

Alberta Off-Highway Vehicle Association

August 2017

Submission to the
Southwest Alberta
Recreation Advisory Group
(SARAG)

Part 2 of 2



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APPENDIX A – SARAG Process

Events Leading up to the Creation of SARAG

Prior to SARAG being established in May 2017, AOHVA advocated as the Government recognized sector stakeholder, to be included at the table for any future local, regional and advisory level meetings. AOHVA also requested that representation at such meetings include local member clubs, providing a broader perspective on the issues.

This request was acknowledged and verbally agreed to in a meeting between AOHVA and the DM of AEP and AEP leadership on March 28, 2017. However, the commitment was not honoured as is evident by the SARAG participant list included below.

According to the SARAG Terms of Reference released on May 11, 2017:

The following list is a list of the sectors and/or communities that will be invited to provide one representative (and one alternate) in Phase One of the SARAG. Representatives may have a named alternate **but only one person from an organization may attend any given meeting.**

SARAG members (2017) for Phase 1 (Planning) include:

- Chair –Alberta Environment and Parks
- Municipal one representative of each directly affected municipality
- Landowners
- Ranching community
- First Nations: a representative of the Blackfoot Confederacy
- Winter motorized OHV
- Summer motorized OHV
- Winter non-motorized
- Summer non-motorized
- Equestrian
- Fish and Game Club or Association
- Guides and outfitters
- Non-Government Organizations
- Industry (Forestry, Oil & Gas, Mining)

Representation (What actually happened)

Between the release of the Terms of Reference and the first meeting, the list of participants and stakeholder representation had changed significantly. The actual list of participants includes the following:



Southwest Alberta Recreation Advisory Group

Membership List

May 11, 2017

		Main Contact	Alternate	Second Alternate
	Organization	Selected	Contact Selected	
Sector				
	Organization Name	Name	Name	Name
	Alberta Equestrian			
Equestrian	Federation	Norm Spencer		
	Southern Alberta Trail			
Equestrian	Riders Association	Norm Spencer	Steve Dormaar	
First Nations	Blackfoot Confederacy	Richard Right Hand		
Fish and Game				
Association	Hillcrest Fish and Game	Wade Aebli	Gordon Chaisson	
Fish and Game	Backcountry Hunters			
Association	Association	Cody Spencer	Kevin Van Tighem	
	Alberta Forest Product			
Forestry	Association	Ed Kulcsar	Keith Murray	
Grazing	Burton Cattle Co. Ltd.	Shawna Burton		
	Livingstone (North Fork			
Grazing	Livestock Association)	Jim Lynch-Staunton		
	Porcupine Hills (Porcupine			
Grazing	Hills Stock Association)	Harry Welsch	Marilyn Welsch	
	Rocky Mountain Forest			
Grazing	Range Association	Roxy Wideman		
Guides and				
Outfitters	Blue Bronna Outfitting	Cody Wilson	Bill Skene	
Guides and	Blue Ridge Outfitting and			
Outfitters	Packing	Dee Barrus	Jon Wyder	
Hiking	Alberta Hiking Association	Alistair Desmoulins		
Hiking	Great Divide Trail	Dave Hockey	Darrell Aunger	
	Livingstone (Land Owners			
Landowner	Group)	Ted Smith	Cody Johnson	
Landowner	Porcupine Hills (Porcupine	John Lawson		
	Hills Coalition)			
Motorized	Recreation Vehicle			
Recreation	Dealers Association	Ron Hall		
	United Riders of			
Mountain Biking	Crowsnest	Jim Lucas	David Whitten	
			Davia Willicell	
Municipality	MD of Willow Creek	Glen Alm		

SARAG Membership List cont'd.



		Main Contact	Alternate Contact	Second Alternate
	Organization	Selected	Selected	
Sector				
	Organization Name	Name	Name	Name
		Brian Hammond		
Municipality	MD of Pincher Creek	(Reeve)	Garry Marchuck	Roland Milligan
		Cameron Gardner		
Municipality	MD of Ranchlands	(Reeve)	Ron Davis	
	Municipality of Crowsnest			
Municipality	Pass	Dean Ward	Dave Filipuzzi	
Non-government	Oldman Watershed			
organizations	Council	Larin Guenther		
Non-government	Southern Alberta Land			
organizations	Trust Society	Justin Thompson	Lorne Fitch	
Non-government				
organizations	CPAWS Southern Alberta	Katie Morrison		
Oil and Gas	Shell Canada			
Oil and Gas	Shell Canada	Ryan Smith	Deanna Grant	
	Shell canada	Ryan Simen	Dearma Grane	
Quad	Alberta OHV Association	Wayne Page	Pam Boytinck	
Skiing	Crowsnest Nordic	Debbie Whitten	Larry Hennig	
	Alberta Snowmobile			
Snowmobiling	Association	Bob Jones		



AOHVA Observations on Representation:

May 12 – A series of emails was sent between Wayne Page and Rob Sm... pointing out the fact that the final participant list deviated from the SARAG TOR as included above. Numerous sectors were now to be represented by **more than one participant** at SARAG meetings.

- Fish and Game
- Equestrian
- Hiking
- ENGO
- Guides and Outfitters
- Municipalities
- Ranching / grazing

AOHVA identified this issue of disproportionate representation, suggesting the original terms of reference (created by SARAG) be restored and adhered to.

AOHVA was advised that the decision to expand the stakeholder participation list was a directive from the higher levels of the government.

Once again a request was made by AOHVA to expand summer motorized recreation representation by including local OHV club participation as was the case for other groups.

Once again the request was denied to include local member club representation at SARAG meetings.

May 16 (the first meeting of SARAG participants)

At a post-meeting discussion between AOHVA representatives and government staff AOHVA raised the following points:

- The significant lack of recreation-related representation on SARAG as compared to non-recreation stakeholders
- The observation that discussion groups / tables without OHV participants had a myopic perspective, evident in comments and a detriment to the process
- A request more OHV participants to be included in subsequent meetings (May 30)

While AEP staff understood AOHVA's position, no commitments were made to changes

May 23 (meeting between AEP and AOHVA)

Face to face meeting between Brad J, Heather S, Rob S, Wayne Page and Pam Boytinck

- Discussion regarding disproportionate representation and the impact to the SARAG process and results
- AOHVA requested increased OHV participation in SARAG
- Wayne and Pam were both allowed to attend future meetings on behalf of AOHVA



The request was made by AOHVA to expand summer motorized recreation representation by including local OHV club participation.

Once again, the request to include local member club representation at future SARAG meetings was denied.

May 16, 30, June 21, July 12 SARAG Stakeholder Meetings

AOHVA believes that the disproportionate representation by some groups being too high and others being too low has had a significant impact on the effectiveness of the SARAG process; the focus of the meetings and messaging, the tone of the meetings and messaging, the attitude of the participants, the input received and the decisions made.

AOHVA voiced this concern numerous times through the SARAG process, as noted above. AOHVA was assured, repeatedly by AEP staff, that the number of people speaking out on certain issues (due to disproportionate messaging) would not outweigh the voices of other participants.

That was proven to be false in the July 12 meeting when Heather S., presenting the SARAG Priority Issue Themes stated that (as per slide # 16)

- Selection Criteria Used:
 - o Frequency with which the issue was raised
 - Whether the issue was raised by multiple sectors
 - Both being a direct result of disproportionate representation

General Comments and Questions:

- No representation by Alberta Tourism in the first meeting
- No representation in the SARAG process by the local business community as a stakeholder
- No representation in the SARAG process by the hospitality industry as a stakeholder
- Disposition holders these users rights are outlined in their terms of the disposition agreement and disposition users should have no more input than other stakeholders so long as they are able to continue to use their disposition as agreed upon by the GoA
- Neighbors the area is a multi-use area and the expectation is that activities will occur on this
 landscape that they may or may not agree with. So long as this use is not impeding onto their land,
 their input is already represented by the general public's input



Speaking specifically to the issue of disproportionate representation, AOHVA cites these specific examples:

- 8 of 28 SARAG stakeholder participants speak on behalf of ranching / grazing...as per their own admission during introductions, even when they have been identified under other sectors on the participant list, i.e.: municipal elected officials.
- 3 ENGOs were included on the stakeholder list, however in addition to the designated ENGO participants certain people, under the guise of other sector interests, are known associates of and outspoken voices for ENGO causes.

AOHVA Position on Representation

For the above mentioned reasons, AOHVA considers the SARAG process to be flawed and openly submits that the participation and representation of the summer motorized sector has been compromised by a process that is neither transparent nor collaborative.

AOHVA believes that the SARAG team, those we have worked with at AEP appreciate our position and have demonstrated a willingness to address these concerns, however, AOHVA also believes that the leadership of the ministry was unwilling to facilitate a truly transparent and collaborative process in their push to impose a political agenda – to remove OHV recreation from Alberta public lands.

To reiterate:

AOHVA believes that the disproportionate representation of ranchers / grazers / landowners and environmentalists to true recreationalists has had a significant negative impact on the effectiveness of the SARAG process.

The focus of the meetings and messaging, the tone of the meetings and messaging, the attitude of the participants, the input received and the decisions made were all influenced by the loud and plentiful voices from certain sectors.

Public Participation in SARAG

Public participation can be any process that directly engages the public in decision-making and gives full consideration to public input in making that decision. Public participation is a process, not a single event.

The following table outlines various levels of public engagement (stakeholder engagement in this case) often referred to by AOHVA in assessing the intent, transparency, integrity and effectiveness of processes we participate in.





In reviewing the SARAG process AEP may believe there is collaboration taking place as everyone is in the same room. However the process has not moved beyond Phase 2.

Flawed and Biased Consultations

According to the SARAG Terms of Reference, the Livingstone-Porcupine Hills recreation management planning process will have two distinct phases: planning and implementation. The multi-stakeholder Southwest Alberta Recreation Advisory Group will assist Environment and Parks with the first phase in 2017.

The Southwest Alberta Recreation Advisory Group will participate in the following ways:

- a. Spring and Summer 2017:
 - Provide advice on the interim designated trail system for 2017.
 - Provide advice on draft Recreation Management Plan components.
 - Participate in outreach activities to help the general public to understand the planning process and the deliverables being developed.
- b. Fall 2017: Provide advice to the Department on
 - (1) feedback from the public consultation and,
 - (2) any proposed changes to the draft plan.



The group being formed in the spring of 2017 to assist with Phase One of the work is advisory only.

Verbally and in writing through individual and group discussions, during scheduled meetings between AOHVA representatives and AEP staff, in the larger scheduled SARAG group meetings and smaller roundtable discussions as well as on an OHV tour in the Crowsnest region, AOHVA has endeavoured to provide advice and guidance on the interim designated trail system for 2017 and provide advice on draft Recreation Management Plan. However, at the direction of SARAG, stakeholder participants have not engaged in outreach activities to help the general public to understand the planning process and the deliverables being developed – AOHVA's reach has been within the stakeholder group of OHV member clubs.

As such, AOHVA came to the realization early on in the process that the function and intent of SARAG was more for optics and less for earnest collaboration.

Understanding that according to the Terms of Reference, "The Department of Environment and Parks will chair the advisory group; will have final decision-making authority about the designated trail system for 2017 and the content of the Recreation Management Plan and associated maps, etc," AOHVA contributed to the process in good faith, openly and honestly representing the summer motorized recreation sector.

That said, the input of and questions asked by AOHVA have been rarely reflected in the SARAG updates for meeting documentation and maps.

General Comments and Questions:

A few examples illustrating the concern of AOHVA as willing and active participants in the SARAG process include...

Input provided regarding:

- Understanding what makes a high-quality OHV user experience
- OHV trails that reflect a quality user experience: duration, length, loops, points of interest, various skill levels
- OHV trails that encompass proper engineering and design, mitigating constraints and promoting responsible OHV use

Questions regarding:

- How does the environmental literature referenced through this process directly apply to the local situation and impending decisions about recreation in Porcupine Hills and Livingstone?
 - o When will the Chief Scientists report be released?
- Can SARAG stakeholders review the current inventory of designated and historic OHV trails?
- Can AOHVA receive and review the detailed list of constraints SARAG and AEP consider in determining appropriateness of OHV trails?



AOHVA Position on Consultation

At this time AOHVA would rate the overall SARAG process as poor.

When looking at the individual components of Public Participation processes, AOHVA offers the following ratings based on a scale of 0 to 5, with 0 being very poor and 5 being excellent.

Inform:

Rating of 1, SARAG participants have not had access to important information to make informed decisions

Consult:

Rating of 3, SARAG participants have been asked to provide input, however it appears that the input is disregarded in place of what we believe are predetermined outcomes

Involve:

Rating of 1, Due to the disproportionate makeup of the SARAG stakeholder group, AOHVA issues and concerns are NOT equitably considered

Collaborate:

Rating of 0, Collaboration does NOT seem to be evident nor sought through this process

Empower:

Rating of 0, Empowerment does NOT seem to be evident nor sought through this process

Information Capture and Sharing

According to the Terms of Reference:

- Meeting notes will be taken and circulated to the SARAG in a timely manner.
- Although the Department would like consensus from the Group on topics, it is not required and all input will be considered in decision making by the Department.

These specific Terms of Reference are of significant concern to AOHVA as our direct experience in the SARAG process causes us to question the sincerity, transparency and integrity of the Information Capture and Sharing aspect of the process.



AOHVA's concerns can be illustrated in three key examples.

In the May 23 meeting between AEP staff and AOHVA representatives, AOHVA was advised that the
meeting notes from the SARAG meeting on May 16 had been sent for review by Minister Shannon
Phillips and that they would NOT be released to SARAG participants until they were approved by the
minister.

AOHVA submits that this action by the minister calls into question the integrity of the information shared with SARAG participants, AEP staff and the public (future.)

2. In the July 12 meeting, an AOHVA representative was a participant in the discussions about Partnerships and Stewardship. As she was typing up the notes from the flip charts, she noticed that some of her personal comments (below) were not included. As such, they were subsequently provided to the SARAG team via email and are included here for your reference – as important points to make.

User Fees

User fees have come up numerous times in the meetings.

- AOHVA and the majority of OHV users are in favour of an OHV user fee.
- The AOHVA 4-Point Plan for Environmentally Responsible OHV Use addresses the financial sustainability of associated OHV trail development and management through an OHV User Fee that would be directed one hundred per cent to overcoming the issues and meeting the requirements of an effective OHV trail system.
- OHV users have told AOHVA that while they may support an OHV user fee dedicated to OHV trail management, they absolutely do not want to see those fees to go to the government not into general revenue (and not into government initiatives.) The 4-Point Plan proposes that AOHVA work in partnership with government under an accountable, transparent and armslength management structure...something we have suggested for many years.
- The existing OHV registration fees have gone to the government for over 20 years with no tangible / measureable benefit back to the users (through either proper trail development, management, enforcement or education.)
- We believe that if we are discussing user fees, we need to consider user fees for all users.
- User pay can be applied to any group you just need to be innovative.
 - I asked my daughters if they still would have bought their hiking boots if they cost \$10 more. They replied yes so there is one approach to a user fee for hikers embed it in the cost of recreation related products.
- 3. The summary meeting notes provided to SARAG participants have been decreasing in volume and detail with every meeting despite significant note taking on flipcharts and increasing participant discussion. AOHVA note taking generally produces 10 12 pages of comments and observations while summary notes sent out by SARAG to participants average 3 5 pages of participant comments.



Additionally, Parking Lot issues / hand written notes provided directly to the facilitator on July 12 were not shared with participants as was the case for previous SARAG meetings.

To provide open, honest and transparent communications, AOHVA set up a sector-specific communications process, including a set schedule and sharing tools to facilitate:

- Requests for sector input
- Review of SARAG materials
- Requests for feedback
- Participation in conference calls and meetings directly with AEP / SARAG staff
- Updates on SARAG process
- Sharing of observations and comments made by participants in SARAG meetings

General Observations and Questions

- AOHVA has provided feedback that the SARAG communications process (timing and access to materials) has been, at times, an impediment to effectively communicating with our sector – primarily volunteers.
- Proper, up to date maps were rarely available at SARAG meetings
- Maps were often NOT made available in an easy to share format...participants had to make a formal request for that to happen in order to facilitate sector input as required by SARAG

AOHVA Position on Information Capture and Sharing

AOHVA submits that participant comments and discussions are not accurately reflected in the materials sent out to the group; influencing participant perspectives and future positions. This may be due to SARAG facilitators not capturing the comments in the first place or due to the review and summarization (sanitization) of discussion notes after the fact. Regardless of the cause, the outcome is a flawed process that will produce flawed results.

To reiterate an important point introduced in the Representation section and relevant to information Capture and Sharing:

- AOHVA was assured that the number of people speaking out on certain issues would not outweigh
 the voices of other participants. That was proven false / misleading in the July 12 meeting when
 Heather S., presenting the SARAG Priority Issue Themes stated that (as per slide # 16)
 - Selection Criteria Used:
 - o Frequency with which the issue was raised
 - Whether the issue was raised by multiple sectors
 - Both being a direct result of disproportionate representation and the Information Capture and Sharing aspect of the process.



Decision-making

Successful trail and recreation use planning recognizes that there are no activities or developments on a landscape that *do not* interact with the environment and other uses.

A meaningful exercise in planning should recognize and incorporate relative values of individual uses which occur on the landscape, in conjunction with economic and environmental values. Without a thoughtful and measured valuation, there cannot be a full understanding or rationale of the trade-offs or their impacts.

Additionally, AOHVA has identified a number of aspects of the SARAG project which, when one delves into the details, are believed to have a negative impact on the effectiveness of the process and on the validity of the outcomes.

Compressed Timeframes

AOHVA agrees with the comments of other SARAG participants, including AEP staff that the process is rushed. The consequences of a rushed process are inadequate information gathering and assessment, and compromised decision-making. In fact, a few SARAG participants voiced their concern to the extent of wondering if the outcomes of the process were pre-determined and the process was more of a "check-the-box" activity than earnest consultation, a point of view shared by AOHVA.

We understand that the initial pressure to meet certain deadlines linked to cabinet review and approval of the PLUZs has been alleviated due to a delay of the political process. We also understand the motivation for SARAG to meet short timeframes to accommodate public consultation for the Porcupine Hills and Livingstone PLUZs in the fall of 2017. Let it be noted that AOHVA does not agree that the timing of a future public consultation activity should supersede good decision —making.

AOHVA acknowledges that SARAG has tried to adapt the process in an effort to accommodate the work of gathering and processing participant information by extending timelines. However, we maintain that the overall timeframes are still insufficient to ensure a thoughtful and truly meaningful process.

AOHVA has noted and agrees with comments by SARAG participants that "it is important to get it right."



Lack of Information

Throughout the SARAG process, participants have voiced concerns about the lack of information available for review and reference, yet they are asked to make sound judgements and decisions.

AOHVA has identified certain topic areas where adequate information is either not available or has not been shared with the SARAG participants to assist in making a valuable contribution to the process and the outcomes.

Trail Inventory

It is well documented prior to the SARAG process and throughout the SARAG process that AOHVA has requested specific information relating to the current trail inventory – a crucial piece of information to making rational decisions about motorized recreation trails now and in the future.

As stated in the ACESS input package of July 21, 2017, ACESS also observed that the SARAG framework did not provide an existing inventory of the current recreational usage with the stakeholders first, and the first round of proposal maps were substantially reduced from current usage using undisclosed analysis, rational and criteria to the recreational stakeholders. Without prior release of a base map showing the existing usage and inventory (which would have been discussed and reviewed by all stakeholders) this can create false impression of the current usage of land, and creates unintended conflict. Each individual user group, environmental NGOs, industry, ranching, and recreationalists all have an inherent sense of ownership of the entire PLUZ planning area. As a result, each future visualization of a user on a map for one group (which in this case, happens to be the motorized use first, as an artefact of the PLUZ designation process), is now viewed as an infringement on other users perceived 'ownership' of the area. Without a meaningful initial view of the actual spatial extent and overlap of uses as they exist on the landscape as currently, all following processes typically focus on conflicts and not successes of the existing integration of use on the landscape.

Based on pointed discussions at SARAG meetings, verbal and written requests for relevant information and specific comments made by AEP staff, AOHVA has come to the conclusion that the government is not in possession of a true inventory of OHV trails in Porcupine Hills and Livingstone. The government is not is possession of one of the most crucial pieces of information to developing a viable trail system or producing a meaningful trail map for motorized recreation.



Capacity

In an article published in the Lethbridge News Now on January 20, 2017, it was explained that with the establishment of the Castle Parks,

"...the government is acting to phase out off-highway vehicles (OHV) over the next five years across the 103,000-hectare piece of land. Existing OHV trails within the Castle parks will be assessed for ecological risks, while non-designated trails will be rehabilitated.

Phillips explained that the Alberta government is in full support of OHV activity, but would rather relocate trails from Castle to nearby public lands and invest in proper infrastructure to ensure that outdoor enthusiasts can continue to enjoy their sports in a way that sustains the environment over the long term."

AOHVA along with other SARAG stakeholders has raised the issues of demand and capacity as they relate to the recreation management plan in Porcupine Hills and Livingstone – specifically in light of the government's decision to remove OHV users from the Castle region. SARAG participants have expressed the need to quantify and understand the factors related to how resultant increased traffic in Porcupine Hills and Livingstone will affect the area's capacity: demand, intensity, frequency, intermittent use, increasing participation in the activity and population growth; and the implications they have on the decisions being made. However, no such information has been provided.

While non-motorized recreation has access anywhere and anytime in the following areas: Waterton Lake National Park, Banff National Park and Jasper National Park as well as in the provincial parks being Writing on Stone, Kananaskis Country, Canmore Nordic Park, Castle Park and Castle Wildland Park, summer motorized recreationalists are limited to a very specific and rapidly decreasing area of public lands for their preferred form of recreation.

Science-based Considerations

According to the Terms of Reference, the Government is proceeding with the development of a draft land footprint management plan for the Livingstone and Porcupine Hills areas. Planning for this project commenced in 2015. The draft plan will be made available for public review in the fall of 2017. The plan will identify a proactive approach for managing ground disturbance resulting from human and motorized activities. It will put forward thresholds (density limits) for future disturbances to constrain the extent of the human footprint on the landscape. Exceeding these established targets will likely result in a deterioration of desired environmental and ecological conditions.

Science figures prominently in discussions and decisions relating to OHV use and rustic camping on public lands – as it should.



That said, AOHVA believes that all Albertans have the right to understand how science is being used to guide important decisions affecting their opportunity to enjoy the province's outdoor spaces; and the government has the responsibility to be upfront and open with Albertans in that regard.

While AOHVA presumes that expert opinions are based on accredited scientific approaches, we have requested access to the scientific evidence (through SARAG and through other communications with AEP staff) used by the government to make important decisions; decisions that will change the way Albertans live, work and recreate.

AOHVA, along with other SARAG participants are still awaiting the report of the Chief Scientist, expected the end of July. Additionally, AOHVA echoes the concern and comments of various SARAG participants questioning the validity of making such important decisions in the absence of the Chief Scientist's Report, and as such, any relevant, validated ecological literature / facts.

Socio-Economic Considerations

AOHVA agrees with comments of various SARAG participants that there is a need to understand and consider the economic implications of decisions made about recreation in Porcupine Hills and Livingstone.

It behooves the government to fully explore the impact of these decisions, particularly in light of government statements promoting economic diversity. As such, AOHVA recommends that the government undertake specific efforts to assess and truly understand and publicly share anticipated effect said decisions will have on local business.

AOHVA would like to offer the results of two independent studies for SARAG consideration.

Canadian Off-Highway Vehicle Distributors Council (COHV)

A recent study conducted by Smith Gunther Associates Ltd for the Canadian Off-Highway Vehicle Distributors Council evaluated the economic impacts of OHV use in Alberta. The study determined the total impacts of ATV and SxS activities to be in the range of domestic expenditures of \$1.6 billion to \$2.0 billion generating GDP of \$1.1 billion to \$1.3 billion.

Those are significant dollars flowing directly into Alberta communities, providing both local and provincial benefit.

The study further determined the size of Alberta ATV and SxS activities to be in the range of domestic expenditures of \$1.6 billion to \$2.0 billion generating GDP of \$1.1 billion to \$1.3 billion including labour force incomes of \$611 million to \$779 million. Tax revenues as a result of ATV and SxS expenditures yield \$289 million to \$347 million. Further, these activities and related expenditures generate fuller employment by 9,104 to 11,622 FTEs.



University of Alberta (U of A)

A study conducted by the University of Alberta, Resource Economics and Environmental Sociology, analyzed the economic expenditures of OHV users within the Crowsnest Pass area of SW Alberta.

Individuals were surveyed throughout the C5 Forestry Management Unit located in south-western Alberta, which includes:

- The Porcupine Hills
- The North C5 Forest Management Unit
- The Castle Special Management Area

The study found that:

- 11,000: A conservative estimate of the number of OHV trips made to this area from May-October 2014
- \$7.1 million: Estimated overall expenditures by OHV riders from May-September
- \$4.4 million: The estimated proportion of those expenditures spent in the local area

Appendix B - Livingstone and Porcupine Hills Recreation Management Plan; AOHVA Perspective

According to AOHVA, the following considerations will detrimentally impact a balanced and informed Recreation and Management Plan for the Livingstone and Porcupine Hills areas.

Vision

Vision Statement #1 (May 16, 2017):

For the Livingstone and Porcupine Hills area, enable Albertans and visitors to enjoy the natural environment by establishing diverse, high quality recreation opportunities on public lands that ensures the long term environmental sustainability for the land, biodiversity and watersheds.

Vision Statement #2 (June 21, 2017):

For the Livingstone and Porcupine Hills area, enable Albertans and visitors to safely and responsibly enjoy and connect to the natural environment through the establishment of diverse sustainable recreation opportunities on public lands that contribute to the long term environmental sustainability for watersheds, biodiversity and the land, quality of life for residents and the economic growth of surrounding communities.

Vision Statement #3 (August 8, 2017)

Albertans and visitors enjoy a diverse range of outdoor recreation pursuits within the Livingstone and Porcupine Hills areas. Recreationists connect to the natural environment and in a responsible manner ad practice stewardship that support ecological health, watershed integrity and protection of cultural resources and values. The recreation system contributes to a good quality of life for all and the economic sustainability of surrounding communities.



General observations and Comments

- To be considered, high quality, we need to ensure the offering encompasses enough meaningful recreation trail opportunities that support a diverse set of OHV users, including campers.
- It is important to consider and understand that the impacts of recreational opportunities are mitigated through engineering and infrastructure to reduce or eliminate the impacts to watershed and biodiversity.
- It is important for this vision statement to include / make reference to social, economic and financial sustainability in addition to the environment.
- In reference to the term "Albertans," OHV users and their families are an important group of people to be included.

AOHVA Position on Vision:

It became apparent very early on that this group was mistakenly named as a Recreation Advisory Group. Rather, it really is an Environmental Protection Advisory Group with a footnote to Recreation. That was reinforced and is evident in the second vision statement that was created and presented to the group at the June 21 meeting.

Recreation Resource Management Planning Principles

Recreation resource planning requires the consideration of many inputs such as an inventory of existing plans and policies, current type and amount of recreation use (supply and demand), recreation trends, public issues, management concerns, regional supply of recreation opportunities, visitor and stakeholder preferences, economic impact of recreation participation, best available science, environmental conditions, and available information from recreation and resource monitoring.

According to Workbook #1, the Society of Outdoor Recreation Professionals provides strong principles for recreation planning that align with the direction and requirements of Alberta's Land Use Framework and Alberta Land Stewardship Act. AOHVA acknowledges that specific principles are have been adapted and adopted to guide the SARAG planning process.

Upon review and consideration of the SARAG planning principles, AOHVA had identified some areas of concern that have been raised as participants have engaged in the process and suggests further support and clarification may be required, namely, in regards to the points highlighted below.

- a. Identification of public issues, management concerns, opportunities, and threats through collaborative stakeholder involvement.
- b. Establishment of planning and decision criteria for evaluating and selecting the preferred alternative.
- c. Inventory of resources, the current situation, and the best available science and information.



- d. Formulation of alternatives which address the significant issues and concerns.
- e. Evaluation of the consequences, benefits, and effects of each proposed alternative.
- f. Selection of a preferred alternative based upon a full and reasoned analysis.
- g. Implementation and monitoring.
- h. Plan adaptation or revision.

General Observations and Comments:

We don't know how decisions are being made; we don't have the information.

Various SARAG participants have stated that "Best Available Science" is neither acceptable terminology nor valid and relevant input to the important decisions expected from SARAG.

One participant from the grazing sector put it quite simply "if the best available science is crap, it shouldn't be used...it may be best available but it's still crap science."

A key principle missing from the SARAG process, focus and intent is financial sustainability - different from economic impact. AOHVA has raised this point and believes that it deserves greater consideration going forward.

Local knowledge has been raised by various SARAG stakeholders through the process. AOHVA agrees that local knowledge (being perspective, information and experience) is an important aspect to a process such as SARAG and the outcomes achieved as a result.

AOHVA Position on Recreation Resource Planning Principles

The principles simply don't align with the action that has been taken throughout the process.

Importantly, science-related references must be derived from studies specific to the species, geographic region and activities that SARAG decisions will impact. AOHVA agrees that "Best Available Science and Peer Reviewed Science" do not equate to valid and relevant data generated from local studies.

In the case of summer motorized recreation, AOHVA wishes to emphasize the lack of consideration given to local knowledge evident in the severely limited representation allowed at the SARAG meetings, in the low engagement by AOHVA in areas where our expertise and experience would be of benefit to the government – namely in ground-truthing trails and in establishing standards for trail development and management – important tasks we are more than capable of assisting with but have been shut out of.



Outcomes

According to the SARAG Terms of Reference:

The primary outcome of the process is to enable both Albertans and visitors to safely enjoy the natural environment by establishing diverse, high quality motorized and non-motorized recreation opportunities on public lands.

The objectives of Recreation Management Planning include:

- Direct recreational opportunities that are environmentally sustainable over the long term and that support healthy ecosystems
- Alignment of the motorized trails allowable with the proposed open motorized access limits of the draft Livingstone-Porcupine Hills Land Footprint Management Plan
- Support of a wide variety of well-managed, safe motorized and non-motorized recreation and tourism experiences which respect the needs of landowners and other users of the landscape.
- Examination of ways to improve and fund infrastructure, maintenance (including reclamation), education-related and enforcement activities in the area.
- Consideration of appropriate opportunities for tourism that support the social and economic goals of area residents.
- Identification of linkages with other planning processes, particularly the Castle Parks Management Plan and municipal/First Nations plans. This will include recommendations for managing the transition of Off Highway Vehicle (OHV) use from the Castle provincial parks to the adjacent public lands.
- Identification of provincial policies, processes and tools that are needed to fully realize these planning objectives (e.g., random camping controls).

Recreation Planning Process Outcomes

Some of outcomes from this process will include:

- A better managed recreation system that supports watershed integrity, biodiversity, reduction of wildfire risk and integrated land management;
- Albertans and stakeholders are well informed about the process and have input into the development and implementation of the plan;
- Stronger working relationships and collective collaboration among the Government of Alberta, First Nations and stakeholders to protect and conserve Alberta's public lands;
- Safe, responsible and respectful recreation use;
- Identification of a designated trail system for motorized and non-motorized users;
- Identification of closures of trails in significant environmental sensitive areas and those that are illegal;
- A Recreation Management Plan that allows for innovative approaches for developing, managing and sustaining shared trail systems that reduce user conflict; and,
- Direct and support enhanced enforcement activities including better education of users.



As SARAG is focused on recreational planning, ACCESS has recommend and AOHVA agrees that a refined framework could assist in providing the government with a transparent, defendable position while facilitating user buy-in and collaboration (and therefore, user adherence) to the final plan – promoting successful outcomes.

AOHVA Position on Outcome and Objectives

It is overwhelmingly evident (note the shaded areas above) that the priorities of SARAG are environmentally focused and weighted heavily to the needs and concerns of adjacent land owners.

AOHVA believes that the environmental perspective is delivered through the SSRP and Land Footprint Management Plans.

AOHVA asserts that landowner rights are addressed under The Alberta Land Stewardship Act.

A recreational Advisory Group should be focused on the recreational aspects of the region. As a result, the SARAG process is seen to be politically driven.

High-Quality Experience – Keeping Riders on the Trails

AOHVA recognizes that recreation use may not be quantifiable for all parameters linearly, but individual trails and route quantified relatively quickly using a qualitative ranking that is assigned a weight informed by some spatially derived information. While Alberta Recreation and Trail Corridors provides for trail classification type, is does not classify user desires that could be captured with a complementing system.

Known user-valued experiences reflect a number of different aspects beyond the length and location of trails.

- Trail Access: trail can be accessed legally, with safe un-loading and loading facilities
- Variety and technicality: trails in general are not boring; trails traverse a variety of ecotypes
- (nature viewing) and scenic opportunities; trail network provides variety in terms of technicality
- Access to water features, scenic viewpoints, unique features: trail passes through or provides
 destination access to key viewpoints, unique features and habitats, river access for fishing, etc.
- **Connectivity:** trail provides meaningful and legal connections between points of interest and other linked recreation (e.g., random camping, staging)
- **Duration:** trail network provides for variety of options for length of trip, ranging from short excursions to half-day to full day rides and a variety of destinations.



Motivations for why individuals may choose to utilize off-road vehicles varies, as is evident from the various user surveys in the Crowsnest-Livingstone-Porcupine areas and other jurisdictions noted previously. As identified in the NOHVCC (2015) *Great Trails: Providing Quality OHV Trails and Experiences*, and previous user surveys conducted by ACESS, recreationalists choose to 'ride' for:

- Fun people recreate to have fun
- Connectivity with nature
- Escape from society
- Physical exertion and exercise
- Personal challenge for vehicles and themselves
- Camaraderie, social interaction and belonging to a group
- Access to water features (e.g., hunting, fishing)
- Access to scenic viewpoints, touring opportunity
- Access to further recreation (e.g., hiking, hunting)
- Wildlife viewing
- Foraging (e.g., berries and mushrooms) and wood cutting

Consideration of the above components in the Recreation Management Plan will ensure that riders enjoy the sustainable trails, care for the trails and stay on the trails.

AOHVA Perspective on High-Quality Experience

Prior to and throughout the SARAG process, AOHVA has provided insight and specific information about creating a high-quality OHV experience. It is puzzling how the most recent maps presented at the July 12 meeting did not incorporate even the most basic principles of interconnectivity, looping and trail access.

Interim vs Future State

Throughout the SARAG process, AEP staff have made reference to Interim and Future State, specifically in regards to OHV trails and mapping.

AOHVA understands the term interim to refer to immediate or prior to the fall of 2017 AOHVA understands the term Future State has been used to infer within 10 years, however, AOHVA believes Future State to truly mean an indefinite timeline or in fact, NEVER.

These key terms used throughout the SARAG process must be clearly since they play a prominent role in the Recreation Management Plan. AOHVA stresses the need to get this right from the get go for two reasons:

- 1) to fully demonstrate transparency and integrity, particularly important as we look ahead to public consultations; and
- 2) drawing from the experiences in other regions like the Ghost and other management areas where deferred trails have not become a reality; where interim actually becomes the future stat



APPENDIX C - ACESS INPUT JULY 21, 2017

July 21, 2017

Heather Sinton
Director, Land and Environment Planning (South)
Alberta Environment and Parks
8660 Bearspaw Dam Road NW
Calgary, AB T3L 1S4

cc: Rob Simieritsch, Brad Jones, Graham Statt, Andre Corbould

Re: Livingstone-Porcupine Public Land Use Zone (PLUZ) Recreational Planning - SARAG

Introduction

ACESS greatly appreciates the opportunity to participate in the training session provided to the SARAG working group on July 6, 2017. At that meeting, the Alberta Environment and Parks (AEP) facilitators invited feedback on the process to-date that has been implemented by the SARAG. Further to this invitation, and upon further reflection of the trail planning model that was presented, ACESS is pleased to have this opportunity to provide this feedback on the trail planning process.

ACESS identifies and promotes management of recreational use on the landscape for sustainability, and contributes collaborative recommendations to promote successful outcomes. Further, ACESSS appreciates that developing a management plan for the entire PLUZ area is a challenging enterprise.

Upon reflection of the ROM model, and overall recreation planning framework presented at the July 6, 2017, meeting of the SARAG working group, ACESS has identified 4 key areas where ACESS believes the process may be refined and improved to provide for a more transparent, deployable and replicable system to provide successful outcomes. Specifically, ACESS believes that the process can be improved in the following areas:

- 1. Overall SARAG Recreational/Trail Planning Process Framework
- 2. ROM Tool Observations and Recommendations
- 3. Incorporating Relative Recreational Values into Trail Designation Evaluations
- 4. Refined Base Inventory of Recreational Use of Trails and Key Points of Interest

In the following, ACESS has focused more on off-highway vehicle recreation use and trail network planning for SARAG, simply as it is understood that this is a priority to planning for the PLUZ designation process as listed within the Public Lands Act, which OHV access is prohibited without designated trails. While OHV use often facilitates a means of access for other recreational opportunities, ACESS clearly recognizes that off-highway vehicle use is not the only recreational use that is valued and should be incorporated into the PLUZ. ACESS endeavors to work and collaborate with all recreational users and it is our assumption that layering of additional modelling of interaction and integration of use for non-motorized use and non-motorized extension of access would be the expected next step.

1. Overall SARAG Land Use Planning Process and Framework

Successful planning of trails (and recreational planning in general) recognizes that there is no human activity that does not influence or effect the environment. Some are positive, some are negative, some neutral. The significance of these effects, and the potential residual effects, varies depending on the nature (e.g., permanence, intensity, and frequency) of the activity and the sensitivity of the receiving environment. The planning model should reflect these variations in environmental sensitivity and the recognition that some integrations of user activities with environmental components of ecosystems is acceptable. OHV use is not 'bad' or negative by virtue, in the same manner that mountain biking, hiking, fishing, hunting, camping, wood cutting or any other recreational activity is not necessarily good or bad by virtue. But these activities are *valued* by participants, and this valuation needs to be captured by the planning models to facilitate inclusiveness and desired user experiences, and properly designed and managed to mitigate negative residuals – providing successful outcome and sustainability.

"A key point that cannot be over-emphasized is that if riders get the experience they want <u>ON</u> the trail, they will not look for it <u>OFF</u> the trail." (NOHVCC 2015)

ACESS understands from previous land use meetings, as well as stated references in the amended 2017 South Saskatchewan Regional Plan for recreation, that the Livingstone-Porcupines PLUZ area is an appropriate and identified area for motorized recreational use. With the intended closure of Castle for this recreation adjacent, recreationists both local and regional will create increased volume on this area. As such, planning for this use with a framework that does not explicitly capture recreational values will not provide for a successful and sustainable outcome, likely creating unintended and unnecessary public and political backlash. It is very well known that poor or limited trail designations that do not provide the user experiences they desire on trail, will promote these users to fulfill for these experiences off trail – requiring increased enforcement and unnecessary funding due to poor implementation and designation. Designation of trails that provide these experiences, reduces enforcement requirements through design, understanding and delivers the experiences the recreationalists desires. Proven successful in many other justifications - this promotes compliance, volunteerism, stewardship while reducing vandalism and off trail environmental impacts.

"Every trail section or challenge area does not have to be sustainable. The value of the recreation experience may outweigh any potential impacts or the value of the resource may not warrant any special mitigation". (NOHCVV 2015).

The trail proposal appears to have been implemented thus far is highly focused through the application of ROM on ground conditions without incorporating *relative valuations* between environmental, social/recreational and economic considerations, providing mitigation measures. As such, the framework seemingly is weighting to environmental constraints and considers all environmental considerations to be equally important <u>and</u> greater in terms of value as compared to existing social/recreation and economic drivers. If planning process characterizes environmental constraints as unmitigable, the model and structure does not accurately account for numerous mitigation measures which can address and eliminate negative continual or residual effects - therefore unnecessarily and sacrifices social and economic benefits currently received from the recreation activity.

ACESS also observed that the SARAG framework did not provide an existing inventory of the current recreational usage with the stakeholders first, and the first round of proposal maps were substantially reduced from current usage using undisclosed analysis, rational and criteria to the recreational stakeholders. Without prior release of a base map showing the existing usage and inventory (which would have been discussed and reviewed by all stakeholders) this can create false impression of the current usage of land, and creates unintended conflict. Each individual user group, environmental NGOs, industry, ranching, and recreationalists all have an inherent sense of ownership of the entire PLUZ planning area. As a result, each future visualization of a user on a map for one group (which in this case, happens to be the motorized use first, as an artefact of the PLUZ designation process), is now viewed as an infringement on other users perceived 'ownership' of the area. Without a meaningful initial view of the actual spatial extent and overlap of uses as they exist on the landscape as currently, all following processes typically focus on conflicts and not successes of the existing integration of use on the landscape.

Livingston/Crowsnest

Trail / LD Classification	Existing/Current Use	AEP Proposed	% of Existing Use
OHV	932.7 km	286.7 km	30.7%
OHV - 4X4	250.6 km	6.6 km	2.6 %
Single Track	259.1 km	54.0 km	20.8%
Total OHV	1442.4 km	347.3 km	24.0%
Not OHV Utilized LD	2149.1 km		
Total LD Identified	3591.6 km		

Porcupine Hills

Trail / LD Classification	Existing/Current Use	AEP Proposed	% of Existing Use
OHV	139.8 km	41.5 km	29.6%
OHV - 4X4	49.9 km	6.3 km	12.6%
Single Track	224.7 km	59.5 km	26.5%
Total OHV	414.4 km	107.3 km	25.8 %
Not OHV Utilized LD	767.7 km		
Total LD Identified	1182.1 km		

As SARAG is recreational planning, ACCESS would recommend that a refined framework could assist in providing the government with a transparent, defendable position while facilitating user buy-in and collaboration (and therefore, user adherence) to the final plan – promoting successful outcome. ACESS would propose that a consolidation of all recreational users would collaborate on an initial base data set which would capture valued recreational activities and destinations first - and thus resolve user conflicts internally through collaboration. (As example, combining OHV/Snowmobile trails is a known user and safety conflict. Internally, working together for mitigation would propose timing separations to avoid these issues.) The government would engage with non-recreational stake-holders for input on a relative

ranking valuation for environment, and with industry and stakeholders to provide input on economic valuation. The Government would then internally assign binary values of these three key factors required of land use planning, that are representable with directives and objectives as listed throughout 2017 SSRP (and other regional plans) vision and strategic plans for recreation and trails. Further consideration of adjacent land uses and demographics for the area can be incorporated to in planning review, as to retain opportunities within the areas. As very preliminary example, the designation of Castle as a protected provincial park could represent Industry 1, Recreation 2 and Environment 5. With adjacent Livingston planning, the values may be more representative of Industry 2, Recreation 4 and Environment 2. Sub classifications could be created to provide the value within each driver. Mitigation (and/or Expansion) steps would be in accordance to values. For example, SARAG has identified subwatershed boundaries as potential geographic representation of planning areas (internally). Theoretically, these could be used as the high-level tool for an overall weighting that reflects the individual environmental, economic and social/recreational values of the internal zones within the PLUZ. Trail mitigation investment would be determined for a given zone's environment and social/recreational values for that area – based on objectives and in respect to adjacent land classification that may not provide the same value for recreational or industrial activity.

ACESS has included a basic framework recommendation we believe would provide more transparency, all recreational user collaboration, reduce conflict, build trust and promote buy-in with positive outcome. This is a basic flow model (Attachment A), and ACCES would gladly work collaboratively with the GoA for further refinement into a detailed model that facilitates positive outcomes to the governments recreational planning objectives.

2. ROM Tool Observations and Recommendations

The ROM model presented to the SARAG working group at the meeting is a valuable tool for trail development planning. ACESS believes that the ROM tool itself represents a very innovative approach to assist in recreational trail management, both new and existing. Used in conjunction with a framework that utilizes collaborative recreational stakeholder input and provided recommendations, this could be translated into a system level deployment for use in planning and implementation of other recreational uses in the Livingstone-Porcupines PLUZ, as well as other regional public land use areas within the province. Having had time to consider the model, ACESS would like to provide the following comments:

- The ROM model appears to be strong in providing a powerful tool for evaluating individual trail constructability and environmental constraints, by identifying areas with high potential to require mitigation (e.g., supplemental trail design; re-routing, etc).
- Furthermore, we understand that model had incorporated measures to reduce conflicts between disposition holders.
- The ROM model does not appear to have a method for evaluating existing trails comparatively
 in terms of value for recreation or have any metric included that captures recreational value. For
 example, the model does not distinguish between routes which dead-end and do not connect
 between staging areas, as compared to routes that provide connectivity or direct access to key
 points of interest.
- The ROM model did not appear to provide for trail side/slope on the landscape. (as opposed to landscape slope, which it captures well). Incorporation of trail slope when used for evaluating

- existing trails (vs new/proposed) would be highly valuable and appropriate for determining actual potential erosion and subsidence risk to aid in mitigation recommendations.
- Application of the ROM model in SARAG did not capture the total existing inventory and investment of the trail networks and recreation currently being utilized in the area.
- The ROM model appears to rank all of the constraints (e.g., wet areas, soil type) and equal in terms weighting and therefore, if used as a standalone tool would consider all constraints to be significant and non-mitigatable through design and construction, or weighted against assigned planning values.

Essentially, based on the information provided thus far on the application of the model to the Livingstone-Porcupines PLUZ, ACESS believes the tool is extremely valuable, but using the *ROM tool on its own* would not provide a standalone to evaluating recreational values and trade-offs that are typically evaluated in recreational trail planning.

ACESS believes that using this tool in conjunction with the proposed recreational value trail classification, utilization of <u>Alberta Recreation Corridor and Trails</u>, implementation of an binary value rating for social, economic and environment for mitigation – all combined in a framework process that is collaborative with the recreational user groups represented will provide a substantive draft proposal that has been already mitigated in consideration of most constraints – prior to engaging with non-recreational stakeholder or public input on recreational planning.

3. <u>Incorporating Relative Recreational Values into Trail Designation Evaluations</u>

The challenge with any spatial modelling exercise is identifying relatively easily measurable parameters which can be used as proxies for known key values or outcomes. ACESS recognizes that recreation use may not be quantifiable for all parameters linearly, but individual trails and route quantified relatively quickly using a qualitative ranking that is assigned a weight informed by some spatially derived information. While Alberta Recreation and Trail Corridors provides for trail classification type, is does not classify user desires that could be captured desktop with a complementing system.

Motivations for why individuals may choose to utilize off-road vehicles varies, as is evident from the various user surveys in the Crowsnest-Livingstone-Porcupine areas and other jurisdictions noted previously. From the NOHVCC (2015) *Great Trails: Providing Quality OHV Trails and Experiences*, and previous user surveys conducted by ACESS, recreationalists choose to 'ride':

- Fun people recreate to have fun
- Connectivity with nature
- Escape from society
- Physical exertion and exercise
- Personal challenge for vehicles and themselves
- Camaraderie, social interaction and
 belonging to a group
- Access to water features (e.g., hunting, fishing)
- Access to scenic viewpoints, touring opportunity
- Access to further recreation (e.g., hiking, hunting)
- Wildlife viewing
 - Foraging (e.g., berries and mushrooms) and wood cutting

"A key point that cannot be over-emphasized is that if riders get the experience they want ON the trail, they will not look for it OFF the trail." (NOHVCC 2015)

ACESS proposes a simple binary ranking can be used to differentiate and classify trails for known user desired experiences. For example, suggestions for rankings which could be incorporated into an overall recreational value for trails and/or trail segments are listed below, with a more detailed suggestion of indicators with relatively ranking defined provided below in Table B1. These parameters have been selected as ACES believes they are relatively easily measurable indicators of key drivers for creating a usable and valued off road experience. This ranking system is an adaptation of processes that are used in functional planning in Alberta for highway development projects.

- Trail Access: trail can be accessed legally, with safe un-loading and loading facilities
- Variety and technicality: trails in general are not boring; trails traverse a variety of ecotypes (nature viewing) and scenic opportunities; trail network provides variety in terms of technicality
- Access to water features, scenic viewpoints, unique features: trail passes through or provides
 destination access to key viewpoints, unique features and habitats, river access for fishing, etc.
- **Connectivity:** trail provides meaningful and legal connections between points of interest and other linked recreation (e.g., random camping, staging)
- **Duration:** trail network provides for variety of options for length of trip, ranging from short excursions to half-day to full day rides and a variety of destinations.

A ranking system like this is *transparent, replicable* and *defensible*. It also provides a method for showing in a geographic way to stakeholders how individual trails are rated and ranked, providing an opportunity for feedback and allowing for stakeholders to understand the rationale for exclusion of individual trails that do not provide valuable recreational opportunities. These values would get rolled up into an overall weighted average which in turn can be rolled into and overall comparative *relative* ranking which weighs recreational value against environmental sensitivity ranking.

As presented in Table B1, ACESS considers the parameters identified to be a preliminary desktop analysis which would allow for an initial relative ranking which could be reviewed by the user groups after analysis to further refinement. It is recognized, as with any model, that there may be individual parameters and values for a give trail which may not be captured well from desktop analysis without continued collaboration with recreational stakeholder input for model refinement.

Addition parameters could be:

- **Difficulty rating** (which can be used in final published for user education) as adapted from Great Trails Guidelines (NOHVCC)
- **Key Fishing and Hunting Locations:** (we recognize that OHV for many users provide access to intended recreation.)

4. Refinement of Existing Use Base Layer

Although it is recognized that the existing trail network within the Livingstone-Porcupine PLUZ was not derived from linear developments intended for recreational use, there is legacy of use that points to the value that the existing network provides for access to recreation. Trails developed as cutline for exploration, etc, would not be utilized for recreational use if there is/was properly designed trails.

Furthermore, ACESS recognizes that many of the existing published maps for the areas do not necessarily represent up-to-date trail data in terms of usage of trails, does not distinguish between trails in terms of value and does not provide information on where previous investments in mitigation have been focused (e.g., bridges).

In an effort to better understand the spatial extent of existing recreational use within the PLUZ area, ACESS undertook an exercise in compiling and refining a base recreational trail base. The "Refined Existing Use Layer" was derived from a combination of input from AOHVA, clubs and user supplied GPS track logs provided by individual contributors, as well as published club maps (e.g., Quad Squad Crowsnest etc). The supplied user data was related to the supplied Livingstone and Porcupines base data provided by the AEP planning team. Utilizing this data set, each trail segment was classified based on the used provided information. Following this, the data was QA/QC'd by reviewing with club contributors and eliminating obvious redundancies and dead-end fragments (e.g., false start). As such, ACESS believes that this data provides a more accurate and considerable ground verified base representation of the existing utilization of trails within the planning area for the PLUZ.

There are artefacts embedded in the data set which present gaps in linkages - this is a defacto artefact of the base data that was provided by the AEP. ACESS chose to work with this data in an effort to be consistent and collaborative with the AEP GIS technicians for future analysis and refinement.

ACESS's recommendation with respect to this data set would be as follows:

- Categorize and name routes. Presently the data consists of linear fragments which inhibits further analysis as trail management should consider overall routes, and not the fragments themselves.
- Identify and highlight trail segments using the AEP ROM model as a preliminary identification of mitigation sites required on the landscape for review/discussion with recreation group.
- Compile and generate a GIS data set that captures existing mitigation measures which are currently in place (e.g., bridges installed for OHV, quad cattle ramp).
- Rank routes using a recreational user valuation such as the suggested model provided herein. To support this, an accurate 'points of interest' type data set, that captures the linked recreational opportunities that are desirable in the local setting (e.g., viewpoints, look outs, geological features such as Window Mountain, old cabins & historical remnants, fishing holes, waterfalls etc).
- Analyses/review for discussion and input.

In addition to compiling user information on the trail usage, ACESS has been working towards compiling data on points of interest and is vested in aiding and collaborating with all recreational users with AEP to develop a more complete data set with respect to this. In this aspect, ACESS believes that a user driven identification of key points of recreation value would provide meaningful input into the planning process.

Conclusion

Successful trail/recreation use planning recognizes that there are no activities or developments on a landscape that do not interact with the environment and other uses. A meaningful exercise in planning should recognize and incorporate relative values of individual uses which occur on the landscape, in

conjunction with economic and environmental values. Without a valuation, there cannot be a full understanding or rational for the trade-offs or their impacts.

There is a total of 496 parks (including National Parks), reserves, protected and public land areas in Alberta, totaling 10M hectares by size. Of those areas, 35 (7% +/-) allow Motorized OHV as a permitted use. With recreational planning in these areas, this additionally allows for distribution of different recreational users as to provide access to their valued experiences and mitigating conflicts. At high level, true collaborative input and planning with recreational users as a group - can provide quality recreational opportunities collaboratively mitigated without sacrificing one type for the other in each area balancing environment, social and economic values and outcomes.

ACESS believes that management of recreational activities on public lands is required to ensure sustainability of both environment and the recreation for future generations. The recreational stakeholders are experts in their fields to assist in providing user experience, and their collaboration can aid the Alberta Government in delivering outcomes beneficial to all.

We look forward to assisting AEP in meeting these outcomes, and truly appreciate the opportunity to provide our feedback on SARAG. If you should have any questions, please do not hesitate to contact us.

Sincerely,

Garett Schmidt

Speet Almil

Chair, Alberta Committee for Eastern Slopes Stewardship

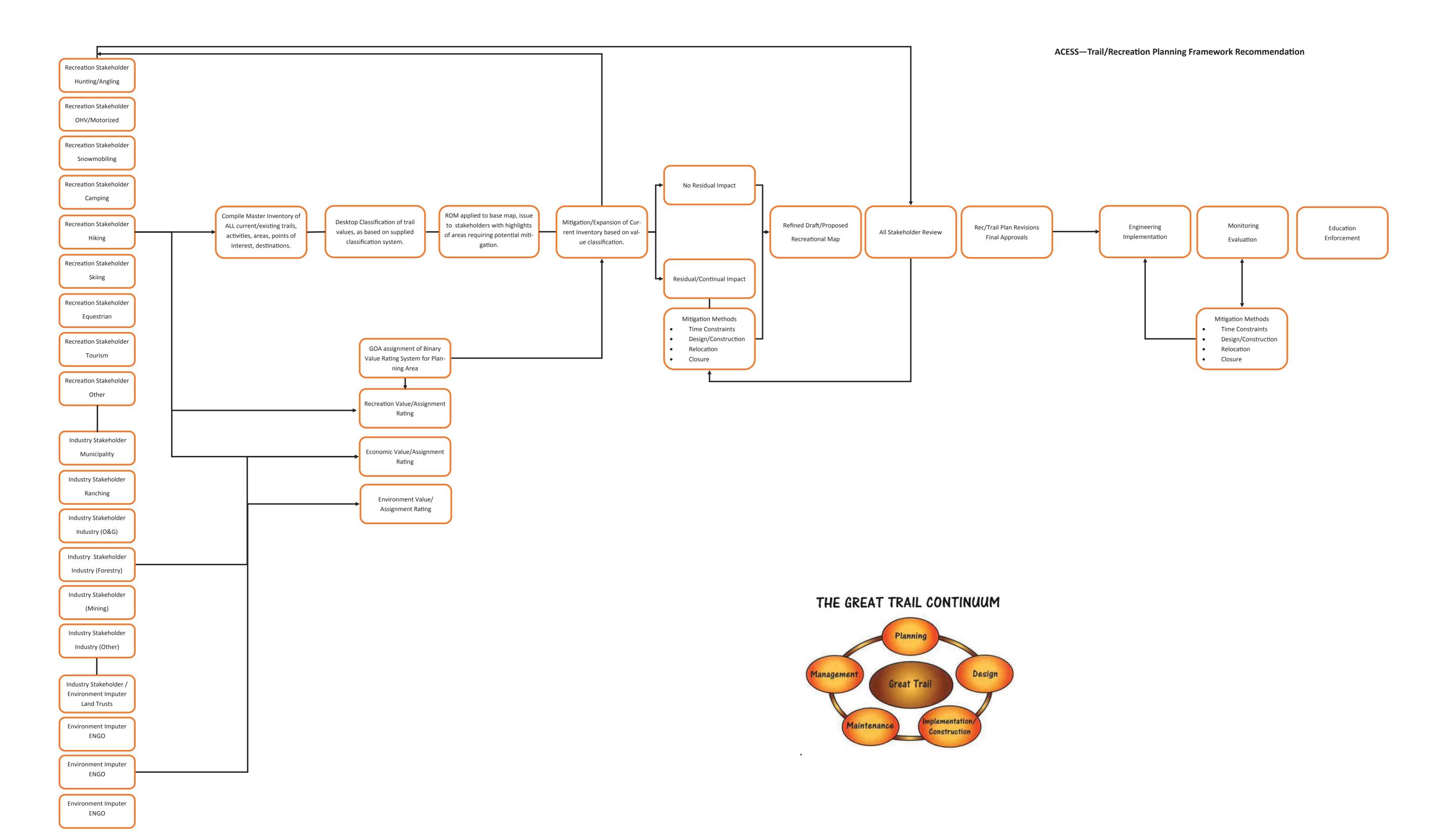
C: 780.690.0372

E: gschmidt@cw-industrial.net

Attached:

Refined Existing Use Maps – PDF Refined Existing Use Maps – Shape Files (ArcGIS)

ATTACHMENT A	
Suggested System-Level Recreational Trail Management Framework	
Suggested System-Level Recreational Trail Management Framework	
Suggested System-Level Recreational Trail Management Framework	
Suggested System-Level Recreational Trail Management Framework	
Suggested System-Level Recreational Trail Management Framework	



Preliminary Suggested Indicators for Re	ATTACHMENT B	twork for Off Highway Vehicle Use
,		3

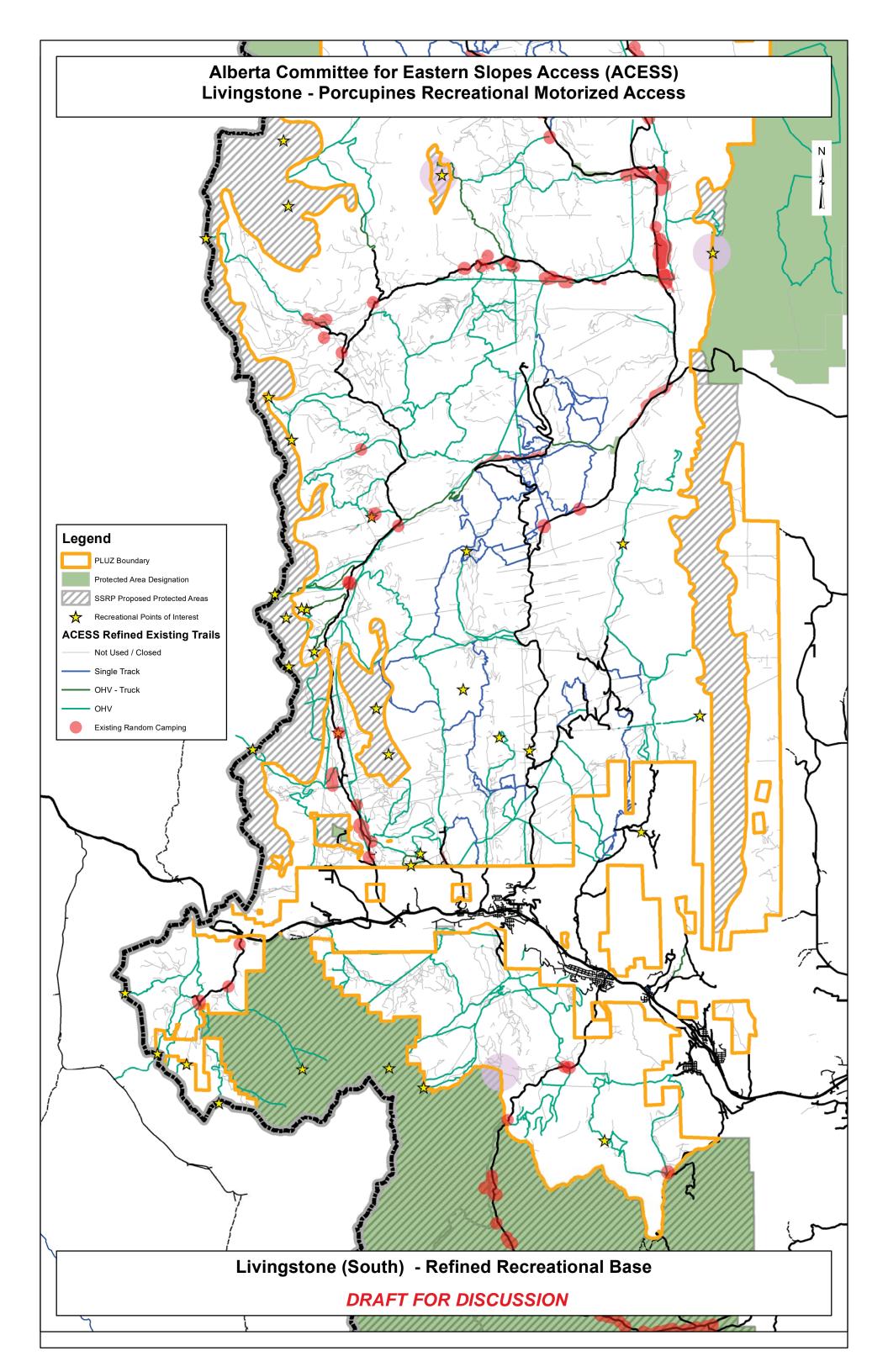
Table B1: Preliminary Suggested Indicators for Recreational Value of Trail Network for Off Highway Vehicle Use

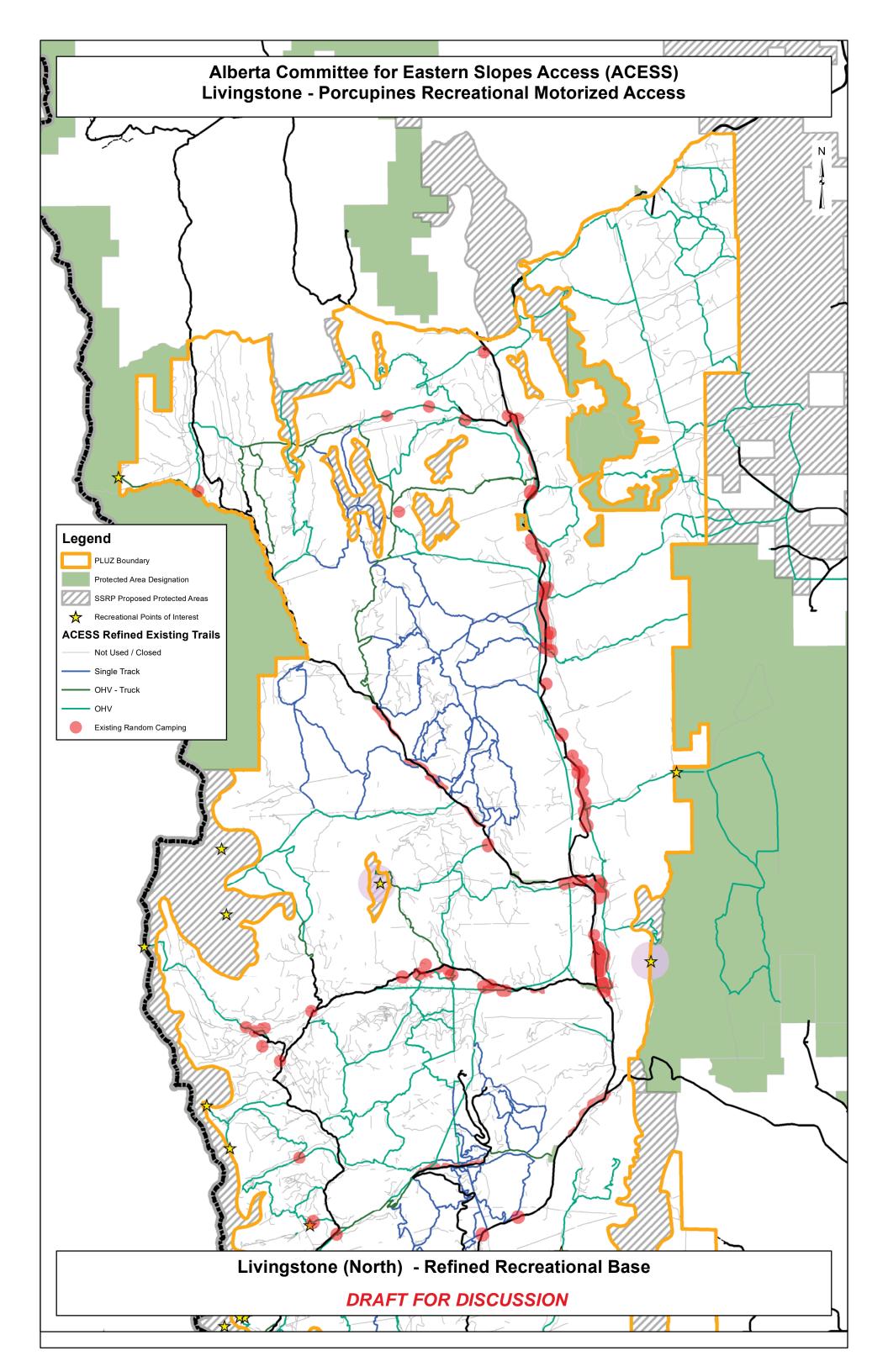
Indicator	Ranking Descriptor	Relative Ranking
Staging	Derived from GIS mapping by running intersection of staging areas with routes.	
	 Trail connects to existing or proposed camping/staging areas (either via connecting trails or on its own; e.g., trail is part of a 'loop'). 	3
	 No connectivity to camping/staging areas, but could be established with short connectors. 	1
	 No connectivity to staging areas without extensive new trail development. 	0
Technicality/Flow	Derived from LIDAR, based on trail segments.	
	Trail is straight and flat	1
	Trail is curvy with variations in topography	3
Variety/Openness	Measured as routes using both vegetation database that is classified	
	by height, and the variety of combined segments.	
	 Trail provides high degree of openness for viewscapes; > 50% of 	3
	trail length is mixed vegetation types with both trees and shrubs or	
	shorter types.	
	Trail provides moderate openness; 15% to 50% of trail length is	2
	through vegetation types of shrubs or shorter types.	
	 Trail provides limited openness; < 85 % of trail length is through 	1
	vegetation types dominated by shrubs or shorter types,	
Length	Derived from overall route lengths.	
-	 Drive time of overall route (entire loop or 'there and return' for non-loop trail) > / = 4 hours 	3
	Drive time of overall route (entire loop or 'there and return' for non-loop trail) 2-4 hours	2
	 Drive time of overall route (entire loop or 'there and return' for non-loop trail) < 2 hour 	1
Points of Interest	Trail connects provides direct route to (or by) point of interest or unique features (e.g., to look-out, geologic feature, water feature)	3
	 Trail connects to point of interest indirectly (e.g., via one to two connections) 	2
	Trail appears to dead-end; no connectivity to other trails / known point of interest	1
Overall	Sum of individual rankings; assumes all are equal. Model can be	
Recreational	modified to emphasize individual parameters and tailored for type:	
Rating	Single Track/OHV/Snow by scaling relative/applicable rankings.	
	High Relative Recreational Value	10-15
	Moderate Recreational Value	5-10
	Lower Recreational Value	< 5

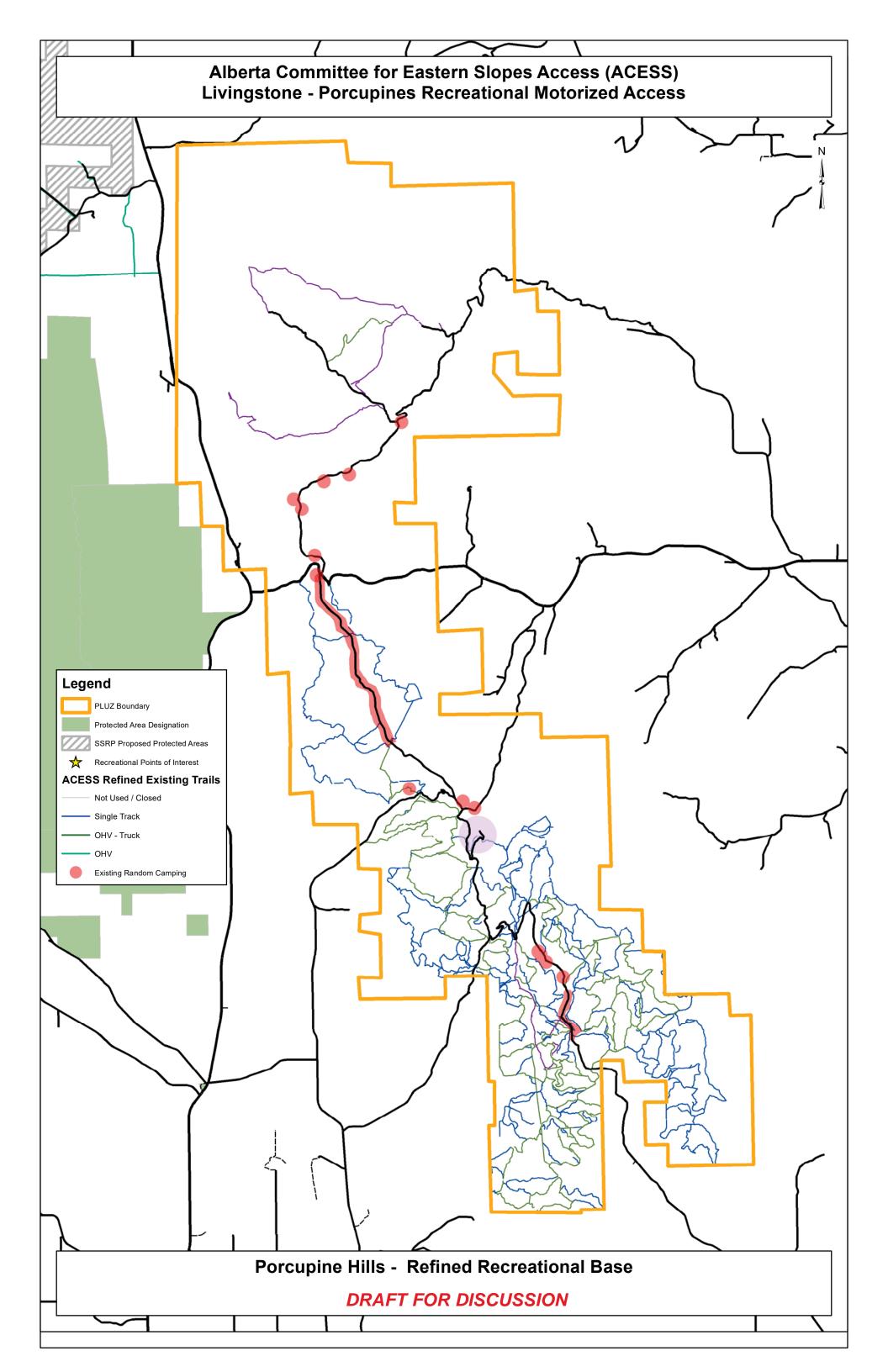
Rankings proposed are scored such that a higher value represents a more desirable trail condition and lower score represents as a less desirable condition.

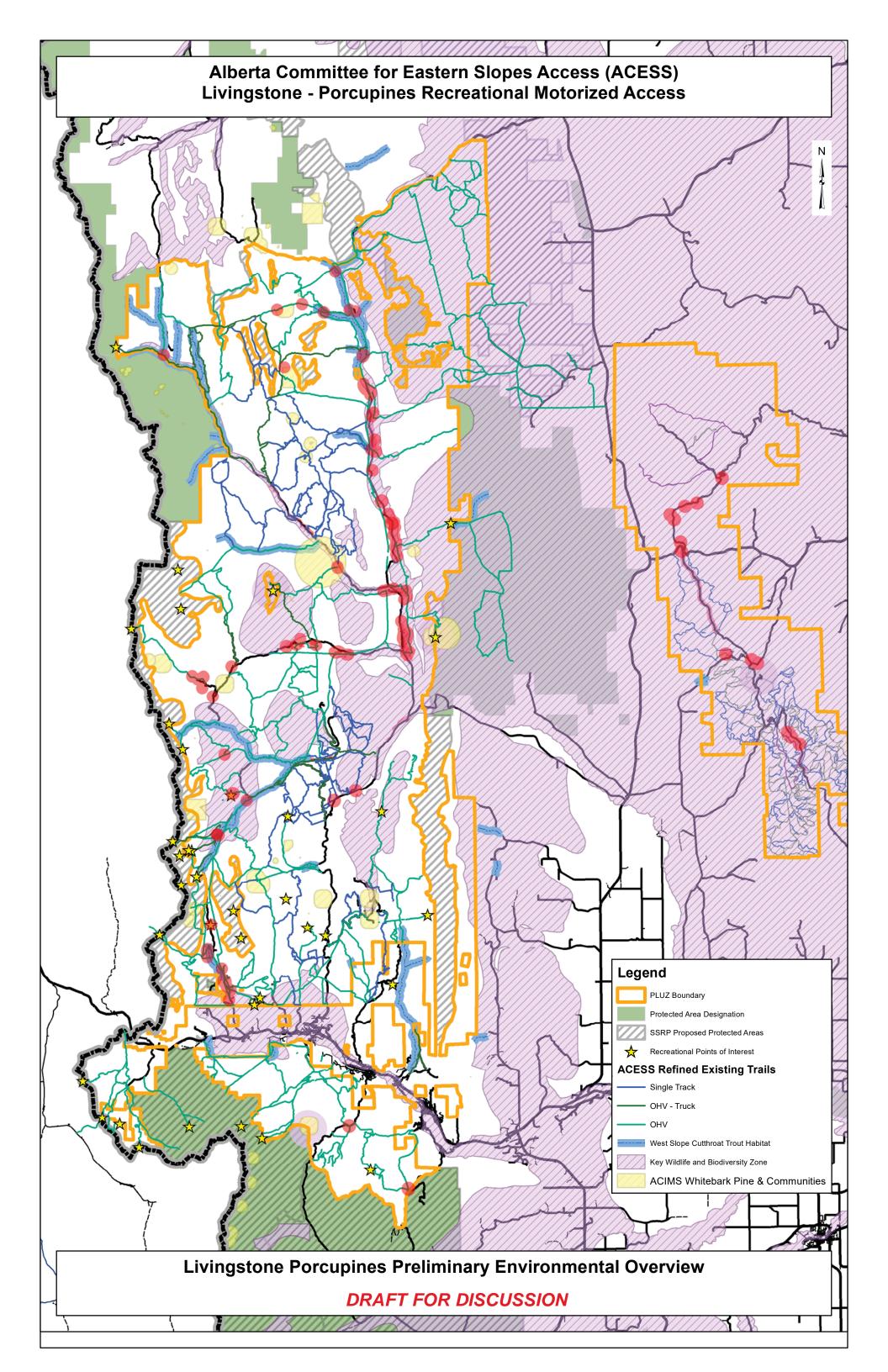
ATTACHMENT C

Refined Existing/Current Recreational Base Maps











APPENDIX D - COHV WELLNESS STUDY

News Release

The Results Are In! Off-Road Vehicle Riding Is Good For Your Body and Soul

Toronto, Ontario, August 26, 2010 –The Canadian Off-Highway Vehicle Distributors Council (COHV) and its funding partners the All-Terrain Quad Council of Canada (AQCC), the Motorcyclist Confederation of Canada (MCC) and the government of Nova Scotia have received the first of four reports from York University, confirming that riding all-terrain vehicles (ATVs) and off-road motorcycles (ORMs) is good for your body and soul.

Jamie F. Burr, Veronica K. Jamnik, Jim A. Shaw and Professor Norman Gledhill at York University's Physical Activity and Chronic Disease Unit, Faculty of Health conducted the study. The purpose of the research -- to characterize the physiological demands of recreational off-road vehicle (ORV) riding under typical ORV riding conditions using habitual recreation ORV riders. Study analysis of exercise intensity during riding revealed "approximately 14% of an ATV ride and 38% of an ORM ride are within the intensity range required to achieve changes in aerobic fitness. Riding on a representative course also led to muscular fatigue, particularly in the upper body."

Jamie Burr, York University, Faculty of Health concluded, "On the basis of the measured metabolic demands, evidence of muscular strength requirements, and the associated caloric expenditures with off-road vehicle riding, this alternative form of activity conforms to the recommended physical activity guidelines and can be effective for achieving beneficial changes in health and fitness." Jamie further added, "Off-Road Vehicle (ORV) riding is similar in aerobic demand to many other recreational, self-paced, sporting activities such as golf, rock climbing and alpine skiing."

"COHV and its partners were pleased to learn that this first report confirms what ORV riders already know -- that being out on the trails is not only fun but contributes to individual and family well-being and physical fitness," stated Bob Ramsay President of the MMIC. "This ground breaking, first ever comprehensive, scientific probe of the fitness and health benefits of ATV and ORM recreational riding proves that riding creates sufficient opportunity to stimulate changes in aerobic fitness and falls within the physical activity guidelines of both Health Canada and the American College of Sports Medicine (ACSM)."



There is still more to come. As they are published, COHV and its partners look forward to reviewing subsequent sections of the study that will further assess the fitness and health characteristics (body composition, musculoskeletal fitness, aerobic fitness, back fitness, physical activity participation, lifestyle characteristics, health characteristics and quality of life characteristics) of this same representative sample of participants.

The COHV and its member companies: Arctic Cat, BRP (Can-Am), Honda, Kawasaki, KTM, Polaris, Suzuki and Yamaha are committed to family recreation and healthy, active life styles. We believe that the results of this study are a great resource to be shared with those who question OHVs as a healthy recreational activity.

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APPENDIX E - National Trails Coalition Partnership

In addition to the effective partnership models currently in place in other Canadian Jurisdictions, as noted above, AOHVA recommends the National Trails Coalition Partnership also be considered as input to the SARAG process.

The Coalition of Canadian Trails Organizations is a federally incorporated not-for-profit organization that operates under the name of the National Trails Coalition. Its members are: Canadian Council of Snowmobile Organizations (CCSO); Canadian Off-Highway Vehicle Distributors Council (COHV); and the Canadian Trails Federation (CTF). The NTC represents hundreds of thousands of Canadians who enjoy outdoor activities on managed trails. The NTC was formed in 2007 to bring the broad spectrum of trail-based activities together in a collaborative manner to build, maintain and promote trails and trail use across Canada.

The success of the NTC's 50/50 public-private funding partnership is best demonstrated by the injection of \$35 million dollars by the federal government between 2009 and 2016 triggering more than \$83 million (with an additional \$5.4 million in-kind contributions) invested in 734 trail projects across Canada, while building, upgrading or rehabilitating 27,043 kilometres of trail.

The investment in trails is an investment in healthy living; safer recreation; better environmental management and education; community development; economic activity; and employment; whether through motorized or non-motorized recreational use such as snowmobiling, off road motorcycling, off-highway vehicle use or walking, running, cross-country skiing or biking that is not only fun but contributes to individual and family well-being.

NTC projects completed across Canada include locations in small, rural communities - areas that are often over looked by larger scale infrastructure programs – creating jobs in the short term through construction (7, 200 FTE's between 2009 & 2016) – and in the long term through enhanced tourism opportunities.