



***RE: Nov. 20, 2015 draft of South Saskatchewan Region Biodiversity Management Framework, Comments by Lori Goater with input from the SAGE Board (following stakeholders workshop in Lethbridge on Dec. 2, 2015)***

Thank you for the opportunity to contribute. It is important that the South Saskatchewan Region Biodiversity Management Framework (BMF) has a strong foundation in order to maintain biodiversity in the region over the long term. The public is supportive of responsible environmental stewardship of our landscape. Managing our collective impacts on water, air, and biodiversity are in everyone's best interest.

Considerable effort has already been invested in monitoring biodiversity within our region. As recognized in the draft BMF, many projects have been dedicated to monitoring suites of biodiversity indicators and evaluating their status relative to past, current and future conditions. An overwhelming amount of information suggests that biodiversity is becoming increasingly threatened across the region. Thus, the government is challenged with the difficult job of arresting biodiversity loss in a timely and transparent manner in the face of growing population and land use pressures.

Habitat extent and quality, as well as species presence and abundance, offer many ways to measure biodiversity and the overall integrity of ecosystems. The Air Quality and Surface Water Quality Management Frameworks are built on gradients and thresholds, so it would be convenient if this approach could be applied to monitoring the status of biodiversity as well. The 'holy grail' for resource managers is a biodiversity indicator with a linear gradient of 'health' and predictable response to increasing landscape disturbance. However, biodiversity is inherently complex & dynamic, responding to the unique environmental variables of each situation.

The Government of Alberta should be commended on its intent to reduce the cumulative effects of development on the environment. Predictive modelling has been invaluable in assessing the impacts of land use scenarios on biodiversity; historic land use and water management trends have been analyzed based on understanding species responses to habitat alteration. This draft BMF is primarily a monitoring strategy, the results of which could contribute to better informed decision-making in the long term, however time is of the essence for maintaining many ecological communities (e.g. rough fescue grasslands, cottonwood forests) and Species At Risk (e.g. Westslope Cutthroat Trout, Bull Trout, Sage Grouse, Grizzly Bear). Several important inadequacies need to be addressed before government can be confident of achieving its biodiversity objectives.

The core of the draft BMF proposes measuring the urgency of management response based on interpreting the condition of an amalgamation of biodiversity indicators. Logically, this approach should be as strong as the science that supports it. Unfortunately, the draft indicates that the breakpoints between risk categories have no scientific basis (inappropriately based on the IUCN guidelines for defining endangerment of species), the 'trigger' tolerances between management levels are set arbitrarily, and performance is ranked relative to current condition instead of a sustainability benchmark. Considering the wealth of available science and the considerable importance of biodiversity (as espoused in the first half of the draft), it was disappointing to see the framework built on such a weak foundation. The majority of workshop participants were, not surprisingly, confused and frustrated during the explanation of the indicators and triggers section.

The draft BMF requires substantial investments in monitoring AND analysis. Co-opting non-government organizations to support the data-collection process could be a sensible approach; improving both monitoring efficiency and data credibility. However, it is clear in this draft that the government is inadequately prepared to analyze the large amounts of raw monitoring data that would result. The vague plan to summarize indicator data into 'pyramids' and draw superficial interpretations based on the aforementioned methodology would discredit the entire process. To prevent this, we suggest that organizations such as AEMERA be given license to define priority biodiversity targets (e.g. native mixed grasslands), select appropriate biodiversity indicators (e.g. obligate grassland bird species) and produce complete status assessments. This would increase transparency and unburden the government to focus on improved planning and managing risk. The government needs to move away from its traditional role as sole data source and become more active and transparent in facilitating information accessibility.

The draft SSR BMF lacks clearly defined, tangible and measurable outcomes that would lead to place-based actions. This can likely be attributed to the failure of the planning processes for the Land Use Framework and the South Saskatchewan Regional Plan to make tough choices and trade-offs regarding land uses and to sufficiently identify and zone those landscapes in the region where conservation and restoration of native ecosystems and species is a priority. More information is required on how the BMF links to or guides human footprint management planning, recreation management planning and forest management planning for defined areas, such as is currently underway for the Porcupine Hills and Livingstone.

Generations of Albertans have benefitted from our region's rich natural heritage. Without strong leadership toward mitigating environmental impacts, our resource-based economy will gradually erode the natural landscape beyond recoverability. Despite the urgent need for a well-designed BMF to build leadership in sustainable practices and environmental stewardship, the current draft falls disappointingly short of these goals.