

CPAWS Comments on South Saskatchewan Regional Plan Strategies Biodiversity Management Framework

The Canadian Parks and Wilderness Society – Southern Alberta chapter (CPAWS SAB) appreciates the opportunity to provide feedback on the draft South Saskatchewan Regional Plan Biodiversity Management Framework.

CPAWS envisages a healthy ecosphere where people experience and respect natural ecosystems. We are the only national conservation organization dedicated to the protection and sustainability of public lands across the country. CPAWS Southern Alberta Chapter promotes awareness and understanding of ecological principles and the inherent values of wilderness amongst resident Albertans and visitors.

CPAWS SAB has participated actively in the Land Use Framework (LUF) process and its regional plans since the LUF's inception in 2008. CPAWS SAB commends the government for taking the initiative on land-use planning to ensure that as we develop our resources, we also maintain and conserve the natural areas that provide the high quality of life we have in Alberta. CPAWS is committed to ensuring these regional plans are completed and working with the Ministry of Environment and Sustainable Resource Development in implementing these regional plans to ensure conservation related objectives are met.

Biodiversity Objectives

Overall the objectives for biodiversity are appropriate for the South Saskatchewan Region; however CPAWS has a few recommendations to strengthen the objectives:

In the objectives “terrestrial and aquatic biodiversity are maintained” should read “maintained and restored.” If biodiversity is defined as the “diversity of all living things, including genetic diversity, species diversity and natural ecosystem interactions” and includes both richness and abundance, we need to aim to not just maintain but to restore biodiversity on our landscape in order to achieve the biodiversity services and benefits outlined in the South Saskatchewan Regional Plan and biodiversity planning documents.

Indicators

CPAWS Southern Alberta largely supports the Tier 1 and Tier 2 indicators selected. These indicators will give us important measures of landscape health and capacity to support biodiversity.

CPAWS SAB also has some recommendations for improving the indicators.

Terrestrial Habitat Indicators

Tier 1 Indicator: Terrestrial Native Cover and Tier 2: Native land cover patch size (upland and lowland) and Native land cover patch integrity are appropriate indicators.

Tier 3 indicators should include similar monitoring by habitats or ecotypes within each natural sub-region.

Aquatic Habitat Indicators

Tier 1 Indicator: Aquatic native cover and Tier 2 Indicators: Temporary/Seasonal wetland cover and Riparian integrity are appropriate indicators. A few questions on aquatic habitat indicators:

- Given that upland disturbances and fragmentation affect wetland and riparian health, how will aquatic native cover and riparian integrity link to terrestrial native cover and patch integrity?
- How will riparian habitat be defined? Does it include ephemeral streams?
- How will upland areas with the potential to impact aquatic habitats be defined?

Terrestrial and Aquatic Species Indicators

Species at Risk should be a Tier 2 indicator. One of the objectives for Biodiversity in the SSRP is that “species at risk are recovered and no new species at risk are designated.” The Indicator Selection also outlines the criteria for selecting indicators as “responsive to changes in land use” and provides “early warning signals,” yet species indicators do not include Species At Risk. It can be argued that species already at risk are those most responsive to land use changes and thus should be included as Terrestrial and Aquatic Species Indicators. This could be measured by monitoring specific species such as westslope cutthroat trout, bull trout, grizzly bear, sage grouse or burrowing owl or could be a measurement of number of species at risk and/or rates of decline.

Triggers

While understanding predevelopment and current conditions are important for understanding cumulative effects, we are concerned about the use of current condition as the starting point for biodiversity. In many cases maintaining current conditions is not enough to maintain or recover biodiversity, including species at risk. It will be important to identify when the current condition has already surpassed a trigger or threshold and that management actions are implemented to restore areas where appropriate.

While the use of triggers to indicate when a management response is needed, thresholds or hard limits should be used when available and appropriate. CPAWS SAB is concerned that without actual enforceable thresholds, the Biodiversity Management Framework will not be strong enough to be enforced. Triggers should be used to prompt a management action before the threshold is hit.

For example both bull trout and grizzly bears show increased rates of decline when linear access features are at or above 0.6 km/km². It is unclear how the Biodiversity Management Framework and the Linear Access Management Framework interact, however the Biodiversity Management Framework should set this as a disturbance threshold to be used in implementing the Linear Access Management Framework.

CPAWS SAB is also concerned that there does not seem to be any defensible method for how triggers are set. While a specific percent decrease in habitat is cause for concern, for some elements of biodiversity, species or natural processes, a 1% decrease from pre-industrial condition may have a drastic effect whereas for others it may have more or less impact. Using a Natural Range of Variability approach would create more defensible thresholds for trigger levels where specific thresholds are not known.

Level 4 triggers should read “improve” not stabilize or improve. If something has reached Level 4, the aim should be to decrease it to a lower level not just stabilize it.

Will the indicators and triggers be measured only at the regional scale? Measurement at the regional scale only is problematic to identify where management actions need to be implemented and when. If one area is specifically fragmented or has low integrity, it is important that management actions are

implemented on a sub-regional level before the trigger is reached at a regional level. Similarly, why will level 3 indicators not have triggers?

Management Response

While it is difficult to comment on the appropriateness of management responses at this stage of the BMF development, CPAWS SAB has a few concerns.

The amount of ministerial discretion of the management response could allow for little to be done. There are many examples of areas where management is needed for biodiversity maintenance or recovery and where management response is weak or not appropriate to the cause of biodiversity loss. For example, most provincial species at risk recovery plans are highly prescriptive yet little action is taken due to conflicting interests. Management options should be linked to magnitude of exceedance and enforceable thresholds.

What is the timeframe between monitoring indicating that a trigger has been reached and a management action put into place? Similar to the above, on-the-ground management actions often lag far behind identification of need for action or even creation of policy. In order to be accountable, a defined period of time should be set from identification of a trigger being reached and implementation of appropriate management actions.

What is the timeline for developing triggers for indicators that have data gaps? Without timelines it is hard to be accountable to monitoring or management actions.

General

CPAWS commends the government for moving forward on the Biodiversity Management Plan, however we are also concerned that adequate resources are not designated to properly monitor indicators and implement management actions either in the short or long term. How will the government ensure that such an important monitoring and management program is sustainable in the long term?

CPAWS SAB appreciates the opportunity to comment on the development of the Biodiversity Management Framework and look forward to providing input at the framework is developed. I would be happy to meet in person to discuss any of our comments further.

Thanks,



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