

ALBERTA WILDERNESS ASSOCIATION



North Saskatchewan Regional Plan (NSRP) *AWA Priorities for the NSR*

North Saskatchewan Land-Use Framework Planning Region





Conservation Priorities

Bighorn

An important piece of Alberta's Eastern Slopes, the Bighorn Wildland is a large and intact wilderness that retains its ecological integrity largely due to the absence of roads and industrialized access. Most of the Bighorn's area was once within the national parks system. AWA is seeking Wildland Park protection for the Bighorn as was promised by the Alberta government in 1986. The area is 4,000 km² along the Eastern Slopes, east of Banff & Jasper National Parks and west of Hwy #734.



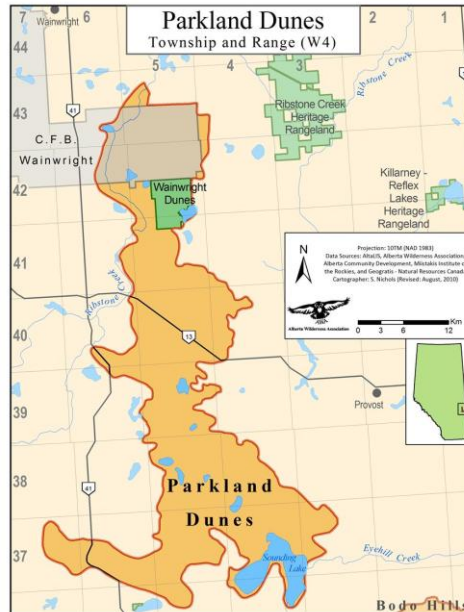
The Wildland has an adjacent 3,000 km² transition zone, and a further 1,000km² lie within the protected Siffleur and White Goat Wilderness areas, along with the Parks Canada-owned Ya Ha Tinda Ranch. There would be no surface access for industrial development within the Wildland, no motorized recreation within the Wildland and in the adjacent transition zone the Environmentally Significant Areas (ESAs) and Critical Wildlife Zones must be placed under development moratorium until proper assessment has been conducted to identify areas requiring protection beyond the core Wildland Park area. Any industrial and recreational activities occurring within this transition zone must be conducted to the highest standards in order to avoid ecological impact.





Parkland Dunes

The 932 km² Parkland Dunes is located in east-central Alberta, southeast of the Town of Wainwright. This AWA Area of Concern stretches from CFB Wainwright in the north to Sounding Lake and Neutral Hills in the south, encompassing the Wainwright Dunes, the Cluster of Unnamed Lakes, Sunken Lake, David Lake, and the hamlet of Metiskow (population ~100). An uncultivated island in a sea of agriculture, Parkland Dunes is a relatively undisturbed area that overlaps two rapidly vanishing, and generally unprotected, natural subregions, Central Parkland and Northern Fescue. A small portion of Parkland Dunes is protected under the *Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act*. Intended to preserve public lands for ecological purposes, this act created the 28 km² Wainwright Dunes Ecological Reserve, designated in 1988. The reserve is located 40 km south of Wainwright and is accessible to the public by foot only. AWA is seeking ongoing protection of the Ecological Reserve if not expansion of the protection to the surrounding important landscapes.



Bodo Hills



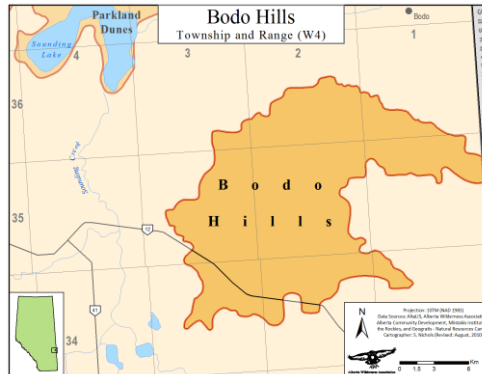
The Bodo Hills have International environmental significance and is one of two large blocks of aspen parkland/northern fescue grassland in the world. The majority of the 348.5 km² site is located within the Grassland Natural Region and lies between the southern edge of the Central Parkland and Northern Fescue zones. Habitat includes lush fescue grassland, aspen woodland and a variety of shrub and wetland types including alkali springs.



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Although numerous cultivated fields border the hills, the area contains much intact biodiversity and a range of ice age remnant features. The terrain is strongly hummocky within typical knob and kettle topography. Ice-thrust ridges are another remnant feature of the last ice age. 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. Sharp-tailed Grouse dancing grounds, Upland Sandpiper, and Cooper's Hawk have been reported. The area also provides provincially significant breeding duck habitat. High landform and plant diversity characterize this relatively small but significant area that AWA believes is worthy of protection.



North Saskatchewan River

The North Saskatchewan River is a glacier-fed river that flows east from the Canadian Rockies into central Saskatchewan. It is one of two major rivers that join to form the Saskatchewan River. The North Saskatchewan's headwaters lie in the national park icefields, but 90% of its flow arises in the Bighorn Wildland that AWA seeks to have protected within the provincial parks system. The basin of the Saskatchewan River within Alberta is made up of a complex diversity of natural land forms and ecological regions, which supports a wide range of human land uses and is vital to more than one million people including the City of Edmonton. But, human activities are polluting, diverting, and depleting the downstream fresh water resources of the North Saskatchewan River. In 2007 Dr. David Schindler and Bill Donahue reported that the North Saskatchewan's flow had diminished by 40 percent from what it was in 1912. Concerns for secure, clean and abundant water are paramount and must be addressed by the NSRP.





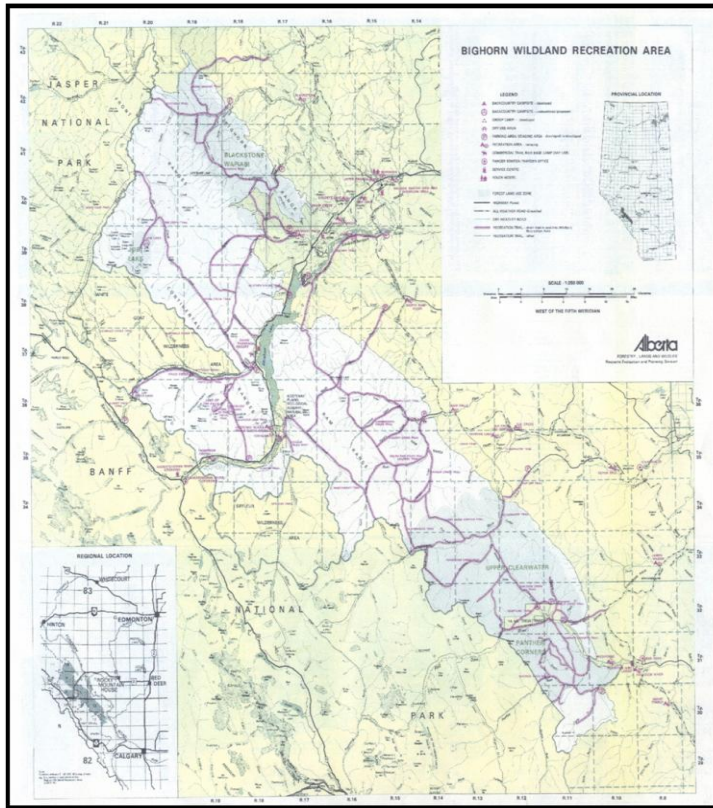
Existing Protected Areas

Maintain or improve designation of existing protected areas within the NSRP

Present day protected areas within the NSRP include Banff National Park, Elk Island National Park and Blue Quills National Wildlife Area (7044 km²). Provincial protected areas include parts of 14 provincial parks, 50 recreation areas, 2 wilderness areas (Siffleur and White Goat), 1 Wildland park, 63 natural areas and 2 ecological reserves (1735 km²). Beaver Hills Lake, within the Beaver Hills Lake Heritage Rangeland Natural Area is an internationally designated Ramsar wetland. There are opportunities within the NSR to add both Foothills and Grasslands Natural Regions to the protected areas network. The ??? report by Strittholt “.....” provides details on the high conservation value Foothills forests within the proposed Bighorn Wildland.

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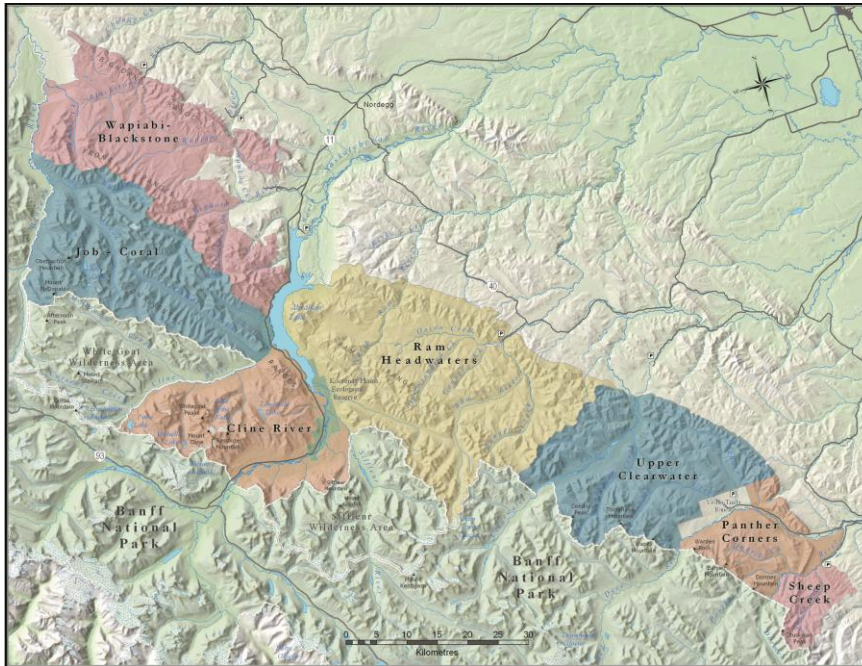
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“Bighorn Wildland Recreation Area” designated by the government in 1986, and placed on Alberta Road Maps – but never legislated.



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Public Land Use Zones (PLUZ – formerly FLUZ) within the Bighorn are shown on this map. The area to the east of the zones, an adjacent 3,000 km² transition zone within the proposed Wildland Park boundary would include the regulation of multiple use activities, including some industry and motorized recreations. Within the PLUZ there would be more restricted usage, protecting the headwaters and falling under Alberta Tourism Parks and Recreation portfolio as a Wildland Park.





Headwater Security

Designate Bighorn Wildland as a Wildland Park under the management of Alberta Parks

These headwaters form vital habitat for many wild species and are the source of water for millions of Albertans and other Canadians living downstream. They need protection from inappropriate industrial development, the effects of excessive linear access and from motorized recreation. Protection was the intent of the 1977 Eastern Slopes Policy for this headwaters area. Although the North Saskatchewan River arises in the ice fields of Banff and Jasper National Parks, 90% of its flow emanates from four sub-basins: the Cline, Ram, Clearwater and Brazeau, whose upper reaches form AWA's long-standing proposal for protection, known as the Bighorn Wildland Recreation Area. The Bighorn area contains some of Alberta's richest and oldest archaeology as well as historic trails used by aboriginals, early fur traders, outfitters, national parks wardens and our early forest service. The city of Edmonton lies downstream, as does Drayton Valley, Fort Saskatchewan, the Saddle Lake Indian Reserve, and much of Alberta's power generation.

The existence of the Alberta Eastern Slopes Policy and the Alberta Coal Policy, as well as the zoning ("Prime Protection" and "Critical Wildlife", that cover much of the Bighorn) have proved significant in maintaining the North Saskatchewan headwaters in the pristine condition they are found in to date. It will be fundamentally important to ensure that the same zoning and management policies are included under the NSRP.

AWA believes this area must be **legally designated as a Wildland Park falling under the management of Alberta Parks** as a result of the NSRP process. This change in status would include the following ramifications:

1. No mineral leases other than the existing, ones which would be phased out in time (minimal change from existing status).
2. No coal development (of which there is currently none) within park boundaries.
3. No commercial forestry (there would still be some management for fire and other threats) within park boundaries: everything west of the Forestry Trunk Road.
4. No cattle grazing allotments, of which there are none now within the park.
5. No provision for commercial tourism developments within the park.
6. The park would fall under the management of Alberta Tourism, Parks and Recreation (ATPR) instead of AESRD.





First Nations and Areas of Archeological Importance

Protect areas of traditional First Nations and archeological importance

AWA is aware of the importance of the Bighorn area to First Nations people having worked with the Bighorn Reserve members through the years of our long interest in the Bighorn Area and as we researched our book "*Bighorn Wildland*". AWA believes engagement with First Nations for increased understanding of their traditional use of the area, particularly those identified within the Bighorn Wildland, is a basic requirement for the success of the NSRP process.

There are sites of historic First Nations use within the Bighorn Wildland that may not have been members of the same nation as the Stony Nakoda Nation but those who travelled from British Columbia. There are important archeological sites worthy of protection near the YaHaTinda Ranch and at other locations in the Bighorn Wildland area.

Linear Footprint Density

Incorporate existing, known science into specific thresholds and recommendations

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, including both land-based species like the grizzly and water-based species like the bull trout. AWA believes the plan would best serve wildlife by **incorporating existing, known science into specific thresholds and recommendations**. For example, 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; newer science indicates an updated target of 0.85 km/km² in non-core habitat. The same targets are found in literature related to other threatened species and have been known for some time. **AWA believes these targets must be incorporated in the NSRP.**

Land Conflicts

Address and deal with land conflicts and cumulative effects management

NSRP must address major land conflicts and cumulative effects management. This plan must not become "all things to all people".





Sustainable Forestry

Dedicate North Saskatchewan headwaters forests for security of our water

Any logging that occurs in the North Saskatchewan headwaters forests must be performed in a sustainable manner that is ecosystem based with appropriate buffer zones in riparian areas backed up with specific thresholds and limits. AWA recommends a 20-25 metre buffer around all surface and ground water sources that would be expanded to 100 metres around any watercourse known to provide habitat for recognized species at risk, consistent with restrictions around Class 'A' watercourses already found in the Operating Ground Rules for logging companies operating in these forests.

AWA does not support commercial forestry in areas that currently have minimal human footprint, specifically any of the areas west of the Forestry Trunk Road including the area known as the Blackstone Wapiabi PLUZ.

There are three companies that have FMA (Forest Management Agreement) areas in the North Saskatchewan headwaters and watershed: Spray Lake Sawmills (SLS), Weyerhaeuser and Sundre Forest Products (SFP). SFP has the biggest footprint in terms of area and affected stream length / quantity of water flow. AWA is open to working with any of these companies to find ways of ensuring logging practices are sustainable from an ecosystem point of view as well as an economic perspective. These practices must protect the ecological integrity of the headwaters.

Coal

Coal development must adhere to 1976 Alberta Coal Policy

AWA believes the intent and environmental focus of the Alberta Coal Policy must be maintained or enhanced. The Policy was developed in 1976 following public hearings conducted throughout the province by the Environment Conservation Authority (ECA). Nearly 40 years later, concerns over development of natural landscapes have not lessened; indeed, concerns are more critical than ever. Key elements of the initial recommendations that must form part of any new approach to land management associated with coal development include:

The policy includes zoning of coal-bearing lands into four categories which reflect the knowledge of coal distribution that resulted from geological mapping by the Alberta Research Council and the Geological Survey of Canada up to 1975 and coal exploration efforts in late sixties and early seventies. Maintaining and respecting the four categories of the policy is essential:

Category 1 - prohibits surface disturbance in some of the most scenic and valuable lands for wildlife habitat and watershed protection, as well as within nationally and provincially designated areas



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Category 2 - allows only underground operations in foothills and mountainous areas deemed able to sustain such development

Category 3 - are lands that remain open to classification into one of the other three categories

Category 4 - allows underground or open pit operations but only in proximity to existing rail lines

The policy closed opportunity for mining in areas of sensitive mountain habitat and especially alpine or semi-alpine environment, or in areas too distant from infrastructure and fully opened development in category 4 lands. Categories 2 and 3 are a compromise between the two perspectives.

There is a fairly high-grade coal seam running through the area, especially near the town of Nordegg. There is currently no existing development of this coal seam.

Oil and Gas Development

All industrial development including oil and gas must be viewed in terms of cumulative effects and prohibited in pristine, prime protection and critical wildlife zones

There is some oil and gas development, especially in the southern part of the headwaters, in the area near Panther Corners. While footprints are small compared to other areas of the province, some current operators are looking to remove themselves from the area, which may leave room for other companies to come in, potentially with an expanded footprint. Areas further north, and west of the Forestry Trunk Road either do not have any mineral leases, or only have a few pre-existing leases that are being phased out and no new ones would be granted.

Wetlands

Increase functioning wetland area in the region

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. Consequently, it is important that these wetland-related thresholds be defined. Instead of referring to the strategy of "(establishing) regional wetland management objectives under the Alberta Wetland Policy," these objectives need to be explicit in this plan. AWA believes that a goal to increase functioning wetland area in the region is appropriate given wetlands' importance to water security and biodiversity, high historic loss in the region, and public support for this goal.

Biodiversity

**Recover species at risk and ensure healthy forests and watersheds,
and an increase in biodiversity**

AWA believes that maintaining biodiversity is insufficient as a goal; to recover species at risk and ensure healthy forests and watersheds, an increase in biodiversity is appropriate. There





are a number of species at risk in the North Saskatchewan Region; remaining intact native habitats must be protected. Biodiversity indicators and a management framework must be included in the NSRP, based upon work done by the Alberta Biodiversity Monitoring Institute (ABMI) for example in their [Status Report for the South Saskatchewan Planning Region - Preliminary Assessment 2011](#), which provides many examples of indicators of biodiversity health that are also applicable to the North Saskatchewan Region. Adopting a biodiversity management framework in this plan is crucial to provide direction to sectors about managing cumulative effects of land uses in the region; indeed, it goes to the heart of the Land Use Framework.

Species at Risk – Grizzly Bears **Secure critical wildlife habitat for grizzly bears**

The grizzly bear is one of the most glamorous and prestigious wildlife species in Alberta. Seen by many as the perfect symbol of Alberta's untamed wilderness, the grizzly is nevertheless under enormous pressure in the province. Grizzly bears once ranged across the whole of Alberta. With the extirpation of the plains grizzly in the late 1800's, their range is now restricted to the Rocky Mountains, Foothills and northwestern parts of the Boreal forest.

Three of Alberta's seven Bear Management Areas as set out in the *Alberta Grizzly Bear Recovery Plan 2008-2013* fall within the North Saskatchewan planning region, as well as Banff National Park, whose grizzly population has one of the lowest rates of reproduction in the world. The North Saskatchewan planning region also includes 48 Grizzly Bear Watershed Units (GBWUs): 39 designated *core grizzly habitat* and nine designated *secondary grizzly habitat*. The recovery plan recommends using open route densities as a surrogate for the amount of human use. The open route density is the total length of all open routes divided by the area of each GBWU. Those GBWUs designated as core habitat having an open route density higher than 0.6km/km² and those designated as secondary habitat having an open route density higher than 1.2km/km² should be targeted to find ways of reducing the level of landscape fragmentation.

Species at Risk – Bull Trout **Secure critical wildlife habitat for bull trout**

The bull trout, Alberta's provincial fish, was federally designated a threatened species in November 2012. However while AESRD has released a [Conservation Management Plan](#), there is no recovery plan for this species that has experienced significant population declines throughout the province. Recovery of the species must be more than just a paper exercise; it will require significant changes to the way in which the forested headwaters are managed. Forest management practices will need to be greatly improved if this indicator species is ever to stand a chance of recovering.





Species at Risk – Harlequin Duck
Mindful conservation of known Harlequin Duck habitat

This colorful bird is a marine bird that migrates inland to the fast flowing waters of the Rockies to breed. The harlequin duck is classified as *Special Concern* in the NSRP documents and *Sensitive* in the current Alberta *General Status of Alberta Wild Species* report. The report states late breeding maturity and intermittent breeding behaviour of this species results in low annual population growth. Breeding habitat is very specific and limited. Harlequins are vulnerable to human activities such as logging, mining, grazing, and recreation. Protection and management measures include restrictions on recreational boating and rafting on some streams and rivers in Alberta and include site-specific mitigation for the effects of mining. The habitat this bird depends on includes some of the fast flowing streams of the Bighorn Wildland and further support the need to protect this pristine wilderness.

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Motorized Off Road Recreation
**Develop a trail network that is properly designed and sustainable;
close and remove trails in sensitive backcountry areas**

Bighorn Backcountry as named and managed by Government of Alberta ESRD under PLUZ legislation makes up most of the headwaters west of the Forestry Trunk Road. AESRD webpage for the Bighorn is at: <http://esrd.alberta.ca/recreation-public-use/recreation-on-public-land/bighorn-backcountry/>.

Each PLUZ has different rules regarding OHV use ranging from none to extensive trail networks. In some areas there are seasonal restrictions on the trails. In general, the further one moves eastward, out of the mountains and away from the National Park boundaries, the more OHV activity is permitted. Some designated trails are unsustainable, damaging to their environment, and should not be where they are. Illegal activity causes damage, especially when users ride during particularly wet and vulnerable times of the year, or when they go “mud bogging” through streams, lake beds, bogs and other wetlands.

AWA 's project, the [Bighorn Wildland Recreation and Impact Monitoring Project](#) (BWRMP) monitors OHV trail use and is in its 11th year. Trail use in general is increasing (along with the overall increase in Alberta’s population, and the increasing availability of OHVs and other similar machines), and with that increase in activity is a corresponding increase in illegal activity.

With increased OHV activity in general, there is a greater need for management and the following:

- A trail network that is properly designed and sustainable and does not include sensitive backcountry terrain.
- OHV (and all, including non-motorized) users who respect the land, the environment, other users, and who stick to the network.
- Enforcement of trail regulations by government authorities.

