



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

June 4, 2013

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RE: Badlands Motorsports Resort Area Structure Plan
(Kneehill County Bylaw 1597, Public Hearing June 11, 2013)

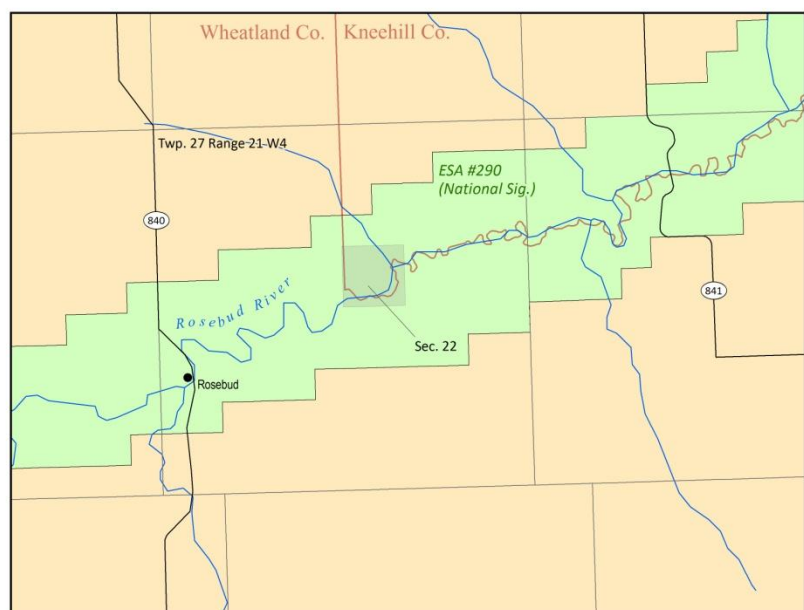
Dear Sirs:

Alberta Wilderness Association (AWA) has recently been apprised of the application made by Badlands Motorsports Resort to have their Area Structure Plan adopted by Kneehill County under Bylaw 1597. We believe the proposal will have negative impacts on important and environmentally significant areas.

As you are doubtless aware, the proposed resort, covering the majority of section 22 in township 27-21-W4, is situated at the edge of the Rosebud River, and the intended development will overlap with the undisturbed coulees and riparian areas along that river that form a part of the Drumheller Badlands.

These undisturbed natural areas form an ecologically sensitive area that is important to the natural well-being of this province, its wildlife and wild waters, and are not an appropriate place for a development of this scope and magnitude.

The entire proposed development site is encompassed within Environmentally Significant Area (ESA) identified by Alberta Environment and



Sustainable Resource Development (AESRD) as #290, an ESA of *National* significance (see map, above). The aforementioned coulees and riparian areas, furthermore, also overlap with the ESA identified as “*Rosebud River*” by Summit Environmental Consultants in their *Kneehill County Environmentally Significant Areas Report* of March 23, 2010, found on the Kneehill County website (see, e.g.: p.68).

Kneehill County’s *Integrated Community Sustainability Plan (2011-2015)* refers to this report in its Goal D, which is to “Preserve and Promote the County’s Natural, Cultural and Heritage assets.” The plan goes on to expand on this goal by affirming that the report “provides a baseline for identification and preservation.”

With that in mind, we note the following value statements from that report:

Conserving significant areas within the County is essential to protect the overall biodiversity, natural ecosystem functions (e.g. hydrological function), rare and unique geological or physiographic features, wildlife movement corridors, and public values. **(emphasis added)**

And, regarding the coulees along the Rosebud River:

These areas have significant natural, historical and recreational value.

On the ESA fact sheet for the Rosebud River, on p.69 of the Summit report, the ESA is listed as having a significance of ESA-1 (Very high) and ESA-2 (High) out of a 5-point scale. Under the management objectives, we then find the following recommendations:

In order to meet the environmental objectives of Kneehill County and work towards the Government of Alberta’s recently adopted Land-Use Framework, planners should set the management goals to preserve the most significant ESAs (ESA-1 and -2) and limit disturbance to or improve less significant ones (ESA-3 and -4). Management objectives for each ESA are outlined below.

Generally, development within an ESA-1 or -2 should be avoided or minimized. (emphasis added)

The specific recommendation for an ESA graded ESA-1 reads:

Generally, ESA-1 is considered pristine in its existing state, meeting several of the ESA criteria and with low levels of disturbance. **Kneehill County should try to avoid or minimize development (including grazing, cropping, land clearing, oil and gas exploration and development, intensive recreational use, etc.) in these areas. (emphasis added)**

Finally, on p.92, recommendations related to “coulees and badlands” read:

Coulees and badlands are unique land features in the Province of Alberta, and there is a large proportion of them within the Kneehill County region. In addition to limiting cattle access, controlling weeds, and stabilizing or vegetating disturbed soils with native vegetation, some special management considerations for coulees and badlands include the following:

- Direct development of permanent structures away from valley edges, protrusions and escarpments (Kneehill County 2005); and,
- Ensure land uses and developments are compatible with contiguous landscapes (e.g. guest ranches and low impact recreation that enable preservation of large areas of land).

AWA does not believe that the proposed motorsports resort plan, as it currently exists, meets any of these guidelines or recommendations. In the area structure plan, we note that less than half (specifically, 47.7



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percent) of the area slated for development will be on already disturbed or cultivated land. The remaining 70 or so hectares (not including lands set aside for the "proposed Environmental Reserve Easement" that "may" be registered against the land) will result in the wholesale transformation of currently intact ecosystems into artificially landscaped terrain. It will not fulfill the essential ecosystem functions currently provided by the native grasses and species.

One of these essential functions is the provision of ideal habitat to animals – aquatic, avian and land-based – that make the area home. The AESRD species inventory (see the *Environmentally Significant Areas Provincial Update 2009* by Fiera Biological Consulting) for ESA #290 notes that it is home to eight animals included in the provincial *Species at Risk* listing, notably including the Leopard Frog, Ferruginous Hawk, Peregrine Falcon and Western Burrowing Owl. These species will find no ready home in the re-imagined landscape described in section 3.17 of the Area Structure Plan. Despite assurances in the plan that "most are anticipated to return to the site after construction has been completed and are likely to adapt to the new conditions and/or adopt new movement patterns" the reality is that many species do not return to areas that have been disturbed, and undergone a change in vegetation.

The intent of the Kneehill County ESA Report cited extensively above is an important measure in the protection of native biodiversity and environmental health. Specifically with regard to the recommendation to avoid development (including intensive recreational use – for which this proposal certainly does qualify) in ESA lands rated ESA-1. AWA believes this type of development is far better left to already disturbed and cultivated areas.

Thus AWA is writing to register our serious concern with the proposed development. We would like to obtain a copy of any environmental impact assessment undertaken for this project and what factors will be considered in any decision to approve this motorsports resort in a prime natural, undisturbed setting. We will appreciate your timely response.

Yours truly,

ALBERTA WILDERNESS ASSOCIATION

Sean Nichols, Conservation Specialist