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

May 11, 2022

Brad Tucker
Senior Parks Planner, South Region Section
Alberta Environment and Parks
By email: brad.tucker@gov.ab.ca

RE: Writing-on-Stone Managment Plan, finalization

To Brad Tucker:

Alberta Wilderness Association (AWA) appreciates the opportunity to engage and comment on the Writing-on-Stone Management Plan. Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide, and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 7,000 members and supporters in Alberta and across Canada, AWA is dedicated to conserving Alberta's wilderness, and advocating for conservation strategies that protect our nation's biodiversity.

AWA supports the vision of the Writing-on-Stone Management Plan to preserve ecosystems, habitats and wildlife corridors, especially for the rare species and ecological communities represented in the park. Given the importance of the area to Indigenous cultural activities, we are encouraged by the engagement and involvement of Indigenous Peoples in park operations, and the support for conducting traditional activities in the park. We accept the need to provide opportunities for guided access to sensitive zones, provided the protection of natural and cultural landscapes is a primary consideration, and these opportunities do not exceed the landscape capacity for disturbance.

We approve of the protection to archeological sites, sensitive landforms and park biodiversity through zoning, enforcement and restoration. AWA strongly supports active conservation efforts of natural and cultural values, and the restoration and monitoring of grasslands and disturbed areas. We agree with the statement "To conserve biodiversity, management practices will not only focus on species, but also the protection of landscapes and their associated natural processes, including grassland and riverine ecosystems", and are encouraged by the objectives to develop clear metrics, maintain health of systems and wildlife corridors, and prioritize conservation in sensitive zones. We appreciate the inclusion of Indigenous knowledge into management practices, and the efforts to educate visitors on best practices.

AWA also supports the increased education focus on grasslands ecology and conservation, and the objectives to increase information dissemination on the park, as well as the monitoring of the archeological and natural features. We agree with the park offering experiential learning opportunities to enhance the experience, as long as caution is applied in sensitive areas. We approve of the park

working with research partners to address gaps in understanding, and look forward to seeing new knowledge addressed and applied to park management.

We strongly agree with the prohibition of off-highway vehicle use and hunting except for management purposes, and the restriction of adverse activities. We are encouraged by the objective to conserve viewscapes and soundscapes for nature viewing, and support the special protections around sensitive areas. Grazing and haying to manage invasive species needs careful management. While grazing can be used to manipulate the species composition, there has also been evidence to indicate livestock grazing may facilitate invasive species spread, and the effectiveness of grazing to manage invasive species depends on the area, the target plant, and the livestock used. We agree with the use of grazing where carefully managed and the risks to ecosystems are the lowest possible.

AWA accepts the expansion of recreational opportunities where necessary, although would like stronger assurances that the environmental impact of any developments will be carefully considered. The environmental review process mentioned in the Management Plan is encouraging, although it should include not only the direct impacts of any new developments or trail planning, but also a consideration of cumulative effects with the trails and facilities already present. We appreciate the focus on previously disturbed sites for additional campgrounds and the decision to minimize intrusions in new developments, and we accept expansion of facilities or trails may be needed to accommodate visitors and offer a range of visitor services. We support outreach and collaboration with the community and Indigenous groups, particularly the efforts to incorporate traditional knowledge, explore possibilities for partnerships and promote reconciliation.

Overall, we agree with the direction of the management plan to protect and conserve natural and cultural values, and to include Indigenous knowledge and guidance into management practices. We support the active efforts to manage and restore biodiversity and habitats, and are encouraged by the decision to develop and monitor specific metrics. We agree with the expansion of facilities and recreational and educational activities, provided this expansion considers all potential environmental impacts and is conducted with attention to the natural and cultural values the park protects.

Thank you for considering these comments. We look forward to the implementation of the management plan.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



Ruiping Luo
Conservation Specialist

455 12 ST NW, Calgary AB T2N 1Y9
Phone 403.283.2025 Fax 403.270.2743 awa@abwild.ca www.AlbertaWilderness.ca