



P.O. Box 52031,
Edmonton, AB., T6G 2T5
Ph: 780.424.5128 ext. 309
www.cpawsnab.org
infnab@cpaws.org

July 31, 2014

Honourable Dave Hancock, Q.C.
Interim Premier of Alberta
Room 408, Legislature Building
10800 – 97th Avenue
Edmonton, Alberta T5K 2B6
premier@gov.ab.ca

Bev Yee
Commissioner
Land Use Secretariat
9th Floor, 10035-108 St. NW
Edmonton, AB T5J 3E1
LUF@gov.ab.ca

Re: CPAWS Northern Alberta Submissions Regarding Phase 1 Consultation of the North Saskatchewan Regional Plan

Dear Sir/Madam,

Please accept this letter as the Northern Alberta chapter of the Canadian Parks and Wilderness Society's ("CPAWS Northern Alberta") official submission to the North Saskatchewan Regional Plan (the "Plan") Phase 1 Consultation.

CPAWS is a national conservation organization dedicated to the protection and sustainability of public lands across Canada. CPAWS has been active in conservation issues in Alberta since 1967 and is currently engaged in numerous discussions with the federal and provincial governments, industry, First Nations, and the Canadian public on land and wildlife conservation. Within CPAWS, the Northern Alberta chapter works as an advocate for conservation issues affecting Northern Alberta, and strives to educate and bring awareness to Alberta's residents and visitors about Alberta's wilderness and wildlife.

CPAWS Northern Alberta's role as an organization is to provide landscape-scale, science-based support and advice for the conservation and protection of Alberta's wild lands. Accordingly, CPAWS Northern Alberta would like to submit the following comments with respect to proposed conservation areas it views as priorities within the Plan:

- 1. The Plan should outline clear conservation goals and incorporate stronger language to legislate the protection of conservation areas in the North Saskatchewan Region.**

The terms of reference for developing the North Saskatchewan Regional Plan state that "establishment of new conservation areas can be considered as a means to contribute to the achievement of objectives

for biodiversity and filling of gaps in meeting targets for representation of Alberta's Natural Regions."¹ It is assumed that this statement makes reference to targets from Alberta Tourism, Parks and Recreation. These targets span all identified landscapes in each of Alberta's 21 Natural subregions. However, the target size and extent are not biologically defensible and do not meaningfully identify the gaps in protected areas within the Province. The targets recommend five widely separated areas of 10 square kilometers for most of the Province's themes. Yet, it is well known that many species require much larger reserve areas, such as grizzly bears who require protected areas greater than 10,000 square kilometers to persist². The targets also encompass less than 3% of the Province, a far cry from internationally accepted recommendations.

The International Union for the Conservation of Nature set targets at the 2010 meeting on the Convention of Biological Diversity for the protection of 17% of the world's terrestrial ecosystems, while Conservation International suggests that 25% of terrestrial ecosystems is a more appropriate target. Currently, only 12.5% of Alberta is protected, and only 4.2% is protected under provincial protected areas. This is far below the conservation targets recommended by both the IUCN and CI. Within the North Saskatchewan Region, many of the Subregions are underrepresented, with only 1.5% protected in Central Mixedwood, 2.6% in Dry Mixedwood, 1.0% in Central Parkland, 0.7% in Lower Foothills, and 1.6% in Upper Foothills.³ Most of the land that is protected in the region is found in the high elevation areas in Banff National Park.

A recent report by Global Forest Watch Canada indicates that forests are disappearing more quickly on the slopes of Alberta's Rocky Mountains than anywhere else in the province. The report states that, from 2000 to 2013, the eastern slopes of the Rockies lost 6.8% of their forests due to industrialization in areas that were not protected.⁴ Thus, it is imperative that protected areas not be designated solely as protected, but *legislated* as protected.

Why Increase Parks and Protected Areas?

Parks and protected areas are central to the Canadian identity, with Canada having one of the oldest and most extensive parks systems in the world. Studies have shown that Canadians need parks and protected areas for their health and economic benefits. Parks allow Canadian and International visitors to experience Canada's natural heritage, and a walk in a park can improve sleep quality and reduce stress levels. Exposure to nature has been linked to faster recovery from surgery, less reliance on medications, and lower job absenteeism. Parks, and the tourism associated with parks, create numerous jobs in a diversity of sectors, generate tax revenues for governments, and stimulate local and regional

¹ See page 29 of the Terms of Reference for the North Saskatchewan Regional Plan.

² R. Woodroffe, "Edge Effects and the Extinction of Populations Inside Protected Areas," *Science* 280, no. 5372 (June 26, 1998): 2126–28.

³ Percentages compiled using ArcMap 10.2.2. with data from Alberta Parks accessed July 04, 2014, <http://www.albertaparks.ca/albertaparksca/management-land-use/current-parks-system.aspx>.

⁴ Global Forest Watch Canada. *The State of Alberta's Forests - With A focus on the Eastern Slopes*. Online at <<http://globalforestwatch.ca/node/204>>. 2014 Global Forest Watch Canada.

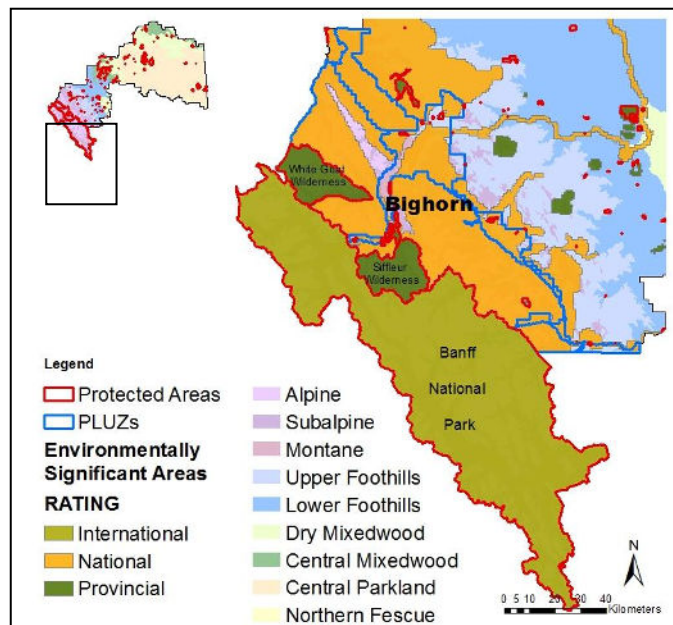
economies. In 2009, visitors to Canada’s parks supported more than 64,000 full-time jobs, generated \$2.9 billion in labour income, and \$337 million in tax revenue.⁵

Parks and protected areas are also critical for Alberta’s and the North Saskatchewan Region’s wildlife. Wide ranging species, such as caribou and grizzly bears, require intact forest habitat in order to sustain their populations. Industrial development, commercial development, mismanaged recreational activities, roads and seismic lines have extremely detrimental impacts by fragmenting habitat and providing greater access by predators. Other species of concern in the region which require increased protection of natural areas are harlequin ducks, piping plover, bull trout and birds of prey such as eagles, peregrine falcons and ferruginous hawks.

CPAWS Northern Alberta believes that the following *legislated* protected areas should be established in order to increase the volume and diversity of protected land across the North Saskatchewan Region, to protect the region’s sensitive wildlife, and to protect the region’s natural heritage:

a. The Bighorn Backcountry (“Bighorn”), including the Upper Foothills

Bighorn is a large and intact wilderness along Alberta’s Eastern slopes, containing over five thousand square kilometers of public lands. Since 1986 it has been designated as a recreation area by the Alberta government, but legislation of this designation has not occurred, The Bighorn is currently divided into six Public Land Use Zones (“**PLUZs**”): Kiska/Willson, Panther Corners, Ghost, Blackstone/Wapiabi, Job/Cline, and the Upper Clearwater/Ram. The Upper Foothills east of these PLUZs is not currently managed.



Bighorn falls within the Environmentally Significant Area (“**ESA**”) #20 in the Rocky Mountain region, which is of “National” significance, with 195 elements of conservation concern including woodland caribou of the mountain ecotype, grizzly bears and peregrine falcons, as well as 17 rare or unique landforms. Natural subregions include Rocky Mountain Alpine, Sub-Alpine, and Montane, as well as Upper Foothills. The large intact forests and soil form high quality

⁵ Canadian Parks Council. *Connecting Canadians with Nature*. Online at <http://www.parks-parcs.ca/english/ConnectingCanadians-English_web.pdf>. 2014 Canadian Parks Council.

watersheds which include the North Saskatchewan, Red Deer, James, Panther, North and South Ram, Clearwater, Bighorn, Wapiabi, Blackstone, and Brazeau rivers, providing clean drinking water to central Alberta, Saskatchewan, and Manitoba.

CPAWS Northern Alberta believes that the Bighorn Backcountry including the Upper foothills east of the Bighorn's PLUZs should be listed as a Wildland Provincial Park to preserve and protect the natural heritage of this region while providing opportunities for backcountry recreation. Tourism is an important industry in this area, with multiple companies providing guided paddling, climbing, hiking, cycling, and other recreational activities. Increasing legislation in the Bighorn and Upper Foothills to establish the area as a Wildland Provincial Park would continue to allow these recreational uses while ensuring protection of important ecological habitats and landforms so that the natural beauty that draws tourists to the area will remain. A Wildland Provincial Park would be an appropriate designation for the Bighorn due to its large, relatively pristine and intact, unfragmented environment.

b. Beaver Hills/Cooking Lake Moraine

The Beaver Hills (also known as the Cooking Lake Moraine), located immediately east of Edmonton, is an extensively treed upland area rich in wetlands and aspen-dominated forests. The Beaver Hills have been nominated as a UNESCO Biosphere Reserve by the Beaver Hills Initiative, with the aim of integrating sustainable economic growth, social development and environmental protection. As part of the Dry Mixedwood Natural Subregion, it serves as a transitional zone between the southern Aspen Parkland and the northern Boreal Forest subregions. It has been considered the most productive of the boreal subregions for wildlife, thanks to the diversity of habitats and productive shrub growth that it provides.⁶ The moraine was formed during the retreat of glaciers about 9000 years ago, and consists of over 1500 square kilometers of "knob and kettle" terrain that supports many wetlands and small lakes, which are key breeding areas for waterfowl and other avian life. Functioning as a groundwater



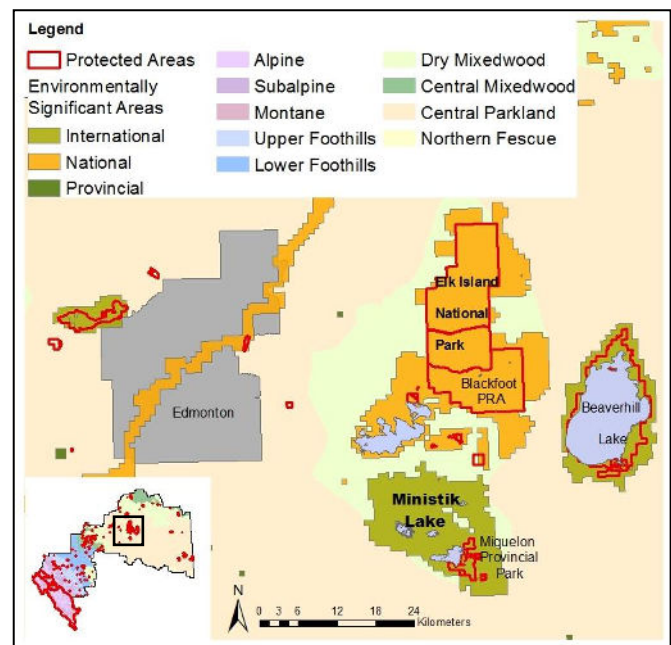
recharge area, the moraine transfers surface water into aquifers supplying some of the major water features of the region, including the North Saskatchewan River.

The importance of the area has been known since the late 1800's when much of the moraine was designated a federal forest reserve. Today, the Beaver Hills contains a network of disconnected patches of protected areas ranging in size and management intent, from the almost 200 square kilometer Elk Island National Park to

⁶ W L Strong and Keith R Leggat, "Ecoregions of Alberta. Alberta Forestry, Lands, and Wildlife, Land Information Division," *Resource Information Branch, Edmonton, Alberta, 1992.*

the 0.025 square kilometer Antler Lake Island Natural Area. Despite current increasing land use in the area, some areas of the Beaver Hills remains heavily forested. However, the important Beaver Hills ecosystem is at risk of disappearing and requires special consideration for conservation and protection. CPAWS Northern Alberta is proposing the development of an Ecological Reserve within the southern portion of the Beaver Hills that will include the Ministik Bird Sanctuary and a corridor that connects it to Miquelon Provincial Park.

The Ministik Bird Sanctuary is an area of over 80 square kilometers of crown land that was designated a bird sanctuary in 1911. There are limited trails and road access to the sanctuary, although private land and oil and gas developments have provided some internal public access.⁷ The area between the Ministik Bird Sanctuary and Miquelon Provincial Park remains heavily forested and provides an important corridor for wildlife. This corridor was designated the Miquelon Bird Sanctuary in 1911, but although it retains its Sanctuary Status it is not currently managed. Both the Ministik and Miquelon Bird Sanctuaries fall within an ESA of “International” rating, which contains nine elements of conservation concern including the American white pelican, ferruginous hawk, piping plover, western burrowing owl, and northern long-eared bat.



Designation of the southern portion of the Beaver Hills as an Ecological Reserve under the *Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act*⁸ would provide strict preservation of the natural ecosystems, habitats, and associated biodiversity found within this region. The area is critical waterfowl habitat and requires legislated protection to ensure that the important habitats and diversity of species remain.

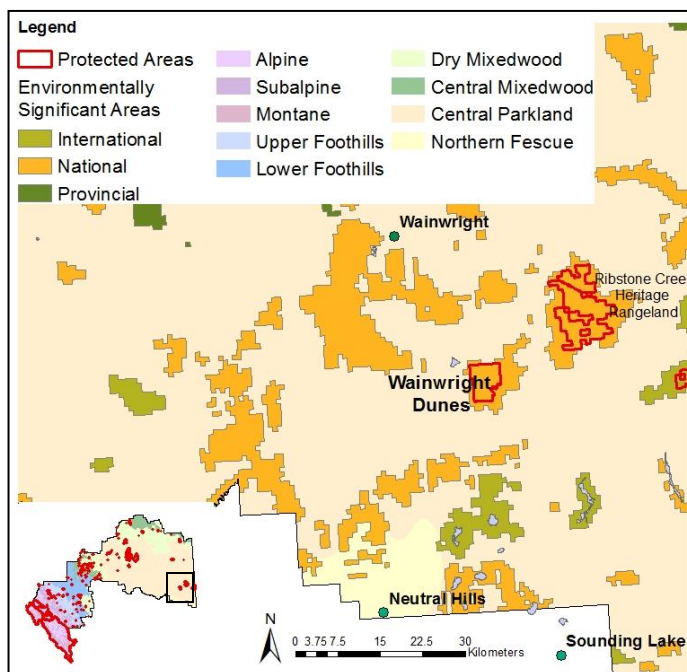
c. Parkland Dunes

Almost 70% of Alberta’s Central Parkland falls within the North Saskatchewan Regional Plan, acting as a broad transitional area between the drier grasslands of the plains and the Mixedwood and Coniferous forests of the Boreal Forest and Rocky Mountains. Native Central

⁷ “Wildlife Management Plan - Ministik Lake Game Bird Sanctuary,” *Alberta Forestry, Lands and Wildlife - Fish and Wildlife Division and Ducks Unlimited Canada*, 1989.

⁸ R.S.A. 2000, c. W-9

Parkland sustains a rich diversity of plant and animal life within its mosaic of aspen forest, fescue grasses, and wetlands. Unfortunately, much of the native parkland has already been converted to farmland due to its productive soils, moisture levels, and climatic conditions conducive to agriculture. It has been estimated that 85-95% of the Central Parkland region has been lost to cultivation, urbanization, roads, agriculture, and oil and gas developments, and the area of uncultivated land continues to decline today.⁹ All remaining patches of native parkland should be considered a priority for protection within the North Saskatchewan Regional Plan.



One of the only surviving patches of original parkland today stretches from the Wainwright Dunes south to the Sounding Lake sand plain. The 28 square kilometer Wainwright Dunes located southeast of the Town of Wainwright was designated as an Ecological Reserve in 1988 under the *Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act*.¹⁰ CPAWS Northern Alberta urges the North Saskatchewan Regional Plan to expand this Ecological Reserve to preserve the surrounding important landscapes from the Town of Wainwright south to Sounding Lake and Neutral Hills. This area includes multiple ESAs that range from

national to international significance, with key habitat for species at risk, including nesting areas for the piping plover, a species designated as “endangered” by the Committee on the Status of Endangered Wildlife in Canada. The native plant and wildlife that is dependent on the habitat in the Parkland Dunes is at high risk and requires legislated protection to ensure that what little is remaining of the native Central Parkland region is preserved.

d. North Saskatchewan River corridor – from Bighorn to the City of Edmonton

CPAWS Northern Alberta is proposing the establishment of a corridor of protected areas along the North Saskatchewan River, from the Bighorn to the city of Edmonton. The North Saskatchewan River is an important river in the region, providing clean drinking water to communities along the river and to the City of Edmonton. Although its uppermost headwaters

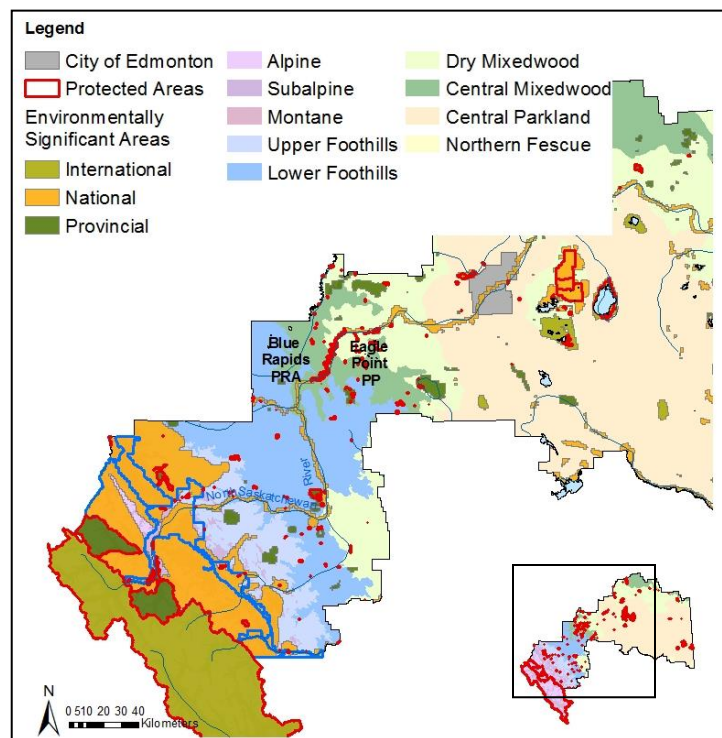
⁹ Alberta Environmental Protection, “The Parkland Natural Region of Alberta,” *Natural Resources Service, Recreation and Protected Areas Division, Edmonton, AB, 1997.*

¹⁰ *supra* note 6

are protected within Banff National Park, 90% of its flow arises in the Bighorn and does not have formal legislated protection. Clean water from the North Saskatchewan River is vital to more than 1,000,000 Albertans, including the City of Edmonton, and the river valley creates important riparian habitat that is critically important to biodiversity within the region. However, flow of the river has diminished by 40% since 1911,¹¹ and much of the area outside of the mountains has been converted to agriculture. Water quality is consequently lower as it moves downstream. It is therefore essential that the North Saskatchewan Regional Plan protects the river and surrounding area, and addresses a clear management plan for the river to ensure secure, clean, and abundant water for future generations of Albertans.

Riparian areas are among the most productive and valuable of all landscape types, and 80% of Alberta's wildlife relies in whole or in part on riparian areas to survive. Riparian areas also help to trap sediment, maintain banks, reduce flood damage, and filter and buffer water from runoff, all helping to maintain or improve water quality. According to the NSRP Profile of the Region, only 11% of riparian areas are considered healthy in the settled part of the province,¹² with the health and functioning of riparian areas influenced by activities such as agriculture, resource extraction, road construction, urban or rural development, and recreation. Creating a corridor of protected areas along the river from the Bighorn to the City of Edmonton would help to maintain biodiversity and restore water quality in the North Saskatchewan River.

Habitat loss and fragmentation of a landscape has been recognized by many to be the key threat to biological diversity.¹³ Within the North Saskatchewan Region, human activities have modified the environment to the extent that it resembles a mosaic of human settlements, agricultural lands, and scattered fragments of natural forests and grasslands.



¹¹ D.W. Schindler and W.F. Donahue, "A Case Study of the Saskatchewan River System," in *Rosenberg Conference on Managing Upland Watersheds in an Era of Global Change*, 2005.

¹² See page 91 of the NSRP Profile of the Region.

¹³ International Union for the Conservation of Nature ("IUCN"), *The World Conservation Strategy* (IUCN, UNEP, WWF: Gland, 1980).

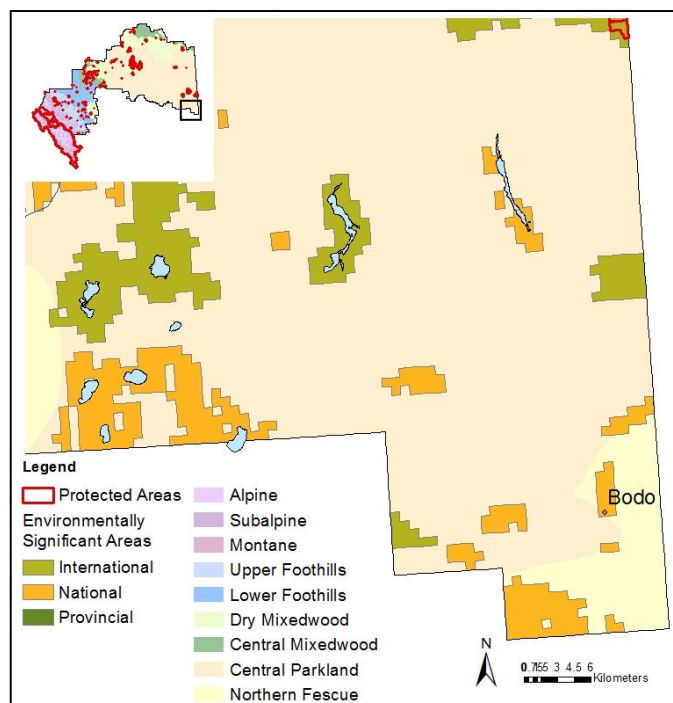
The creation of habitat corridors that not only physically connect larger protected areas but that also span Alberta's natural regions would allow for wildlife to disperse and provide habitat to support and maintain biological diversity.

The river also offers numerous tourism opportunities, including paddling, rafting, camping, or hiking. Protecting the river from development along its banks would increase the availability of the river as an avenue of recreation for Albertans and for visitors.

Currently, the only protected areas greater than 10 square kilometers within our proposed habitat corridor are the 35 square kilometer Blue Rapids Provincial Recreation Area and 19 square kilometer Eagle Point Provincial Park near Drayton Valley. CPAWS Northern Alberta proposes that a habitat corridor be legislated as a Natural Area under the *Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act*.¹⁴ This habitat corridor would connect the Bighorn to the Blue Rapids Provincial Recreation Area and to Eagle Point Provincial Park, and to the City of Edmonton, and would thereby create protected areas connecting all eight of the natural subregions within the North Saskatchewan Regional Plan.

e. Bodo Hills

The Bodo Hills, located at the transition between Central Parkland and Grassland Natural regions, make up one of two large blocks of aspen parkland/northern fescue grassland in the world. Although the hills are bordered by cultivated fields, the area still contains intact native habitat and large natural areas. There are over 200 species of native plants and over 50 species of birds, including the ferruginous hawk and the western burrowing owl. A variety of mammals also roam the typical knob and kettle topography leftover from the last ice age. CPAWS Northern Alberta proposes that the Bodo Hills be legislated as a Heritage Rangeland under the *Wilderness Areas, Ecological Reserves, Natural Areas and Heritage Rangelands Act*,¹⁵ to protect this small but ecologically significant area.



¹⁴ *supra* note 6.

¹⁵ *ibid.*

Recommendations

- Bighorn should be protected legislatively as a Wildland Provincial Park, which would exclude industrial development from the area;
 - New protected areas should be put in place in the Beaver Hills, Parkland dunes, and the Bodo Hills; and
 - A habitat corridor protecting the North Saskatchewan River, river valley, and riparian habitats should be put in place, spanning the province's natural regions and providing habitat to support and maintain biological diversity.
- 2. The Plan should incorporate known, sound science before allowing further industrialization or commercialization, should follow previously adopted policy in the region, and should incorporate the Precautionary Principle.**

In addition to the sensitive natural areas described above, the Plan should follow certain principles and incorporate what is known scientifically about how land use impacts Alberta's wildlife. For example, clear cuts and seismic lines in forests have been shown to negatively impact caribou populations by decreasing the area of intact forest available to herds and by providing increased access to the herds by predators such as wolves. In addition, mismanaged recreational activities that fragment and disturb forest and parkland habitat have negative impacts on grizzly bears and aquatic species. Scientifically established targets should be incorporated into the Plan to ensure that future land use does not increase pressure on already threatened areas and species, and best practices should be established to ensure that any industrial activity that does occur is conducted with minimal impact to the landscape and wildlife.

The Plan should also adhere to policies already in place for the protection of the region, such as the Alberta Coal Policy and the Alberta Wetland Policy. Where thresholds or implementation details are vague or undefined in such policies, the Plan should strive to identify and define such thresholds, while incorporating the Precautionary Principle – no further industrialization or commercialization should be allowed in the North Saskatchewan Region if the impacts on the region's wildlife, water quality, air quality or biodiversity are unknown or unclear. Incorporation of the precautionary principle is smart management and in the best interests of all Albertans; a healthier North Saskatchewan Region is more sustainable and will be more economically productive in the long run for both citizens and industry.

Finally, CPAWS Northern Alberta urges the Plan to recognize that it cannot be "all things to all people." As surely as commercial, agricultural and industrial interests should be considered, so must the interests of the region's citizens and wildlife. The Plan should not attempt to satisfy commercial, agricultural or industrial interests at the expense of the region's wildlife and natural areas.

The Plan is an opportunity to make smart and sustainable decisions about the North Saskatchewan Region's future. The region's natural heritage is among the most diverse in the province of Alberta, and deserves to be considered and protected.



P.O. Box 52031,
Edmonton, AB., T6G 2T5
Ph: 780.424.5128 ext. 309
www.cpawsnab.org
inforab@cpaws.org

CPAWS Northern Alberta appreciates the opportunity to submit comments on the Plan, and looks forward to working with all stakeholders into the future.

Sincerely,

Danielle Pendlebury
Conservation Coordinator
Canadian Parks and Wilderness Society – Northern Alberta

Alison Ronson
Executive Director
Canadian Parks and Wilderness Society – Northern Alberta

- cc: **Hon. Robin Campbell, Minister, AESRD**
west.yellowhead@assembly.ab.ca
- cc: **Hon. Richard Starke, Minister, ATPR**
tpr.minister@gov.ab.ca
- cc: **Graham Statt, ADM Parks Division, ATPR**
graham.statt@gov.ab.ca
- cc: **Chad Willms, LUF Planning Lead for North Saskatchewan Region**
chad.willms@gov.ab.ca