

AOHVA Comment to:

Draft Ghost-Waiparous - Operational Access Plan

Date: May 30 2005

The Alberta Off-Highway Vehicle Association (AOHVA) believes that in order to create effective access management plans; there are standard project management principles and processes that must be utilized to ensure success. These processes are standard practices in industry when embarking on a project of this scale. We wish to offer SRD our view of these principles pertaining to land access planning:

- Comprehensive land management and equitable treatment demands that all users impacting a plan area have their impacts assessed simultaneously within comparable protocols. This includes industry, commercial operators, grazing and all recreational uses.
- Stakeholder buy-in requires extensive stakeholder to stakeholder face to face processes/interaction throughout the planning process.
- Protocols, definitions, assessment criterion and other key parameters for the plan along with acceptable impact mitigation measures should be established and agreed to by stakeholders at the outset.
- Fair and transparent plans require open communication of meeting minutes, data, progress reports, maps, studies, etc. to all stakeholders on a non-preferential basis as to scope and timing. An informed public is to be sought not avoided by restricting information distribution.
- Objective science should be the determining factor for modification, mitigation, or possible discontinued use - unsubstantiated opinion, or pre-emptive generalizations deserve no credibility.
- Report writing teams should include user appointed representatives from all major groups to ensure the underlying decisions and ultimate report writing are unbiased and/or dissenting opinions are heard.
- Interim reports should specify the basis for curtailment of use or access by specific location to enable users to respond to preliminary findings.
- Government teams working access plans should include representatives from all ministries with authority to impact the access plan and its implementation. These representatives should be in attendance at stakeholder meetings, or someone with authority to speak on their behalf should be designated.
- Most of the environmental abuse that has been allowed to go unabated is caused by a radical OHV element and abetted by the near total absence of SRD enforcement. To a large degree damage is a direct result of SRD abdicating its mandate. Responsible OHV users seek meaningful penalties along with comprehensive enforcement.

After a review of the Draft Operational Plan and planning process to date, the AOHVA wishes to provide the following comments:

Topic: *Plan to address four primary subject areas*

- The topics of User Safety, Natural Resource Sustainability, Minimize Conflicts and Provide Recreational Opportunities presented in the plan are not entirely consistent with the IRP: Sec 2.4 Recreation, Objectives (1-4) and Guidelines (1-5). By using the IRP Objectives and Guidelines the Draft Plan would provide consistency in the process as well as provide additional outcomes that are required for a successful plan. The IPR provides requirements for addressing all forms of recreational activity, not just motorized. As seen in the May 14th 2005 meeting there is a need by all stakeholders to address all the issues, not just OHV trails.
- SRD has failed to show how their trail selection and rejection methodology has met any of the 4 criteria (User Safety, Natural Resource Sustainability, Minimize Conflicts and Provide Recreational Opportunities). Indeed, SRD has indicated no selection or rejection methodology, or supporting information for their positions.
- SRD has failed to show how OHV use is damaging water quality in the Ghost River, or how GAMP will improve water quality or volume. Rocky Mountain Dirt Riders Association presented data directly from the Alberta Water Quality database that showed the Ghost River water quality is pristine. Indeed it is better than the Bow River water quality. A recent study in the McLean Creek area; *'Monitoring Turbidly Events at a Ford on Howard Cr., a Small Stream in the McLean Creek Off-highway Vehicle Use Zone'* (Brewin, Eisler and Baayens, 2003), managed to determine that OHV's crossing a stream did cause turbidity but failed to determine impact. In fact the study states; "...there has been little research conducted to help resource managers better understand the impacts of OHV activity in streams on fish and fish habitat."
- SRD has failed to show how OHV use is creating harm to Threatened and Endangered Species, or how GAMP mitigates any harm. According to the November 2004 Canadian Species At Risk report by COSEWIC, there are no Threatened or Endangered species in Ghost/Waiparous.

Topic: *Introduction – Recognition of significant increase in OHV activity*

- The second paragraph recognizes the displacement of motorized users in the Ghost as the result of the access restrictions imposed on Kananaskis Country. While stating statistics on the efforts of the Alberta Government to add facilities such as camp grounds and an additional 170km of trail to handle this displacement, this brings up a bigger question. Where are the now displaced OHV users going to go? This plan fails to address the user displacement to Willow Cr., McLean Cr., Clearwater, Dutch Cr. Livingstone etc. This plan fails to fit into a cohesive Provincial long term plan and ignores long term impacts on other regions. Inter-regional and overall provincial impacts resulting from this plan must be addressed.

- The IRP states; “*OHV use is a legitimate activity and highly valued by many users of the area.*” In Section 2.4 Recreation it also states that the area provides facilities for; “*...staging areas for an estimated 1197 km (960 Mi.) of developed off-highway vehicle (OHV), motorcycle and snowmobile trails.*” It is our opinion that the current Draft Map fails to recognize this fact as stated in the IRP. A proper inventory of the existing trails must be completed before any designated trail can be implemented. Failing this, the “...opportunities for summer and winter recreation OHV use” will be severely compromised. Much more discussion is warranted before decisions are taken.
- Guidelines on how to manage motorized random camping activities required definition up front rather than later in the document as found in Section: ‘*Signs*’. Why is it that only random camping involving on-highway vehicles are of concern when the issues around random camping have been stated as water quality and human waste? The plan does nothing to address these issues in areas where there is high foot and equine usage. A significant number of motorized campers are entering the bush with well equipped motor homes and trailers that are self contained and waste is hauled away. The plan must address all random camping and commercial camps equally. It has been stated that the area of greatest concern is the Prime Protection (Zone 1) with headwater quality being the foremost issue. OHV’s would be of the least concern considering that OHV’s pass through Zone 1, depositing no waste, and are there for a relatively short period of time, a couple of hours at most. Whereas foot, bicycle, or equine users may linger for a day or days, leaving behind human and animal waste, waste water etc. for this period.
- OHV’s not being permitted in the Don Getty Wildland Provincial Park is not supported by legislation, or the IRP. Heritage Rangelands is the only designation that does not permit motorized recreation.

Quote from the AB Community Development Web site:

“Wildland provincial parks preserve and protect natural heritage and provide opportunities for backcountry recreation. _____

- *Wildland parks are large, undeveloped natural landscapes that retain their primeval character.*
 - *Trails and primitive backcountry campsites are provided in some wildland parks to minimize visitor impacts on natural heritage values.*
 - *Some wildland parks provide significant opportunities for eco-tourism and adventure activities such as backpacking, backcountry camping, wildlife viewing, mountain climbing and trail riding.*
 - *Designated trails for off-highway vehicle riding and snowmobiling are provided in some wildland parks.”*
- The IRP in Section 2.5 Access, Guidelines #2 states; “*Snowmobile use will considered and permitted on selected routes in Zone 1 when approved though the access management plan.*” It goes on to state snowmobiling can

be permitted in Critical Wildlife (Zone 2). Permitted uses are well documented and the Draft Plan fails to recognize this, again limiting recreational opportunities. Using the guise of low snow pack to limit snowmobiling opportunities limits the long term vision this plan should provide. Consistency between Government departments is required. All opportunities must be explored to facilitate plan longevity.

Topic: Trends in Off-Highway Vehicle Sales

- In 2003, AOHVA and ASA conducted an economic study for the value of the ATV, dirt bike and snowmobile industry in Alberta for the year 2002. This data is available for your use in the plan as the study shows the significant economic contribution motorized recreation provides this province.

The Economic Impact of Off-Highway Vehicles and Snowmobiles in Alberta

	Off-Highway Vehicles	Snowmobiles	Total
Direct Expenditures	\$410,221,345	\$238,704,007	\$648,925,352
Value Added Impact	\$421,612,076	\$231,192,430	\$652,804,506
Total Wages (Direct, Indirect and Induced)	\$249,976,306	\$123,481,137	\$373,457,443
Total Employment (Direct, Indirect and Induced)	8,129	4,113	12,242
Taxes			
➤ Federal	\$107,359,370	\$56,060,248	\$163,419,618
➤ Provincial	\$51,298,965	\$27,583,661	\$78,882,626
➤ Local	\$17,246,298	\$9,240,526	\$26,486,824
➤ Total	\$175,904,633	\$92,884,435	\$268,789,068

Source: The Economic Impact of Off-Highway Vehicles and Snowmobiles in Alberta in 2002 (July, 2004)

Prepared by: Econometric Research Limited (Dr. Atif Kubursi)

Prepared for: Alberta Off-highway Vehicle Association

Topic: *Public and Stakeholder Concerns*

- Figure 5, Random Sample Telephone Survey Results, is a serious misrepresentation of the collected data;
 - In early 2003, over 1,100 Albertans completed written surveys while 400 responded to a telephone survey. Since the reference data for Figure 5 is missing, it is hard to determine what the source data is. It appears to be from the 400 respondent *random* telephone survey. Why did the Plan favor the 400 person random survey results over the 1100 person survey of Ghost/Waiparous users? A full 37% of telephone respondents had never heard of Ghost/Waiparous. Of the remaining 63%, only 24% had been to Waiparous in the last 5 years. Is this management plan based on the opinions of 60 “knowledgeable” random telephone survey respondents versus the views of 1,100 actual cross-sectional users?
 - Presenting only the two charts on Threat To The Natural Environment and Impact On Enjoyment by Other Users from the telephone survey is a misuse of the data, especially considering it is the views of only 203 *multiple* responses. How many independent responses of actual Ghost users does this represent especially when statistically deceiving multiple responses were permitted?
 - If SRD were to create open public access to the plan and map, be assured that more than 60 responses would be received.
 - If the surveys are to be used as a guide for setting policy under GAMP, then they need to be broad based, not solely to discriminate against OHV users.
 - Question 1i) Responses of 73 % of 1015 respondents indicated viability of wildlife habitat has not been reduced by too many trails, yet the number of trails has been severely reduced under GAMP.
 - Question 2e) Responses of 60 % of 1007 respondents indicated that a designated trail system would reduce user’s enjoyment, yet GAMP is a highly reduced designated trail system.
 - Question 3e) Responses of 98 % of 1005 respondents indicated that campers be required to dispose of waste properly, yet GAMP contains no waste management plan other than restricting motorized random camping.
 - There were no survey questions designed to gather information specifically on user conflicts on multi-use trails, yet the specter of user conflicts has been postulated to remove OHV use from a large number of existing trails (routes).
- Numerous letters have been written to elected officials concerning GAMP. This feedback appears to have been ignored in the plan in favor of a random telephone survey.

- Information on the plan has been severely lacking, or withheld and stakeholder input has been superficial at best. Roll-out of the proposed trail map was restricted to original GAMP participants only. They were restricted from re-producing it in any way and the Operational Access Plan is difficult to locate on the SRD website. These documents should be front and center along with a copy of the map for all interested and impacted members of the public to assess.
- Three, one-day long meetings were offered to OHV stakeholders to make trail presentations. Only 1 hour has been provided to date to present alternate trail proposals to the stakeholder group. No mechanism has been offered by SRD on how they will act on these proposed trails.
- Kiosks have been erected at major staging areas. Why is there no detailed GAMP information or a copy of the new map?
- GAMP is an OHV specific plan. However, there were no OHV representatives on the writing team to provide balance or specific knowledge in the document and map.
- No recognition has been made for Trials riding areas.
- No recognition has been made for non-OHV concerns such as facility security and random camping issues on lease land.
- Single track trails have not been recognized on the map, nor is there any recognition that single track is the least environmentally damaging trail use.
- Existing, recognized staging areas have been eliminated with no provided rationale (i.e. Bar C area).
- Unsubstantiated “user conflicts” have been supposedly solved by closing trails to OHV’s without any recognition of other conflict resolution mechanisms proposed by OHV users.
- Large areas of Ghost/Waiparous no longer embrace the multi-user mandate of the area since they are completely closed to OHV’s (i.e. South Ghost).

Topic: *Enforcement, Identified Trails and Designated Areas*

- There is no argument that access only be permitted on designated routes. There is the note stating; *“As it is not possible to identify and map all trails in the planning area, those that have not been identified, mapped or signed will be classified and considered as unavailable for motorized recreational use. Use of these trails by motorized vehicles will be considered an infraction under the proposed regulation.”*

SRD chose not to conduct a complete inventory the trails. SRD was provided with maps of all the known and used trails, **SRD chose to ignore them and use the exercise against those who produced such maps.** How given today’s technology can this occur?! AOHVA has expertise in trail inventory techniques that make this statement beyond belief. In 1988 the IRP recognized there to be *“...staging areas for an estimated 1197 km (960 Mi.) of developed off-*

highway vehicle (OHV), motorcycle and snowmobile trails.” How was this determined in 1988? **Secondly, to disregard and eliminate existing trail because of SRD’s inability to use current technology is totally irresponsible and will not be accepted!** The Rocky Mountain Dirt Riders Association, a 100% volunteer group, provided a trail proposal characterization methodology that eclipsed SRD’s acknowledged “bits and pieces” of mapping methodology. To date, none of the proposed trails have been accepted or rejected.

Topic: *Future Initiatives*

- The GAMP plan leaves too many clearly identified and important issues for future consideration or other jurisdictions;
 - Parties, substance abuse, etc.
 - Penalties for environmental damage
 - Code of Conduct
 - Acceptable vehicle specifications
 - Noise enforcement
 - Alternative funding

These issues are at the very core of many of the problematic behaviors seen in Ghost/Waiparous and this has been so for the last decade. Finding solutions to these issues is equally, if not more, important as designating trails yet GAMP has not provided any specific recommendations. If GAMP is to be successful, solutions need to be the core part of it, not left for some undefined future resolution. A designated trail system cannot function successfully in the absence of vehicle specifications, meaningful penalties and enforcement.

- To align penalties closely with those given to industrial users would not be deemed as ‘objective deterrents.’ This is an unrealistic goal and would not be tolerated by recreating Albertans. Realistic penalties and deterrents must be put in place prior to GAMP implementation.
- Vehicle definitions need to be part of GAMP, not a follow-up action. The majority of the serious damage to Waiparous is being caused by vehicles that are outside of any prior envisioned use of the area.

Topic: *Operational Details*

- Budgets; the plan does not contain any information on the budget required for implementation, or specify budgeted sources of funding.
- Manpower; the plan does not contain any information on the manpower requirements to enact and enforce the plan.
- Engineering; the plan does not contain any trail standards, engineering proposals, or project budgets. The maintenance plan that is “to be developed” is a sign of haste and poor project planning.

- Liability; with the continued promotion of the ‘Adopt a Trail’ program, SRD has yet to address this issue. Success of this program will be dependent on the government finalizing a volunteer liability policy.
- Regulations designated under a FLUZ must outline requirements and expectations for ALL users of the planning zone. To enact specific regulations pertaining to only one user group and ignoring issues relating to others is not an act of good faith on behalf of SRD.

Conclusion:

It is our view that the process to develop this plan has failed to procure the support and buy-in required to produce a plan that will stand the test of time. It does not adequately address the key issues identified as public safety, water quality, resource sustainability and user conflicts (red herring). A plan that is heavily dependent on the participation of the volunteer stakeholder organizations that have limited funds and resources, should secure stakeholder consensus support before further taxpayer money and resources are expended on sub-optimal solutions. As stated in the Plan document, Calgary’s and Alberta’s population is increasing at a dramatic rate. Appreciation for the impact of all future recreational pressures on the Ghost-Waiparous and surrounding regions has not been taken into account.

The Operational Access Plan and accompanying map are deeply flawed, and are not based on accepted land management planning principles and procedures. As AOHVA have outlined in this document and numerous prior correspondence, the Plan is based on incomplete or absent science, a failure to consider relevant evidence, superficial stakeholder and public consultation and an abuse of managerial discretion. It contains no detail on how it will be implemented and its success depends on regulations yet to be developed. AOHVA respectfully requests that SRD delay implementation of GAMP until these serious defects are remedied. We continue to remain open to a dialog on GAMP and look forward to your response to our stated concerns.

Calvin Rakach

AOHVA - President