

Comments on the Draft South Saskatchewan Regional Plan



The Hon. Alison Redford, Q.C.
Premier of Alberta
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January 15, 2014

Dear Premier Redford,

Re: Canadian Parks and Wilderness Society – Southern Alberta Chapter Feedback on Draft South Saskatchewan Regional Plan

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

The Canadian Parks and Wilderness Society (CPAWS) envisages a healthy ecosphere where people experience and respect natural ecosystems. CPAWS is 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 has been working on conservation in Alberta since 1967 and is engaged in a variety of discussions with provincial and federal government staff as well as industry on a number of different conservation issues in Alberta. Our particular role as an environmental organization in Alberta is to provide landscape scale, science-based support and advice for the conservation and protection of Alberta's protected areas and wild lands. We have a positive public profile and pride ourselves on working cooperatively with government, First Nations, businesses, non-government organizations and individuals to achieve practical conservation solutions on the landscape.

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. However, we believe that the draft South Saskatchewan Regional Plan (SSRP) falls far short of meeting these objectives.

CPAWS SAB is concerned with seven key areas of the plan:

- The SSRP contains vague language about prioritizing headwaters integrity, but fails provide specific changes and standards. The draft SSRP allows obsolete practices such as clear-cut logging to continue.

- Virtually all of the “new” protected areas in the plan are in high alpine areas and are already protected by policy; thus very little additional protection is included in the plan.
- The draft plan fails to protect the entire 1,041km² of the Castle Special Place and ecologically significant areas in the eastern slopes and native grasslands.
- Wildlife need to be able to move across the landscape. None of the designated protected areas are connected in any way.
- The Linear Footprint Management Plan is a much needed tool for biodiversity and watershed protection and should be implemented immediately.
- Motorized traffic and crowds on off-road vehicles lead to degraded streams and dirty water, disrupted water runoff patterns, conflicts between people and loss of key wildlife habitats. This is already too common in the region. The plan does little to address these issues.
- The tourism and recreation development strategies in the draft SSRP focus largely on promoting motorized recreation. This plan fails to give proper weight to eco-tourism potential of the region and the real reasons people come to visit our beautiful Alberta wilderness.

Detailed comments on the plan are provided below.

1. The region’s economy is growing and diversified (p. 12-35; p. 59-66)

The Region Today (p. 12-35)

Forestry (p. 18)

The draft SSRP indicates that forestry is an important industry within the region yet the plan does not place the economic or employment numbers in the context of the region but rather talks about the value of the industry on a provincial scale. A draft paper prepared by the ASPEN group for AENV and ASRD in 2008 estimates the economic value of forestry to the annual GDP in Southern Alberta as \$2.4 million.¹ All other economic sectors in the draft SSRP describe the value of the industry in the region.

Recommendation:

- Include a full-cost economic and employment value of commercial forestry in the South Saskatchewan Region in the document to put real perspective on the economic value of this sector in the SSRB region.

¹ The ASPEN Group. 2008. Draft Alberta Southern East Slopes Integrated Land Management Pilot Project. The ASPEN Group. Prepared for Alberta Environment, Environmental Monitoring and Evaluation Branch and Alberta Sustainable Resource Development, Sustainable Resource and Environmental Management.

Tourism (p. 20)

The draft SSRP focuses on motorized recreation. This focus is set at the outset of the document in the economic section on tourism, which singles out the economic value of motorized recreation. This economic estimate for motorized recreation does not include the costs of damages caused by unfettered motorized recreation.

If the plan includes the value of motorized recreation it should also include the value of non-motorized recreation and protected areas. These industries rely on protected and wilderness areas to support the industry. Other lower impact forms of recreation, such as equestrian and hiking, photography and birding contribute greatly to the economy and the health of communities and should receive more focus in this plan.

For example, a report by the Canadian Parks Council estimates that in 2009 the economic impact of parks in Alberta was over \$1.4 billion². This estimate does not include the contribution of non-motorized recreation to the economy through clothing, transportation and gear.

In another study by Headwaters Economics³, it was shown that rural counties in the Western United States where 30% of their land base was protected as national parks or monuments experienced economic growth of 345% between 1970 and 2010. In counties where less than 10% of the land base was protected, growth of only 90% was experienced during the same time period.

Recommendation:

- Include the full economic impact of parks and non-motorized recreation in the section on Tourism in the SSRP.

Ecosystem Services

The plan does not include the value of ecosystem services such as clean water, air purification, carbon capture and many other services that intact ecosystems provide.

A mandatory requirement to determine the net economic benefit or cost of current management compared to the net economic value of ecosystem goods and services, protected areas and low-impact recreation should be conducted. A precedent exists for valuing assets such as ecosystem services and biodiversity, both in Canada and internationally.⁴

² Canadian Parks Council. 2011. The Economic Impact of Canada's National, Provincial & Territorial Parks in 2009. Canadian Parks Council. A Technical Report prepared by The Outspan Group Inc. Amherst Island, Stella, Ontario

³ Headwaters Economics. 2012. West is Best How Public Lands in the West Create a Competitive Economic Advantage. Headwaters Economics. Bozeman, MT.

⁴ Miller, E. and P. Lloyd-Smith. 2012 The Economics of Ecosystem Services and Biodiversity in Ontario: Assessing the Knowledge and Gaps. Prepared for the Ontario Ministry of Natural Resources

TEEB (2010), The Economics of Ecosystems and Biodiversity Ecological and Economic Foundations. Edited by Pushpam Kumar. Earthscan, London and Washington.

Hanna, E, P. R. Hanna, T. Hanna, T. Koveshnikova, and P. Victor. 2010. Valuation of Ecological Goods and Services in Canada's Natural Resources Sectors. Report for Environment Canada.

Forest and grassland management practices and ecosystem goods and services are assets of the people of Alberta and, as such, need to be valued during decision-making processes about land-use. By implementing these analyses into watershed plan reviews and all future resource management decisions, Alberta can, over time, become a leader in the valuation of its assets.

Recommendation:

- Include a requirement for full economic assessment of ecosystem goods and services, protected areas and low-impact recreation in the region to be conducted prior to making land-use decisions.

Outcome 1: The region’s economy is growing and diversified (p. 59-66)

Despite the focus in the title of this section on economic diversification, the entire section focuses on status quo economic development based on natural resource development, with little acknowledgement of the land use issues arising from unfettered and unplanned development presented in the rest of the document. Although CPAWS SAB recognizes the importance of the natural resource sector to our economy, this cannot be addressed in isolation of land-use planning.

Recommendations:

- To achieve the objectives of the rest of the draft SSRP in maintaining biodiversity and headwaters, for each of Energy, Renewable Energy, Corridors for Linear Infrastructure and Surface Materials, a key planning principle needs to be added:
“A priority will be to locate new development and access where development already exists and on existing disturbed land to the greatest extent possible so as to maximize efficiencies and minimize landscape fragmentation.”

Agriculture (p. 61)

The section on agriculture is not in alignment with the rest of the document and should include Market Based Instruments described on page 74.

Recommendation:

- Include the Market Based Instruments as part of the diversification of Agriculture.

Forestry (p. 63)

Despite the excellent commitment on page 69 to “Manage forests in the Green Area with headwaters protection and integrity (water storage, recharge, and release functions) as the highest management priority,” and the section on forestry on page 63 does not mention headwaters protection, water quality or water storage. Rather, the economic section on forestry (p. 63)

The Pembina Institute. 2009. Counting Canada’s Natural Capital: assessing the real value of Canada’s boreal ecosystems. Canadian Boreal Initiative.

recommends promoting diversification through the Alberta Forest Products Roadmap to 2020, which is entirely focused on timber supply and products, and through managing forest health through pine beetle and wildlife control.

Although managing for pine beetle and wildlife are done through commercial forestry, and restoration and water storage through maintaining intact forests, the role of ecosystem-based management in the southern eastern slopes should be recognized as a potential strategy for economic diversification of the forestry sector.

There are working examples of successful forestry reform in North America. For example, in western Montana several multi-stakeholder groups of conservationists, motorized recreational vehicle users, outfitters, loggers, mill operators, state government and the U.S. Forest Service have developed systems of restoration forestry. These initiative were initiated based on the realization that the “present system was failing – failing our timber workers and timber-dependent communities, failing the ecological health of our forests, and failing our responsibility to future generations.”⁵ These new initiatives aim to find a solution to these failures.

These innovative approaches to forest management attempt to rejuvenate and recover natural structure, function, and process in a landscape context by using adaptive management and a flexible and open approach. These groups collaboratively create scientifically-defendable, socially-appropriate principles or objectives for a new type of forest management in the region, which prioritize management of social and ecological objectives.⁴

A key part of this model is the collaborative approach to, not just forest management, but creation of new protected wilderness areas in Montana. This innovative system also provides for a new forest economy in the region and restoration and maintenance of important ecosystem services.⁶

This model of restoring forests to meet ecosystem and social objectives is one that Alberta could adapt as part of an alternative forest management model for the Southern Eastern Slopes.

The adjustment and aligning of the “Forest Management Unit C5 and Spray Lakes Sawmills Forest Management Agreement areas and associated ground rules” (p. 69) should include adopting an ecosystem-based management approach. Solely adjusting the management plans and ground rules will not achieve the desired objectives as long as commercial timber supply is a key objective. Under an ecosystem-based approach, timber would be a by-product of other management actions rather than an objective of management.

Recommendations:

- Priorities for forest management of the region should be based on social and ecological objectives such as headwaters protection, wildlife habitat and low-impact recreation rather than timber extraction. This should be explicitly outlined in the forestry, headwaters protection and maintenance of biodiversity sections of the plan.

⁵ Montana Forest Restoration Committee. 2013. Restoring Montana’s National Forest System Lands Guiding Principles and Recommended Implementation. Montana Forest Restoration Committee.

⁶ Southwest Crown Collaborative. 2012. The Southwest Crown Collaborative. Available at: <http://www.swcrown.org/> Accessed November 29, 2013.

- Forest management should include restoration as a key component of land-use planning and management of the Southern Eastern Slopes.
- The final SSRP should incorporate the creation of a pilot project for an ecosystem-based approach to forest management using the Southern Eastern Slopes.
- There should be no further logging in the Castle Special Place.

Tourism (p. 64)

The objective of the region as a world-class, year-round, tourism destination is a valuable way of diversifying our economy. Although “accommodations, attractions, events, activities and amenities” are all important parts of attracting visitors to the region, these developments will not alone attract visitors to the iconic wilderness that people come to Alberta to see – such wilderness must exist for people to see it.

As such, the economic development plan for tourism conflicts with many other areas of the plan, which allows for industrial development and unregulated motorized recreation throughout the region. For example on page 55, the plan states the “recreation, tourism and industry must co-exist on the landscape outside the designated camping areas, industrial activity will continue and new industrial tenures will continue to be granted.”

The outdoor recreation and tourism industry are important economic sectors in the region which rely on the existence of intact and iconic wilderness areas. The value of these areas decreases when they are also used for industrial development, clear-cut logging and unregulated motorized recreation. “Long-term security” (p.65) will not be achieved through longer leases alone – it must also include the security that wilderness areas, a key attraction, are maintained now and in the future.

Recommendation:

- The plan should include development of a sustainable tourism strategy for the region including specific measures and policies around industrial development in iconic regions. This strategy would increase security that the wilderness areas, which draw people to the region, will remain intact for low-impact tourism developers and operators.
- The plan should include a statement that “Tourism development nodes, to the greatest possible extent, should be on private land and in proximity to existing communities and public infrastructure.”

2. Biodiversity and ecosystem function are sustained

(Strategic Direction p. 38-44; Outcome 3 p. 66-74; Appendix C, D, F, H; Schedule C)

Conservation Areas p. 39-41, 66

Protected Areas Targets p. 39

The plan states that “conserving a range of landscape types representative of Alberta’s natural diversity provides for habitat that will support and maintain species and other aspects of biological diversity that depend on these landscapes” (p. 39). This statement makes reference to the natural region protection targets in Appendix C.

Alberta Tourism, Parks and Recreation (ATPR) targets are not biologically defensible and are completely inappropriate for a meaningful identification of gaps in protected areas. The International Union for the Conservation of Nature (IUCN) indicate that at least 17 percent of lands needs to be protected to conserve known biodiversity, whereas Conservation International suggests that 25 percent is a more appropriate target⁷. Currently only 4.2 percent of our land is protected as provincial protected areas.

Notwithstanding the inappropriate ATPR targets, virtually all the “new” protected areas in the SSRP are in the Alpine and Subalpine Natural Sub-Regions, which are already protected under current policy.

Several Natural Sub-Regions underrepresented in Alberta’s protected areas system, Foothills Parkland (2.1% protected), Foothills Fescue (1.3% protected) and Mixedgrass (1% protected), occur exclusively within the SSRP region and a significant portion of the Dry Mixedgrass Sub-Region (1.6% protected) falls in the region. Even with the Pekisko Heritage Rangeland which doubles the protection of Foothills Parkland to 4.2% of the Natural Sub-region, this area of protection is far below the international targets for ecosystem protection.

Despite significant gaps in these sub-regions, the draft plan does little to nothing to conserve a range of landscape types or fill protected areas gaps by identifying protected areas in these sub-regions.

Conservation Areas p. 39-41, 66

Although targets are useful for broad scale planning, identification of protected areas is not just about meeting a target number. To meaningfully protect biodiversity, the most ecologically important or sensitive areas must be protected in a range of habitat types both between and within natural sub-regions.

The plan states that the prime protection zone from the Eastern Slopes Policy was used to designate new Wildland Parks in the SSRP. The prime protection zone is described in the Eastern Slopes Policy as “high-elevation forests and steep rocky slopes” designated to “protect

⁷ Conservation International. 2010. Technical Brief A rationale for protecting at least 25% of Earth’s land and 15% of Earth’s oceans to protect global biodiversity and ecosystem services (Strategic Plan Target 11). Conservation International.

the rugged mountain scenery.”⁸ Using this out-of-date policy ignores the last 30 years of ecological science, knowledge of landscape planning and recommendations from the province’s own species-at-risk biologists and species at risk recovery plans⁹ and therefore contributes little to conservation of biodiversity. We are also dealing with a different landscape than we were in 1977 or 1984 when the Eastern Slopes Policy was drafted. The 2013 landscape has more people and more pressures on the land from industrial and recreational activities and from the effects of a changing climate. We will not resolve our land-use conflict and create a plan for the next 50 years by looking for solutions from 30 years in the past.

On page 47, the draft plan states that “the environmentally significant areas assessment and mapping provides information on areas that significantly contribute to maintaining healthy aquatic ecosystems” This Government of Alberta document does also not appear to have been used in designation of new protected areas.¹⁰

Although not a complete network of protected areas, the RAC advice seemed to have used more recent science to identify the proposed Candidate Conservation Areas including some areas of critical wildlife habitat. However the draft plan does not even use these recommendations and only designates the rocky mountain top areas, not wanted by industry or off-highway vehicle users. This does not, in effect, add any on-the-ground protection either in the Eastern Slopes or the Grasslands (outside of the Pekisko Heritage Rangeland). These designations may be politically easy solutions but do not address the conflicts or required trade-offs that form the basis of the Land Use Framework.

Furthermore, protection of the mountain tops does not protect the ecologically important lowland and riparian areas or a range of habitat types. To conserve biodiversity, a diversity of habitats must be protected in order to protect a diversity of species. Protecting only the mountain tops protects only species that rely exclusively on alpine and subalpine habitats such as mountain goat and big horn sheep. Species that require large areas and/or species that rely on lowland or riparian habitats will continue the decline we have seen over the last few decades.

If one of the main purposes of new protected areas is to maintain biodiversity (p. 67), these protected areas must be chosen and designated based on value to a variety of species. A recent report by the Wildlife Conservation Society, using Government of Alberta data, recommends the

⁸ Government of Alberta. 1984. A Policy for Resource Management of the Eastern Slopes Revised 1984. Government of Alberta. Edmonton, AB.

⁹ E.g. Alberta Grizzly Bear Recovery Plan 2008-2013. 2008. Alberta Sustainable Resource Development, Fish and Wildlife Division, Alberta Species at Risk Recovery Plan No. 15. Edmonton, AB. 68 pp.

Alberta Environment and Sustainable Resource Development. 2013. Alberta Greater Sage-grouse Recovery Plan 2013–2018. Alberta Environment and Sustainable Resource Development, Alberta Species at Risk Recovery Plan No. 30. Edmonton, AB. 46 pp.

¹⁰ Government of Alberta. 2009. Environmentally Significant Areas of Alberta. Parks Division, Alberta Tourism, Parks and Recreation.

http://tpr.alberta.ca/parks/heritageinfocentre/environsigareas/docs/esa_pdfwebmap_update2009.pdf

most appropriate areas in the southern Rockies for protection of key vulnerable species¹¹. This data should be used in designation of protected areas in the SSRP.

One of the most glaring oversights of the SSRP is in regards to the Castle Special Place. The Castle is important to Albertans and to all of Canada. It is treasured for its stunning beauty, habitat for rare wildlife, its opportunity for wilderness recreation and as the source of clean water for communities far down stream. The Castle contains the highest level of biodiversity in the province after Waterton Lakes International Peace Park and provides 30 percent of the water in the Oldman River Watershed. Protection of this important region is essential for maintaining the future of wilderness and communities in our province.

The plan proposes to protect the rocky mountain tops of the Castle, previously protected as prime protection zone in the Eastern Slopes Policy, as a Wildland Park and ignores the problems of unregulated off-road traffic and the pressure for inappropriate development. This does little to address the conflicts that plague the lowland areas. The rest of this unique landscape is left unprotected and is slated for intense off-highway vehicle use, road-building and logging.

It also proposes to designate a few of its valleys as ill-defined Conservation Management Areas, which still allow for commercial forestry. While a new definition of forestry is needed on the Eastern Slopes there are also places where commercial forestry is not appropriate in any form. For its ecological, social and watershed values, the Castle is one such place. This does not preclude ecosystem-based forest management in these areas but does exclude commercial timber-driven forestry. The designation of a “Castle Conservation Area public land use zone” (p.71) is in essence a multi-use zone with a meaningless conservation title with no legal backing.

Albertans have called for full protection of the Castle time and time again – in the past few years over 100,000 people have contacted the Premier’s office to ask for full protection. Polls also show that southern Albertans want full protection for the area. A 2011 poll, for example, found that three out of every four of area residents¹² and 87 per cent of Lethbridge/Coaldale residents¹³ support designating the Castle as a Wildland Park. Albertans have spoken clearly that they want the entire Castle protected as a Wildland Provincial Park¹⁴ yet the plan ignores the desires of these citizens. The science and public opinion both argue for full protection of the Castle Special Place.

¹¹ Weaver, J.L. 2013. Protecting and Connecting Headwater Havens: Vital Landscapes for Vulnerable Fish and Wildlife, Southern Canadian Rockies of Alberta. Wildlife Conservation Society Canada Conservation Report No. 7. Toronto, Ontario, Canada. <http://www.wcscanada.org/WildPlaces/CrownoftheContinent.aspx>

¹² The Praxis Group. 2011. Castle Special Management Area Public Opinion Study. The Praxis Group. Calgary, AB. http://cpaws-southernalberta.org/upload/Castle%20Public%20Opinion%20Poll_Praxis_2011.pdf

¹³ Ellis, F. 2011. Castle Special Management Area Lethbridge Public Opinion Study – Winter 2011. Citizen Society Research Lab. University of Lethbridge, Lethbridge, AB. https://www.lethbridgecollege.ca/sites/default/files/imce/about-us/applied-research/csrl/Castle_Winter_2011.pdf

¹⁴ Castle Special Place Citizens’ Initiative. 2009. Castle Special Place Conceptual Proposal for Legislated Protected Areas. Castle Special Place Working Group. http://cpaws-southernalberta.org/upload/castle_special_place_conceptual_proposal.pdf

Recommendations:

- A Wildland Provincial Park for the **entire** 1,040 km² of the Castle Special Place.
- Protected areas should conserve ecologically important habitat in a variety of habitat types from “mountain top-to-valley bottom,” not just the harsh, windswept areas above timberline.
- New Heritage Rangelands in areas of intact native prairie.
- New protected areas should be put in place in the Ghost watershed, Kananaskis country, the Porcupine Hills, the Milk River watershed, the Livingstone Range and the Castle Special Place.

Grasslands

The introduction section of the plan indicates that the SSRP region has more than 80% of the province’s species at risk (p. 21). The decline in these species to the point where they are listed either federally or provincially indicates that existing policies and practices to conserve wildlife and their habitats in Alberta are not working.

Most of these species at risk are associated with mixed grassland and wetland habitats. However outside of the Pekisko Heritage Rangeland, no new conservation areas are identified or designated in the grasslands region.

While CPAWS SAB fully supports the Pekisko Heritage Rangeland as an important first step in grasslands conservation and help protect against further species declines, this area alone will not contribute to recovery of currently listed species-at-risk in eastern Alberta.

Additionally the boundary of the Peksisko Heritage Rangeland should be extended north to the Highwood River. Valuable native grassland exists between the current northern boundary and the Highwood River. From an ecological standpoint, the Highwood River is a far more logical boundary.

The plan states that “opportunities for further conservation management approaches will be explored...” (p. 40). This statement, in essence, proposes a wait-and-see approach and a “plan-to-do-more-planning” in critical grassland and wetland habitats. Areas of intact grasslands are known (see map on page 128 of the draft SSRP) and species at risk recovery plans outline important habitats for Alberta’s species at risk. Additionally the RAC advice identified areas of high conservation priority that were not reflected in the draft plan. Thus further exploration is not needed to identify areas for protected areas or conservation designations. Putting off this important responsibility does not provide the provincial leadership that the LUF promised nor will it address the continued loss and fragmentation of wetland and native prairie habitats in Southern Alberta.

The draft plan also mentions that “the environmentally significant areas assessment and mapping provide information on areas that significantly contribute to maintaining healthy aquatic ecosystems” p. 47. This Government of Alberta document should be used to identify areas for protection in the grasslands.

Recommendations:

- Extend the northern boundary of the Pekisko Heritage Rangeland to the Highwood River.
- Additional new protected areas in the grasslands are needed to support our ranching culture and protect species-at-risk such as the sage grouse.
- Use the intact native grasslands map from the draft SSRP and environmentally significant areas¹⁵ map to identify new Heritage Rangelands.

Connectivity

On page 39 the plan states: “Connectivity of wildlife habitat across landscapes is also an important factor in maintaining biodiversity.” This is the one and only time landscape connectivity is mentioned in the document.

In contrast, the Regional Advisory Council (RAC) advice identified an integrated network of public and private lands that contribute to the conservation of biodiversity. This concept has not been included in either the identification of protected areas or any other part of the draft SSRP.

Recommendations:

- Include connectivity in protected areas planning such that new and existing protected areas are meaningfully connected to allow wildlife species and other natural processes to move across the landscape.
- Outside of protected areas, identify a new land use designation, which identifies and protects habitat for wildlife movement between protected areas, especially along stream and river corridors.

Public Land – Green and White Zones (p. 41-44, 66-69)

Linear Footprint Management Plan

The Linear Footprint Management Plan (p. 41, 67) is an important and necessary part of conservation of both the green and white zones. Linear disturbances can fragment habitat for wildlife species, create avenues for invasion of non-native species and provide access for motorized traffic and crowds on off-road vehicles which lead to degraded streams and dirty water, disrupted water runoff patterns, conflicts between people and loss of key wildlife habitats.

Studies of linear densities in the eastern slopes¹⁶ indicate that in many areas linear densities are far above thresholds for species at risk in Alberta such as sage grouse, grizzly bear, cutthroat trout and bull trout¹⁷.

¹⁵ Government of Alberta. 2009. Environmentally Significant Areas of Alberta. Parks Division, Alberta Tourism, Parks and Recreation.

http://tpr.alberta.ca/parks/heritageinfocentre/environsigareas/docs/esa_pdfwebmap_update2009.pdf

¹⁶ E.g. Lee PG and M Hanneman. 2011. Castle Area Forest Land Use Zone (Alberta) – Linear disturbances, access densities, and grizzly bear habitat security areas. Edmonton, Alberta: Global Forest Watch Canada 1st Publication for International Year of Forests.

http://www.globalforestwatch.ca/pubs/2011Forests/02Castle/Castle_report_GFWC.pdf

Given the significance of these disturbances we should not wait until 2017 to implement this tool. Additionally watersheds containing bull trout and westslope cutthroat trout and native prairie habitats should be included in the priority planning areas.

Recommendations:

- Immediate development and implementation of the Linear Footprint Management Plan for the entire South Saskatchewan Region including a strategy for restoration of areas already above targets.
- Include watersheds containing bull trout and westslope cutthroat trout and native prairie habitats as areas for priority planning.
- Enforceable limits should be created for the public lands in the entire region not just specific areas. This helps ensure that, not just at-risk species are protected, but also that we are limiting habitat loss and fragmentation throughout the region to prevent species from becoming at-risk.
- The last point under key features of the plan should read: “A practical system for monitoring, measuring, reporting and *enforcing limits to* linear footprint.
- In the White Area Public Land, no new linear developments on native grasslands should be approved. New approvals should be limited to agricultural and otherwise disturbed areas.
- Strategies on Green Area Public Land should include not just a “management approach” (p. 68) but restoration of obsolete roads and trails and unregulated motorized recreational trails, restrictions on motorized access outside of the designation trail system and an enforcement strategy.
- The plan should include a statement to the effect that until the linear footprint management plan is developed and executed, a moratorium on new linear footprint development will be put in place for public land, including tax-recovery lands, that contains native prairie, sage grouse habitat, core grizzly habitat or watersheds containing, westslope cutthroat trout or bull trout streams.

Ghost Watershed Alliance. 2011. Cumulative Effects Assessment, Ghost River Watershed. Ghost Watershed Alliance. Cochrane AB. http://www.ghostwatershed.ca/GWAS/Research & Data files/2011%20Ghost%20Report-web_1.pdf

Fiera Biological Consulting Ltd (Fiera). 2013. Oldman Watershed Headwaters Indicator Project – Draft Report (Version 2013.3). Edmonton, Alberta. Fiera Biological Consulting Report #1346. www.oldmanbasin.org/index.php/download_file/view/899/89/

¹⁷ E.g. Alberta Grizzly Bear Recovery Plan 2008-2013. 2008. Alberta Sustainable Resource Development, Fish and Wildlife Division, Alberta Species at Risk Recovery Plan No. 15. Edmonton, AB. 68 pp.

Alberta Environment and Sustainable Resource Development. 2013. Alberta Greater Sage-grouse Recovery Plan 2013–2018. Alberta Environment and Sustainable Resource Development, Alberta Species at Risk Recovery Plan No. 30. Edmonton, AB. 46 pp.

The Alberta Westslope Cutthroat Trout Recovery Team. 2013. Alberta Westslope Cutthroat Trout Recovery Plan: 2012-2017. Alberta Environment and Sustainable Resource Development, Alberta Species at Risk Recovery Plan No. 28. Edmonton, AB. 77 pp.

Alberta Sustainable Resource Development 2012. Bull Trout Conservation Management Plan 2012 - 17. Alberta Sustainable Resource Development, Species at Risk Conservation Management Plan No. 8. Edmonton, AB, 90 pp.

Biodiversity Management Framework (p.66)

CPAWS SAB supports a new approach to cumulative effects management in the South Saskatchewan region. While the Biodiversity Management Framework is a key part of the strategy for sustaining biodiversity in the region, CPAWS SAB has several recommendations for the Framework in the draft SSRP.

Recommendations:

- It is important that the indicators and key species chosen are appropriate for assessing the effects of cumulative developments on both species-at-risk and biodiversity. Appropriate indicators should be chosen in consultation with wildlife biologists and conservation organizations.
- The Biodiversity Management Framework does not include the ability to designate new protected areas in key species habitats or landscapes. Although protected areas are not the only tool for conserving biodiversity they are the keystone tool in all conservation plans worldwide. For the Framework to be meaningful and effective, this key tool should not be taken off the table before the process even begins.
- Sector-specific ecological thresholds and cumulative effects thresholds related to land-uses should be included in the biodiversity management framework. Forest management practices should be required to comply directly with legislated ecological thresholds (e.g., for forest cover, linear disturbance, water quality, wildlife habitat) identified by an independent monitoring body and practices should adjust where necessary. Penalties should be applied and enforced for companies that exceed determined thresholds.

White Area Public Lands (p.43-44, 67-69)

On page 43 the plan states: “While the management intent for agriculture and infrastructure on these lands will not change, there will be additional clarification regarding multiple uses of the White Area public land, which is maintaining intact native grasslands and habitat as a high priority.”

The plan also states that in Alberta the grasslands support the majority of our species-at-risk and provide many ecosystem services such as watershed retention and carbon storage.

Native grasslands are one of the most endangered ecosystems on earth. Given their importance and the continued loss and fragmentation of native grasslands, maintaining public native grasslands should be the highest priority for land-use planning in the White Area.

On pages 44 and 69, the plan states that “conversion of native grasslands to other uses such as cultivation-based agriculture, tame pasture or facility developments will be minimized.”

However this statement is contradicted in Appendix H (p. 127) which provides for sale of any intact public grasslands that have irrigation potential. No public land containing intact native prairie should be sold for cultivation. The number of species-at-risk dependent on native is a clear sign that Alberta has already passed the safe threshold for conversion of grassland. All surviving larger tracts of native grassland vegetation on Crown lands should be designated as Heritage Rangelands with longer-term leases for existing grazing lessees and immediate

restrictions on any new surface disturbance. Any irrigation expansion should be onto existing cultivated land currently used for dryland crop agriculture.

Recommendations:

- The sentence on page 43 should be revised as follows: “While the management intent for agriculture on these lands will not change, there will be additional clarification regarding multiple uses of the White Area public land, which is maintaining intact native grasslands and habitat as *the highest* priority.”
- The plan should state that no further conversion of public native grasslands, including tax recovery lands, to other land-uses will occur.
- There should be a moratorium on further leases and surface disturbance on intact grasslands to ensure no further loss occurs.

Invasive Species

CPAWS SAB supports the efforts to manage risks associated with invasive species.

Conservation on Private Lands (p. 44-45, 74-75)

CPAWS SAB supports the use of Market Based Instruments to encourage conservation on private land. Landowners play a key role in stewardship and conservation in southern Alberta.

The section on page 74 provides a broad overview of market-based conservation instruments; however the details of how and when these strategies will be implemented are missing. Without having a clear, specific strategy of implementation, these initiatives will be another case of “planning-to-plan.”

CPAWS SAB also has concerns with the Southeast Conservation Offset Pilot (p. 74-75). While restoration of native prairie through conversion of cropland to grasslands is a much needed initiative, this should not be done at the expense of currently intact native grasslands. Restoration of native prairie from agricultural lands is still experimental. Implementation of this type of offset runs the risk of offsetting high-value native grassland with low-value reclaimed grasslands – contributing to the continuation of decline in grassland species. Thus while restoration projects are important, they should not be conducted as the sole strategy for industrial offset.

Recommendations:

- The plan should include commitments to tangible market-based pilot projects aimed at, for example, restoration of sage grouse and burrowing owl habitat on privately-owned agricultural lands.
- Restoration of native grasslands from agricultural lands should not be based on offsets from disturbance and loss of high-value intact native prairie habitats.
- No new disturbance should occur on intact native grasslands.

3. Watersheds are managed to support ecosystems and human needs (p. 45-48 , p. 81-91)

Advancing Watershed Management p. 45-48

The floods of 2013 reminded us that what happens upstream in Alberta impacts everyone many miles downstream. The mountains and foothills of southern Alberta are natural water towers for millions of people.

When clear-cut logging, road-building and unregulated motorized vehicle use impact headwater forests, these lands lose their natural ability to regulate water flows. Soils exposed by clear-cutting, packed hard for roads or eroded from off-highway vehicle use are unable to store as much water, adding to floods and leaving less water during droughts.

The SSRP contains vague language about prioritizing headwaters integrity, but fails to walk the talk by providing specific changes and standards. The draft SSRP allows obsolete practices such as clear-cut logging to continue.

This section on advancing watershed management focuses largely on infrastructure and flood plain mitigations to flooding and has little connection between watershed management and land-uses. Better land-use decisions need to be made not just within “flood hazard areas” (p. 46) but also in headwaters landscapes.

On page 47, the plan refers to the environmentally significant areas assessment and mapping as providing information on areas that significantly contribute to maintaining healthy, aquatic ecosystems. This mapping should be used in identification of new protected conservation areas in order for these areas to actually protect headwaters systems.

On page 48 the importance of wetlands and the extent of wetland loss in southern Alberta are highlighted, but there is nothing proposed to stop and reverse this loss.

On pages 52 and 96, reference is made to redevelopment of flood affected areas. CPAWS SAB supports restoring low-impact recreational trails and use areas in Kananaskis Country and along the Bow River; however, the plan does not address the issue of restoring the damage by off-highway vehicle recreation which can lead to increased magnitude of future flooding events.

Recommendations:

- A strategy for restoring area impacted by clear-cut logging, road building and off-highway vehicles should be outlined and implemented as soon as possible.
- Detailed strategies for achieving natural, healthy water systems and wildlife habitat need to be defined in sections on forest management.
- Protected areas outlined in the SSRP should include more than just the mountaintops above timberline. Protected areas should also include the slopes and valleys through which the streams and rivers flow. Government of Alberta ESA mapping could be used in this assessment.

Surface Water Quality Management Framework (p. 81-82)

CPAWS SAB supports the implementation of the Surface Water Quality Management Framework for the South Saskatchewan Region and the use of water quality guidelines (p. 81). However, without linking the cumulative effects on water quality to land uses that degrade water quality, or having legally enforceable standards, it will be hard to regulate such standards.

Recommendations:

- Include limits and targets for land-use that contribute to decreased water quality (eg. linear densities, forest clearing) as part of the water quality management framework.
- Make water quality limits legally enforceable.

Enhanced Integrated Watershed Management (p.87-88)

On page 87, the plan states that the work of watershed planning and advisory councils will be supported. In our view, there is little point in doing watershed planning or serving on advisory councils if there is no prospect of the results being implemented.

Recommendation:

- Add: “Watershed plans developed under the Water for Life strategy, to the extent that they support implementation of the SSRP, may be designated Sub-Regional Plans under the ALSR and, upon coming into force, carry similar weight to the over-riding SSRP.”

On page 87 the plan commits to establishing regional wetland management objectives under the Alberta Wetland Policy and assessing the feasibility and need for a regional riparian management strategy. Wetland and riparian areas are very important for both headwaters protection and provision of habitat for species at risk. Restoration of wetlands should be a key priority in the region. The management objectives for wetlands and riparian areas, including thresholds and multipliers on wetland replacement offsets, should be clearly stated in the final SSRP.

Recommendations:

- As market-based instruments for ecosystem services on private lands are developed, a priority for implementation should be the restoration and development of those ecologically-productive classes of wetland that have suffered the greatest losses in the region.
- Include clear objectives and thresholds for wetland and riparian management.

Unregulated off-highway vehicle use is contributing to the deterioration of our headwater landscapes and water sources throughout our region. Inappropriate activities such as mud-bogging, poorly-laid out trails which were never designed for heavy recreational use and other issues associated abuse by off-highway vehicle users are a key issue in headwaters management. However these issues are not addressed in the section on headwaters management.

Recommendations:

- Include a new, enforceable regulatory requirement that motorized recreation users avoid both wetlands and riparian areas.
- Address unregulated off-highway vehicle use as a contributing factor in the degradation of headwaters (see specific recommendations in section 4 below).

The quality of our sole water source in Southern Alberta should not be left to best management practices and optional source water protection plans.

Recommendations:

- Page 88 (e), (f) and (h): Replace “encourage” with “require”

Efficient and Resilient Water Supply (p. 88-90)

The section on Efficient and Resilient Water Supply (p. 88), once again fails to link watershed health, land-uses and disturbances in the headwaters landscape to water quantity and resiliency.

The timing, volume and quality of water are to a very large degree a factor of the health of forests, wetlands and valleys which intercept and retain the runoff from snowmelt and rain. However, the draft plan focuses on water storage and hardly mentions headwaters. Without addressing headwaters land management we are not looking at the whole picture of achieving an efficient and resilient water supply or mitigating the impacts of future flood events.

Upstream land-uses such as clearcut logging, industrial disturbances, linear disturbances and unregulated off-highway vehicle use have significantly impaired the ability of our headwaters to perform their natural function as water regulators, contributing to increased flood intensity and drought magnitude.

Improving resiliency by restoring natural areas that mitigate floods and droughts such as headwaters regions, wetlands, river-connected aquifers and riparian areas should all be advanced with the SSRP through specific, measurable targets and limits.

“Climate variability” (p. 89) will only increase as the climate changes, leading to more severe flooding and drought events in Southern Alberta. The best ways to address these changes and ensure that we indeed are resilient in the face of such changes are not short-term infrastructure solutions but using our great natural capacity for adaption – intact landscapes.

According to current climate predictions, the province’s annual mean temperature is projected to increase between 3°C and 5°C by 2050.¹⁸ Climate change will cause changes to the water cycle, leading to an increase of extreme events like floods, droughts, and blizzards. The following changes are anticipated due to the changing temperature and precipitation patterns, as a result of climate change:

- Changes in species community composition and structure.

¹⁸ Barrow, E.M. and Yu. G. 2005. Climate Scenarios for Alberta. A Report Prepared for the Prairie Adaptation Research Collaborative (PARC) in co-operation with Alberta Environment. University of Regina, Saskatchewan. Available at http://www.parc.ca/research_pub_scenarios.htm

- Alteration to the timing and amount of water availability.
- Increased rainfall triggering more flood events.
- Inability of species to migrate relative to the rate of climatic change, possibly leading to extinction.
- Northward and upslope shifts in species distribution.
- Changes in plant phenology (e.g., the timing of bud burst and flowering);
- Increasing occurrence of disturbance and threat of invasive species.
- Decline of old growth forest communities.

The plan also does not address the impacts of climate change. It is difficult to see how a 50-year plan could ignore such an important and significant issue. The Government of Alberta commissioned climate change scientists to develop climate change scenarios for the South Saskatchewan Region. Not only was this work not used in the draft, there is not even a reference to the documents that were produced.

Healthy, functioning and diverse ecosystems are more resilient to change, thus providing more opportunity for nearby human communities to adapt as well. Retaining intact natural areas with options for species to persist and expand in the face of climate change is a key adaptation strategy.¹⁹

The SSRP should include climate change predictions for the region and planning should be based on this current and future landscape rather than the landscape of the past. Measures to enhance the resiliency of the landscape to climate change, including conservation of forested and grassland areas, must be an essential element of any serious regional plan.

Recommendations:

- Reform management of headwaters landscapes and source water areas in all use sectors.
- Implement changes to forestry, road construction, beaver management and recreational infrastructure to increase the resilience, storage capacity and filtering ability of the headwaters forests of the South Saskatchewan region.
- Include the science-based predictions of the effects of climate change in headwaters management planning and ensure planning aligns with such predictions and contributes to enhancing resiliency of the landscape to climate change.
- Include commitments to restore natural areas that mitigate floods and droughts such as headwaters regions, wetlands, river-connected aquifers and riparian areas

Headwaters (p. 90-91)

On page 90, the draft plan states “Headwaters are protected through the establishment of conservation areas.” Given that these “new” conservation areas are mostly rock above tree line, these areas do not provide the storage, filtration, flood control, or the riparian habitat that the vegetated areas on the lower slopes, valleys and foothills provide. In addition, none or very few threats to the watershed exist on the top of the mountains. The threats to the watershed from industrial, recreational, and residential development activity occur more in the foothills or further

¹⁹ Hebda, R. 2010. The future of flora: The impacts of climate change on the flora of the Canadian Southern Rocky Mountains and its value to conservation. Vancouver, BC: Canadian Parks and Wilderness Society.
http://cpawsbc.org/upload/CPAWS_Flathead_Climate_Rockies_flora_comp_Mar2010.pdf

down on the grassy or forested slopes of the mountains. It is a huge stretch to say that these areas are designated for headwaters protection.

Among the many important headwaters areas, the Castle Special Place provides 30 percent of the water for the Oldman Watershed. The symbolic protection of the mountain tops of this key water source area does not in any way address the issues headwaters protection.

Recommendations:

- A Wildland Provincial Park for the **entire** 1,040 km² of the Castle Special Place.
- Protected areas should important source watersheds from “mountain top-to-valley bottom,” not just the rocky areas above timberline.
- Headwaters protection should also include specific measures for reforming forest management towards an ecosystem-based approach.

4. Quality of life is enhanced through recreation (p. 51-56, 68-69, 96-97, 114)

Meeting Demand for Outdoor Recreation (p. 96-97, 114)

The plan states that “the demand for outdoor recreational opportunities such as camping, hunting, fishing, ski touring, paddling and trail use is growing, and these forms of active living are a significant aspect of the quality of life for the region... Existing provincial park recreation amenities in the region are generally at or over capacity and demand will increase as the region’s population grows” (p.34).

The plan also states that it will “expand and designate new provincial parks and recreation areas” (p. 96) to meet that demand.

Despite this statement, the plan adds only 13.5 km² of provincial parks, 1.3 km² of recreation areas (p. 114). New Wildland Parks are also entirely at mountain tops which, although used by some are largely inaccessible to many outdoor recreationalists.

According to the Alberta Population Projection, Alberta's population is expected to increase by an additional two million people in the next thirty years, bringing the total number of people in the province to approximately six million.²⁰ It is estimated that by 2041 the population of the Calgary area will exceed two million people. This increase will create additional pressure on our remaining wild areas and resources, such as the availability of clean water and natural spaces.

It begs to question how or where this growing demand for low-impact recreation for a growing population will occur.

Recommendation:

- Expand the provincial parks system in the final SSRP to meet the need for expanded conservation and protected area and the demand for low-impact recreation. One such area could be the expansion of the provincial parks system in Kananaskis.

²⁰ Government of Alberta. 2012. Alberta Population Projection. Alberta Treasury Board and Finance. <http://www.finance.alberta.ca/aboutalberta/population-projections/2013-2041-alberta-population-projections.pdf>

OHV Use in Conservation Areas (p. 41)

On page 41 the plan states: “Off-highway vehicle use is permitted on existing trails and areas or where a management plan, trails plan or regulation specifies. In areas where designation of trails has not yet occurred, use of existing access can continue, but no new trails or routes or access may be developed without an access management plan. No motorized access is permitted in wetlands and water courses. Off-highway vehicle use will continue to be prohibited in the beds and shores of permanent water bodies.”

Where designated trails have not been established, no motorized access should be permitted on or off existing non-regulated trails.

CPAWS SAB fully supports the prohibition of motorized access in wetlands and watercourses. This prohibition should also include “riparian areas” including areas adjacent to water and seasonal streams and waterbodies and should apply to all areas in the SSRP region.

Recommendation:

- The second sentence should be changed to read: “In areas where designation of trails has not yet occurred, *access only by non-motorized means is permitted* and no new trails, routes or access may be developed without an access management plan.”
- Include “riparian” areas as areas where motorized access is prohibited.
- Prohibition of motorized vehicles in wetlands, water courses and riparian areas should apply to all areas of the SSRP region.

Public Land Use Zones (p. 41-43, 68-69)

The plan indicates that “Public Land Use Zones (PLUZ) will be consolidated and expanded to provide the ability to more effectively manage public land across the Green Area and address priority issues such as protection of watercourses and sensitive areas.” (p. 43, p. 68)

PLUZs have not proven to be an effective tool for management of multiple uses. They are, in fact, the “everything can happen everywhere, all the time” model. Current management of PLUZs creates a situation where the land is dominated by OHV activity which can exclude low-impact users who enjoy big, wild and quiet spaces entirely apart from noise and pollution that comes with motor traffic. In other words, the problems and impacts of unregulated off-highway use should be addressed before any expansion occurs and bigger problems are created.

While the plan provides provision for protecting industrial facilities and public safety by requiring avoidance of camping and OHV recreation on industrial facility areas (p. 68), it does not provide for protection of the land or water.

CPAWS SAB supports low-impact sustainable outdoor recreation. The SSRP should focus on promoting low-impact outdoor recreation, which creates less damage than motorized recreation. The plan should include an assessment of the cumulative effects of motorized recreation in our natural areas compared to low-impact recreation. No expansion or promotion of motorized recreation should occur without an understanding of the long-term cumulative impacts of this land-use.

Southern Alberta is big enough for a diversity of recreational opportunities. However, when the rule is “anything goes,” there will soon be nothing left. The wrong kinds of activities in the wrong places lead to displacement of wildlife, degraded waterways, damaged habitat and conflicts between people.

Recommendation:

- No expansion of Public Land Use Zones should be considered until:
 - all existing damage to native vegetation, soils, wetlands and streams in existing PLUZs has been effectively remediated;
 - new regulatory and enforcement tools have been established for recreational off-highway vehicle use; and
 - the linear footprint management plan for White and Green Area lands has been completed in implemented.
 - a long-term cumulative effects assessment of the impact of this land-use has been conducted.

On page 52 the plan indicates that integrated recreation and access management plans will be created in the priority areas of North Castle, Porcupine Hills, Livingstone and Willow Creek. CPAWS SAB supports the creation of a designated trail system, restoration of damaged areas and clear enforcement of unregulated motorized use of the green zone. It is unclear in the document whether these management plans are to expand motorized recreational trails or to limit access and restore damaged areas. CPAWS SAB recommends that no expansion of motorized recreational trails should occur in these areas until a system of designated trails is created AND damaged areas are restored. The intent of these areas should be made clear in the plan. The SSRP needs to provide clear actions for ending landscape abuse and to repair existing damage, not expand it.

Recommendation:

- Make the intent of recreation and access management plans in the priority areas clear. Indicate that no new motorized trails will be developed until a system of designated trails is created AND damaged areas are restored.

Public Land Recreation Areas (p. 55, 96-99)

On page 55 the plan states “New Public Land Recreation Areas will be established in the eastern slopes to support random camping and access to trails.” While random camping and the damaging effects of irresponsible use in the eastern slopes most definitely need to be controlled, CPAWS SAB has several concerns with the new PLRAs.

The plan states that these areas were chosen based on “highly popular areas of random camping on public lands” (p.55) rather than areas the most ecologically appropriate areas. An assessment needs to be conducted on the effects of formalizing camping in these areas before they are established and alternate areas should be chosen if PLRAs have the potential to affect prime fish or wildlife habitat, headwaters streams, important recreation areas or private property.

Related to this concern is that this approach seems to be a “if you build it, they will come” strategy to formalize random camping and does not guarantee that random camping will be directed to these area nor does it provide any limits to random camping outside of these areas. The education and Guardian program is an essential part of educating people on responsible use. However this program must be complemented with clear limits and rules for random camping and sufficient resources for enforcement. The plan should also include a strategy for restoring areas already impacted by irresponsible random camping.

CPAWS SAB is also concerned that no fees will be charged for use of these areas despite provision of basic amenities such as fire rings and gravel pad and services such as the education and enforcement (both within the PLRAs and throughout the eastern slopes). This arrangement also creates a disparity between users in provincial campgrounds and those choosing to camp randomly while still receiving government services. Although access to the outdoors is an important part of our Alberta culture, resources to fund education, enforcement and restoration of damage could be funded through a permit or service fee.

Recommendations:

- Include clear limits and rules for random camping and sufficient resources for enforcement.
- Include a strategy for restoring areas already impacted by irresponsible random camping.
- An assessment should be conducted on the effects of formalizing camping in these areas before they are established.
- As with provincial campgrounds, permits and fees should be charged for random camping in PLRAs and throughout the eastern slopes.

South Saskatchewan Regional Trail System (p. 97, 130-131)

CPAWS SAB supports the development of the South Saskatchewan Regional Trail System. This system should be purposefully designed for recreation and to avoid the most ecologically sensitive areas such as important wildlife habitat, wet areas and watercourses and key low-impact recreation areas. Public Land Use Zones, do not adequately manage motorized recreation on public land. The current designated trail system was not designed for recreational use, rather it is comprised of linear disturbances turned recreation trails.

Recommendations:

- Immediate development and implementation a regional trail system.
- No new motorized trails will be developed until a system of designated trails is created AND damaged areas are restored
- Regulations that all off-highway recreational vehicles to be registered and clearly marked, front and back, with a unique vehicle identification plate should be implemented. Substantial penalties (up to and including confiscation of vehicles) should be given to registered owners (not just the operator) of OHVs that are found to be operating outside authorized areas.

Conclusion

The vision and objectives of the draft SSRP are an encouraging step for Albertans to move towards a sustainable future. However with a few exceptions the plan is set up as a 'business as usual' approach to planning which will not achieve the objectives of the Land Use Framework.

Although the government has spent millions of dollars and countless hours in public consultation, little of this information appears to have been used in the drafting of the plan. Likewise, the hard work of the Regional Advisory Council (RAC) is largely not incorporated. We hope that these comments and the comments of the many Albertans who took the time provide feedback on the plan and their vision for the future of southern Alberta are carefully considered. A transparent process of how current science and public comments were included in the plan and why decisions were made should accompany the release of the final SSRP.

We look forward to these revisions being included in the final SSRP, to ensure that we maintain our beautiful wild spaces, our quality of life and the vital ecosystem services we receive from intact natural areas.

Sincerely,



Katie Morrison
Conservation Director



Anne-Marie Syslak
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