



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

November 29, 2018

The Honourable Rachel Notley
Office of the Premier
Email: premier@gov.ab.ca

The Honourable Shannon Phillips
Minister of Alberta Environment and Parks
Email: aep.minister@gov.ab.ca

RE: Bighorn Country

Dear Premier Notley and Minister Phillips,

For 50 years, Alberta Wilderness Association (AWA) has worked to protect the Bighorn Wildland. Our members and directors - old and new - have spent countless hours exploring and taking care of this last foothold of pristine wilderness in a province that is so largely developed.

The natural and pristine wilderness resources of the Bighorn are priceless. From secure clean water, to vibrant healthy forests and habitat for native and threatened species, protection of the Bighorn is long overdue. AWA is pleased, supportive and grateful for Premier Notley's conceptual ideas of Bighorn Country that will recognize and protect this significant missing piece in Alberta's protected areas network.

AWA is writing today to provide the following comments with hope that Bighorn Country achieves careful, well-reasoned management for its world class wilderness and adjacent public lands.

Bighorn Wildland Provincial Park

The proposed boundaries of the Wildland Provincial Park provide a pragmatic approach to protecting this vital wilderness area. AWA agrees that the mandate of the park must be the "conservation of biodiversity in an undeveloped natural landscape that retains the character that drew users to the area in the first place".

While the concept is excellent, a number of the details in the proposal appear to threaten the character of this wilderness area and contradict its mandate. From backcountry huts, ongoing helicopter tours, to increased development within the west planning area the ideas may not match the vision and the details need work. AWA believes development should be focused within adjacent public land use areas and nearby gateway communities in order to support local wilderness economies; not in the Wildland Provincial Park. Development within this Wildland paradise will degrade the very wilderness values that legislated designation and Wildland Provincial Park protection is meant to provide.

West Country Public Land Use Zone (PLUZ)

AWA believes that the creation of the West Country PLUZ will make a significant difference by providing government staff the ability to manage and enforce the impacts of land uses. Our field tours of this

region confirm that these public lands are currently suffering from decades of neglect and abuse. There is a critical need to establish legislative limits on linear disturbance and spatial footprint, protect critical bull trout spawning areas and other key conservation values, and invest in enforcement and restoration of damaged landscapes.

Off Highway Vehicles (OHVs)

Since 2003, AWA has monitored OHV traffic levels within and has physically walked the trails of the Bighorn on an annual basis, recording the effects of OHV use (and abuse) on the landscape. In our 14 years of documentation of the Hummingbird Trail system, we are able to say with confidence that the current level of OHV use in the fragile landscapes of the prime protection and critical wildlife zones is unsustainable. Our trail monitoring work makes it abundantly clear that confining OHV use to designated trails is not necessarily a solution to the damage OHVs can do to the land. AWA opposes the creation of any new designated OHV trails in the Bighorn Wildland Provincial Park. Any such trails, and the activity they invite, clearly contradict what the Bighorn Country Proposal document identifies as the Visitor Experience goal of a Wildland Provincial Park: “Protected areas where the primary purpose is the conservation of nature on large, healthy landscapes with opportunities for backcountry/wilderness recreation and experiencing nature in a relatively undisturbed state.” We are also concerned with proposals to retain OHV use in the proposed Provincial Parks; not only are these trails nominal and appear to serve no real purpose, they counter the very purpose of provincial parks. Furthermore, it is a serious mistake to limit “direct consultation” to local off-highway vehicle organizations when it comes to developing sustainable trails – our organization has been a steward of the Bighorn since the 1960s and, along with other non-motorized interests, should be part of any trail development consultation.

Camping

AWA is supportive of the proposal to provide “rustic group camping” opportunities in current popular random camping areas including the Bighorn Dam and David Thompson Provincial Park in order to accommodate growing demand. However, we stress the need to avoid sensitive areas when creating these opportunities. We believe that these opportunities should be provided at a low cost and available on a first-come, first served and time-limited basis in order to accommodate local communities. We support the management of human waste at these sites through the installment of washrooms and garbage receptacles.

Front country camping areas within Shunda, Snow Creek, and the Ya Ha Tinda Provincial Park also appear to be reasonable opportunities for formal front-country camping within Bighorn Country.

AWA agrees that the creation of backcountry campgrounds may be necessary in order to manage high volumes of human use in certain areas but AWA cautions that careful review and deliberation must be taken when considering any level of development in the Wildland Provincial Park.

Hunting

AWA agrees that hunting is a compatible use with the Bighorn Wildland Provincial Park. However, we emphasize that we do not support the use of off-highway vehicles for game retrieval. Traditional forms of game retrieval (by foot or horsepack) are a more compatible use with park values and will have the additional benefit of supporting local outfitters and guides in the area.

AWA is concerned about allowing hunting in the proposed Provincial Parks. These parks are relatively small, will contain concentrated levels of human use, and are largely inaccessible for hunting to begin with. Hunting is not permitted in the vast majority of provincial parks and we request that, as in the case

of Cypress Hills, there must be a strong ecological justification for any hunting season in these new parks.

In the case of the David Thompson Provincial Park, AWA suggests that the intent may be to provide hunting access to the neighbouring Wildland Provincial Park. If this is the case, AWA suggests the rules that apply to most provincial parks are sufficient for this purpose, "if a hunter is carrying a firearm in a provincial park or provincial recreation areas, or hunting in land adjacent to a park where they are staying, the firearm shall be unloaded and disassembled or fully encased".

AWA supports the Bighorn Country vision and hopes that the best on-the-ground outcomes will be achieved without further delay.

We look forward to your timely response.

With regards,

A handwritten signature in blue ink, appearing to read 'Joanna Skrajny', with a stylized flourish at the end.

ALBERTA WILDERNESS ASSOCIATION
Joanna Skrajny, Conservation Specialist

cc: AEP Bighorn Engagement, aep.bighorncountry@gov.ab.ca