



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Cliff Thesen, Area Manager,
Alberta Community Development,
Parks and Protected Areas Division,
Room 416, Administration Building,
909 – 3rd Avenue North,
Lethbridge, Alberta, T1H 0H5.

Thursday, December 18, 2003

Dear Mr. Thesen

Re: Bob Creek

Alberta Wilderness Association (AWA) welcomes the opportunity to comment on the new draft Management Plan for the Bob Creek Wildland and Black Creek Heritage Rangeland. We would congratulate the Alberta government on the protection of these two crucial parts of the Whaleback area, and on the distribution of this draft document for public comment.

Alberta Wilderness Association makes the following recommendations in response to the draft plan:

Off-Highway Vehicle Use. Recreational Off-Highway Vehicle (OHV) use is **not** an appropriate use of protected areas. The plan states: "*The primary goal of the Wildland and the Heritage Rangeland is as follows: To preserve the natural heritage ...of the two protected areas in perpetuity. Other provincial protected areas program goals ... are of secondary importance with respect to the protected areas. The heritage appreciation and outdoor recreation goals may be met, but only to the extent that their attainment does not conflict with or impinge on the preservation goal.*" The plan then goes on to propose allowing OHV access on designated trails. This is clearly in conflict with the stated aim of the plan. The Plan even mentions Bill 24 (the June 2003 amendment to the Wilderness Areas, Ecological Reserves and Natural Areas Act) "*prohibiting recreational off-highway vehicle use in Heritage Rangelands.*"

Of particular concern is a designated trail along White Creek, which is one of the few east-west animal migration corridors in the area, and of particular importance for migrating elk (the Whaleback supports one of the province's two largest wintering elk herds).

Transition Zones. The protected areas are a part of the larger Whaleback ecosystem. Lands outside the protected areas are also an integral part of this broader ecosystem, and should



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also be managed sympathetically. Oil and gas development adjacent to protected areas must not be allowed.

Funding. Management of protected areas such as these, including monitoring and enforcement, require adequate funding. Budgets of enforcement staff have been consistently cut during the past decade, and there is an urgent need to restore funds to manage these areas to a suitable standard.

Oil and Gas. Crown petroleum and natural gas leases in the protected areas, and outside, were donated to Nature Conservancy Canada in 1999 by BP Amoco. *"Our partnership with the Nature Conservancy ensures that oil and gas activity will never occur in the Whaleback protected area"* Said Joseph H. Bryant, President of Amoco Canada Petroleum at the time. The Department of Energy must offer these leases once they expire in April 2004.

Riparian Areas. More measures should be introduced to ensure that riparian habitat is not damaged by grazing operations. Section 2.1 (under Management Strategies) suggests, 'For watercourses where riparian areas are in a degraded state, these areas will be managed to bring about improvements such that: at least 20% of the riparian area is healthy and functioning; 70% is functioning at risk and; not more than 20% is in a non-functioning condition.' A target of 20% healthy and functioning is extremely unambitious, and certainly doesn't appear to fit in with the aims of the Alberta government's new 'Water for Life' policy. With limited use of water troughs and solar-powered water pumps, it would be reasonable to greatly improve upon this figure.

Carnivores. Management should allow for the full complement of native carnivore species. Management of potential livestock predators should focus on removing only individuals which are known to predate on livestock, while leaving non-predating animals.

We look forward to the opportunity to discuss these matters further.

Yours sincerely,

**Nigel Douglas,
AWA Outreach Coordinator**