



**A leading voice for a healthy and
environmentally sustainable community.**

Box 383 Lethbridge AB T1J 3E9

October 1, 2015

To: Land Use Secretariat
South Saskatchewan Regional Plan Amendment Consultation

From: Braum Barber
Southern Alberta Group for the Environment

Re: Enhancing the Protection of the Castle Area

The Southern Alberta Group for the Environment (SAGE) commends the Government of Alberta for its commitment to protect the Castle as an important source for clean water in southern Alberta, as water storage for late season streamflow, and as a migration corridor and crucial habitat for wildlife.

SAGE supports the planned amendment to the South Saskatchewan Regional Plan (SSRP) to designate a Castle Wildland and Provincial Park that ‘would protect important fish and wildlife habitats and shared international wildlife populations, provide headwaters protection, help to manage and develop recreational and tourism opportunities, and reduce or remove industrial impacts on the landscape.’

SAGE has been actively involved in providing feedback during consultations on the South Saskatchewan Regional Plan (SSRP), and continues to be interested in supporting sustainable policy and practices in the region. Sustaining biodiversity and ecosystem function should be paramount in this plan and will require not only protection, but restoration and rigorous scientific monitoring.

SAGE remains concerned that the SSRP does not adequately address current trajectories of land use for industrial growth, which clearly indicate unsustainable impacts and unacceptable cumulative effects in the region. 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 document 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 in the SSRP, and aligned to the outcomes of the Climate Leadership discussion.

There is no clear commitment to preserve native grasslands in the SSRP, nor is there a commitment to reduce the impact on wetlands and riparian areas or to reduce the adverse effects on aquatic ecosystems caused by high quantities of water allocation for irrigation. In fact, the SSRP indicates that there is an expectation for ongoing expansion of agricultural land under irrigation and the development of on-stream storage to mitigate expected water scarcity in the future. 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, and a nod to species-at-risk protection without a clear plan to maintain and improve habitat.

The Minister of Environment and Parks has recently noted that Alberta is 'on track to having the worst air quality in Canada.' Fine particulate matter is an ongoing (though seasonal) concern in the south, and is substantially related to agricultural activities including intensive livestock operations. SAGE has been actively involved in the Clean Air Strategic Alliance and the Odour Project Team, which has recently completed a Good Practice Guide (available online at casahome.org). It would be appropriate to consider the documents developed through this consensus process in the SSRP.

Timelines to monitor environmental conditions, evaluate data, and assign indicators are much too protracted in the document. 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, with a commitment to invest in scientific monitoring. Data gathered should be independently verified and made freely available to the public. Open and transparent processes of communicating data will be important for the success of regional planning.

A strong regional plan must be clear in stating limits, setting priorities, and providing direction for future decision making. Extant wilderness must be protected and restored, 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 current SSRP does not say this clearly enough.

Furthermore, as the Municipal Government Act is under review, it would be timely to assign clear responsibilities to municipalities within the purview of the SSRP: for example, improving water quality from stormwater systems, reducing water abstractions from rivers, reducing the impact of urban sprawl on land-use, improving building standards to reduce energy consumption, and lowering emissions through alternative transportation infrastructure.

SAGE wholeheartedly supports the proposed amendment to the SSRP regarding the designation of the Castle region as park land. We hope that the Alberta Government will take the opportunity to advance other aspects of the regional plan towards achieving a sustainable future for Albertans.

Sincerely,



Braum Barber
SAGE