



Honorable Shannon Phillips
Minister of Environment and Parks
208 Legislature Building
10800 – 97 Avenue
Edmonton, AB
Canada T5K 2B6

December 4, 2018

Dear Minister Phillips,

The Alberta Backcountry Hunters and Anglers (ABHA) is an organization dedicated to conservation of wild spaces throughout North America for the benefit of ecosystems, wildlife, and the enjoyment of hunters, anglers and other recreationists. The Bighorn Backcountry and the adjacent public land is a priority conservation area for our organization, and we were pleased to see the release of the Bighorn Country Proposal last week. Congratulations on taking steps to ensure long-term conservation in the region. We support the overall intent of the proposal, in particular the creation of the Bighorn Wildland Provincial Park and the West Country Public Land Use Zone (PLUZ).

The Bighorn Backcountry is one of the few remaining intact landscapes on Alberta's eastern slopes that has not been extensively fragmented by industrial development and motorized recreation. Collaboration between the government and the Bighorn Standing Committee has maintained a multi-user landscape with a limited number of motorized vehicle trails that are subject to trail closures where necessary. We are pleased that the government will continue to seek the advice of this committee on recreation management in Bighorn Country moving forward.

Changing the designation for much of the Bighorn Backcountry from a PLUZ to a Wildland Provincial Park provides certainty that this area will remain a high-value ecosystem and backcountry hunting and fishing destination. Unlike a PLUZ, where industrial development and forestry are permitted, the management goal of a Wildland Provincial Park is to protect undeveloped natural landscapes while retaining opportunity for backcountry adventure.

Within the Bighorn Wildland Provincial Park, we are concerned with the focus on increasing tourism and the potential for the development of huts, trails, and other tourist attractions to detract from the pristine and remote wilderness setting of the Bighorn, diminishing opportunity for those who value the region as a true backcountry destination. Bighorn Country, and in particular Bighorn Wildland Provincial Park, should be managed with the intent of maintaining wilderness with tourism opportunities focused in the communities adjacent to Bighorn Country.



This approach would still economically benefit these communities without degrading the backcountry experience. At the very least, before any development in the Bighorn Wildland Provincial Park proceeds, we request that environmental impact assessments, as well as consultation with recreation groups be conducted, to ensure minimal impact on fish and wildlife habitat and to maintain quality opportunities for all recreationists in the park.

We strongly believe that Wildland Provincial Parks are the ideal conservation designation in Alberta, protecting ecological integrity and backcountry recreation opportunities. Therefore, we would have preferred that the Wildland Provincial Park designation encompassed all of the PLUZs that currently comprise the Bighorn Backcountry, and we have the following recommendations to ensure the lands outside of the Wildland Provincial Park are managed to conserve and improve fish and wildlife habitat and backcountry recreation opportunities.

1. The designation of three Provincial Parks in Bighorn Country will impact hunters even if hunting opportunities are retained, as hunting will be restricted to areas away from expanded facility/tourism zones. As we mentioned earlier, the remote and wild nature of the Bighorn should be retained and any/all tourist attractions such as restaurants, zip-lines, and other retailers should be developed in the surrounding communities. Plans for David Thompson Provincial Park are of particular concern, as this area could see a significant tourism increase that would diminish the backcountry nature of the area and negatively impact high-quality winter range for ungulates.
2. With the introduction of the Wildland Park, due to existing restrictions on the use of dogs within Wildlands (refer to our letter from Jan. 31, 2018, see attached), this will result in a loss of hunting opportunities for upland game bird and cougar hunters who currently have no restrictions within the Bighorn country. We urge the department to take this into account and consider allowing off-leash dogs in Wildland Parks while employed in a lawful hunt, as this has a large impact on the hunting community, as demonstrated within the Castle Wildland.
3. The West Country PLUZ designation for the public lands east of the Kiska-Willson PLUZ is an important management decision that ABHA supports. The West Country has long been subject to unsustainable land use practices from forestry, industry, and recreation. These combined pressures have degraded habitat for native fish populations, diminished habitat quality for elk and mule deer, and reduced the opportunity for backcountry recreation in a landscape heavily fragmented with roads, seismic lines, pipelines, and other development features. For both the West Country and Kiska-Willson PLUZ, we would like to see land use and recreation management plans developed that include science-based limits on motorized roads and trails, management of random camping, protection of threatened native fish species, comprehensive habitat fragmentation analysis of all human activity, and creation of additional areas of non-motorized use.



4. The Bighorn Backcountry is currently managed for an array of recreation users and the Bighorn Country Proposal retains these opportunities. The area has long been underfunded for both habitat restoration and enforcement. Because recreational use of Bighorn Country is expected to increase, we believe that funding needs to be clearly designated in the proposal for both of these issues to ensure that habitat and quality of experience is improved and not degraded by the proposed changes.

Thank you for the conservation leadership you have shown by bringing the Bighorn Country Proposal to the Alberta public. We appreciate the efforts made in the proposal to incorporate the values that ABHA endorses, and we look forward to working with Alberta Environment and Parks to refine the proposal for the benefit of the Bighorn's majestic wilderness and for the hunters and anglers who venture there.

Sincerely,

Alberta Backcountry Hunters & Anglers

cc. Deputy Minister Beverly Yee