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January 15, 2010

Re: South Saskatchewan Regional Plan - Suffield National Wildlife Area

Dear Mr. Bartesko,

The Suffield Coalition welcomes the opportunity to provide input regarding conservation areas for the South Saskatchewan Regional Plan (SSRP) under development by the Government of Alberta as part of the Alberta Land Use Framework. The Suffield Coalition comprises 7 groups: Alberta Wilderness Association, Federation of Alberta Naturalists, World Wildlife Fund Canada, Nature Saskatchewan, Southern Alberta Group for the Environment, Grasslands Naturalists, and Nature Canada. In our view, it is essential that the SSRP integrate the Canadian Forces Base (CFB) Suffield National Wildlife Area (NWA) into Alberta's regional conservation goals.

CFB Suffield is located in Southeastern Alberta, approximately 50 km northwest of Medicine Hat and 250 km southeast of Calgary. In 1971, DND recognized the national significance and fragility of the area now encompassing the NWA and placed the area out of bounds to military ground training. Suffield NWA was established in 2003 to protect endangered native prairie and the many species of animals and plants at risk in the area. It is home to more than 1,100 species of plants and animals, including approximately 90 species of concern, 18 of which are federally listed species at risk. This nationally protected area also contains numerous historical sites such as medicine wheels, bison kill sites, and stone cairns. The Government of Alberta is responsible for water resources and wildlife in Suffield NWA, which is managed by DND.

The importance of Suffield National Wildlife Area has been widely recognized. The World Wildlife Fund has recognized the Northern Great Plains as one of about 200 globally significant natural regions. It is one of only six major mixed grassland remnants on the Northern Glaciated Plains of North America. It is also classified as an Important Bird Area, part of network of critical sites for the conservation of bird species diversity in Canada and around the world.

In 2008, Environment Canada and the Department of Defence submitted evidence confirming the biological importance of the Suffield NWA to the Joint Review Panel that considered the proposal by EnCana Corporation to drill 1,275 shallow gas wells in the National Wildlife Area. In the words of the Government of Canada:

CFB Suffield NWA is unique, nationally significant, and offers a northern refugium for endemic prairie wildlife. This has been substantiated by recent wildlife studies on invertebrates, birds, mammals, reptiles, amphibians, and plants. Only 17 – 21% of Canada's grasslands remain, much in small patches, and CFB Suffield NWA is one of the few extant large blocks of dry mixed-grass prairie remaining in Canada. CFB Suffield NWA hosts over 1,100 catalogued species including numerous endangered, threatened, special concern and other sensitive species. Considered together, the outstanding natural features, conservation values, and research opportunities of CFB Suffield NWA necessitates implementation of the highest standards of environmental protection and management.

CFB Suffield NWA was established for the purpose of protecting and conserving wildlife and their native habitat, and should be managed so that its ecosystems and dependent species are sustained. To meet this overall objective for CFB Suffield NWA, the NWA's ecological integrity and natural habitat must be maintained...

CFB Suffield NWA is the only NWA specifically affording protection at a scale large enough to achieve the survival and recovery of prairie grassland species that have been identified at risk. Its establishment in 2003 recognized that native prairie grasslands were continuing to disappear at an alarming rate and that it was imperative to set aside a large block of habitat for local and regional benefit. (Written submission of the Government of Canada, p.143. EUB Application No. 1435831, Canadian Environmental Assessment Registry No. 05-05-15620, EnCana Shallow Gas Infill Development Project, Suffield National Wildlife Area, Alberta, March 2008)

In its report, released on January 27, 2009, the Joint Review Panel acknowledged the importance of the Suffield NWA for the conservation of wildlife to the point of finding the proposed project should not proceed because of its anticipated impact on the National Wildlife Area.

At 2,690 km², CFB Suffield is critical to conservation of the prairie biome and hence cannot sustain the development aspirations of industry and agriculture. The integrity of the National Wildlife Area is a fundamental component contributing to the conservation of Alberta's prairie grassland biome and its wildlife. As a protected area, Suffield also

has a major role to play in helping prairie wildlife and people adapt to climate change.¹ No new energy development should be permitted in the Suffield NWA and livestock grazing and pre-existing energy development must be carefully regulated. Consultation and cooperation with the Federal Government in this matter is essential.

The Suffield Coalition believes the SSRP should recognize Suffield NWA as an area destined for conservation and further include measures to support, enhance and leverage the area's conservation value and functions. The National Wildlife Area is the largest protected area of prairie grassland in Alberta, and the entire Base is one of the largest blocks of prairie grassland in Canada. Thus, it is to be expected that Alberta interests will recognize the importance of the Suffield Block for biological diversity and ecological processes and meaningfully integrate it in regional planning for land use.

We look forward to a South Saskatchewan Regional Plan that capitalizes on the conservation value of Suffield and would be pleased to provide further information on this matter.

Yours truly,



Cliff Wallis
Vice-president
Alberta Wilderness Association

On behalf of:
Alberta Wilderness Association
Federation of Alberta Naturalists
World Wildlife Fund Canada
Nature Saskatchewan
Southern Alberta Group for the Environment
Grasslands Naturalists
Nature Canada

¹ Dudley, N., S. Stolton, A. Belokurov, L. Krueger, N. Lopoukhine, K. MacKinnon, T. Sandwith and N. Sekhran [editors] (2010); *Natural Solutions: Protected areas helping people cope with climate change*, IUCN/WWF, TNC, UNDP, WCS, The World Bank and WWF, Gland, Switzerland, Washington DC and New York, USA