

**Comments and Key Messages on the Report: Environmental Assessment Registration - Mount Carleton Grooming Hub Project, NB Department of Tourism, Heritage and Culture**

**Prepared by Canadian Parks and Wilderness Society – NB Chapter**

**Overall Comments - What is missing from the report:**

- The report doesn't analyze the potential impacts that this snowmobile trail and grooming hub development will have on non-motorized tourism and use of the park, either during winter or other seasons. It assumes a net economic benefit to the park from the new snowmobile developments and use, without any socioeconomic study about how the changes made to the trail up Mount Carleton might impact non-motorized use year-round.
- The report provides misleading information by referring to the East Trail up Mount Carleton as an "existing snowmobile trail". This trail has not been an authorized snowmobile trail, so any snowmobile use that has happened on it is being done without permission or authorization, and only because the park doesn't have enough enforcement in winter to prevent that use. Since "existing use" can influence how technical reviewers perceive the potential impacts of a development, this needs to be clarified.

**What is inadequate in the report**

Section 4: Environmental Impacts

Impacts on Wildlife:

- The report does not provide details of locations of critical wildlife habitats in the park or along the routes that would be developed. For example, the Gaspé shrew is listed as "May be of Concern" by the Province of New Brunswick's General Status of Wildlife. There are only two known locations in the province, one on Mount Carleton. The report doesn't mention any recent field work, or any description of whether this development might affect known locations in the park. Gaspé shrews are active during the winter, creating snow tunnels to search for food, so could be significantly impacted by snowmobile and groomer use in their habitat.
- The report dismisses the impacts of noise from motorized vehicles on wildlife, and ignores a significant body of research that indicates noise impacts on moose, bald eagles, hibernating bears, and small mammals. Snowmobile noise disturbs wintering wildlife. It causes stress, as wildlife need to use extra energy reserves to avoid noise and disturbance, and changes where wildlife go in the park to rest, eat or hibernate. Wildlife may be displaced into less optimal habitats that lower their chances of surviving through the winter.
- The report ignores the impact of snow compaction on wildlife. When the groomer and snowmobiles go on the trail, they compact the snow, changing it from deep, fluffy snow to hard, packed snow. Small mammals, such as shrews, mice, weasels, squirrels and voles, live in extensive

tunnels they create under the snow to search for food and to create warm burrows. Compacting the snow reduces habitats for these mammals. Small mammals can be killed directly when the snowmobile goes over top of them, or the snowmobiles can collapse the snow tunnels that wildlife had been using to search for food. Reducing the populations of small mammals would remove food sources for owls, hawks, Canada lynx, weasels, and American marten – resulting in ecosystem wide impacts up the food chain.

- The mitigation measure the government proposes to deal with potential wildlife collisions on the trail is to widen the trail further, to increase visibility for snowmobilers. However, this would likely worsen the erosion problem on the slope, and will cause more canopy and habitat to be removed.

#### Impacts on Water and Aquatic Habitats

- The report dismisses the potential impacts of increased snowmobile pollutants, however there are studies that show an increase in acidity when the pollutants released from snowmobiles accumulate in the snow over winter. They are released in the spring during snowmelt, flowing into lakes and waterways. This impact has been shown to depend heavily on the volume of snowmobile activity, where snowmobiles travel (such as near waterways or on slopes) and the types of snowmobiles (two stroke engines release more pollutants)

#### Impacts on soil and vegetation – erosion:

- The report does not describe in any detail the potential impacts of developing and clearing the trail up Mount Carleton to make it wider and remove some of the canopy. CPAWS expects that this development will remove the protective cover that is helping to control erosion on the trail. However, the report doesn't provide any details on extent of widening, although the width seems to have grown from 2015 estimates, from 12 feet to at least 13 feet wide.
- The report does not describe any field surveys of the trail to identify which trees or shrubs would actually be removed, or how much removal will need to happen at each point along the trail. There is also no description of the size of the turn-around area near the top of Mount Carleton, how it will be maintained, or whether it will be "treated" to discourage regrowth.

#### **For more information:**

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