



May 2, 2018

Alberta Environment and Parks
Planning Branch
8660 Bearspaw Dam Road
Calgary, AB T3L 1S4
Email: AEP.Planning@gov.ab.ca

RE: Comments on the Draft Livingstone-Porcupine Hills Land Footprint Management Plan and Draft Livingstone-Porcupine Hills Recreation Management Plan

To Alberta Environment and Parks,

Alberta Beef Producers (ABP) is a democratic and representative organization that speaks and works on behalf of over 18,000 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.

We wish to thank you for the opportunity to comment on the Draft Land Footprint and Recreation Management Plans for the Livingstone-Porcupine Hills area. We have been participating with great interest in land use planning initiatives for the entire province, most recently in Southern Alberta with both the development of the Castle Park and Castle Wildland Park, as well as land management planning for the Livingstone-Porcupine Hills area. On the latter, we know that several ranchers who live and work in this area and who graze cattle on the forestry reserves were involved in consulting on these plans. We are pleased that the Alberta Government has recognized the value of producers' input and the complexity of managing working public landscapes. In addition, we appreciate that Alberta Environment and Parks (AEP) recognizes that cattle grazing can be used to enhance the health of this ecosystem and that the government is committed to working with beef producers to develop a sustainable and long term livestock grazing plan to complement other land uses. Cattle producers are strong environmental stewards and work diligently to ensure best grazing practices will maintain and enhance the health of sensitive lands and riparian areas.

General Comments on Conservation and Stewardship of Public Lands

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 and forestry grazing permits 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.

General Comments about the Draft Land Footprint Management and Recreation Management Plans

We support the overall purpose, objectives, and management outcomes of the plan, as we believe that this area needs to be managed by several users and stakeholders to ensure the landscape is healthy, ecosystems continue to function properly, and the land can continue to be sustainably managed for a variety of uses and enjoyment by Albertans.

One of our critiques of the plan is that there seems to be unnecessary additional layers of complexity which could inhibit practical improvements on the landscape and significantly increase the cost of these improvements to the taxpayers. Examples of these layers are increased data gathering, monitoring, and reporting, as well as increased layers of oversight. There are several organizations and individuals, currently using the landscape and also sharing the values of conservation and preservation, for which practical plans, guidelines, and best management practices have been developed (grazing management plans and reclamation techniques for example) and are working well. We do recognize that there may need to be increased enforcement and oversight as new rules are implemented, however there are many tools and practices we can continue to use and these may only need refinement to have high value benefits for the landscape.

In addition, both plans fail to recognize the potential for conflict between users and describe how conflict will be managed. Conflict will be inevitable so a plan to address this will be important moving forward. This will be increasingly important as displaced recreational users of the Castle Park will move into this area.

Lastly, the government will need to reconcile precedent setting by this plan with the vast public landscape on the rest of the Eastern slopes. There is potential for an enormous amount of costs to implement this and other plans, especially if impacts in the Livingstone-Porcupine, although mitigated, create increased impacts in other areas to the north.

ABP General Recommendations:

- That AEP consider using current organizations already working on the landscape to administer, monitor, and refine respective plans.
- Integrate conflict management into both plans, and at the very least, the Recreation Management Plan.
- Consider the high cost of administration and implementation of the management plan. The plan needs to be simple and practicable, where lowest cost solutions with greatest benefits are prioritized.

Specific comments on the Draft Land Footprint Management Plan***Definition of Threshold, p1:***

ABP supports this definition that thresholds are defined as management thresholds and consider socioeconomic realities of conservation decisions.

Conservation landscapes pg. 9-10:

Segregating landscapes into planning zones makes sense. This zoning, including area boundaries, should be updated and adjusted as landscapes and uses will change over time. It should be recognized that for Zone 1 Conservation areas, cattle and other livestock can be used to help restore health in these areas, especially in rejuvenating grasslands, controlling invasive plants, and controlling forest encroachment. In some areas, *increased* use of grazing could achieve beneficial restoration and conservation outcomes. In addition, full exclusion from riparian areas for livestock may be too costly and impracticable for minimal positive impact, so a combination of management tools, such as off-stream watering systems and temporary (electric) fencing for areas of concern, should be considered.

2.2 Management Thresholds pg 8:

Disturbance limits, especially *Spatial Human Footprint Targets*, that affect grazing must be practical, effective at achieving the outcome with minimal cost, and developed with stakeholder input, especially grazing disposition holders and organizations such as Cows and Fish and the Alberta Biodiversity Monitoring Institute. These limits and footprint targets need to consider adaptive management and be adjusted as more information, testing, and knowledge becomes available.

2.3 Siting to Avoid Valued Features

We are unsure how this will affect or impact grazing. For sensitive habitat, especially rough fescue grasslands, well managed cattle should not be restricted unless restoration is necessary. Siting should be developed with local grazing disposition holders and rangeland resource staff.

“Multiple Win Solutions” are a worthy goal.

2.4 Restoration and Reclamation

While we support the intent and objectives of restoration and reclamation, we believe that the Eastern Slopes Restoration Strategy needs to be developed with input from experts working in reclamation, including private industry (oil and gas reclamation companies), the Foothills Restoration Forum, land managers, and forage associations such as the Foothills Forage Association. We would expect these groups would have very good guidelines and restoration plans already developed which would reduce the duplication arising from AEP developing plans in isolation.

In addition, it is important to consider whether it is necessary to fully reclaim linear or other disturbances as these areas can still provide benefit such as allowing for cattle movement, low impact recreation access, and increased forage for wildlife.

Invasive Species including forest encroachment

It is important to address invasive species; however, some will be too costly to address (ie timothy grass). We recommend that control of noxious weeds is of highest priority and the opportunity to implement multi-

species grazing with sheep and or goats to assist in the control of invasive species be considered on a site-specific basis. In addition, we think it is important to consider forests as potential invasive species on rough fescue grasslands based on consideration of the historical landscape, which was likely a much higher abundance of grasslands in comparison to forests. Therefore, forest encroachment on grasslands needs to be addressed and mitigated as part of a restoration plan. This would include not replanting certain forested areas that have been harvested if these areas were historically a grassland ecosystem.

3.1 Detailed Regulatory Limits and Targets

Regulatory limits and targets need to be adaptive, adjustable, practicable, and developed with input from the users of the landscape. In addition, areas targeted for restoration and other conservation measures need to be developed in consultation with the land managers and grazing disposition holders to ensure positive “multiple win” outcomes.

3.2 Detailed Integrated Land Management Practices

Public Land Use Zones pg. 20

Need to ensure that these zones do not inhibit or unduly restrict regular operations of grazing disposition holders or other business related uses. For example, these zones should not restrict cattle moving through them unless absolutely necessary and for a valid reason.

3.2.6 Management of Grazing and Range

We strongly recommend that the responsibility to manage grazing and range be the grazing disposition holders with support from Alberta Environment and Parks, rangeland management experts/scientists, Cows and Fish, the Rocky Mountain Forest Range Association, and other organizations with expertise in beneficial management practices that improve range and riparian health. We recognize that some oversight and monitoring is needed to ensure improvements are made or ecosystem integrity remains intact. This is a role that AEP currently plays and should continue in the future.

In some cases, restoration or projects may need government support for achieving outcomes. This support could be in paying for equipment and tools for fencing and off-stream watering or increased labour for cattle management.

3.3 Detailed GoA Business Process and Integration Mechanisms

Security of tenure, including long term 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 with grazers, coupled with sound oversight and advice by rangeland health biologists, forage associations, AEP rangeland resource management staff, and organizations such as Cows and Fish, 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. We strongly recommend that the current grazing disposition tenure, disposition, and allotments be maintained as they are.

If grazing is restricted in a certain zone or area, this may reduce the amount of animal unit months (AUMs) that the disposition holder can access (over and above current year to year AUM adjustments as range health permits). As these permits are tradeable and have market value, government will need to consider compensation for decreases in market value of grazing permits if AUMs are permanently reduced.

4.0 Implementation and 4.1 Governance

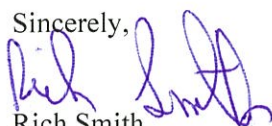
ABP strongly supports the inclusion of both government agencies and resource managers, including grazing disposition holders, in leading the implementation and governance of the plan. ABP also strongly supports the commitment for the plan and governance to evolve and be adaptable as land-use pressures change or new tools or science becomes available.

Addressing unintended consequences or “knock on” effects outside the Livingstone-Porcupine boundaries

We understand that increased restrictions 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 and implementation of the Livingstone-Porcupine Footprint and Recreation Management Plans. We believe we can develop a strong, long term plan that could be used on other public lands, so long as it remains simple, practicable, and efficient.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rich Smith".

Rich Smith
Executive Director

Cc. Honourable Oneil Carlier, Minister of Agriculture and Forestry
Honourable Shannon Phillips, Minister of Environment and Parks
Rick Blackwood, Assistant Deputy Minister, Alberta Environment and Parks
Andre Corbould, Deputy Minister, Alberta Agriculture and Forestry