

February 2019



PURPOSE

This policy statement provides an overview of the Red Deer River Watershed Alliance's official submission on land use in Bighorn Country. This work was conducted in alignment with an engagement process led by AEP in 2019 regarding a proposal to establish Bighorn Country. This was passed by a majority of our Board members in February 2019.

WHO WE ARE

The Red Deer River Watershed Alliance (RDRWA) is the designated Watershed Planning and Advisory Council (WPAC) for the Red Deer River watershed. WPACs are multi-sector, collaborative, not-for-profit organizations that assess watershed conditions, lead in watershed planning, and promote the good stewardship and proper management of water resources.

Our activities support the three pillars of Alberta's Water for Life Strategy: 1) Healthy aquatic ecosystems; 2) Reliable quality water supplies for a sustainable economy; and, 3) Safe, secure drinking water. The RDRWA works to achieve these goals by serving as a forum for information exchange and dialogue, raising awareness of critical watershed issues, and by promoting the use of best practices and integrated management of land and water resources. As a science-based organization, the RDRWA has engaged a broad network of stakeholders across multiple sectors to support the development of a State of the Watershed report (2009), Blueprint: An Integrated Watershed Management Plan for the Red Deer River watershed (2016), and ongoing research and policy recommendations related to multiple watershed management issues.

BACKGROUND

• The Government of Alberta commenced work in 2019 on a proposal to develop a new parks and land-use system in the area known as Bighorn Country, along the eastern slopes of the Rocky Mountains. The proposed Bighorn Country would include a new wildland provincial park, three provincial parks, four public recreation areas, and two public land use zones (PLUZ) west of Rocky Mountain House and Sundre.

PROPOSAL AREA

The proposed Bighorn Country area includes a sizeable portion of the headwaters of the Red Deer River watershed (Figure 1), including parts of the Panther, James, Raven, and Medicine subwatersheds. The Bighorn proposal would affect land uses in the following areas with footprint in the Red Deer River watershed (Table 1):

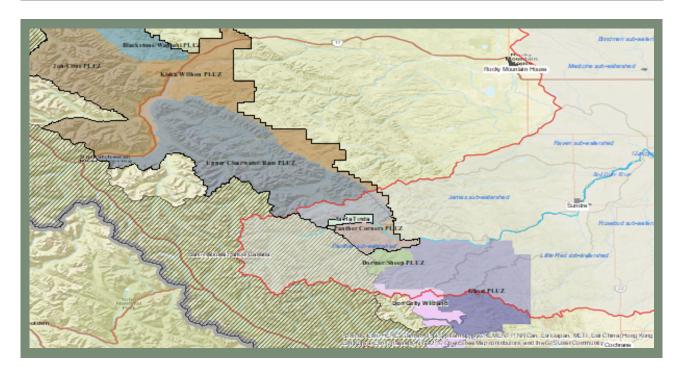


Figure 1. A map showing the intersection of the Red Deer River Watershed (outlined in red) and the southern extent of Bighorn Country (outlined in black), based on the current boundaries of public land use zones.

Table 1. Proposed and current land-use designations in the parts of Bighorn Country with footprint in the Red Deer River watershed, with proposed permitted and non-permitted industrial and recreational uses. Bolded items marked with a Δ reflect a change in permissions from the current state.

Proposed	Current		ustry	Recreation	
		Permitted	Not Permitted	Permitted	Not Permitted
Ya Ha Tinda Provincial Park	Overlaps with: Upper Clearwater/ Ram PLUZ Kiska/Wilso n PLUZ Ya Ha Tinda Public Land Recreation Area	 Existing Petroleum/Nat ural Gas Freehold Minerals Existing grazing Existing trapping 	 New Petroleum/Nat ural Gas (Δ) Metallic & Industrial Minerals (MIM) and Coal Sand and Gravel (Δ) Commercial forestry 	• Auto	 Backcountry camping (Δ) Drones (Δ)

Bighorn Wildland Provincial Park	Overlaps with: Panther Corners PLUZ Upper Clearwater/ RAM PLUZ Kiska/Wilso n PLUZ	 Existing Petroleum/Nat ural Gas Freehold Minerals Existing grazing Existing trapping 	 New Petroleum/Nat ural Gas (Δ) MIM and Coal Sand and Gravel (Δ) Commercial forestry 	 OHV Backcoun try camping Equestria n Cycling Foot access Hunting, Fishing, Guiding Helicopte r Auto access camping (Δ) Tourism Facilities 		
Kiska/Wils on PLUZ	Kiska/Wilson PLUZ (small boundary changes)	 Petroleum and Natural Gas MIM and Coal Freehold minerals Sand & Gravel Grazing Trapping 	Commercial forestry	 OHV Backcoun try camping Auto Access camping (existing) Equestria n Cycling Foot access Drones 		
				 Hunting, Fishing, Guiding Helicopte r Tourism Facilities 		
West Country PLUZ		To be determined through more stakeholder engagement. Proposed management direction is to continue to permit all forms of industrial and recreational activities on public lands, with additional recreation planning in four sub-regions: Brazeau, Prairie Creek, Nordegg River, and James River. The James River sub-region is located in the Red Deer River watershed. Does not include privately, municipally, or federally titled lands.				
Ya Ha Tinda Ranch	Ya Ha Tinda Ranch	No change. Federal land.				
Don Getty Wildland Provincial Park	Sheep/Dormer PLUZ	While the Sheep/Dormer Public Land Use Zone is included in the current boundary of the Bighorn, it is not included in the new proposal for the Bighorn Country. This area of land has been recommended through the South Saskatchewan Regional Plan to be an expansion of the Don Getty Wildland Provincial Park.				

Table 1. indicates that the Bighorn Country proposal would limit additional oil and gas development and sand/gravel extraction in the proposed Bighorn Wildland Provincial Park and Ya Ha Tinda Provincial Park (two specific areas within the overall plan). There are no foreseen impacts on the forestry industry. Off highway vehicles (OHVs) would have access to each of the areas with footprint in the Red Deer River watershed, either on designated trails or in designated areas. The proposed Ya Ha Tinda Provincial Park would offer frontcountry camping facilities and act as a staging area for the more remote Bighorn Wildland Provincial Park, which would be managed with a focus on conservation.

As part of the South Saskatchewan Regional Plan, the area currently known as the Sheep/Dormer PLUZ is already slated to be included in an expansion of the Don Getty Wildland Park. Taken together, the realization of the Bighorn proposal would lead to an interconnected system of parks (Don Getty Wildland Provincial Park, Bighorn Wildland Provincial Park, and Ya Ha Tinda Provincial Park) spanning a major portion of the Panther River sub-watershed along the Eastern Slopes. Distinct from this park system, the West Country PLUZ is a new proposed area that will continue to permit industrial and recreational activities on public lands, but will enable detailed recreation management planning and the identification of a trail network.

COMMENTS

The RDRWA welcomes the window of opportunity to provide comment on the proposals for the Bighorn Country and recognizes this as an opportunity to better address potential cumulative effects within Alberta's watersheds. Our comments below relate to the proposals for Bighorn Country with direct footprint in the Red Deer River watershed.

- 1. Bighorn Country is an area of critical hydrological importance for communities across the Red Deer River watershed. Over 50% of the total water yield in the Red Deer River originates from snow and rain in the Rocky Mountain and Foothill regions in the upper headwaters (Kienzle and Mueller, 2010), which includes the southern toe of the proposed Bighorn Country. Because the headwaters capture and convey such a significant volume of water for downstream use, source water protection is an essential water security strategy for communities and industry in the basin. This is particularly important given that the South Saskatchewan River basin, which includes the Red Deer River watershed, is expected to face serious water resource stresses linked to a changing climate (ibid; Schindler and Donahue, 2006). Studies indicate that streamflow regimes along the Eastern Slopes are already changing through reduced winter snowfall and earlier spring snowmelt (Farr et al., 2018). Projected increases in temperature and shifts in the timing and form of precipitation may also further alter the volume, consistency, and quality of streamflow generated in the headwaters (ibid). Protecting these "water towers" is critical for the water security of communities downstream, to reduce vulnerability to extreme events like flood and drought, and to ensure there is enough quality water for drinking water, for agriculture, for industry, and for nature.
- 2. We support the need for integrated multi-use planning in Bighorn Country. Notably, the Panther River sub-watershed was identified in our 2009 State of the Watershed report as the most pristine sub-watershed in the basin, with an overall condition rating of "A" (Aquality, 2009). The Panther River sub-watershed is critical for the overall basin's water supply (Kienzle and Mueller, 2010; O2, 2013), is home to wildlife species that require additional protections (Weaver, 2017), and is highly sensitive to potential non-point source contamination from land-use pressures (O2, 2013b). Any land-use planning in this sensitive area should consider the integrity of the headwaters, the connectivity of critical wildlife corridors, and support responsible recreation.

3. Additional consultation and recreation planning is needed for the area currently proposed as the West Country Public Land Use Zone. The southern portion of this proposed zone overlies the James River and Raven River sub-watersheds, which were both given overall condition assessments of Fair (B+) in our 2009 State of the Watershed Report (Aquality, 2009). There is an extensive network of linear developments in the area, mostly consisting of roads and cutlines (Aquality, 2009; Farr et al., 2018). Importantly, rare peat-forming bogs and fens make up 7.4% of the James River sub-watershed (O2, 2013), and this peatland cover should be maintained because of the important ecosystem services they provide. While we support the need to thoughtfully plan and manage multiple land uses across this area through a lens of cumulative effects, the Red Deer River Watershed Alliance also strongly encourages the Government of Alberta to meaningfully engage local stewardship groups and affected stakeholders in any planning for this region, to not rush this process, and to focus on building on the significant work already undertaken by local stewardship and recreation groups. We would also like to participate in planning related to recreation in the James River sub-region.

Moving forward, the Red Deer River Watershed Alliance would appreciate the opportunity to comment on any detailed plans pertaining to areas of Bighorn Country with footprint in the Red Deer River watershed, and the opportunity to participate in the sub-regional recreation planning for the James River system (part of the proposed West Country PLUZ). We also encourage our partners to make use of technical resources available on our website, including our 2009 State of the Watershed Report, and a series of technical reports which address issues including water quality, land use, water quantity, and biodiversity (see www.rdrwa.ca). Managing for the cumulative effects of development and all activities on the environment at a regional level will require a thoughtful and coordinated effort among all partners. We all have a role to play, and it is our hope that any plan for Bighorn Country will prioritize headwaters protection, provide a mix of recreation and industrial opportunities, and support traditional land-uses by Indigenous peoples.

This submission was supported by a two thirds majority of the RDRWA Board.

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