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A leading voice for a healthy and environmentally sustainable community

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To: Honourable Robin Campbell, Minister ERSD

cc: Bev Yee, Assistant Deputy Minister, ESRD
Greg Weadick, MLA Lethbridge-West
Bridget Pastoor, MLA Lethbridge-East

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

Re: Draft South Saskatchewan Regional Plan (SSRP)

The Southern Alberta Group for the Environment (SAGE) has enthusiastically supported the process of developing the Draft SSRP. We believe that it is extremely important that the Government of Alberta take a leadership role in managing land-use for the long-term benefit of Albertans, and the SSRP is a promising effort in this direction. We encourage the government to continue to pursue regional planning; however, we believe the current Draft SSRP will require some adjustment to be effective.

General comments:

Before elaborating some specific concerns, it is important to first express some general objections about the tone of the document. Consider the following quote:

“While cumulative effects are considered to be the combined effects of past, present and reasonably foreseeable land-use activities on the environment, it is not the intention of the biodiversity management framework to return Alberta to the levels of biodiversity found prior to European settlement. Today’s Alberta includes working landscapes, and the Land-use Framework policy acknowledges the need to balance environmental, social and economic considerations. The focus of the framework is from today into the future ...” (p.38, 119).

Is there anyone who has seriously proposed that we restore the South Saskatchewan basin to a condition ‘found prior to European settlement’? Is this rhetorical flourish meant to temper expectations for the ‘need to balance environmental, social and economic consideration’ in the following sentence? As we have already eliminated at least 60% of native vegetation and 64% of natural wetlands from the region and compromised much of

the natural ecosystems that remain, wouldn't a 'balance' suggest conserving what remains and that some serious restoration be considered? Or are the criteria for 'balance' based on current conditions, or the conditions in 2017, or 2024 when the government writes a new planning document? One might argue, with so much land already converted from its natural state, that what remains must be preserved. That a proper 'balance' would be a no-net-loss policy with concerted efforts towards restoration and expansion of conserved land.

Perhaps this seems pedantic, but how does the concept of 'balance' correlate with the concept of 'growth'? The tone of the document suggests that 'growth' is the *sine qua non* of Alberta's economic strategy - inevitable, indeed desirable - and that conservation efforts are not intended for long-term preservation, but simply a delay in exploitation until a time when areas critical for water purification, water retention, carbon sequestration and habitat have more economic value for other land uses, as guided by the omniscient invisible hand of valuation. Unfortunately, "if land-use decisions are based on market-priced goods alone, then a reduction in environmental regulations must always appear justified."¹ In other words, conservation must recognize both market and non-market goods and services, with difficult-to-monetized impacts managed by imposing sustainability constraints – the SSRP requires more sophistication in its approach to valuation. This document would be more effective with a clear admission of limits – limits to growth, and limits to converting what remains of our natural heritage for human uses.

In addition to the uncritical veneration of growth, there is a clear paucity of imagination in the Draft SSRP of what type of economic growth Alberta can expect over the next decades. Are forestry, oil & gas exploitation, and irrigation really our only vision for economic prosperity in the province? With limits on natural resources (both renewable and non-renewable), can perpetual growth of resource extraction be realized? Can further growth of land-based human activities be realized while 'balancing' the need for preserving natural areas?

It is our general concern that the current Draft SSRP is emasculated by its lack of clear vision for Alberta's future. Some definition of conservation, of balance, and of growth would make clear the goals for future decisions that will be made based on this planning document. As it stands, the actual goals of the document are ambiguous and the actions emerging from the SSRP are likely to be inconsistent, if not incompatible.

Structural comments:

The second concern about the Draft SSRP is the impetuous use of existing documents to support the regional plan. We can understand the desire to integrate other planning documents under this overarching regional plan. What is telling is the choice of planning documents: On page 61 of the Draft SSRP, the recent *Alberta's Irrigation: A Strategy for the Future 2013-2035* is referenced as the 'roadmap' for agriculture in the basin. On page 63, the *Alberta Forest Products Roadmap to 2020* is referenced – a document created by the forest industry in collaboration with the government and released in early 2013. On

page 73, implementation of the *Air Quality Management Framework for the South Saskatchewan Region* (released October 2013) was supported, and on page 81 the *South Saskatchewan Region Surface Water Quality Management Framework* (draft released October 2013) is invoked.

These documents are rather recent (published in the last year) and have not been examined adequately through open public processes or through practice. It would strengthen the SSRP if the relevant goals and ‘roadmaps’ for irrigation, forestry, and air & water quality management be transliterated into the document. As it stands, the omnibus approach allows for interpretation and expectations that may conflict with the overarching goals of the regional plan. In other words, if the SSRP is to be the lead document for Alberta’s vision for the future of this region, it should be self-contained.

Content comments:

The Draft SSRP in Outcome 1 advocates for the growth and diversification of the economy. Current trajectories of land use for industrial growth clearly indicate unsustainable impacts and unacceptable cumulative effects. The document says, correctly: “Alberta’s landscapes and the ecosystem services they provide are being strained from a combination of pressures such as population growth, climate change and industrial development which are impacting limited ecosystem resources” (p.44). As already noted, continual growth of the traditional sectors of our economy is not possible – we believe Albertans realize and accept the idea of limits, and are willing to live within them to maintain healthy and purposeful lives. Furthermore, the reliance on growth by exploiting marginal oil & gas plays in this region does not fully acknowledge ecological valuation in cost-benefit analyses, and ignores our collective responsibility to reduce greenhouse gas emissions. Emission goals and approaches to reducing them should be specifically stated – referring to Alberta’s Climate Change Strategy is inadequate in this regard.

Regarding agriculture, there is no clear commitment to preserve native grasslands, reduce the impact on wetlands and riparian areas or reduce the adverse effects of high levels of water allocation for irrigation on aquatic ecosystems. In fact, as noted in Appendix H, there is an expectation for ongoing expansion of agricultural land under irrigation and on-stream storage to mitigate expected water scarcity in the future. Existing intact grasslands appear unprotected if ‘irrigation potential exists’. What is ‘irrigation potential’? The plan says that where public land is to be converted, an ‘appropriate ratio’ of private land may be exchanged. What is an ‘appropriate ratio’? Will this require a similar (and similarly dysfunctional) scheme as the one outlined in the Wetlands policy?

The forestry plan also seems to advocate for a business-as-usual approach to logging, despite the ongoing criticism of the C5 plan, and the adverse impacts of current logging techniques including aesthetic losses for recreation and tourism, critical habitat loss, fragmentation of wildlife corridors, aquatic and riparian health, and downstream water quality. Best practices for forest management are required, current practices seem to defer solely to fiber management.

Sustaining biodiversity and ecosystem function should be paramount in this plan. There is a lack of clarity, however, on how lands will be conserved into the future. Sustaining biodiversity will require maintaining and restoring connectivity and river corridors – the SSRP is unclear on this. It is telling here that the recommendations of the South Saskatchewan Regional Advisory Council (RAC) regarding a conservation network were largely disregarded. Five grassland areas identified for conservation management by the RAC with valley and coulee connectors are ignored in the SSRP, except a vague commitment to maintain “intact native grassland and habitat as a high priority” (p.43) and a nod to species-at-risk protection without a clear plan to maintain and improve habitat. Establishment of the Pekisko Heritage Rangeland, the Castle Conservation Area and expansion of wildland parks in the Eastern Slopes is a step in the right direction, although inclusion of the most productive habitats and planning appropriate connectivity for wildlife is lacking.

More generally, timelines to monitor environmental conditions, evaluate data, and assign indicators are much too protracted, many initiatives stretching into 2017. We agree that monitoring, program evaluation and assigning indicators of environmental health are important, but much work already exists – notably the Oldman Watershed Council *Headwaters Action Plan 2013-2014*. Once clear goals are established by the SSRP, well-researched indicators like density of linear footprint, native fish populations and invasive species can be initiated immediately. Furthermore, it would also enhance the SSRP if a clear list of indicators be included in the document (Table 1), with a commitment to invest in scientific monitoring. Data gathered should be independently verified and made freely available to the public, rather than through the “release of reports on an annual basis that speak directly to the plan” (p.102). Open and transparent processes of communicating data will be important for the success of regional planning.

A strong regional plan must be clearer in stating limits, and providing direction for future decision making. More land must be protected, native grasslands must be protected, industrial activity and vehicular use must be curtailed in these areas, habitat connectivity must be established, the headwaters must be protected, and adequate instream flows must be maintained. Off-highway vehicle recreation must be restricted to designated trails, managed and enforced. The Draft SSRP does not say this clearly enough. And where are the municipalities in this plan? If, as the regional plan states, “municipal planning and development decisions will ... have to be in alignment with the regional plan to achieve the regional outcomes established in the plan”, shouldn't there be clearer direction given for municipal sustainability planning (including water quality conservation, transportation planning, waste reduction and management, industrial activity and emissions, etc.)? It is interesting to note the clear priority of extracting oil & gas, in which the municipalities are expected to “identify areas of existing and future extraction of energy resources, and determine appropriate land use in the vicinity of these resources” (p.95). What exactly is the priority here? Shouldn't municipalities be allowed to follow sustainable practices of development without being hampered by energy exploitation within its boundaries?

Balancing environment with a growing economy is the wrong metaphor. The economy is embedded and reliant on a healthy environment. Society is embedded and reliant on a healthy environment. There are thresholds to environmental degradation that cannot be passed without effecting our health and prosperity. SAGE respectfully requests that these imperatives become more evident in the final draft of the South Saskatchewan Regional Plan.

ⁱ Bateman, et.al. (2013). Brining ecosystem services into economic decision-making: Land use in the United Kingdom. *Science*, 341(5). 45-50.