



April 6, 2017

Attn: Senior Parks Planner
Alberta Environment and Parks,
Parks Division; Castle Provincial Park and Castle Wildland Provincial Park
4th Floor Administration Building
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Lethbridge, AB T1H 0H5
ABParks.PlanComments@gov.ab.ca

To Alberta Environment and Parks

RE: Public Consultation Submission on the *Castle Management Plan Revised Draft March 2017*

Alberta Beef Producers (ABP) is a democratic and representative organization that speaks and works on behalf of close to 20,000 cattle and beef producers from all sectors of primary beef production (seedstock, cow/calf, cattle feeders) and all areas of the province. ABP is an organization of producers, led by producers, working for producers. The ABP mission is to strengthen the sustainability and competitiveness of the beef industry for the benefit of beef producers and all citizens in Alberta.

As you may know, we have been watching with great interest the development of the Castle Park and Castle Wildland Park and accompanying management plan. On behalf of the cattle and beef producers in Alberta, we are pleased that the Alberta Government has recognized the value of cattle grazing for managing and enhancing the health of ecosystems as outlined in the Revised Castle Park Draft Management Plan, and is committed to working with beef producers to develop a sustainable and long term livestock grazing plan to complement the park's conservation objectives. Our producers are strong environmental stewards and work diligently to ensure best grazing practices will enhance and maintain the health of sensitive lands and riparian areas.

General Comments on Conservation and Stewardship of Grasslands

Rangelands, which include grasslands and forest areas used for grazing, are the foundation of the province's cattle and beef industry and grazing on Crown land under agricultural dispositions is an integral part of our industry. Grazing leases are a fundamental component of a Crown land use strategy that provides benefits to the people of Alberta and the

leaseholders while maintaining our province's rangelands as functional, working landscapes. Our objectives for functional rangelands are that these lands support efficient and economical cattle production while also meeting the environmental and social objectives of Albertans for protecting land, water, plants, and animals.

Security of tenure on both private and public lands is essential for maintaining or improving health of the grazing lands. On most Crown lands under agricultural disposition, the leaseholders 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 staff are key reasons why the land, water, and biodiversity on these lands are in good health. Secure tenure for grazing dispositions serves Albertans and leaseholders well and does not preclude the use of the land for other compatible activities or land uses.

General Comments about the Revised Castle Management Plan

ABP appreciates AEP's commitment to working with local ranchers who hold current grazing dispositions to create a long-term grazing plan for the Castle Park. ABP also appreciates the government's recognition of cattle grazing as an effective tool to enhance the health of rangelands in the area, including using livestock to control forest encroachment onto grazing lands.

Specific comments on the Plan

Section 2.1.4 Viewscapes; Objective 2:

It will be very important to engage and consult with neighbouring landowners on aesthetics. The Park Plan will need to recognize that at various times, farms or ranches may not be as aesthetically pleasing (spring thaw) as tourists would like. It will be important to use common sense approaches that do not inhibit the daily functions of the farming or ranching business. If there are economic constraints put on landowners due to the viewscape, there must be plans developed to compensate landowners for this loss or to help improve the viewscape.

Section 2.2.4 Vegetation; Objective 1; Section 2.4 Vegetation Management; Section 2.4.2 Fire:

Understanding historical (100yr) forest/ grassland areas will be very important to determine where forests may be encroaching or have already taken over grassland areas. These areas

should be considered for restoration into a rangeland which can ensure habitat for wild ungulates.

If forest control is an appropriate measure, it would make sense to harvest the timber before a fire control program is initiated.

Section 2.2.5 Fauna; Objective 1:

Engaging neighbouring landowners to develop wildlife management strategies to address wildlife “overflow” will be very important. As mentioned above, one of these strategies could be removal of forested areas to encourage grassland growth in the park, thereby keeping the current wild ungulate populations within the park boundaries.

Section 2.3 Water

We agree with the protection of riparian areas to ensure a healthy waterway and quality of water. It will be important to begin measuring water quality and riparian health in order to understand the baseline from which to make improvements if some areas are unhealthy and threatening the quality of water.

Section 2.4.3 Grazing

This revised section has been well considered and addresses many of our concerns with the original draft plan. We are very appreciative that this section was added and that there is a commitment of the government to continue to use cattle grazing as a rangeland health management tool. We would like to emphasize that long term grazing allotments (10yrs+) ensure security of tenure, as well as stronger commitment by the rancher to ensure cattle are managed properly and to invest in rangeland improvements (research, cattle management techniques, infrastructure, rangeland and riparian assessments, fencing, etc.). We are very pleased to see the commitment to use rangeland agrologists, cattle rancher expertise, the Rocky Mountain Forest Range Association, Cows and Fish, and others to help develop and monitor the success of the Grazing Management Plan. Lastly, we also appreciate government’s willingness to invest in infrastructure (ie fencing, off-stream watering systems, etc.) to help reduce recreational conflict and manage sensitive areas.

In terms of trails for hiking or mountain biking, cattle can actually be used to develop high quality, compacted trails and have the potential to increase the positive hiking and biking experience. However, we expect the most positive hiking experiences will be in the alpine or sub-alpine where cattle are very unlikely to graze. We expect the management of cattle on trails will be possible.

In summary, we strongly support this section of the plan and all objectives on cattle grazing within the park.

Addressing unintended consequences or “knock on” effects outside the park boundaries

We understand that the development of the Castle Park and Castle Wildland Park will displace some recreational users, specifically random campers and OHV users. Understandably, OHV recreationalists will seek other areas to in which to use their OHVs and this may create higher traffic, environmental impacts, and conflict on other public lands where many cattle producers also hold grazing permits. We believe there are solutions that can help us coexist on these other public lands, while also minimizing negative impacts of increased recreational OHV use. It will be important that the government continue to consult stakeholders who will be impacted in other adjacent public land areas and develop collaborative and cooperative plans.

We encourage AEP staff to continue to communicate and consult with ABP, the Rocky Mountain Forest Range Association, and the local grazing disposition holders in further development of the Castle Park Livestock Grazing Management Plan. We believe we can develop a strong, long term plan that could be used in other parks and on public lands, perhaps creating a strong model for collaboration between land managers and parks across Canada.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rich Smith". The signature is fluid and cursive, with the first name "Rich" and last name "Smith" clearly distinguishable.

Rich Smith, P.Eng.,
Executive Director