



February 15, 2019

Honourable Shannon Phillips
Minister of Environment and Parks
208 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

RE: Bighorn Country Proposal Public Consultation Submission

Dear Minister Phillips,

Thank you for the opportunity to comment on the Bighorn Country plan as proposed by Alberta Environment and Parks. There are close to 270 beef producers in the area who hold grazing leases, permits or are members of a grazing reserve and therefore may be impacted (either positively or negatively) by the Bighorn proposal.

ABP Considerations and Positions:

ABP has been a strong supporter of environmental stewardship and conservation of sensitive lands and riparian areas for many years. We have seen how well managed grazing livestock can not only complement conservation, but also enhance the health of rangelands, riparian areas, and forests. For example, cattle and other livestock can be used to curb forest and brush encroachment onto valuable native grasslands, or mitigate invasive plant species, ensuring longevity and health of those lands for wildlife as well as domestic livestock. ABP recognizes that there is increased pressure from many users and land use planning is essential for long term environmental health in the Bighorn area.

Security of tenure on both private and public lands is essential for maintaining or improving health of rangelands. On most Crown lands under agricultural dispositions, the grazing disposition holders have relatively secure tenure. This security of tenure provides a strong incentive for leaseholders to manage the land sustainably. Secure tenure and sound oversight by Alberta Environment and Parks rangeland agrologists are key reasons why the land, water, and biodiversity on these lands are in good health. Secure tenure for grazing dispositions serves Albertans and disposition holders well and does not preclude the use of the land for other compatible activities or land uses.

We are pleased to see the Government of Alberta's commitment in the Draft Bighorn Proposal and particularly the Public Land Use Zones (PLUZs) to honour all grazing leases, permits, and established grazing reserves and that there will be no change to the administration of grazing leases and permits within the Bighorn proposal. **We strongly support continued long term, secure grazing disposition tenure in the Bighorn area as well as continued administration by Alberta Environment Rangeland Agrologists on those grazing dispositions.**

We also appreciate that the **Recreational Access Regulation would still apply** within the PLUZs, however there may be increased pressure for greater access to grazing reserves and leases for recreational opportunities. It will be very important to understand leaseholder concerns, manage and reduce conflict, and ensure continued engagement with leaseholders as recreational management plans are developed.



Primary Concerns:

As mentioned previously, we recognize the importance of land use planning in the Bighorn area for long term conservation outcomes and although we don't have issue with the overall concept, it is difficult to fully evaluate the impact of the proposal on beef producers since many of the details and management plans still need to be developed. Unlike the Castle and Livingstone/Porcupine where land use management plans were developed and vetted through years of multi-stakeholder consultation beginning with the South Saskatchewan Regional Plan and subsequent stakeholder advisory committees for each area, these important and detailed management plans have yet to be completed in the Bighorn, and is creating unease among grazing stakeholders. The perceived **speed of implementation** of the Bighorn proposal, without developing the management plans with stakeholders prior to release of the proposal, is further adding to stakeholders' discontent.

There has also been some confusion about the need to designate the West Country and Kiska-Wilson as Public Land Use Zones if the current recreation access regulations are working. The need to reclassify the area as a PLUZ has also created uncertainty and skepticism about whether the new designated area will actually remain a PLUZ, with continued domestic livestock grazing, in the long term. Once a boundary and designated area is established, stakeholders fear that it would make it that much easier to convert that area into a park in the future. Again, **security of tenure and assurances that grazing will remain in the area for the long term is vital** to both implementing best conservation grazing management practices and for the viability of many ranching operations in the area. We strongly believe that public lands under grazing dispositions achieve equal conservation outcomes that a designated park can provide, often with increased environmental benefits over a park.

Recommendations:

- **The GOA commit to long term (20 year) secure tenure of leases, grazing permits, and grazing reserves within the Bighorn area.** Long term security ensures proper management for healthy ecosystem outcomes and conservation.
- **The GOA commit to automatic lease and permit renewal based on proper stewardship (Tenure for Stewardship) within the Bighorn area.**
- **Delay final implementation of area boundaries and designations until proper recreation, user conflict mitigation, and area land use plans are developed in consultation with grazing disposition holders**
- **Allow for new temporary or shorter-term grazing permits within the Bighorn Wildland Park for brush control and improvements to the Park's rangeland health.**
- **Allow for commercial forestry as a forest encroachment control and fire management tool within the Bighorn Park and Bighorn Wildland Park.** This will ensure grazing lands are maintained or improved for wildlife within the park boundaries and will mitigate migrations of ungulates (and predators who follow) onto agricultural private and lease lands.



- **Consider removing the areas from the Bighorn Park and Wildland Park that did not achieve consensus in the RAC recommendations.** There will always be opportunity to add these in at a later time when/if concerns are addressed.
- **Incorporate the NSRP RAC recommendations for priority planning within the West Country Public Land Use Zone.**
- **Ensure grazing reserves, leases, permits, and the PLUZs are overseen by Public Lands and their rangeland resource managers and scientists, in collaboration with grazing disposition holders.**
- **Any new or updated grazing management and riparian management plans must be developed with grazing disposition holders to ensure best management practices are practical and have mutual desired outcomes.**

Further Considerations with respect to Canada's Conservation Targets:

We appreciate that Alberta is committed to helping Canada achieve its conservation targets of 17% of total land by 2020 as part of international agreements made at UN Convention on Biological Diversity (called Canada's Target 1¹). While we strongly support this worthy goal and are committed to work with the provincial and federal governments in achieving this target, we recommend that government give more consideration to the use of *Other Effective Conservation Measures* (OECM) in reaching Canada Target 1. We believe healthy rangelands, both public and private, that are managed by livestock producers could greatly contribute to these targets under the OECM guidelines. While parks and protected areas are also important, they are not the only means to reach Canada Target 1 and our governments should consider well managed crown lands under grazing dispositions as opportunities to help reach Canada's conservation and biodiversity targets.

If you have any further questions feel free to reach out to us anytime by contacting our Government Relations and Policy Manager, Tom Lynch-Staunton, at toml-s@albertabeef.org.

Sincerely,

Charlie Christie
Chair

cc. Bev Yee, Deputy Minister, Alberta Environment and Parks
Ronda Goulden, Assistant Deputy Minister, AEP Policy and Planning Division
Mike Fernandez, Assistant Deputy Minister, AEP Parks Division

¹ Under the UN Convention on Biological Diversity, this same target is called Aichi Target 11. Canada committed to 20 different Aichi targets at the UN CBD in 2010. Currently, Canada's % of protected lands is at 10.6%