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Alberta Environment and Parks  
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To whom it may concern:

*Re: Lower Kananaskis River – Barrier Lake Redevelopment  
Bow Valley Provincial Park  
Draft Plan for Public Consultation*

The Canadian Parks and Wilderness Society-Southern Alberta Chapter (CPAWS-SAB) is pleased to provide the following comments in response to the above-noted draft plan.

#### **1. INTRODUCTION**

The Canadian Parks and Wilderness Society (CPAWS) is Canada's only nationwide environmental charity dedicated solely to the protection of our public lands and waters, and ensuring our parks are managed to protect the nature within them. Founded in 1967, CPAWS-SAB is a respected leader in the conservation and stewardship of the Southern Albertan landscape. We strive to educate, collaborate, engage, and empower Albertans in developing solutions that safeguard, connect, and expand parks and wilderness areas. Over the past fifty years, we have worked successfully to increase protection for Alberta's sensitive and essential habitats, including the Whaleback, the Castle, and Kananaskis Country (K-Country).

CPAWS SAB has decades of experience influencing management planning for K-Country. Our two thousand members in Alberta regularly camp, hunt, fish, ride, hike, paddle, ski, and otherwise experience the many recreational and wilderness opportunities there.

We have carefully reviewed the *Draft Plan for Public Consultation (Draft Plan)* regarding the proposed redevelopment along Highway 40 from Canoe Meadows to Barrier Lake. Our lens during our review is primarily from the perspective of protecting ecological integrity.

Overall, we agree that this plan will have benefits for the ecology of K-Country. The following components of the plan will have a positive impact and CPAWS-SAB recommends their implementation:

- shrinking the Facility Zones at Barrier Lake, the Visitor Centre, and Canoe Meadows and expending the Preservation Zones
- concentrating the recreational footprint away from the wildlife corridor
- formalizing and decommissioning trails to reduce random trail development
- paving parking lots
- decommissioning roads
- installing deceleration lanes and reducing the speed limit on Highway 40 from Canoe Meadows to Barrier Reservoir

All of the above are steps that likely will, at least in the short term, reduce impacts or prevent them from growing.

However, much of the plan appears to be responsive to recreational activities that have been initiated by users, such as white-water courses and river surfing and associated special events, without any provincial regulatory oversight or approval. Rather than determining whether the emergence of such activities on public land is appropriate, the plan is designed to accommodate, encourage, and expand such use. We question whether this is the appropriate response.

Further, we believe the plan could be improved by addressing the issues we describe below.

## 2. CONTEXT

The six-kilometre stretch along Highway 40 from Canoe Meadows to Barrier Lake is very ecologically important. The entire area is within a wildlife corridor connecting patches of sensitive habitat, and the area around the Barrier Lake site is critical for wildlife movement. The Lower Kananaskis River is considered critical habitat for a variety of species because of its low elevation, longer growing season, long snow-free season, lower snow pack, and high percentage of aspen and mixed wood forest.<sup>1</sup> The entire length of the project area essentially acts as a bottleneck where animal movement is constrained by steep slopes and human development.<sup>2</sup> This narrow and critical movement corridor not only is constrained by topography, it also is fragmented by Highway 40, existing day use areas along the Highway and existing trails.<sup>3</sup> In fact, much of the project area is classified as Primary or Secondary sink habitat, where mortality risk is high even though habitat quality also is high.<sup>4</sup> Given the importance of the project area to connectivity for a variety of large mammal species and the existing fragmentation, we believe that the overall goal of any redevelopment in the region should be to increase habitat security and connectivity.

The project area is a small part of the much larger Bear Management Area (BMA) 5 and is designated as “core” habitat for grizzly bear (*Ursus arctos*) management purposes. Conflicts

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<sup>1</sup> *Draft Plan*, page 55.

<sup>2</sup> *Ibid.*, page 56.

<sup>3</sup> *Id.*

<sup>4</sup> *Draft Plan*, page 57.

with grizzly bears due to public safety in BMA 5 are the second highest of any BMA,<sup>5</sup> and 36 bears were removed from this BMA between 2009 and 2013 in response to human-bear interactions.<sup>6</sup> It is thought that the grizzly population may be increasing in the northern reaches of BMA 5, i.e., K-Country.<sup>7</sup> However, the mortality rate for grizzly bears in this BMA is substantially over the thresholds for population growth.<sup>8</sup> Wildlife-vehicle collisions are the single largest source of grizzly bear mortality in the BMA.<sup>9</sup>

Among the priorities within the provincial draft *Grizzly Bear Recovery Plan* for this BMA are:

- Improving and implementing attractant-management initiatives and
- Developing strategies to mitigate wildlife-vehicle collisions.<sup>10</sup>

These imperatives suggest avoiding development and activities that might increase the availability of attractants or increase vehicular traffic on Highway 40, or both.<sup>11</sup>

### 3. OVERNIGHT ACCOMMODATION

New overnight accommodation, both tent sites and so-called 'comfort camping' sites, are proposed for the Barrier Reservoir location, and the number of overnight guests is being increased at Canoe Meadows. We suggest that these plans, particularly new camping at Barrier Reservoir, are ill-advised and in conflict with the province's draft *Grizzly Bear Management Plan* for the following reasons:

1. Grizzly bears are intelligent animals that are highly adaptable to human use when it is predictable. The area's grizzly bears know that there will be no overnight human presence at Barrier Reservoir and are able to use overnight periods to move between important habitats in Bow Valley Provincial Park. Allowing new overnight presence of humans at these locations will disrupt that predictability and increase the likelihood of grizzly-human interactions.
2. Facilitating overnight camping at Barrier Lake and growing the number of tent sites at Canoe Meadows greatly increases the likelihood of improperly stored food and other materials that are attractive to grizzly bears, again increasing the likelihood of conflicts potentially leading to human injury or bear removal.

The addition of new overnight accommodation, where none has existed before, is a major concern to CPAWS-SAB because of potential conflicts with wildlife.

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<sup>5</sup> *Alberta Grizzly Bear Recovery Plan*, Draft June 1, 2016 <http://aep.alberta.ca/files/GrizzlyBearRecoveryPlanDraft-Jun01-2016.pdf>, page 15, Table 5.3.

<sup>6</sup> *Ibid*, page 23.

<sup>7</sup> *Ibid*, page 22.

<sup>8</sup> *Id*.

<sup>9</sup> *Ibid*, page 28, Table 5.8.

<sup>10</sup> *Ibid*, page 23.

<sup>11</sup> We suggest that Alberta's *Grizzly Bear Management Plan* and its application to the project be included in the list of relevant legislation and policies in section 5.1 of the *Draft Plan*.

We recognize that the *Bow Valley Protected Areas Management Plan* (2002) contemplates even more extensive overnight accommodation along Highway 40 than is contemplated by the *Draft Plan*. However, aspects of that plan already have been rejected by the provincial government, as demonstrated by the rejection of many aspects of the proposed 2011 redevelopment plan. This Management Plan is now fifteen years old, a time during which we have learned a lot about wildlife management and strategies for reducing human-bear conflicts. Given the importance of the Highway 40 corridor adjacent to Barrier Lake for grizzly bear habitat and movement and the imperatives of the *Grizzly Bear Recovery Plan*, it makes no sense to us to create the potential for greater conflict by installing overnight camping facilities at Barrier Reservoir.

#### **4. VISITOR GROWTH**

For the most part, it appears this plan is designed to better manage current visitor levels, which is commendable. However, there are aspects of the plan that will directly encourage growth in visitor use. This concerns CPAWS-SAB because of the ecological impacts of increased human use and the potential for increased human-wildlife conflicts, including collisions with wildlife.

The proposed white-water training facility at Canoe Meadows, in particular, appears designed to attract more users to the vicinity. Visitor use in K-Country is highly likely to increase dramatically over the next several decades, even without the provision of specific attractions. In twenty-five years, the population of Calgary is predicted to approach 2.5 million people.<sup>12</sup> The challenge for Alberta's public land managers will be to maintain visitor use at levels that are ecologically sustainable (see comments below under "Future Management"). It is detrimental to those objectives to create new facilities that will encourage visitor growth.

#### **5. INTERPRETATION AND EDUCATION**

The protection of the ecology of Alberta's public lands must be the paramount management consideration, particularly in the mountains and foothills that are the last refuge for many large mammal populations. Northern K-Country, in particular, is very important for its role in providing critical habitat for wildlife and for the wildlife movement corridor that connects the Kananaskis River Valley with the Bow River Valley.

It is essential that visitors to K-Country understand this context and their role in helping to preserve the ecological values of the area. The more knowledge that visitors have about the area's ecology, the more likely they are to appreciate and support a management approach that prioritizes wildlife protection. Knowledgeable citizens will be the future defenders of K-Country.

We would like to see a much greater emphasis throughout the plan on a comprehensive approach to heritage interpretation and environmental education that ensures visitors are constantly reminded of the special place in which they are recreating and their responsibility to

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<sup>12</sup>Michael Wright, 'Calgary and area projected to hit 2.4 million by 2041', *Calgary Herald*, July 10, 2014  
<http://www.calgaryherald.com/news/alberta/calgary+area+projected+million+2041+graphic/10015881/story.html>

help preserve it. Signage, brochures, interpretive loops, and interpretation events are some ways in which this can be accomplished.

## 6. FUTURE MANAGEMENT

The Draft Plan explicitly states that it represents the 'build out of this area for the foreseeable future'.<sup>13</sup> However, other than this statement, nothing is proposed that would guarantee that no future infrastructure is considered within the planning area. CPAWS-SAB suggests that Alberta Parks consider mechanisms, such as legislation, that would make this commitment a reality and discourage prospects for future development.

## 7. CONCLUSION

CPAWS-SAB congratulates Alberta Parks for undertaking such a thorough review of the planning area and recommending many measures, identified above, that will reduce impacts and channel human use away from critical wildlife areas. However, we think that more can be done to protect and educate K-Country users about the ecological importance of this area. In particular, we recommend that new camping options at Barrier Reservoir be removed from the plan, that the concept of a white-water training facility be abandoned until a comprehensive assessment of need, carrying capacity, and management of current and future use is assessed as well as an impact assessment of this development on the ecological integrity of the area. We also recommend that education and interpretation be given a higher priority in the planning area.

Thank you again for providing Albertans with the opportunity to comment on the *Draft Plan*.

Respectfully submitted,



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<sup>13</sup> *Draft Plan*, p.5.