

AEPA Key Messages to the South Saskatchewan Regional Advisory Council's Advice

Overarching Comments

- The regional plan should indicate that agriculture is an important renewable resource that will continue to generate substantial economic activity well into the future.
 - AEPA is seeking clarity on the priority agriculture would hold in the allocation of limited resources.
- Effective land use planning must be guided by clear, well articulated GoA policies and from the agricultural perspective, those policies must integrate water resource management, the efficient use of land, land stewardship, biodiversity and conservation management.
- Continued engagement with agriculture in the development of land planning policies is necessary to prevent unintended consequences to the industry, and to ensure agriculture is able to operate in an economically, environmentally, and socially sustainable manner.
- AEPA encourages producers to provide feedback on the RAC advice by completing the workbook and/or by attending one of the public information sessions later this year.
- AEPA is generally supportive of the RAC Advice in the points relating to agriculture; support for agricultural industry development, voluntary approaches to encourage private land stewardship, recognition for property interests, and irrigation development considerations.

Agriculture Economic Development

The RAC provided considerable advice in support of economic outcomes, much of which applies to agriculture. AEPA agrees with this advice but wishes to emphasize the following:

- Strategic and sustainable infrastructure related to water supply, transportation and utility transmission will be key considerations for agriculture to realize future growth and diversification opportunities.
- Government of Alberta (GoA) should ensure an appropriate regulatory environment to enable and not hamper sustainable agricultural growth.
- Emerging agricultural opportunities should be facilitated by the GoA through research, education and policy development or the application of appropriate policy instruments.
- Market-based opportunities and financial incentives for conservation and stewardship have potential for broad-scale adoption by the agricultural community (even though currently it's only a minor revenue stream for agriculture).
 - GoA should move quickly on developing and communicating policy and regulation to support conservation and stewardship market opportunities.
 - In the implementation phase education will be needed to help agricultural producers/land owners identify risks and opportunities associated with these developing markets.

Agricultural Land Fragmentation

The RAC recommended that GoA continue with the current policy approach of encouraging municipalities to minimize agricultural land fragmentation and conversion. They also recommend that GoA ensure that the metrics of fragmentation and conversion are more carefully tracked into the future. With respect to this issue, AEPA would like to emphasize the following:

- GoA should clarify their official position regarding the development of a provincial policy on agricultural land fragmentation and conversion, as it had originally been identified as a LUF priority.
- With the current policy regime, producers should be proactively working with municipalities to ensure that agriculture interests are respected through development and conservation tools (for e.g. zoning, Transfer of Development Credits (TDCs) and easements).
- Conservation tools (such as TDC approaches) are important policy instruments for municipalities to help manage agricultural land fragmentation while protecting and respecting agricultural landowner property interests.
 - GoA should hasten the release of draft TDC regulations for public review.
 - GoA should support municipalities during the implementation phase for TDCs to help identify priority agricultural lands and ensure that property interests are respected.
- GoA should implement an effective tracking system to monitor the loss of agricultural land including fragmentation and conversion.
- Options should be developed and made available to landowners to reduce land-use conflicts, and a fair and reasonable dispute resolution process established when conflicts arise.

Irrigation and Water

AEPA agrees with the RAC advice related to irrigation and water but would like to emphasize the following additional points:

- Future agricultural growth opportunities are contingent on access to reliable water supplies for irrigation, livestock production and value added processing.
- Strategic management of surface water (including storage, drainage, and distribution) should be at the forefront in the SSRP because of the significant impact on industry (including agriculture), municipalities, recreational users and environmental needs.
 - Integrated approaches for off-stream storage that include provisions for drainage should be explored to address the issue of flooded agricultural land (i.e. in areas that are deemed as having low wetland functionality).
 - Storage has the potential to benefit the environment (water quality, stream flows and habitat) and recreational interests while addressing industrial and municipal supply risks.
- Irrigation water holder rights should be respected when considering options to secure a portion of the irrigation district efficiency gains to help meet in-stream conservation needs.
- Increased groundwater mapping and risk assessment for both surface and groundwater quality is required to support policy and programs.

Agricultural Land Stewardship

The RAC recommended that the GoA facilitate the implementation of best management practices (BMPs) to help protect source waters (surface and ground). The RAC also recommended the conservation/restoration of wetland, riparian and floodplain areas through market based approaches on privately owned lands. AEPA agrees with RAC's advice but would like to emphasize the following points:

- BMP adoption should be facilitated through incentives or market opportunities where current economic incentives for adoption are inadequate.
- In the implementation phase, target areas for BMP adoption should be based on a thorough environmental risk assessment approach.

Cumulative Effect Management

The RAC supported the GoA approach to cumulative effects management of developing regional management frameworks (MFs) for air, water and land (biodiversity). These MFs are intended to have thresholds based on best available science, and triggers or targets for action based on public consultation. AEPA understands the need to manage cumulative effects, but would like to emphasize the following:

- Management frameworks need to be explicit as to the process and actions required by affected stakeholders when management actions are required.
- Cumulative effects management needs to be thoroughly assessed for unintended consequences to agriculture such as potential loss of industry competitiveness.
 - AEPA seeks engagement to fully understand its impact.
- If and when water quality thresholds/limits are developed for tributaries, they will need to be adjusted taking into account the scale of the system. For example, it is not realistic to transfer the objectives established for the mainstem rivers to the tributaries.
 - Tributaries that originate in agriculture watersheds have inherently higher nutrient concentrations compared to main stems.
- To remain economically viable, the agriculture industry will require time to develop the capacity to effectively respond to place-based water quality thresholds or objectives. Improvements will be incremental and measurable change may not be immediately detectable but will occur over the course of time.
- Conservation and/or restoration of wetlands, riparian areas or wildlife corridors on agricultural land will require incentives and market based approaches that respect property interests.

Conservation Management Areas (CMAs)

The RAC has recommended nine candidate conservation management areas on public land that encompass the range of natural landscapes within the region. The majority of these are in the settled area (White Zone) and are under lease for agricultural grazing. Management intents include continued livestock grazing as a vegetation management tool in support of ecological outcomes, with an obligation for leaseholders to update their range management plan to show how conservation objectives can be met.

- AEPA strongly supports RAC's advice that grazing will continue as a priority use for conservation management areas.