

Conservation Recommendations for the South Saskatchewan Regional Plan

October 2009



Alberta Wilderness Association



Alberta Wilderness Association

Summary	3
Introduction	4
1. Preservation of Headwaters	5
2. Conservation of Land	5
2.1 Environmentally Significant Areas	7
2.2 Wild Spaces	8
2.3 Public Land Conservation	9
2.4 Private Conservation Initiatives	9
2.5 Groundwater Conservation	10
2.6 Wetland Conservation	10
3. Management of Human Footprint	10
3.1 Access Management	10
3.2 Grizzly Bear Conservation	11
3.3 Industrial Activity	11
3.4 Biodiversity Targets and Monitoring	12
4. Public Input	12
References	13

Summary

As part of Alberta’s South Saskatchewan region planning process, Alberta Wilderness Association (AWA) is making this submission to the South Saskatchewan Regional Advisory Council and the Government of Alberta, to highlight conservation outcomes we believe are necessary to achieve a balance of environmental, economic and social objectives in the region.

AWA has been an enthusiastic stakeholder participant right from the beginning of the Government of Alberta’s Land-Use Framework (LUF) process. We continue to work to ensure that the LUF succeeds in its aim to “improve land-use decision-making in Alberta”. In this spirit, AWA offers the following submission to the South Saskatchewan Regional Advisory Council.

AWA applauds the LUF’s recognition of the vital function of the southern Eastern Slopes for supplying clean and abundant drinking water throughout southern Alberta, and offers a number of suggestions for the effective protection of these headwaters lands. At the same time, the South Saskatchewan Region includes important natural grassland and parkland ecosystems which are currently under-represented in the province’s protected areas network, and AWA encourages the RAC to address that shortfall. The Government of Alberta’s new Environmentally Significant Areas reports and biodiversity monitoring program should be key elements in this identifying, legislating and protecting significant landscapes.

The LUF clearly emphasizes that the South Saskatchewan Regional Plan will make hard choices in determining limits and thresholds for the numerous activities which cumulatively impact the landscape. Some activities can be entirely compatible with the stated watershed priorities of the region; some will need careful management; and others will be deemed to be unacceptable uses in some places. The regional plan must include clear, enforceable thresholds on human impacts.

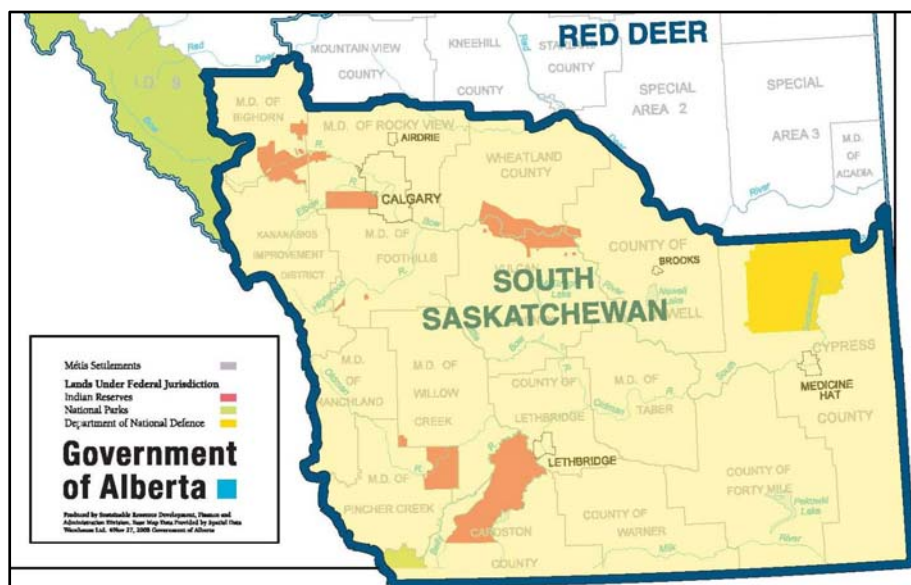


Figure 1. South Saskatchewan Region (from Government of Alberta website, <http://www.landuse.alberta.ca>)

Introduction

For many years, AWA has been seeking an overarching policy for land management in Alberta. Lack of comprehensive landscape-scale planning over a number of years has led to increasing conflicts between land-users and a multiple-use philosophy that often means multiple abuse. Different activities – recreation, resource extraction, residential development – are generally planned in isolation, but with no overall policies or body with the authority to plan for the complicated interactions between these numerous activities on the province’s finite land base. Recognition that “the status quo is not working” (Ted Morton, 2006) was the impetus which led to the development of the province’s Land-Use Framework. The 2008 *Land-Use Framework* (LUF) document acknowledges “We have reached a tipping point, where sticking with the old rules will not produce the quality of life we have come to expect. If we want our children to enjoy the same quality of life that current generations have, we need a new land-use system.”

Since being invited to participate in the initial Ideas Group for the Land-Use Framework in 2006, Alberta Wilderness Association (AWA) has been closely involved as a stakeholder in the Land-Use Framework process. At every step of the process, through the 2006 Cross Sector Forum and the 2007-08 Stakeholder Working Groups, AWA has participated in good faith, and provided input to help to ensure that the LUF can achieve its intention of better land management across the province.

AWA believes that the fundamental basis for Alberta’s land management process must be the recognition that land is a finite resource. There is only a certain amount of cumulative human impact that a landscape can sustain before it undergoes unacceptable deterioration. As the 2008 LUF describes it, “There are more and more people doing more and more activities on the same piece of land. The competition between user groups creates conflict, and often puts stress on the finite capacity of our land, air, water and habitat... Our land, air and water are not unlimited. They can be exhausted or degraded by overuse.”

An effective land management system must begin with the question: How much activity can the landscape sustain? For example, what is the maximum development footprint which society is prepared to accept in a region? What is the maximum road density? What is the minimum water quality? From this starting point, land-use planning can help to give direction to day-to-day land management decisions that can allow appropriate activities to take place within the natural carrying capacity of the landscape.

Part of the land-use planning tool chest must include well-defined and enforceable thresholds of development. The concept of development limits and thresholds in Alberta is nothing new: the forestry sector’s Annual Allowable Cut, or maximum well densities for the oil and gas industry are examples of limits that are broadly acceptable in day-to-day activities. In both cases, there is a general acceptance that, once these limits are reached, no further activity will be allowed in that specific area within a designated time period.

The 2008 LUF defines the following strategy: “A cumulative effects management approach will be used in regional plans to manage the combined impacts of existing and new activities within the region.” While it is tempting to divide the landscape into specific zones – natural regions, green zone or white

zone – it is critical that the principle of landscape carrying capacity prevails throughout the South Saskatchewan regional planning process. A successful Regional Plan must define acceptable limits of, for example, road density, residential footprint, water quality and quantity across the whole region.

1. Preservation of Headwaters

Some of the strongest language in the 2008 *Land-Use Framework* document is reserved for the vital watershed functions provided by the headwaters of the Eastern Slopes: “All of southern Alberta depends on the ecological integrity of the Eastern Slopes for its water supply.” The fragility of the landscape, and the considerable pressures which it faces are also recognized: “The breathtaking beauty of the landscapes for which southern Alberta is famous...is also at risk from new oil and gas development, new power lines and pipelines, the demand for more acreages and country residential housing, and the fragmentation of traditional ranch and farm properties.”

AWA is encouraged that the LUF reaffirms previous government commitments, not always realized in practice, to better management on the Eastern Slopes: “Historically, watershed and recreation were deemed the priority uses of the Eastern Slopes. These priorities should be confirmed, and sooner rather than later.” It is crucial that this strong emphasis in the LUF is accurately translated into positive action through the South Saskatchewan Regional Plan. More than anywhere, the southern Eastern Slopes are an example of the wide range of benefits provided by Alberta’s natural landscapes – beautiful scenery, abundant clean water, recreation and wildlife. But at the same time, they also provide a sobering example of the many, often conflicting human activities taking place, each with their own footprint. How well the South Saskatchewan Regional Plan serves to prioritize these different activities on a practical landscape scale will be the ultimate measure of its success. Some activities can be entirely compatible with the stated watershed priorities of the region; some will need careful management; and others will be deemed to be unacceptable uses in some places.

Recommendation:

- *The LUF’s emphasis on watershed and recreation priorities for the Eastern Slopes must be clearly reflected and emphasized in the South Saskatchewan Regional Plan.*

2. Conservation of Land

AWA believes we need areas protected that will in some cases provide essential cores, to complete the provincial protected areas network. Others may function as corridors or transition zones, and still others require sound management to achieve the working landscape ideal, where economic development is integrated with conservation objectives. The South Saskatchewan Regional Plan must contain a specific target for “conservation” in the region.

As shown in the 2005 Natural Regions and Subregions map (Figure 2), the South Saskatchewan Region contains the Rocky Mountain, Parkland and Grassland Natural Regions, each of which is further subdivided into Natural Subregions.

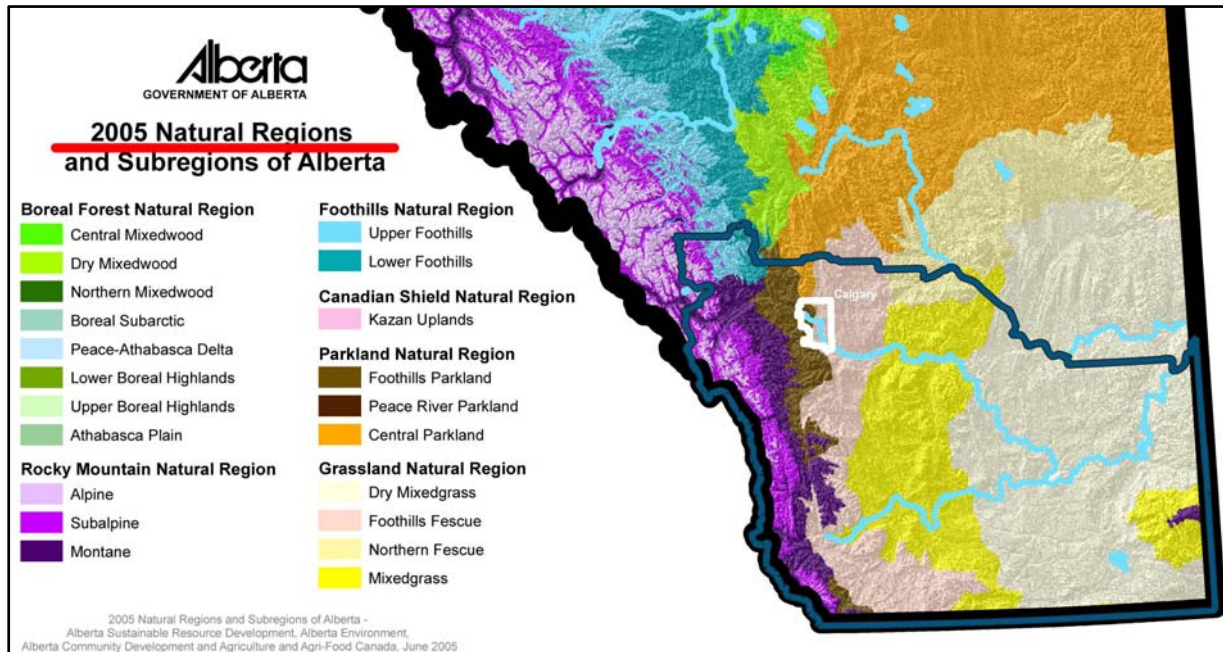


Figure 2. Natural Regions and Subregions of Alberta (extract from Government of Alberta website, <http://tpr.alberta.ca/parks/heritageinfocentre/environsiqareas/default.aspx>)

Protected land in Alberta is not evenly distributed across these different regions and subregions. A kangaroo rat living in the Dry Mixedgrass Subregion will not benefit from the fact the Alpine areas of Banff National Park are relatively well protected! So the province's protected areas network needs to be more representative of the many and diverse subregion habitats. According to Alberta government figures (Alberta Community Development, 2005) levels of protection in Alberta's three most under-protected Natural Regions are:

Natural Region	Percentage Protected in Alberta
Foothills	1.38%
Parkland	0.88%
Grassland	0.82%

By any standards, these numbers are inadequate and it is imperative that this shortfall in the province's protected areas land base is corrected as soon as possible. The government's Special Places program in the 1990s set very modest preservation targets in these regions but current protection does not even meet these targets. On Crown lands in particular, the need for increased levels of legally protected land is critical.

Recommendations:

- For all Natural Regions and Subregions, the South Saskatchewan Regional Plan must develop clear targets for legislated protection on publicly-owned land, and for conservation easements and other conservation initiatives on private land.
- In the Grassland and Parkland Natural Regions, there must be no net loss of remaining intact native ecosystems (whether on public or private land).

According to the report, the majority of the southern Eastern Slopes is identified as *Nationally Significant*. Major areas of the Grassland and Parkland Subregions are also identified as *Nationally Significant*. AWA believes that the clearly-identified environmental significance of these areas warrants a considerably higher level of protection than currently exists.

The 2008 *Land-Use Framework* document recognizes this shortfall in the province’s protected areas network: “The Government of Alberta will address the gaps associated with conserving and protecting the biodiversity of Alberta’s land base (Natural Regions and Sub-regions Framework)”. This commitment is restated in the Alberta government’s 2008 *Plan for Parks*. The 2008 *Land-Use Framework* document also re-emphasizes the environmental importance of the Eastern Slopes: “Historically, watershed and recreation were deemed priority uses of the Eastern Slopes. These priorities should be confirmed, and sooner rather than later.”

Recommendations:

- *All of the areas identified in the Government of Alberta’s 2009 Alberta’s Environmentally Significant Areas report as Internationally, Nationally or Regionally Significant must have some form of legislated protection.*

2.2 Wild Spaces

For many years, Alberta Wilderness Association has used its *Areas of Concern* map, below, to highlight the best wilderness areas remaining in the province. The areas identified on the map as *Wild Spaces* are consistent with those identified by the Alberta government as *Environmentally Significant*. These are the areas where a range of conservation initiatives, including full legislated protection, need to be applied.



Figure 4. Alberta Wilderness Association Areas of Concern

2.3 Public Land Conservation

On publicly-owned land, the inadequate recognition of *Environmentally Significant Areas* can be addressed through increases in legislated protection. Protection does not necessarily mean an end to all activities on the land. Some activities, such as traditional ranching operations can be entirely compatible with protected areas.

According to the Alberta government's 2008 *Plan for Parks*, "Parks protect ecosystems vital to our province's environmental health. They are home to natural species, historic and cultural landmarks and breathtaking landscapes that could otherwise be lost." Parks also have an important economic role to play in the province: "Parks also attract visitors from around the world, contributing tourism dollars to the province and creating a variety of jobs, from backcountry guiding to upscale hotel and food services."

Like the Land-Use Framework document itself, the *Plan for Parks* recognizes the need to expand the province's protected areas network: "Consistent with the process for nominating new parks, Alberta Tourism, Parks and Recreation will lead initiatives to create new parks, or expand or reclassify existing parks, to help fill conservation, recreation, and tourism gaps in the current parks system."

The need for additional protected land in the region has been clearly established by previous government processes and documents. Alberta's 2009 *Plan for Parks* recognizes the need to protect representative landscapes: "The parks system is structured to reflect Alberta's environmental diversity – from boreal forest to grassland – to ensure parks visitors for generations to come will be able to see and learn about Alberta in its natural state."

Quite apart from their value in protecting wildlife and ecosystem services, protected areas also have considerable economic benefits. According to Alberta Parks (2006), "Each year \$1.1 billion in expenditures by visitors to Alberta's parks generate a province-wide economic impact of \$1.2 billion... These expenditures sustain 23,480 person-years of employment, province-wide. Total economic activity generated by visitor spending is \$2.7 billion annually." The biodiversity conservation we ensure through protected areas will be a measure of our environmental and economic health.

2.4 Private Conservation Initiatives

The 2009 Alberta Land Stewardship Act makes provision for a number of conservation initiatives on privately-owned land, including Conservation Easements and Conservation Directives. Private conservation, while laudable, would represent only a small fraction of the ESAs designated in the 2009 Government of Alberta report. Also, private conservation does not have the tools to prevent industrial activity. Once designated as provincially or higher ESA, private landowners must also have the ability to say no to new industrial activity.

Recommendation:

- *The South Saskatchewan Regional Plan must include specific targets for the amount of private land in the region to be conserved under these different initiatives.*
- *Once private land is designated as Environmentally Significant by the Alberta Government, private landowners should also have the ability to say no to new industrial activity.*

2.5 Groundwater Conservation

Recommendations:

- Groundwater must be a key focus of the South Saskatchewan planning, as it is in the Lower Athabasca region.
- Impacts of activities on groundwater quality and quantity and, particularly, groundwater recharge in the region's headwaters must be closely monitored, and acceptable limits to groundwater impacts must be defined and enforced.

2.6 Wetland Conservation

The RAC must consider wetland conservation as part of the plan, and make recommendations on appropriate rules for conservation offset requirements.

Recommendations:

- *Recommendations in the province's draft Wetlands Policy for no net loss of remaining wetlands must be adopted in the South Saskatchewan Regional Plan.*

3. Management of Human Footprint

All human activities – economic and social – have benefits and they all have liabilities. As the 2008 Land-Use Framework document stresses, it is the impacts of these activities that must be managed.

Recommendation:

Firm threshold targets must be set across the region for a range of indicators of human footprint, including:

- *Footprint area (hectares)*
- *Footprint edge (kilometres)*
- *Road density (km per km²)*

These thresholds must be enforceable. Procedures must be specified for management directives and options once these thresholds have been met or exceeded.

3.1 Access Management

If there is one issue which highlights more than any other the conflicts between different users on the landscape, it is access management, particularly motorized access. A lack of government regulation and enforcement over a number of years has led to a situation where motorized users in many areas have developed a sense of entitlement to use public land wherever they can physically access it. Such access must be controlled. The Land-Use Framework clearly recognizes the province's land base is finite, and different uses need to be managed so as not to compromise the many services which this land gives us, including provision of clean water, recreation opportunities and wildlife habitat.

In recent years, certain areas have undergone an access management process. The Ghost-Waiparous, the Castle and Willow Creek, for example, have access management plans for motorized access. Forest land-Use Zone (FLUZ) legislation has been used as a tool to regulate access management. Unfortunately, as FLUZ legislation has been introduced in specific areas, so motorized abusers have tended to simply relocate and spread into unregulated areas nearby.

Recommendation:

- *Access management is required for all public land, particularly in the Eastern Slopes. Access levels must be driven by what the land can sustain, not by demand. Motorized access must be allowed **only** on designated trails.*
- *The role of the Prime Protection and Critical Wildlife Zones, as identified in the 1984 Eastern Slopes Policy must be reaffirmed. Motorized recreation is not an appropriate use.*
- *Motorized and non-motorized recreation must be differentiated. Access planning for motorized access must not be undertaken without including provision for non-motorized access.*

3.2 Grizzly Bear Conservation

The provincial government's mapping of core and secondary habitat for grizzlies supports the *Environmentally Significant Areas* mapping, as well as AWA's *Wild Spaces* mapping. Conservation of land in the southern Eastern Slopes to protect clean water supplies for southern Alberta will also contribute to the province's stated intentions for the recovery of grizzly bear populations.

The Alberta Grizzly Bear Recovery Plan makes it clear that "Human use of access (specifically, motorized vehicle routes) is one of the primary threats to grizzly bear persistence." The plan concludes that "Bears and humans can coexist on the same landscape if there is a willingness to conduct human activities in ways that are conducive to grizzly bear conservation."

Recommendation:

- *Grizzly bear recovery, based on the principles and recommendations of the provincial Grizzly Bear Recovery Plan, must be a fundamental part of the South Saskatchewan Regional Plan.*

3.3 Industrial Activity

The 2008 *Land-Use Framework* document has specified that "Historically, watershed and recreation were deemed priority uses of the Eastern Slopes. These priorities should be confirmed, and sooner rather than later." The 1984 *Eastern Slopes Policy* clearly defined these priorities. Some uses in some places are quite simply not compatible with this watershed protection and recreation use.

Recommendation:

- *There should be no industrial-scale forestry operations south of the Trans-Canada highway.*
- *All industrial-scale operations throughout the South Saskatchewan Region must be examined, and limits to growth established.*

3.4 Biodiversity Targets and Monitoring

The Government of Alberta has made substantial investments in the Alberta Biodiversity Monitoring Institute (ABMI), the world's most comprehensive biodiversity monitoring program. This group's work must inform decision-making and planning for the South Saskatchewan Regional Plan.

Recommendations:

- *The ABMI program must be the core for determining desired environmental outcomes of the South Saskatchewan plan and provide the quantitative thresholds and targets for a range of species and include an overall index of biodiversity.*

4. Public Input

As the September 2009 *LUF Quarterly Update* expresses, "Regional Advisory Councils will provide advice that, along with input from the public, stakeholders and Aboriginal peoples, will shape the development of the plans." This public input has been a key element of the LUF from its inception, and it is essential that opportunities for meaningful public participation are central to the South Saskatchewan regional planning process.

Public input was solicited by the Alberta government in 2007, and the results were summarized in the *Land-Use Framework Summary Report*. What was noteworthy thing about the survey was that participants were specifically asked to make planning choices, and to clarify their own priorities. The results of the survey should have a major bearing on subsequent discussions by the RACs. For example:

- 74.3% of respondents believed that "At present the balance between developing and using our land versus conservation of our land is too focused on economic development and growth."
- Asked to rank three outcomes according to which was most important to them,
 - 67.2% of respondents listed *Healthy environment and ecosystems*
 - 14.9% of respondents listed *Sustainable prosperity supported by our land and natural resources*
 - 10.9% of respondents listed *Well-planned places to live and play.*
- 70.8% of respondents would be willing to accept limits to Residential and commercial developments to allow for more Protected Areas
- 70.2% of respondents would be willing to accept limits to Energy development to allow for more Protected Areas
- 68.0% of respondents would be willing to accept limits to forestry development to allow for more Protected Areas

Recommendations:

- As the Government of Alberta has invested considerable time and expense in soliciting the opinions of Albertans, it is imperative that the final Regional Plans accurately reflect their expressed wishes and concerns.



References

Alberta Community Development, 2005. *Protected Area Categories in Alberta by Natural Subregion* (table).

Alberta Sustainable Resource Development, 2008. *Alberta Grizzly Bear Recovery Plan 2008-2013*.

Alberta Wilderness Association, 2007. *The Forests of Alberta's Southern Eastern Slopes. Forest or Forestry?*

Government of Alberta, 2009. *Environmentally Significant Areas. Provincial Update 2009*.

Government of Alberta, 2009. *Plan for Parks*.

Government of Alberta, 2008. *Land-Use Framework*.

Government of Alberta, 2007. *Land-Use Framework Workbook Summary Report*.

Government of Alberta, 2006. *The Value of Alberta Parks... Priceless* (brochure).

Ted Morton, 2006. Pers comm. to Land-Use Framework Cross-Sector Forum, December 2006.