associated with it. While the Citizen's Initiative has been a transparent and inclusive process, and open to all who wished to participate, some who for whatever reason may have not participated in the process, may very well want to participate in the management planning.

Those who wish to be involved in the future and how

Members on the Working Group have indicated that they are willing to be contacted by the Department when it undertakes management planning.

Shell Canada Ltd. and Improvement District #4 (Waterton) also specifically indicated they want to be involved in the province's consultation process regarding establishing the protected area and contacted by the province regarding management planning for the protected area.

Those listed below wish to be involved in the additional ways specified.

Organization	How Would be Involved in Future
Syncline Castle Trail Association	<ul style="list-style-type: none"> • Stewards for Syncline Cross-country Ski Trails in proposed Syncline-Castle Bridge PRA & PP, including maintenance of trails.
Wendy Ryan	<ul style="list-style-type: none"> • Volunteer steward, including continuing to organize & do: <ul style="list-style-type: none"> ○ Maintaining hiking/equestrian trails. ○ Garbage removal. ○ Invasive weed control – pulling and bagging.

Organization	How Would be Involved in Future
	<ul style="list-style-type: none"> ○ Water quality monitoring in high alpine lakes. ○ Reporting concerns in the Castle to ASRD, TPR & CCWC.
Bree Stefanson-Korobanik	<ul style="list-style-type: none"> ● Steward for West-Castle Wetlands Ecological Reserve.
Castle-Crown Wilderness Coalition	<ul style="list-style-type: none"> ● Continue organizing & leading annual, public program of non-motorized trips. ● Continue organizing volunteer stewards, state of the Castle report from the stewards' reports and weed-pulls.
Sierra Club Canada	<ul style="list-style-type: none"> ● Together with CCWC will coordinate the annual Castle Special Place Invitational Trip modeled after international Waterton-Glacier Superintendents Hiking Trip. ● Will work with area user, community and First Nation groups, and area residents on a community digital storytelling project for the Castle Special Place. ● With input from Oldman Watershed Council, Alberta Riparian Habitat Management Society (Cows and Fish) and the Watershed Groups will explore coordinating a volunteer program focused on restoration of riparian areas.

Footnotes

- i Energy IL 2003-25, Honouring Existing Mineral Commitments in Legislated Provincial Protected Areas, Sept. 2003.
- ii See www.tpr.alberta.ca/parks/managing/establishing.asp#special Full name is Castle Special Management Forest Land Use Zone. As described on the government website, Forest Land Use Zones are not designated protected areas (e.g. they have no bearing on industrial activity or other uses) <http://srd.alberta.ca/lands/usingpublicland/recreation/fluz/default.aspx>
- iii Municipal District of Pincher Creek, Municipality of Crownest Pass, Town of Pincher Creek and I. D. Number 4 (Waterton). Castle Special Place falls within the municipal jurisdiction of the M.D. of Pincher Creek.
- iv A disposition holder is any entity (e.g. person or company) that has a legal agreement with the province, which conveys specific rights of occupation or use of either the surface or the subsurface that are different from the rights of the general public (e.g. license of occupation, grazing permit, trap-line license, timber quota).
- v Honoured means the right would not be dismissed out of hand. One of the provincial government's roles is to negotiate with the existing disposition holders should protected area or park designation require any changes in their existing rights.
- vi The definition of ecological integrity is taken from Noss, R.F. 1995. Maintaining ecological integrity in representative reserve networks. World Wildlife Fund Canada and World Wildlife Fund United States, Discussion Paper. *In* Arc Wildlife Services Ltd. 2004. Selected Ecological Resources of Alberta's Castle Carbondale: A Synopsis of Current Knowledge. Compile by Arc Wildlife Services Ltd., Calgary, Alberta. Prepared for CPAWS Calgary/Banff and Shell Canada. 216 pp.
- vii Unsustainable and sustainable in this document refer to the principles of "sustainable development" which entail the management of human use and its cumulative effects with the aim of protecting the environment so that today's use does not foreclose meeting future needs into the indefinite future. The term was coined by the Brundtland Commission (United Nations. 1987. *Report of the World Commission on Environment and Development*. General Assembly Resolution 42/187, Dec.11, 1987) and defined as development that "meets the needs of the present without compromising the ability of future generations to meet their own needs."
- viii Jurisdictions apply broadly, including federal and provincial (e.g. the adjacent Waterton Lakes National Park and British Columbia), departments within the Alberta provincial government, and municipal and First Nation governments.
- ix "Access" is used here in the general meaning of the term and is not confined to only road and off-road "motorized access." It is used to mean a way of getting to, approaching, reaching or entering and includes all forms of motorized and non-motorized means (e.g. foot, horse, paddle and bicycle).
- x Aboriginal places include pre-historic, historic, spiritual and cultural sites.
- xi Cultural use includes traditional ceremonies, subsistence hunting and fishing, gathering of ceremonial items and gathering of medicinal plants by the First Nation cultures indigenous to the area.
- xii The Castle Special Place does not include the existing Castle Mountain Resort and the area provided the resort within the municipal Area Structure Plan.
- xiii Ipsos-Reid survey, August 23, 2007
- xiv Alberta Tourism, Parks and Recreation. 2008. Survey of Albertan's Priorities for Provincial Parks. Final report submitted by The Praxis Group for Alberta Tourism, Parks & Recreation. Edmonton, AB.
- xv Second to Whaleback – North Porcupine Hills unit; part of which is protected in the Bob Creek Wildland Park and Black Creek Heritage Rangeland.
- xvi Energy IL 2003-25, Honouring Existing Mineral Commitments In Legislated Provincial Protected Areas, Sept. 2003,
- xvii Stankey, G. H. 1985. Visitor Attitudes and Behavior: Research on visitor behavior, perceptions, motivations and on factors such as visitor conflict and crowding. National Wilderness Research Conference, Colorado State University. Fort Collins, Colorado.
- xviii Excerpts from province's website on types of protected areas and parks www.tpr.alberta.ca/parks/managing/flashindex.asp
- xix A Policy for Resource Management of the Eastern Slopes (1977)
- xx Rosenberg International Forum on Water Policy. March Program Synopsis & Lessons for Canada & Alberta. Pp. 90-91.

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- xxi “The combination of climate warming, by way of its effects on glacial melt, evaporation and accelerated spring melt, plus high water temperatures, increasing human populations, agricultural use and industrial development” are the primary factors threatening these basins, the other being the Bow. Rosenberg International Forum on Water Policy. March 2007. Program Synopsis & Lessons for Canada & Alberta. P. 56.
- xxii Reeves, Brian and Sandra Peacock. 2001. “Our Mountains are Our Pillows,” An Ethnographic Overview of Glacier National Park. Glacier National Park Montana.
- xxiii Alberta Wilderness Association. 1986. Eastern Slopes Wildlands, Our Living Heritage. Alberta Wilderness Assoc., Calgary, AB.
- xxiv Dobson, Stephen and John Thompson. 1996. Parks and Protected Areas: Their Contribution to the Alberta Economy, a Discussion Paper. Alberta Environmental Protection, Edmonton, AB.
- xxv Compilation of research on resource economics identified four key factors for attracting those who have choices and where they live and locate their business, or retire. Those four factors are proximity to protected areas; well developed community planning structure, proximity to an airport with scheduled flights and adequate health and education services. (Pacific Analytics Inc. Nov. 2005)
- xxvi Ibid.
- xxvii The forum addresses water-stressed regions around the world. Rosenberg International Forum on Water Policy. March 2007. Program Synopsis & Lessons for Canada & Alberta. Pp. 90-91.
- xxviii Alberta Environment, flow volume calculations, April 18, 2006.
- xxix Arc Wildlife Services Inc. 2004.
- xxx Alberta Energy Utilities Board. 2000.
- xxxi Natural Resources Conservation Board. December 1993. Decision Report: Application to Construct Recreational and Tourism Facilities in the West Castle Valley, near Pincher Creek, Alberta.
- xxxii Alberta Energy Utilities Board. 2000. Decision 2000-17: Shell Canada Ltd. Application to drill four critical sour gas wells and construct and operate related pipelines and facilities, Castle River area; and Arc Wildlife Services Inc. 2004. Selected Ecological Resources of Alberta’s Castle Carbondale: A synopsis of Current Knowledge. Calgary, AB.
- xxxiii At that time, the Castle Special Place proposed as 90% Wildland Park and 10 % Provincial Park as the Andy Russell-I’tai sah kóp Parks.
- xxxiv For an example, see Dec. 2007 letter from Livingstone Landowners Group in Appendix VIII.
- xxxv E.g. Jan. 31, 2007 letter from Tourism, Parks, Recreation & Culture Minister and March 18, 1998 announcement of protected area designation,
- xxxvi Alberta’s protected areas & parks legislation consists of two Acts: Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act and Provincial Parks Act. A third, the Willmore Wilderness Park Act, does not provide for any new Wilderness Parks.

Milestone Reached in Preserving Alberta's Natural Heritage

Edmonton - The designation of six new Wildland Parks in the Canadian Shield Natural Region, and a range of preservation measures for the Castle area in the Rocky Mountain Natural Region will add approximately 2,800 sq km to Alberta's protected areas network under Special Places.

"The addition of these six sites in the Canadian Shield is particularly significant because it fills Alberta's protected areas gaps in that Natural Region," said Minister of Environmental Protection Ty Lund. "Together with the protection of the Castle, these designations mark a major milestone in the preservation of Alberta's natural heritage for future generations."

The Wildland Park designations in the Canadian Shield Natural Region protect areas of natural landscape with minimal facilities and interference with natural processes. Eco-touring, adventure travel, guiding and outfitting are supported. These designations cover two Natural Subregions. The Kazan Upland Subregion will be represented by La Butte Creek, Colin-Cornwall Lakes and Fidler-Greywillow sites on the north shore and several adjacent islands of Lake Athabasca. The Marguerite Crag and Tail, Richardson River Dunes and Maybelle River sites will represent the Athabasca Plains Subregion. Traditional and historical uses of the land will continue under the Wildland designation.

The protection measures for the Castle area reflect the Local Committee's recommendations to provide legislated protection for the area while taking into account the region's importance for recreation, tourism and established development.

Implementation of the Castle recommendations will proceed in two phases.

In the first phase, a Special Management Area will be established as a Forest Land Use Zone to provide immediate legislated protection for the Castle area by regulating the existing Castle Access Management Plan, currently being managed through voluntary compliance.

As part of this first phase, an Ecological Reserve will also be created in the wetland area in the West Castle River valley following the required 60-day notification period.

- more -

Secondly, the government will conduct a full review and update of the Castle Sub-Regional Integrated Resource Plan (IRP), as recommended by the Local Committee.

"The Local Committees have done an excellent job given the widely differing circumstances of the Shield and the Rocky Mountains," Lund said. "Each committee provided thoughtful recommendations on how to best meet the preservation goal of Special Places while respecting present interests and recognizing the program's other three goals of heritage appreciation, outdoor recreation and tourism/economic development."

Today's announcements demonstrate the continuing progress of the Alberta government's Special Places program. A total of 44 new sites have been added to Alberta's network of protected areas since the program was first announced in 1995, representing a contribution of more than 4,800 sq km.

"I am pleased with the substantial progress that has been made by the Provincial Coordinating Committee in completing the review of four natural regions. I would also like to thank Albertans for their enthusiastic participation in the public nomination process and bring the nomination phase of the program to a close," concluded Lund. "Special Places is now focused on identifying the best candidate sites from the over 380 sites nominated by Albertans for consideration by Local Committees."

- 30 -

Attachments: backgrounders and maps

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Minister's Office
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Alberta Environmental Protection
Communications Division
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Regional contacts for the Canadian Shield and the Castle:

Canadian Shield:
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Regional Environmental Coordinator
Northeast Boreal Region
Phone: (403) 623-5255
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Castle:
Jay Litke
Regional Environmental Coordinator
Southern East Slopes Region
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Fax: (403) 297-6069

HIGHLIGHTS OF THE CASTLE SPECIAL PLACES DESIGNATIONS

Special Places is the Government of Alberta's protected areas policy. The vision is to complete a system of protected areas by preserving representative examples of Alberta's six natural regions. Although the Rocky Mountain Natural Region was already well represented, the Castle area, located west of Pincher Creek, was one of four sites in this Natural Region advanced by the government for consideration in response to Albertans' interest. The Castle is an area with a rich variety of plant and animal species.

In July 1997, following extensive public consultation, the Castle Special Places Local Committee submitted its recommendations to the Minister. The Local Committee's 10-point recommendation balanced the importance of preserving valuable habitat, honouring existing commitments and recognizing the many historical and traditional uses of the area. This approach provides regulated protection for the area, while meeting the four goals of preservation, heritage appreciation, recreation and tourism/economic development.

The Castle Special Management Area will be implemented in two phases.

Phase I:

- Provide immediate legislated protection through a Forest Land Use Zone (FLUZ) which will regulate the existing access management plan, previously managed on a voluntary basis.
- Create an Ecological Reserve to protect an important wetland area in the West Castle River valley following the required 60-day notification period.

Phase II:

- Review the existing Castle River Sub-Regional Integrated Resource Plan (IRP) as the management planning exercise for the Castle

In the Alberta Government's March 18, 1998 News Release and highlights of their decision on the Castle Special Place, four goals are referred to for the area: preservation, heritage appreciation, outdoor recreation and tourism/economic development.

The Government's *Special Places 2000: Alberta's Natural Heritage Policy and Implementation Plan* at the time defined each goal as follows:

Preservation – to designate natural landscapes that preserve the full range of environmental diversity and special natural features of Alberta.

Heritage Appreciation – to include landscapes that ensure, for all Albertans and visitors, the opportunity to explore, understand and appreciate the full range of Alberta's natural heritage.

Outdoor Recreation – to include natural landscapes throughout Alberta that ensure opportunities for a variety of resource-based, dispersed recreation pursuits.

Tourism and Economic Development – to include areas capable of supporting tourism infrastructure and sustaining long-term economic viability of adventure travel and ecotourism, including extended tours in unspoiled natural landscapes.

Today, those goals are similarly defined by the Government (from www.tpr.alberta.ca/parks/managing/flashindex.asp).

Goals: Four goals reflect our collective commitment to maintaining a network of parks and protected areas for present and future generations. The primary goal of preservation is balanced with three other goals: heritage appreciation, outdoor recreation and heritage tourism. Achieving these goals contributes to our cultural identity, health, well-being and economic prosperity.

Preservation - to preserve, in perpetuity, a network of parks and protected areas that represent the diversity of the province's natural heritage and related cultural heritage.

Heritage Appreciation - to provide opportunities to explore, understand, and appreciate Alberta's natural heritage, and to enhance public awareness of our relationship to and dependence upon the natural world.

Outdoor Recreation - to provide a variety of natural landscape-dependent outdoor recreation opportunities and related facilities and services.

Heritage Tourism - to encourage Alberta residents and visitors to discover and enjoy the province's natural heritage through a variety of outdoor recreation and nature-based tourism opportunities, facilities and accommodation services.

List of Participants in the Castle Special Place Working Group

Listed below are the people who participated in the development of and who support this conceptual proposal as a product of the Castle Special Place Working Group for purposes of initiating Government action on obtaining legislated protection; identified by their sector, organization or interest, and the nature of their involvement. The 'nature of involvement' column is specified as follows:

1. Participants of the Working Group listed as 'representatives of' an organization are those who officially speak for their organization, and their organization has formally endorsed the conceptual proposal.
2. Participants of the Working Group who are listed as 'members or staff of' organizations contributed to the proposal by sharing the perspectives of the organization they are part of. In this case, it should not be assumed by the reader that their organization has formally endorsed the proposal at this time. The nature of some organizations is that they must remain neutral.
3. Other participants of the Working Group are listed as community member; as individuals representing their interests as landholders adjacent to the Castle Special Place, disposition holders within it, or businesses that use it; or in their specific role in relation to the Castle Special Place (e.g. steward, scientist).

All participants in the Working Group are:

- residents of Livingstone-Fort Macleod constituency or are representing groups that have members resident there; or
- businesses that use the Castle Special Place; or
- Lethbridge residents. (The largest user group of the Castle Special Place is the residents of Lethbridge, as determined by earlier visitor surveys.)

Castle Special Place Working Group

	Sector	Name (including alternates)	Nature of Involvement on Work Group	Organization or Interest
1	Adjacent landholder	Phil Hazelton	Landholder	landholder, Gladstone Valley, Division #3
2	Adjacent landholder	John Russell	Landholder	landholder, Division #1
3	Adjacent landholder	Hilah Simmons	Landholder	landholder, Gladstone Valley, Division #3
4	Commerce	Jolaine Kelly	Business	Stepping Stone Bed & Breakfast, Beaver Mines
5	Community-at-large	Gerry Stefanson	Community member	Castle Mountain Resort Community
6	Community-at-large	Larry Mitchell	Community member	Municipality of Crowsnest Pass
7	Community-at-large	Gary Taje	Community & Council member	Municipality of Crowsnest Pass
8	Community-at-large	Brian Hamilton	Landholder	Rural landholder
9	Community-at-large	Kelly Rinaldi	Outdoor recreationist	Outdoor recreation
10	Community-at-large	John Hancock	Scientist	Independent researcher
11	Conservation	Mary Ann Johnson	Representative of	Alberta Native Plant Council
12	Conservation	Rick Cooke, Bill Paton	Representatives of	Crowsnest Conservation Society
13	Conservation	Kristie Romanow, Anne Stevick	Staff of	Nature Conservancy of Canada

Sector	Name (including alternates)	Nature of Involvement on Work Group	Organization or Interest
14 Conservation	Richard Burke, Mike Lamb	Representatives of (see below table)	Trout Unlimited - Oldman Chapter
15 Disposition - petroleum	Roger Creasey	Staff of (see below table)	Royal Dutch Shell Canada
16 Disposition – recreation; Educational Org.	Mike Bingley	Regarding Camp Impeesa & Beaver Mines Lake area	Scouts Canada, Chinook Council
17 Environment	Sarah Elmeligi, Gregoire Belland	Representatives of	Canadian Parks & Wilderness Soc.
18 Environment	Gordon Petersen, Judy Huntley	Representatives of	Castle-Crown Wilderness Coalition
19 Environment	Dianne Pachal	Representative of	Sierra Club of Canada
20 Environment	Cheryl Fujikawa	Representatives of	Southern Alberta Group for the Environment (SAGE)
21 First Nation	Edwin Small Legs	Regarding First Nations concerns	Crow-Eagle Traditional Trail Ride; Member of Blackfoot Confederacy and Piikani First Nation
22 First Nation	Margaret Plain Eagle	Regarding First Nations concerns	Piikani Community Wellness Society; Member of Blackfoot Confederacy and Piikani First Nation.
23 Guide & Outfitter	Cameron Welsh	Business	Tread Softly Adventures
24 Guide & Outfitter	Alan Brice	Business	Alberta Fly Fishing Adventures and The Fly Shop
25 Landholder Group	Larry Frith	Member of	Chinook Area Land Users Assoc. (CALUA)
26 Municipal Government	Andrew Colley	Member of Council	Town of Pincher Creek
27 Municipal Government	Dr. Brian Reeves	Representative of (see below table)	I.D. # 4 (Waterton)
28 Recreation	Tim Grier	Representative of	Alpine Club of Canada
29 Recreation	Wendy Ryan	Representative of	Syncline Castle Trails Association
30 Recreation, Conservation	Ian Gazeley; Don Sheppard	Member of	Lethbridge Fish & Game Association
31 Recreation, Conservation	Mike Philip	Member of	Southern Alberta Bowhunters Association
32 Stewards	Bree Stefanson- Korobanik	Steward	West Castle Wetlands Ecological Reserve
33 Watershed Group	James Tweedie	Representative of	Castle Watershed Group (Castle- Crown Wilderness Coalition)
34 Watershed Group	Stephanie Palechek, Leta Pezderic	Staff of	Oldman Watershed Council
35 Watershed Group	Bradley Bustard	Member of	Pincher Creek Watershed Group

In addition to the above list, the following participation in the Working Group should be noted.

Improvement District (ID) # 4 (Waterton) and Trout Unlimited, Oldman River Chapter support this conceptual proposal in principle.

Shell Canada Ltd., Shell Global updated its May 6, 2008 letter regarding its position. See Appendix III for current letter regarding their position regarding the conceptual proposal.

Mac Main, an adjacent landholder and area rancher with a summer grazing permit in the Castle Special Place also participated in the Working Group. While supporting the need for legislated protection of the Castle Special Place, instead of the recommended Wildland he would prefer to see the area legislated as a Heritage Rangeland and also as one where, unlike grazing leases and other Heritage Rangelands, the public would not require permission of the lease/permit holder for access. He emphasizes that grazing needs to be entrenched in the legislation for the protected area, because grazing is needed to maintain the diversity of native species there (e.g. reduce encroachment of trees and shrubs onto the grasslands, and maintain the diversity of the grasslands).

Ross Macdonald and Tony Stoklosa of the Hillcrest Fish & Game Protective Association participated throughout the Working Group process. However, their organization has chosen not to support the conceptual proposal for reasons stated in the attached letter of July 9, 2009 (Appendix III).

There were also two observers of the Working Group: David Green, Manager, Southwest Alberta Sustainable Community Initiative and Olivier La Rocque, researcher, McGill University.

Appendix III

October 29, 2009: Shell Canada Ltd., Shell Global is in the process of updating their May 2008 letter regarding the Castle Special Place. The updated letter will be included here as soon as it is available.

From: eieio <eieio@telusplanet.net>
To: <accounting@crownsnestpasspromoter.com>
Date: Thursday, July 9, 2009 3:13 PM
Subject: castle.doc

R.D.MacDonald

Land use chair, Hillcrest Fish and Game Protective Assoc.

July, 9 2009

The Hillcrest Fish and Game Assoc. cannot endorse a change of land jurisdiction from S.R.D. to Tourism, Parks and Recreation. The Castle Special Places working group is proposing a Wildland designation that is the least onerous option to traditional use of the land by our membership. While we believe that the Castle River drainage needs more protection from motorized recreation, random camping, and increased industrial activity using the land, a "Parks" designation is not the only option available. It is argued that only the Parks department has the necessary legislation on hand to control land use issues on public land. A change in jurisdiction leaves us in apprehension as to what the future of hunting, fishing, and reasonable access will bring about. We do not see Tourism, Parks, and Recreation a viable tool to over see a land use framework into the future for our membership.

R.D. MacDonald - Land use chair
B. Lowell - President

Appendix V

Castle Special Place – Conceptual Proposal

Interests & Organizations That Received the Draft for Comment

Sector	Organization or Interest	Name	
Adjacent landholder	Castle Mountain Resort Ltd.	Brian	Rhodes
Adjacent landholder	Gladstone Mountain Gathering Grounds	Greg	Hamilton
Adjacent landholder	landholder	Gwen	Allison
Adjacent landholder	landholder	Vince	Anderson
Adjacent landholder	landholder	Carita	Bergman
Adjacent landholder	landholder	L	Copp
Adjacent landholder	landholder	Jamie & Cas	Freeman
Adjacent landholder	landholder	Leonard	Green
Adjacent landholder	landholder	Arnold	Janz
Adjacent landholder	landholder	Stan	Judd
Adjacent landholder	landholder	Mike	Judd
Adjacent landholder	landholder	G&S	Landeryou
Adjacent landholder	landholder	Gordon & S	Leskosky
Adjacent landholder	landholder	Cathy	Lunn
Adjacent landholder	landholder	Ron	Mantle
Adjacent landholder	landholder	Ryan	McClelland
Adjacent landholder	landholder	Frank	McLaughlin
Adjacent landholder	landholder	Tom & C	Olson
Adjacent landholder	landholder	C&C	Riviere
Adjacent landholder	landholder	Barb	Shenton
Adjacent landholder	landholder	Dave & Jean	Sheppard
Adjacent landholder	landholder	Teri & Allen	Tapay
Adjacent landholder	landholder		Tingle Family Ranch
Adjacent landholder	Pincher Creek Ranch	Chris	Coleman
Adjacent landholder	Spear Point Cattle Co.	Clint	Marr
Adjacent landholder	Vialta Investments Ltd.		
Commerce	Beavermines Store		
Commerce	Crowsnest Pass Chamber of Commerce		
Commerce	Fort Macleod Chamber of Commerce	Emily	McTighe
Commerce	Pincher Creek & District Chamber of Economic Development	Bette Jean	Scott
Commerce	Taxidermy by Tracy	Tracy	Latham
Community Assoc.	Castle Mountain Resort Community	Michelle	Fraser
Conservation	Alberta Riparian Habitat Management Society (Cows & Fish)	Michael	Gerrand
Conservation	Ducks Unlimited - Crowsnest Pass Chapter	Barb	Kelly
Conservation	Southern Alberta Land Trust	Alan	Gardner
Conservation (Deligated Admin. Org., AB Gov.)	Alberta Conservation Assoc., Lethbridge	Randy	Lee
Disposition	University of Lethbridge	Andrew	Hurly
Disposition - campground operator	Rocky Mt Camping	Janice	Remis
Disposition - grazing permit		Brent	Barbaro
Disposition - grazing permit		Louis	Dingreville
Disposition - grazing permit		Mike	Grasi

Sector	Interest or Organization	Name	
Disposition - grazing permit		Peter	Grasi
Disposition - grazing permit		Richard (Dick)	Hardy
Disposition - grazing permit		Frank	Jenkins
Disposition - grazing permit		Blaine	Marr
Disposition - grazing permit		Brent	McGlynn
Disposition - grazing permit		Norm & Tammy	McNeil
Disposition - grazing permit		Barb	McRae
Disposition - grazing permit		Mac	McRae
Disposition - grazing permit		Ted	Nikkel
Disposition - grazing permit		Holly	Ouellette
Disposition - grazing permit		Joyce	Taylor
Disposition - grazing permit		Ted	Whipple
Disposition - grazing permit		Bruno	Yagos
Disposition - grazing permit & adjacent landholder		Bev & Keith	Everts
Disposition - grazing permit & adjacent landholder		Darryl	Carlson
Disposition - grazing permit & adjacent landholder		Leonard	McGlynn
Disposition - petroleum	Devon Canada Corp.	Shad	Watts
Disposition - timber	Spray Lakes Sawmills	Gord	Lehn
Disposition - trapline		Roy	Hendrickson
Disposition - trapline		Gordon	Hoffman
Disposition - trapline		Bruce	Mackintosh
Environment	Bert Riggall Foundation	Nancy	Tripp
Environment	Southern Alberta Group for the Environment (SAGE)	Cheryl	Bradley
First Nation	Piikani Friends Along the River	Harley	Bastien
First Nation Gov.	Piikani First Nation	Chief	Redge Crowshoe
Guide & Outfitter	King Fisher Guides Service		
Guide & Outfitter	Mountain Meadow Trail Rides		
Guide & Outfitter	Timber Mountain Pack Train	James	Kenny
Guide & Outfitter	Trout Bums, Fly Fishing Guides	Mark	Edwards
Guide & Outfitter	Western Adventures Holidays on Horseback	Leslie & Glen	Huber
Guide & Outfitter	Yeti Adventures	Spencer	Kirkoski
Guide & Outfitter		D.	Barrus
Guide & Outfitter, disposition holder		Ottis	Handford
History, Museum	Historical Society (Crowsnest Pass Museum)	Wendy	Zack
History, Museum	Historical Society (Kootenay Brown Museum)	Farley	Wuth
Landholder Group	Chief Mt Landhoder Group	Jeff	Bectell
Landholder Group	Livingstone Landowners Group	Myrna	Marty
Municipal	Action Committee, Crowsnest Pass Community Revitalization Initiative	Shane	Stewart
Municipal Government	City of Lethbridge		
Municipal Government	I.D. #4 (Waterton)		
Municipal Government	Municipal District of Pincher Creek		
Municipal Government	Municipality of Crowsnest Pass		
Municipal Government	Town of Pincher Creek		
Recreation	Climbers Access Society of Alberta	Eric	Hoogstraten

Sector	Interest or Organization	Name	
Recreation	Crowsnest Forest Stewardship Society	Andrew	Rusynyk
Recreation	Turtle Mt Riding Club	Eileen	Woolf
Recreation	Southwest Alberta Trails Advisory Council	Dennis	Brasley
Recreation - equestrian	Glenwood Riding Club	Kimberley	Radcliffe
Recreation - motorized	Crow-Snow Riders	Francis Boone,	Vern Pedersen
Recreation - motorized	Mountaineers Snowmobile Club	Jacques	Daignault
Recreation - motorized	Quad Squad	Glen	French
Recreation - non-motorized	Chinook Outdoor Club	Ann	Cesar
Recreation - non-motorized	Cross-Country Ski Assoc., Crowsnest Pass	Neil	Chalmers
Recreation, Conservation	Fort Macleod Fish & Game Assoc.	Gloria	Flynn
Recreation, Conservation	Willow Valley Trophy Club	Charlie Price,	Bill Thorpe
Service Club	Southern Alberta Community of Environmental Educators	Paul	Bohnert
Service Club	Pincher Creek Rotary Club	Karin	Burhman
Tourism	Alberta Southwest Regional Alliance	Ted	Smith
Tourism	Trail of the Great Bear	Beth	Towe
Tourism	Waterton-Crowsnest B&B Assoc.	Wendy	Meerveld
Watershed Group	Pincher Creek Water Co-op	Linden	Willms



CITY OF
Lethbridge

Office of the City Clerk

October 21, 2009

625-D

Carol Stark, Executive Director
Chinook Institute for Community Stewardship
P.O. Box 8618
Canmore, AB T1W 2V3

Dear Ms. Stark:

re: **Castle Special Place**

At the regular meeting of City Council held on Monday, October 19, 2009, the following resolution was passed:

“WHEREAS City Council directed the Oldman River Chapter in May 2009 to provide the completed conceptual proposal for protecting the Castle Special Place, for its review and comments

AND WHEREAS a report regarding the Conceptual Proposal, Castle Special Place – Legislated Protected Areas was received from Carole Stark, Executive Director, Chinook Institute for Community Stewardship for City Council review

BE IT RESOLVED THAT City Council supports in principle the Proposal prepared by the Castle Special Place Working Group

AND FURTHER BE IT RESOLVED THAT City Council supports the Castle Special Place Working Group principle that:

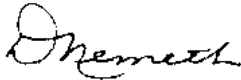
- **the current provincial system of designated Protected Areas and Parks be adopted as the basis for obtaining legislative protection for the Castle Special Place with the boundary being that which the Alberta Government has already mapped as per the Alberta Community Development map titled Special Places Program Final Status – July 24, 2001**

... 2

- the lands held by Castle Mountain Resort be exempted as proposed by the Castle Special Place Working Group.

AND FURTHER BE IT RESOLVED THAT a copy of this resolution be forwarded to Carole Stark, Executive Director, Chinook Institute for Community Stewardship and Richard Burke, Co-Chair, Oldman River Chapter, Trout Unlimited Canada.”

Sincerely,
City of Lethbridge



Dianne Nemeth, CLGM, MMC
CITY CLERK

/bb

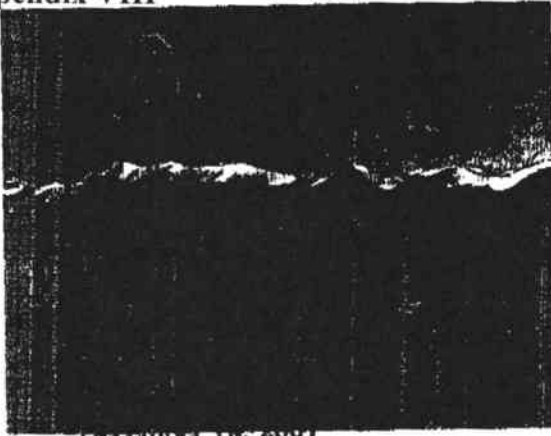
- c. ~~Richard Burke, Co-Chair~~
Oldman River Chapter, Trout Unlimited Canada .

Appendix VII

Short Chronology of the Conservation History of Today's Castle Special Place

1883	Area rancher, Fredrick W. Godsall of the South Fork Ranch ¹ writes William Pearce, Superintendent of Mines, Dominion of Canada urging that "without delay," reserves be set aside forever from settlement for public use (" <i>camping and holiday making</i> ") and to prevent these lands from being " <i>spoiled</i> ." (He was also one of the founders and the first vice- president of the Pincher Creek Stockmen's Associations.)
1911	Today's Castle Special Place becomes part of the national Rocky Mountains Forest Reserve.
1914	Waterton Lakes National Park (established 1895) is expanded to include today's Castle Special Place as far north as the Carbondale River. It had been part of the national Forest Reserve.
1921-1954	Castle moved out of the national park and moved back into the national Rocky Mountains Forest Reserve as a game preserve. (In 1921, the boundary between Castle and national park becomes what it is today.)
1934	Responsibility for all natural resources in the Province of Alberta (established 1905) transfers from federal to provincial jurisdiction.
1950	Owing to competition for forage between game and livestock, decision made to phase out horse and sheep grazing, with the last sheep grazing permit (Yarrow Creek valley) discontinued 1954 and horse permits ending in 1956.
1968	Pincher Creek Fish and Game Association advocates the Castle be protected as a recreational wilderness.
1968	Alberta Wilderness Association formed at Lundbreck. It also takes up the cause of provincial legislated protection for the Castle.
1974	Following public hearings on the future of the Eastern Slopes Region, and presentations from area residents for the legislated protection of the Castle as a "wildland recreation area," the Alberta Government's Environment Conservation Authority recommends a large wildland recreation area be established in the headwaters of each of the major river basins, including the Oldman River Basin. Alberta Government places much of the Castle under Crown Reservation for a future park.
1977	Alberta Government issues <i>A Policy for Resource Management of the Eastern Slopes</i> , noting for the southern Eastern Slopes " <i>two areas are particularly significant: the Castle River headwaters and the Kananaskis-Elbow-Sheep area</i> " and describes the Castle as a very important water producing area and as having a high potential for wildland recreation.
1989	Castle-Crown Wilderness Coalition formed at Pincher Creek. Focused on establishment, restoration, maintenance and environmental protection of the Castle.
1995	As a part of the Alberta Government's <i>Special Places 2000: Alberta's Natural Heritage Policy and Implementation Plan</i> for establishing legislated protected areas and parks, area residents, including members of the Piikani First Nation, nominate the Castle for protection.
1995	Crowsnest Forest Stewardship Society formed. Focused on continuation and sustainability of multiple use opportunities, while maintaining environmental objectives in the Crowsnest Forest, Rocky Mountain Forest Reserve.
1998	The Alberta Government designates the Castle Special Place as a protected area. Based on the recommendation of a local advisory committee, it decides to phase in the protection starting with a Forest Land Use Zone, rather than legislating it as a protected area at that time.

¹ South Fork Ranch was 20,000 acres located between the Middle Fork (Crowsnest River) and South Fork (Castle River) of the Oldman River. Mr. Godsall was also a mountain climber and climbing peaks in the Castle.



Livingstone Landowners Group

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December 18, 2007

Premier Ed Stelmach
Government of Alberta
Room 307, Legislative Bldg.
10800 - 97 Ave.
Edmonton, Alberta
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Dear Premier Stelmach:

We wish to express to you and your Ministers our support for legislated protection of the Castle Special Place in the southern Eastern Slopes.

The Livingstone Landowners Group exists to foster sustainability of the natural environment, the existing rural and agricultural economies, and the communities in this region. Like many others, we are increasingly aware of the critical need for protection of our precious headwaters and for improved stewardship of our lands. Ranchers, farmers, other residents, and public interest organizations are cooperating to change and develop better approaches to our use of the land. For the sake of both current and future generations, we simply cannot continue to allow uncontrolled use and irreparable damage to our most sensitive and irreplaceable resources.

The Livingstone Group has been very actively seeking action and leadership from the province to protect critical water resources and landscapes, to establish a more balanced and comprehensive land-use framework, and to put local initiatives and priorities at the front of these processes.

In that context, we believe that the proposed park will be a positive step and we encourage your government to take action. The proposed park is one important step towards protection of the headwaters along the southern Eastern Slopes. Further, our understanding is that current uses such as grazing permits are proposed to be continued, and we expect that with protected status, low intensity recreational and tourism use would likely expand. Both of these are important to the local community and we support them.

Establishment of the Andy Russell-I'tai sah kop wildland Park and Provincial Park cannot address all the land-use issues and pressures facing southwestern Alberta. Nor can it relieve our