



ALBERTA WILDERNESS ASSOCIATION
"Defending Wild Alberta through Awareness and Action"

April 17, 2018

Premier Rachel Notley

By email: premier@gov.ab.ca

Hon. Shannon Phillips, Minister Alberta Environment and Parks

By email: aep.minister@gov.ab.ca

Re: North Saskatchewan Regional Plan (NSRP) Regional Advisory Council (RAC) Advice

Dear Premier Notley and Minister Phillips,

Alberta Wilderness Association (AWA) appreciates the opportunity to comment on the North Saskatchewan Regional Plan Council's (NSRAC's) Recommendations Report. AWA works throughout the entire North Saskatchewan Region (NSR) and submitted detailed comments on the North Saskatchewan Region Plan (NSRP) in July of 2014 that we have attached to this letter as reference.

AWA would like to begin by noting our concerns with the serious lack of diversity on the NSRAC. The 24 members of the committee largely represented industry and municipalities, included only two women, and did not include First Nations representatives or environmental non-governmental organizations (ENGOS) that undertake advocacy work. Therefore, the recommendations from the NSRAC must be considered knowing there were important representatives missing from the deliberations.

SUPPORTING BIODIVERSITY

In 2015, Canada's federal, provincial and territorial governments committed to conserving at least 17% of Canada's lands and inland waters by 2020, otherwise known as Aichi Target 11 under the Convention for Biological Diversity. In keeping with this national and international commitment, the Alberta government has committed to protecting 17% of Alberta's landscape. While some of Alberta's natural areas, such as Rocky Mountains, are relatively well protected, many of Alberta's Natural Regions are poorly represented in the current network.

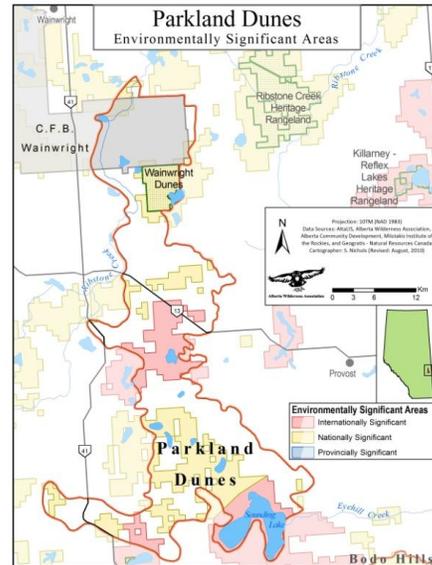
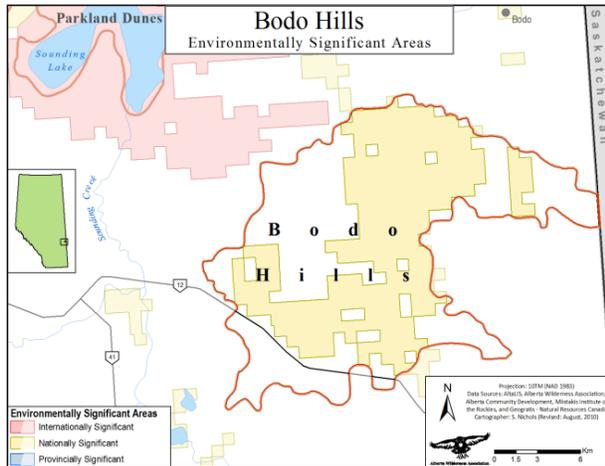
The North Saskatchewan Region contains critical priorities to protect some of Alberta's most threatened landscapes, including one of the last opportunities to protect the central parkland subregion and foothills natural region in the province. In addition, the North Saskatchewan River headwaters are also among the only ones in Alberta without legislated protection. The vital need to secure headwaters is undisputed.

The provincial government provided the NSRAC a number of candidate areas to consider for protection. AWA **believes these areas represent less than the bare minimum that must be protected** and we note that the NSRAC did not even reach consensus on protecting these areas.

Central Parkland

Currently, only 0.9% of the Central Parkland Subregion is protected and the provincial government has noted the "North Saskatchewan Region is essentially the only region that can fill representation gaps in the Central Parkland natural sub region on public lands". Therefore, **all of the conservation areas that have been identified within this natural region must be protected**, including the identified Ribstone Heritage Rangeland Expansion which did not achieve RAC consensus.

Protection of the Parkland Dunes (conservation areas #27-32 on Figure 2, pg. 63 of the NSRAC report) **must be expanded beyond what has been identified in the NSRAC report.** There are additional public lands within the area, much of which is leased for grazing purposes. While the amount of native vegetation remaining in these areas is likely depleted, the area still needs to be conserved and will maintain a larger connected landscape for native fescue. The establishment of Heritage Rangelands would maintain the stewardship grazing offers while simultaneously conserving these landscapes for future generations.



Bodo Hills makes up one of two largest blocks of aspen parkland/northern fescue grassland in the world. The majority of the 348.5 km² area is located within the Grassland Natural Region and lies between the southern edge of the Central Parkland and Northern Fescue zones. Habitat includes lush fescue grassland, aspen woodland and a variety of shrub and wetland types including alkali springs. More than 200 kinds of native plants, over 50 bird species and a variety of mammals as well as regionally or provincially rare plants are found here. High landform and plant diversity characterize this relatively small but significant area including areas that are contained within the Red Deer Region that must be conserved immediately in order to protect this critical landscape.

Foothills

The RAC advice contains little, if any protection of Alberta's Foothills Natural Region, despite the fact that less than 2% of Alberta's Foothills Natural Region is currently protected. AWA believes that **at minimum all of the government's proposed conservation areas within this region (#12, 21, 22, 23) must be protected.**

Headwaters

Protecting the North Saskatchewan Headwaters is one of the most straightforward and effective ways of accomplishing objectives of the Land Use Framework and safeguarding against the cumulative effects from multiple overlapping uses of the landscape that the NSRP is intended to manage. An important piece of Alberta's Eastern Slopes, the **Bighorn Wildland** is a large and intact wilderness located within the headwaters of the North Saskatchewan that retains its ecological integrity largely due to the absence of roads and industrialized access. The Bighorn contains vital headwaters landscapes, habitat for native and threatened species and the necessary conditions for healthy ecosystems to continue functioning. We also know the region holds great significance for Indigenous peoples, as well as current

and future generations of Albertans who enjoy and understand the intrinsic value of pristine wilderness to our health and well-being.

The NSRAC recommendations fall short of the protection that is needed for the Bighorn Wildland and must include, at minimum, those areas **promised for protection by the Alberta government since 1986** (proposed conservation areas #1-12, 14). The area would provide 4,000 km² of additional protection along the Eastern Slopes, east of Banff and Jasper National Parks and west of Highway 734 (the Forestry Trunk Road).

In the *Kiska/Wilson PLUZ and remaining public lands*, AWA supports the establishment of Public Land Use Zones and undertaking sub regional planning initiatives to establish legislative limits on land uses including industrial activity and motorized recreation, while recognizing and protecting critical bull trout spawning areas and other key conservation values. Our field tours of this region confirm that these public lands are currently suffering from decades of neglect and abuse resulting in excessive linear disturbance on the landscape.

AWA believes **that expanding protections of the North Saskatchewan, Ram, Brazeau, and Clearwater River corridors is an important opportunity** and would help to provide water security and protect important wildlife migratory corridors. It is important to note that keeping riparian corridors ecologically healthy does not preclude recreation opportunities such as fishing, swimming, canoeing and low impact camping.

Tourism

In general, the Bighorn is known and valued for being one of the last remaining areas of wilderness in the province and AWA maintains that it should remain that way. AWA believes highway-side regions are best left undeveloped and can provide pull over stopping points for viewing and accessing the wilderness. AWA is firmly opposed to any commercial development within Bighorn Wildland. The number of “tourism nodes” proposed along the David Thompson Highway Corridor need reassessment.

There are many excellent opportunities for tourism development and support (gas stations, hotels, etc.) within Nordegg, Caroline, Sundre and Rocky Mountain House and these towns are ideally situated gateway communities for the parks, and to service park visitors.

Fixed roof structures of any kind, or associated “adventure tourism experiences” are not appropriate within the Bighorn Wildland including, but not restricted to, the concepts of hut-to-hut backcountry travel or via ferrata. These activities are not compatible with maintaining a wilderness landscape.

Urbanization of wilderness must be avoided. The highest priority for Bighorn Wildland, given the extremely high ecological, scientific and natural history value and cultural significance to Alberta, is that of a legislated protected wilderness.

Camping

In general, AWA agrees that the provision of increased camping experiences is needed in the region, but we maintain that in addition to providing new front country campgrounds we must continue to provide random camping opportunities.

AWA generally approves of random camping, as a low cost and accessible provision of camping opportunities to Albertans. However, random camping is a privilege often abused. Consistent management and enforcement must be in place. Fourteen day limits on random camping are appropriate and offer ample opportunity to hikers and campers to explore and enjoy the surrounding wilderness areas. We find that in general these limits are being ignored; some campers are simply

squatters, setting up semi-permanent camps that last over the course of the season and often over several years. Random camping, if left unchecked, often places particular pressure on riparian habitat which is by far the most important for most forms of wildlife. We believe that random camping opportunities should continue to be provided and we support the avoidance of sensitive areas and the management of human waste at these sites.

Are the identified proposed public land recreation areas in Figure 4 intended as staging areas for motorized recreation? There is a proposed public land recreation area, which looks like it would replace the Blackstone Provincial Recreation Area. What are the intended changes in management and use with this designation? Without clarification it appears the change in designation would allow industrial development and weaken existing protection. Adjacent to the Red Deer River Provincial Recreation Area, there is a proposed expansion of the Recreation Area, the creation of a new recreation area and the creation of a Public Land Recreation Area that already exists. What are the intended uses with these different designations? For consistency and ease of understanding, the area may best be established as a Provincial Recreation Area.

AWA supports the proposed protection of Eagle Point Provincial Park. The protection must not be stopped as suggested in the RAC Report because of a perceived “loss” of an aggregate resource. **Gravel mining in this area should not be permitted.** Aggregate extraction within the 1:100 year floodplain is inappropriate as it poses significant and long lasting environmental risks to local water quality, groundwater, and wildlife. Intact floodplains are critical to provide natural flood and drought mitigation, as well as clean drinking water and habitat for terrestrial and aquatic species.

In conversations with local residents and members in the North Saskatchewan Region, we have noted that there is also an increased need to improve year-round availability for camping and non-motorized recreation opportunities, we hope that these opportunities will be provided in the NSRP.

Cumulative Effects

The 2008 *Land-Use Framework* made it clear that future planning needed to do a better job of managing the cumulative impacts of multiple activities on the landscape: “Our future well-being will depend on how well we manage our activities so that they do not exceed the carrying capacity of our environment.” The Terms of Reference for the NSRAC supported this, stating that “the cumulative impact of human activity is a growing concern for the region, particularly in areas of significant ecological importance and areas with prime agricultural land. The ecologically important eastern slopes of the Rocky Mountains, which provide central Alberta with much of its water supplies, are facing growing pressures from industrial development and recreational demand.”

Despite these terms of reference and the identified need for addressing cumulative effects management, the NSRAC advice fails to meaningfully address cumulative effects management. The RAC has not prioritized different activities in different areas. Instead the recommendations suggest that the landscape can be managed to allow for all activities to continue without any negative effects: everybody can have what they want if we just plan a little harder. This approach is uninformed, lacks foresight and is clearly unacceptable.

The NSRAC recommendations are weakened by avoiding difficult decisions between differing priorities and land uses. The RAC’s formal recommendations rely on voluntary practices and “enhanced management” and are unacceptable. For decades, we have witnessed, documented and discussed what best management practices, good intentions, and voluntary measures have failed to accomplish. The government is long overdue to take back responsibility for stewardship of our public lands, contrary to the RAC recommendations that will do little to secure the protection this vital area deserves.

The Alberta public has been clear throughout the Land-Use Framework process. Public consultation by the Alberta government in 2007 as published in the *Land-Use Framework Workbook Summary Report*, includes:

- 74.3% of participants believed that “at present, the balance between developing and using our land versus conservation of our land is too focused on economic development and growth”;
- 95% of participants were “concerned” or “very concerned” about the “failure to consider the combined (i.e. cumulative) effects of land-use activities.”

AWA recommends a thoughtful and responsible plan will recognize the impacts of cumulative effects and provide guidance that respects the needs for management of them. The Plan must address major land conflicts and cumulative effects management in order to be credible.

The proliferation of motorized access opportunities (industrial access roads, seismic lines, pipelines, transmission corridors, trails; a.k.a. *linear access*) constitutes one of the greatest threats to the survival of several species at risk in this region, including both land-based species like the grizzly and water-based species like the bull trout. A plan for the NSR would best serve wildlife by **incorporating existing, known science into specific thresholds and recommendations.** The [Alberta Grizzly Bear Recovery Plan 2008-2013](#) calls for management of linear access densities below 0.6km/km² in designated core grizzly habitat and 1.2 km/km² in remaining habitat. Bull trout are a threatened Alberta fish species that is sensitive to stream habitat degradation; permitting a road density of as little as 0.2 km/km² can reduce the probability of bull trout occurrence by about 30%. **Scientifically established limits on linear disturbance must be included in the NSRP.**

AWA is also concerned about existing management policies in effect in the North Saskatchewan. The Bighorn Wildland today is a largely intact functioning wilderness ecosystem due in no small part to the foresight of a couple of well-developed provincial policies that have shaped the region:

- Protection was the intent of the 1977 *Eastern Slopes Policy* (“A Policy for Resource Management of the Eastern Slopes”) for this headwaters area. The Eastern Slopes Policy was developed through a well-designed process that included the involvement of all Albertans, and established land management zoning (for example, *Prime Protection* and *Critical Wildlife* zones) that covers much of the Bighorn.
- The 1976 Alberta Coal Policy is a world-class energy policy that establishes land-management guidelines, also through a zoning system, of coal bearing lands.

AWA recommends it is fundamentally important to ensure that these same zoning and management policies are included under the NSRP.

Wetland Management

Wetlands in the North Saskatchewan are recognized as some of the most significant in North America, and represent the core of the prairie pothole region. These wetlands represent a landscape with one of highest rates of loss (60-70%). **Protecting the remaining wetlands within the North Saskatchewan Region (NSR), particularly within priority areas, should be a primary and urgent goal.** While the RAC identified priority wetlands for conservation and reclamation there was refusal to protect or limit destruction of remaining wetlands within the NSR.

The [Alberta Wetland Policy](#) released on September 10, 2013 leaves many implementation details such as thresholds and limits up to the regional plans, including the NSRP. **Defining wetland related thresholds, setting objectives to protect priority wetland areas and establishing legislative limits for**

wetland disturbance must be included within the North Saskatchewan Regional Plan (NSRP) and the Biodiversity Management Framework.

Increased protection to functioning wetland area in the region must be included in the NSRP given wetlands' importance to water security and biodiversity, high historic loss in the region, and public support for this goal.

Lake Management

Developing a lake management strategy, monitoring lake health and threats, and beginning to undertake recovery work in lakes that receive the most stress are all important first steps in identifying and addressing threats to lakes in the region. The RAC recommendations do not incorporate any proactive measures to immediately improve lake health. One of the biggest opportunities to advance conservation objectives would be to protect lakes that have ecological significance, such as prairie pothole lakes which are important for bird migration and flood mitigation. **The North Saskatchewan Regional Plan should identify and protect important lakes with limits on development, recreation and known pollution sources.**

Founded in 1965, AWA is a province-wide conservation organization with 7,000 members and supporters in Alberta and around the world. AWA promotes awareness and protection of Alberta's wild lands, wildlife and wild waters. In addition to our 50-year involvement in conservation efforts in the North Saskatchewan watershed, we have a longstanding expertise in the wilderness lands found within the NSR. We provided a detailed submission to the RAC in 2014, which as mentioned in the beginning, we attach here for your reference.

AWA hopes that the North Saskatchewan Regional Plan will be strengthened and the issues discussed in this letter will be addressed. We look forward to your reply.

Yours truly,
ALBERTA WILDERNESS ASSOCIATION



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