



November 1, 2024

To: Dr. Digvir Jayas
President, University of Lethbridge
president@uleth.ca

Cc: U of L Business Development Corp
administration@ulbcorp.ca
City of Lethbridge Planning and Development Services
planninganddesign@lethbridge.ca

From: Braum Barber
Chair, Southern Alberta Group for the Environment

Re: Native Grasslands and the ULBC South Campus Development

The University of Lethbridge Business Corporation (ULBC) is in the process of conducting a market analysis that will guide the South Campus Development of approximately 100 acres owned by the University¹. Part of the area proposed for housing development has been identified in the City of Lethbridge *Environment & Historic Resources Strategy* as natural grasslands². The Strategy states: "It is rare to find undisturbed native grasslands in Lethbridge. These remaining patches of native grassland must be preserved. Sites that are disturbed native grasslands often require significant intervention and management to restore native species and to ensure the health of these regions does not worsen. Natural grasslands are rapidly declining and there need to be processes put into place so that the remaining areas are preserved" (p.92). Furthermore, according to the *State of the Prairie Technical Report* by the Prairie Conservation Forum, native grassland in the Lethbridge Plain declined 8% during the period 1990-2010, the greatest amount of change in the Grassland Natural Region of southern Alberta³.

The fragmentation and loss of grasslands abutting the coulees may lead to decreased biodiversity, including species-at-risk, and may negatively impact drought resilience, soil stability and consequently a loss of carbon sinks which help mitigate climate change.

We expect a high standard of business development, professional practice and environmental stewardship from the University of Lethbridge, given its commitment to biodiversity and conservation in the curriculum, and as a leader in science-based decision making. It is standard professional practice to apply Alberta government guidelines for conservation of native grasslands in decisions regarding industrial development applications. In addition, professional practice expects the application of provincial guidelines and directives to minimize the impact of land-use activities on wildlife⁴.

As such, the Southern Alberta Group for the Environment (SAGE) would request that the University of Lethbridge expand its market analysis to include an environmental assessment. Avoidance of losing native grasslands is the preferred approach – it appears to be possible to proceed with about three-quarters of the development and leave the native grassland portion without surface disturbance.

Unfortunately, native grasslands continue to be lost to industrial, agricultural and urban development in Alberta. It is important that their preservation be prioritized. We look to the University of Lethbridge to make principled decisions for its South Campus Development.

¹ <https://ulbcorp.ca/projects/>

² <https://www.lethbridge.ca/media/3ruh5jvh/environment-and-historic-resources-strategy.pdf>

³ https://albertapcf.live-website.com/rsu_docs/state-of-the-prairie-summary-document_final.pdf

⁴ <https://www.alberta.ca/land-conservation-and-reclamation-guidelines-for-native-grasslands>
<https://www.alberta.ca/wildlife-land-use-guidelines>