

Integrated Response to the Draft Upper Smoky River Sub-Regional Plan (US-SRP)

Submitted by Grande Cache Chamber of Commerce

Overview

The Draft Upper Smoky River Sub-Regional Plan (US-SRP) outlines land-use changes aimed at supporting caribou recovery and broader conservation goals. While conservation is a shared value, the current draft raises significant legal, ecological, cultural, and economic concerns. The plan was developed without meaningful consultation with local Indigenous groups, land users, or industries that have responsibly stewarded this region for generations.

Key Concerns

1. Premature and Improper Planning

- The US-SRP was introduced before completion of the Upper Peace Regional Plan, **violating Alberta's Land-Use Framework**.
- **There was inappropriately embedded under the South Saskatchewan Regional Plan**, which applies to southern Alberta and creates legal and jurisdictional inconsistencies.

2. Inadequate Consultation

- The Grande Cache business community, including the Grande Cache Chamber of Commerce, was not consulted during the planning process, despite being directly affected by land-use changes.
- Indigenous groups, including the Mountain Métis and Aseniwuche Winewak Nation, and other groups like the Willmore Wilderness Foundation along with trappers, outfitters, mountain guides and tourism operators, were not meaningfully engaged.
- The exclusion of local, intergenerational land users undermines the plan's legitimacy and long-term sustainability.
- The marginalization of the Willmore Wilderness Foundation is detailed in their April 30, 2025, submission to the US-SRP team in a document titled *Points of Concern – Upper Smoky Sulphur Gates PRA*, which documents repeated 2022 email requests for meeting minutes, transparency, and participation; requests that were either ignored or only partially addressed. The Foundation was effectively blocked from the consultation process, even though Willmore Wilderness Park spans 4,600 square kilometres, half of which (2,300 km²) drains into the Upper Smoky region. The Foundation maintains a year-round presence in the park and works closely with

some of the most knowledgeable experts on its ecology, history, and traditional trail systems.

3. Unnecessary Park Designation

- There are more than 15 existing designated parks near Highway 40, between Hinton and Grande Prairie areas, including the Kakwa–Willmore–Jasper complex. *(Please refer Appendix 1)*
- Adding another “Nature First” park ignores the underutilization of current parks and lacks a clear justification. The Grande Cache Chamber of Commerce is opposed to the proposed “Nature First” park.
- Strategic focus should instead be placed on managing and investing in the stewardship, accessibility, and public awareness of the region’s substantial existing conservation areas, along with the development of management plans for these long-neglected parts of the Rockies.

4. Encroachment on Willmore Wilderness Park

- Willmore Wilderness Park is governed by the Willmore Wilderness Park Act, not the Provincial Parks Act.
- This legislation prohibits roads and industrial activity and must remain legally distinct and protected.

Risks and Impacts

1. Traditional Land Use and Cultural Continuity

- Trail closures, permit limitations, and unclear zoning impact Indigenous harvesting, spiritual practices, as well as youth training and mentorship initiatives led by the Willmore Wilderness Foundation.
- Programs tied to horseback culture, traditional land skills, and cultural preservation are threatened by access restrictions.

2. Trapline and Leaseholder Access

- Holders of Registered Fur Management Area traplines, both indigenous and non-indigenous trappers may face new limits on winter access.
- Commercial Trail Riding face uncertainty over group sizes, seasonal use, and infrastructure access.

3. “Slow Go Zone” Designation on the Smoky River near the Smoky Bridge

- A proposed Slow Go Zone overlaps active Indigenous land use (e.g., Joachim Enterprises), long-standing tourism and commercial lease, horse holding lease, Fish & Game Club, and possibly a long-standing gravel pit plant.
- Long standing commercial and tourism lease holders face uncertainty in tourism promotion.
- Residents report **no observed caribou in this area**. The environmental sensitivity claim appears scientifically unsupported and must be reviewed transparently.

4. Wildfire Risk Ignored

- The plan restricts land use in areas critical to fire mitigation without incorporating Alberta's wildfire strategies.
- This raises fuel load concerns and threatens public safety and ecological health.

Industry-Specific Threats

Coal Mining Threats

1. Prohibition of New Surface Coal Mining

- Development banned in Zone 2 (including much of Grande Cache).
- Applications outside Zones 1 and 2 also prohibited, halting surface coal expansion.

2. Limited Underground Mining Opportunities

- Only one designated coal zone restricts to underground operations.
- Raises risk of surface mining encroaching on sensitive ecosystems.

3. Overlap with Critical Wildlife Habitat

- Coal zones intersect caribou and biodiversity corridors.
- Development could further degrade fragile habitats.

Forestry (Lumber Extraction) Threats

Conservation Units Added Without Notice

Conservation Area / Industry Additions: The plan has added two new units, Conservation Areas A & B, which were not mentioned in any known public consultation, Task Force, or Technical Working Group associated with the sub-regional planning process. Conservation Area B overlaps a recently completed Forest Management Plan (FMP) for Forest Management Unit (FMU) E10 developed by Foothills Forest Products. The timber volume from this unit was

expected to supply approximately 1.25 months of mill operations and had an estimated gross value of \$3 million in harvesting, trucking, and related services for local companies.

Considerations:

- Most of the caribou zones lie outside FMU E10, yet the SRP discourages future timber supply for a local Grande Cache sawmill—a major employer in the region.
- The sawmill has applied for a Forest Management Agreement (FMA) for FMUs E10 and E8 and completed the corresponding Forest Management Plans.
- Over 2 million hectares of nearby lands are already protected (Kakwa, Willmore, Jasper), making additional restrictions unnecessary.
- The SRP fails to incorporate Alberta’s wildfire mitigation plans, increasing wildfire exposure risk due to unmanaged fuel buildup.

This late-stage addition of conservation zones disregards proper planning protocols, introduces significant economic risk, and compromises the collaborative spirit of the planning process.

6. Broader Community and Cultural Impacts

The Draft Upper Smoky River Sub-Regional Plan (US-SRP) poses a direct threat to the cultural survival, economic viability, and community cohesion of Grande Cache and its surrounding region.

Impact on Indigenous Cultural Practices

The Mountain Métis Community Association and the Aseniwuche Winewak Nation have maintained traditional land-based practices—such as moose hunting, hide tanning, and spiritual use of the land—since their displacement from Jasper National Park in 1909. These communities rely on continued access to culturally significant landscapes that are now under threat. A Provincial Park designation for “Nature First” would impose regulatory barriers and land-use restrictions that would severely impair their ability to carry out traditional activities and uphold cultural continuity.

Community Viability at Risk

If implemented in its current form, the plan will have devastating effects on Grande Cache:

- Coal mines and sawmill operations will be eliminated, stripping the community of its foundational industries.
- The result will be a hollowed-out community with limited employment options, dependent solely on a correctional facility.

- The lack of stable industry has already led to difficulties in retaining essential professionals such as doctors and teachers.
- **Tourism cannot replace industrial employment**
The community cannot survive on seasonal or short-term tourist revenue alone.

Ecological Concerns Questioned

- The Redrock–Prairie Creek caribou herd, a central justification for restrictions, is located far from Grande Cache and is no longer considered viable. Redirecting regional planning to "save" a herd that cannot be recovered is scientifically questionable.
- The À La Pêche caribou herd, the only herd with a self-sustaining population, does not primarily inhabit the US-SRP planning area.
- There are **no caribou in the proposed "Slow Go Zone"** near Grande Cache. Local land users and Indigenous residents confirm this through decades of direct observation and occupancy.

Disconnect from Alberta's Own Planning Framework

The **plan violates Alberta's Land-Use Framework** by proceeding ahead of the Upper Peace Regional Plan and embedding the US-SRP under the South Saskatchewan Regional Plan, which was developed for southern Alberta. This legal and planning misalignment undermines both the integrity of the process and the trust of local stakeholders.

Driven by External Interests, Not Local Realities

Many of the proposed restrictions appear to be driven by urban-based environmental lobbying groups, rather than by data or lived knowledge of the region. These "weekend warriors" lack the generational understanding of the land that local Indigenous and non-Indigenous land users possess. Their influence has contributed to landscape sterilization, removing access for those who have responsibly managed it for generations.

A Community's Last Stand

Grande Cache still has two viable coal mines and a functioning sawmill. These represent the last pillars of economic hope for the region. If the US-SRP removes these, it removes any path forward for a self-sustaining future.

Key Recommendations for Policymakers

- Pause Implementation until a full Upper Peace Regional Plan is completed and reviewed.

- Remove SSRP Reference to maintain geographic and legal consistency for northern Alberta.
 - Uphold the Willmore Wilderness Park Act, protecting it from reinterpretation or regulatory encroachment.
 - Respect Indigenous Rights, including co-management, free prior and informed consent, and protection of traditional land use.
 - Safeguard Local Economies, including forestry, coal, trapping, equestrian tourism, and youth programs.
 - Evaluate Scientific Claims Transparently, especially for new conservation zones and the “Slow Go Zone.”
 - **The Grande Cache Chamber of Commerce is opposed to the Slow Go Zone immediately north of Grande Cache along the Smoky River.**
 - Ensure Inclusive Consultation at all stages of implementation, with meaningful input from Indigenous groups, trappers, leaseholders, and local industries.
 - There is an overabundance of parks along Highway 40.
 - **The Grande Cache Chamber is opposed to the proposed “Nature First” Park.**
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Conclusion

The Draft US-SRP does not adequately reflect legal frameworks, ecological realities, or the lived knowledge of land users who have long stewarded Alberta’s Eastern Slopes. For the plan to succeed, it must be co-developed—ensuring Indigenous rights, community voices, and regional sustainability remain at the core of land-use decisions.

Appendix 1

An Overabundance of Parks Along Highway 40 North of Hinton

Alberta's Highway 40 corridor between Hinton and Grande Prairie is home to a wide range of protected areas, including Provincial Parks, Wildland Parks, Provincial Recreation Areas (PRAs), and one of Canada's most expansive interprovincial wilderness complexes. These sites collectively protect critical habitats, support traditional land use, and offer extensive opportunities for outdoor recreation such as hiking, horseback riding, fishing, and camping. The region is anchored by Willmore Wilderness Park and features several key staging areas that serve as gateways into Alberta's Eastern Slopes and backcountry landscapes.

Provincial Parks

1. **Willmore Wilderness Park**
 - A vast, undeveloped wilderness area covering approximately 4,600 km², offering backcountry hiking, horseback riding, and camping.
 2. **Rock Lake Provincial Park**
 - Located northwest of Hinton, this park serves as a primary staging area for Willmore Wilderness Park, providing camping, boating, and equestrian facilities.
 3. **Pierre Grey's Lakes Provincial Park**
 - Situated 37 km east of Grande Cache, this park features five lakes ideal for fishing, boating, and camping, along with historical significance as a former trading post.
 4. **William A. Switzer Provincial Park**
 - Located between Hinton and Grande Cache, this park offers campgrounds, lakes for water activities, and trails for hiking and wildlife viewing.
 5. **Two Lakes Provincial Park**
 - This provincial park located in Alberta, Canada, situated 140 km southwest of Grande Prairie in the foothills of the Rocky Mountains.
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Wildland Provincial Parks

6. **Kakwa Wildland Provincial Park**
 - Part of the Kakwa-Willmore Interprovincial Park, this remote area features rugged terrain, waterfalls, and diverse wildlife, accessible primarily by foot, horse, or OHV from the north.
7. **Rock Lake–Solomon Creek Wildland Provincial Park**
 - Adjacent to Willmore Wilderness Park, this park protects diverse ecosystems and serves as a wildlife corridor between major parks.

Provincial Recreation Areas (PRAs)

8. Sulphur Gates PRA

- Near Grande Cache, this area offers dramatic canyon views and serves as a staging area for Willmore Wilderness Park.

9. Big Berland PRA

- Located along Highway 40, this area provides access to Willmore Wilderness Park and facilities for camping and equestrian use.

10. Kakwa River PRA

- Situated 90 km south of Grande Prairie on Highway 40, this area offers camping, fishing, and hiking opportunities along the Kakwa River.

11. Sheep Creek PRA

- A small area along Highway 40 providing camping, fishing, and hiking amenities.

12. Smoky River South PRA

- Adjacent to Grande Cache, this area offers river access for fishing and boating activities.

13. Musreau Lake Provincial Recreation Area

- Located approximately 80 km south of Grande Prairie on Highway 40 and 2 km east via a gravel access road, Musreau Lake Provincial Recreation Area offers a serene setting for various outdoor activities.

14. Tamarack Recreation Area

- Located about 5.5 km south of Grande Prairie via Highway 40, this area is suitable for day trips, featuring picnic areas and trails.

Kakwa–Willmore Interprovincial Park

15. Kakwa–Willmore Interprovincial Park

- Kakwa-Willmore Interprovincial Park is a **protected area that spans both British Columbia and Alberta in Canada**. It includes Kakwa Provincial Park and Protected Area in British Columbia, Kakwa Wildland Provincial Park in Alberta, and Willmore Wilderness Park in Alberta.

The Kakwa-Willmore Interprovincial Park, encompassing Kakwa Wildland Provincial Park (Alberta), Willmore Wilderness Park (Alberta), and Kakwa Provincial Park (British Columbia), is a vast area. Kakwa Wildland Provincial Park is approximately 650 square kilometers. Willmore Wilderness Park is 4,600 square kilometers. The total area of the interprovincial park, while not specifically stated, would be the sum of the individual park areas, which is well **over 5,250 square kilometers**.