



wildsight

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Adventure Tourism/Commercial Recreation

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Akamina Adventure Incorporated's proposal for an Adventure Tourism license of occupation for two intensive use sites for lodges and cabins is not consistent with government objectives, adopted land-use planning policy, and the wildlife values and wilderness character of this particular region.

The location of this proposal, the southeast corner of the Flathead, is biologically significant. Geographically, the east side of the Flathead lies in the center of the larger Crown of the Continent ecosystem. This makes it a continentally significant area for east-west and north-south large carnivore movement. The Flathead supports incredible biodiversity. Maintaining the wilderness characteristics of this area is critical to the intact Crown of the Continent ecosystem and to health of biodiversity and wildlife populations.

The long-standing proposal for a protected area in the Flathead, as an expansion of Waterton-Glacier International Peace Park, calls for the area to become a wilderness protected area. This is in direct contrast to the front country development of Waterton National Park. The proposed Akamina Adventures development is inconsistent with the wilderness designation that Wildsight and its partner groups in Flathead Wild have actively promoted for many years. Development of the proposed facilities and trails would make it impossible to create a wilderness protected area in the future.

Please note that this comment is being submitted by Wildsight on behalf of all members of the Flathead Wild coalition (Canadian Parks and Wilderness Society - BC Chapter,, Headwaters Montana, National Parks Conservation Association, Sierra Club BC and the Yellowstone to Yukon Conservation Initiative) as all share interests in protecting this area.

The Proposal Area

The proposal will have significant impact on wildlife movement within the Sage and Kishinena drainages. The east side of the Flathead River Valley has been highlighted both through the CORE process and in the Southern Rocky Mountain Management Plan (SRMMP) as a special management area because of its wildlife populations and globally significant ecosystem values.

Sage Creek is one of the key wildlife corridors in the transboundary Flathead system in which east-west wildlife movement occurs (Weaver 2001). The proposed intensive use sites (22 cabins, 2 lodges) and the sheer number of guests (600 visitors by year three) threatens the integrity of this east-west and adjacent north-south wildlife corridors. Wildlife connectivity is identified as a priority in the SRMMP, in particular noting that “access management is essential to the maintenance of connectivity”.

Grizzlies, wolverines, and lynx are carnivores that have low resilience to human impacts and disturbance (Weaver 2001). All three species have been confirmed present in the Flathead. There is significant high value habitat for grizzly and wolverine within the tenured area. It is also highly probable that there is high value habitat for lynx within the proposed tenured area due to the abundance of early to mid seral forests and snowshoe hares at mid elevations.

1. Wolverines

Wolverines are particularly sensitive to human disturbance and generally avoid areas of high human activity. February-April is the natal period for wolverines. Disturbance from human recreation could result in denning site displacement and reduced vigour and lower reproductive success. Females in particular have been found to be negatively associated with winter recreation and backcountry skiing (Krebs et al 2007).

Tony Clevenger, wolverine researcher, set up two bait-sites at or near the proposed tenure during his 2014-2016 field work; three wolverines per bait site were detected, a significant finding for the typical low density of wolverine populations. According to Clevenger the southeast corner of the Flathead is important “at a local scale, regional scale and perhaps for the larger metapopulation for cross boundary connectivity between US and Canada in the Rockies”. The area near Sage Pass is excellent wolverine habitat according to Clevenger. This region adjacent to the continental divide is used as habitat and as a corridor linking the Glacier and South Rockies wolverine populations.

It's important to note that the southeast corner of the BC Flathead sees virtually no winter recreation due to its remote location. This project would threaten the viability of critical connectivity corridor in this pinch point for wolverine movement between the Greater Glacier wolverine population and the South Rockies population.

2. Grizzly Bears

The Flathead is a continentally significant area for grizzly bears. In 2003, the SRMMP designated the Flathead as a core area for grizzly bear populations. The proposed tenure area is classified through the Kootenay Boundary Land Use Plan as management priority 1 grizzly bear habitat.

The Kishinena and Sage drainages are of particular importance as they have high value avalanche path habitat that serve as spring forage areas for grizzly bears. There are abundant huckleberry and thimbleberry patches that provide food for bears in the late

summer and fall. There are several mineral licks that are key habitat features for grizzlies year round above Kishinena Creek and within the general vicinity of Intensive Use Site A.

Although the Flathead supports a healthy grizzly population, almost all current grizzly mortality in the Flathead is human caused (Lamb et al 2017). This proposal will increase human access into the backcountry and with it both human-bear interaction. When human access into the backcountry increases so does grizzly bear mortality (Lamb et al 2017). It's also likely that increased human presence will result in displacement of grizzlies from high value habitat. Both intensive use sites are in high value grizzly bear habitat.

3. Ungulates

The proposed tenure area is summer habitat for moose. Telemetry data from WSI corroborates this. The large scale of this development and the amount of recreational use in the proposed adventure tourism area could displace moose from their preferred habitat, as observed in other areas (Neumann et al 2011). The upper northwest part of the proposed tenure (Sage Pass) is a key moose movement route (Weaver 2001).

AAI's proposal (specifically the increased recreational user presence and access) will lead to more goat and sheep encounters with humans, will alter habitat and movement, and potentially resulting in habituation. According to recent government goat surveys, goat populations across the East Kootenay have been declining in areas of significant access. Increased access and recreation will result in further stress on goat populations. Summer clients will access high elevation areas and winter clients will access slopes for backcountry skiing that overlap with critical goat and sheep winter range like Sage Pass.

4. Other mammals

The northern reaches of the proposed tenure area are within the Wildlife Species Inventory (WSI) polygon for fisher. Fisher are rarely observed in the Flathead and classified as vulnerable and Blue Listed by the BC Conservation Data Centre.

5. Natural Hazards

The proposed trail system requires travel through hazardous avalanche terrain. Although terrain exposure can sometimes be mitigated, winter travel in the southeast corner of the Flathead requires significant exposure to complex avalanche terrain. It's also likely that AAI would not confine backcountry skiing to this designated trail system.

There is exposure to complex avalanche terrain (class 3) from Waterton Glacier and Akamina for backcountry skiing. A party will have to cross multiple class 3 slide paths in order to travel from the Waterton entrance of Akamina-Kishinena Provincial Park to the Intensive Use Site A. Trail E travels through class 3 avalanche terrain for kilometers at a time and even at valley bottom there is very little safe terrain as the avalanche paths on the west side of the loop trail run to valley bottom.

6. Motorized Use

A variance or partial exemption to the Motorized Vehicle Closed Area Plan should not be authorized. This area is identified as non-motorized access only in the SRMMP and the existing roads that are proposed for use to access the site are not designated for motorized use. The area is being managed as a motorized free wildlife management area and the roads to intensive use Site A and B are being reclaimed by alder and vegetation.

7. Other tenures

There is potential for conflict with the local guide outfitter who operates on this territory. The guide outfitter is not supportive of this proposal.

8. Levels of Use

Given the proposal for 22 cabins (at least some appearing to accommodate 4 people) in addition to camping spots, it appears the proposal would allow for more than 100 overnight guests per night. This level of development suggests long term plans are for more than 600 client days per year (presumably the proponent does not intend to build facilities with an average occupancy rate of roughly six nights per year). Even 600 client days per year would be a significant increase in use for this very lightly used backcountry area and higher use levels, in line with the number of beds proposed, would be a very major change.

It is unclear how Akamina Adventures intends to remove garbage to landfill on a weekly basis as indicated without additional motorized exemptions. It is also likely that additional motorized exemptions would be required for increased re-supplying in the higher use scenario described above.

9. Land Use Plans

Akamina Adventure Incorporated's proposal for Adventure Tourism is not consistent with government objectives and adopted land-use planning policy. This proposal is located within Landscape Unit C18 (LU - C18) of the Southern Rocky Mountain Management Plan. This LU is described in the plan as one of the most remote of all units in the planning area and that character is reflected in its use.

This particular area is defined as a connectivity zone and a Special Resource Management Zone in the Kootenay Boundary Land Use Plan, which indicates a *general resource management priority to maintain the integrity of the numerous special and sensitive values that are known to exist in those areas.*

The SRMMP was adopted as government policy by Cabinet in August of 2003. A number of objectives within the SRMMP are in direct conflict with the proposal:

- a) Objective 9.4.1 states: *Within core grizzly bear areas in the plan area (see Map B.9.4.1), the expansion of, or new, formal **recreation or tourism-related structures***

are not permitted in landscape units C14 and C18. The entire proposal area is within this core grizzly area.

b) The desired future condition statement for LU - C18 states *“This area will retain its remote character, **facility development shall be limited to existing authorized structures. Development of other infrastructure is not recommended.**”*

c) **LU-C18 and the proposed development is within an Recreation Management/Development RM1 zone, which is designated for Low Development/Use.**

An RM1: Low Development/Use zone is the most strict/protective designation for restricting recreation use in the plan. In this zone:

- *Informal structures are acceptable to facilitate existing and approved uses to mitigate environmental impacts:*

- *Low incidence of managed trails, routes or sites*

- *Low acceptance of recreational changes in the landscape*

- *Low incidence of human contact or managerial presence*

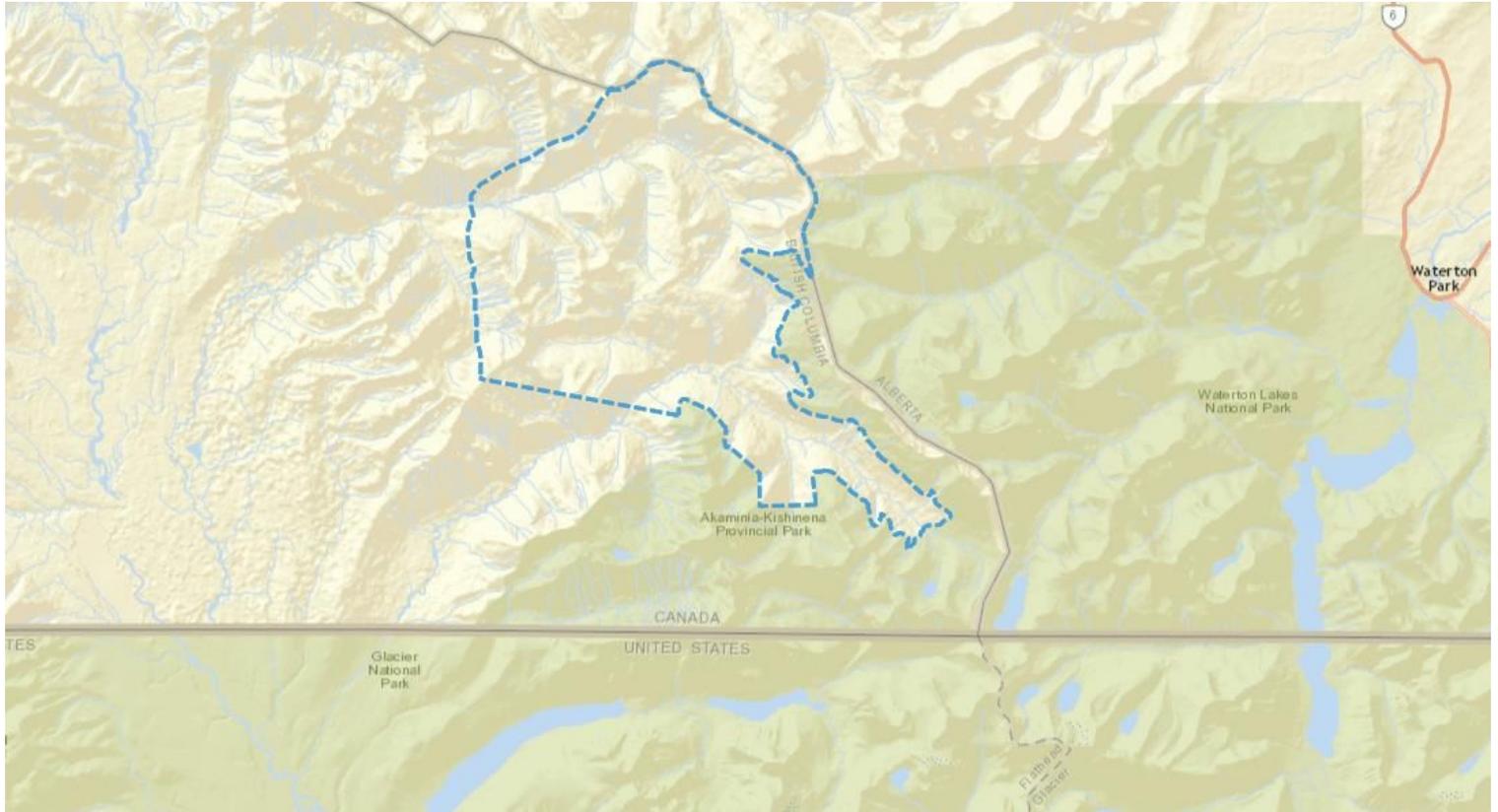
d) Objective 9.2.4 states: **Facility development in the plan area within OGMA's or MMAs, with the exception of permitted activities for mineral, coal, or oil and gas exploration, development and production, is not permitted.**

It appears that Intensive Use Site B may be within the boundaries of the Old Growth Management Area in the SRMMP. We cannot determine if this is the case or not based on the maps available in the SRMMP, as the boundaries of the OGMA are complex in this area.

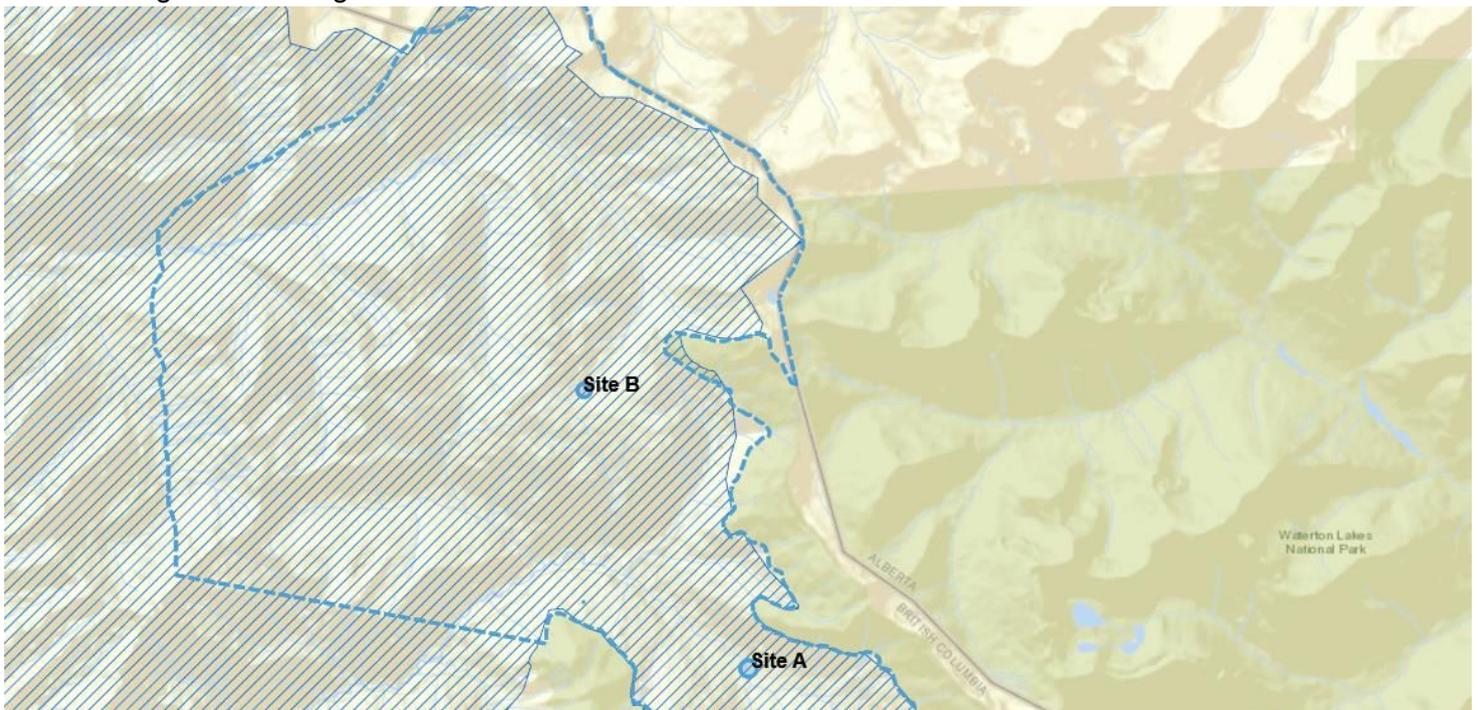
Maps

All maps have been created through IMAP BC and use government provided layers.

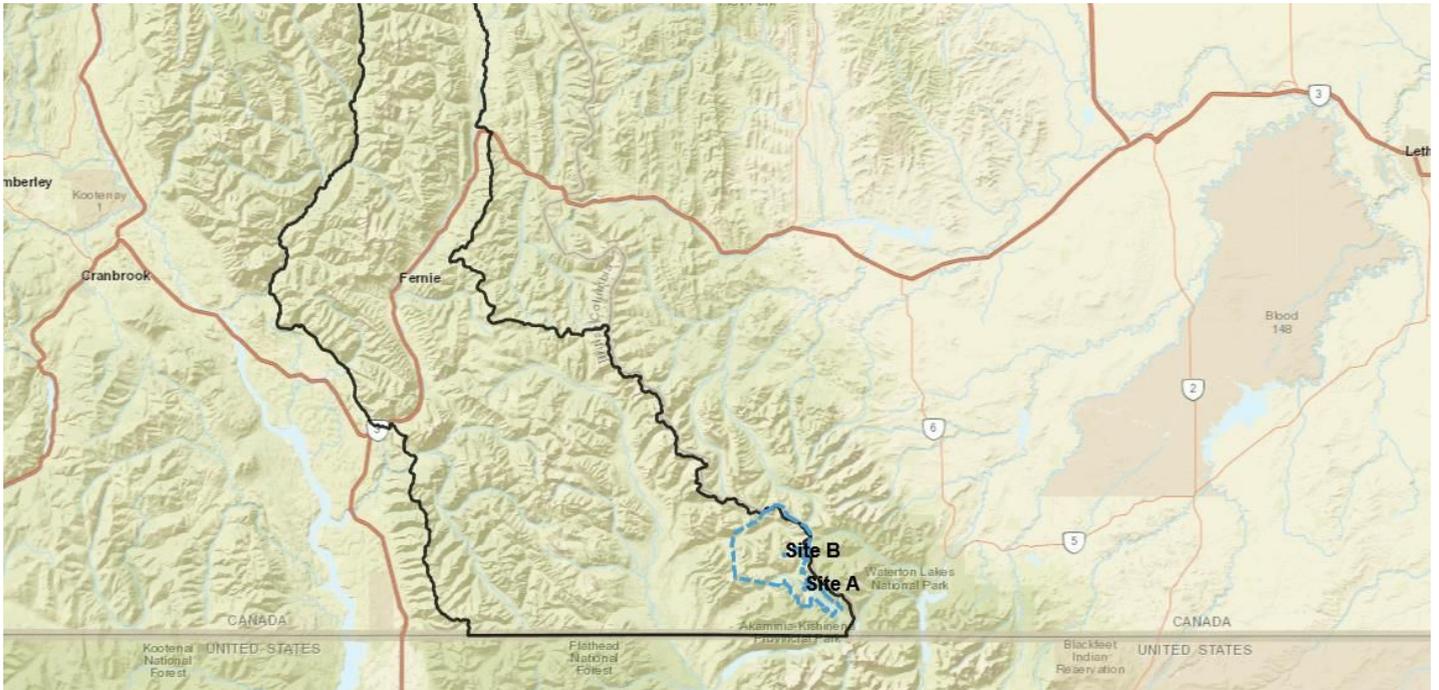
Map 1 Blue dotted line: approximate boundaries of proposed Adventure Tourism Proposal.



Map 2 Shaded area: Connectivity zone and Special Resource Management Zone as legislated through KBLUP.



Map 3 Black boundary: Areas within SRMMP



Map 4 Dark Green: Grizzly Bear Priority 1 (KBLUP)



References

Krebs, J., Lacroth, E., Parfitt, I. 2007. Multiscale Habitat Use by Wolverines in British Columbia, Canada. *Journal Of Wildlife Management* 71 (7).

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Neumann, W., Ericsson, G., Dettk, H. 2011. The Impact of Human Recreational Activities: Moose As A Case Study. *Alces*, 47: 17-25

Weaver, John L. 2001. The Transboundary Flathead: A Critical Landscape for Carnivores in the Rocky Mountains. *Wildlife Conservation Society*. No. 18.