

May 3, 2018

Mr. Rick Blackwood  
Stewardship Commissioner  
Land Use Secretariat Commissioner Office  
Alberta Environment and Parks  
9th Floor Centre West Building  
10035 - 108 Street  
Edmonton, AB T5J 3E1

**Via Email**

Dear Mr. Blackwood

On behalf of our partners, the Agri-Environmental Partnership of Alberta (AEPA) would like to offer our perspective on the North Saskatchewan Regional Advisory Council (RAC) Recommendations.

AEPA is a multi-stakeholder partnership of the agriculture industry, government, and environmental non-government organizations, working together to proactively address agri-environmental issues from a policy perspective. Our Vision: *'Agri-environmental policies are balanced and support sustainable industry growth'*.

The agriculture sector is a significant land manager in Alberta, particularly in the North Saskatchewan Region with a high percentage of the land base in private hands. Agriculture is the number one renewable and sustainable resource in the province which will continue to generate substantial social, economic and environmental benefits into the future.

Below are the RAC Recommendations we support and believe should be reflected in the Regional Plan.

**Advice Areas Supported:** *(noted in the Executive Summary)*

- Supporting biodiversity in the region, particularly;
  - Voluntary practices as one of the best approaches for managing working landscapes (integrated land management, efficient use of land tools, best management practices).
  - Mature the *Alberta Land Stewardship Act (ALSA)* private land stewardship tools (i.e., transfer of development credits, conservation easements, and conservation offsets). Government, in collaboration with municipalities and landowner groups, should develop a long-term strategy and action plan that provides leadership for the tools to be implemented; this includes the key strategy and action plan elements *(points noted in the Executive Summary)*.
  - Conduct private land stewardship pilots to test stewardship tools and practices and increase private landowners' awareness.

**AEPA Comments:**

- AEPA supports voluntary approaches and using mechanisms and tools that incent or reward private land managers for protecting and conserving ecosystem services and biodiversity.
- GoA support for tools and pilots enabled under *ALSA* have not moved forward to implementation. This is restricting opportunities for conservation and stewardship outcomes since landowners are competing in a global agricultural marketplace. Providing credit and other support for implementation will create new opportunities for landowners which will help GoA achieve their desired outcomes.
- Potential contributions require development/application of policy, regulations and economic instruments which will enable development of a voluntary ecosystem services and biodiversity market; this will help facilitate the integration of the environmental assets into a new business model.

- Managing wetlands and lakes as part of watershed management, particularly;
  - Implement the full suite of tools it has within the *Water Act* and Alberta Wetland Policy, including addressing the incentives and offsets that are needed to address the economic benefits and challenges of maintaining and restoring wetlands. As part of the policy implementation, address the process of

wetland replacement by facilitating offset program exchanges as close as possible, within the area or municipality if possible. A well-functioning market is required to provide cost-effective compensation options so that cross-regional exchanges would be the exception.

- Educate and engage with landowners and lease holders regarding the actual identification of their wetlands, the values of those wetlands and options on how to mitigate loss to their wetlands, including the programs that are in play to support such mitigation.
- Strengthen the current approach with partners by being more deliberate in the uptake of wetland management practices offered by partners.

AEPA Comments:

- Market-based approaches should be voluntary, respect property interests, and provide business opportunities with net financial advantages for agricultural producers.
- AEPA supports watershed land and water management practices which have positive environmental outcomes while enabling landowners to apply efficient farming practices.

- Community growth and community land-use planning, specifically;
  - Assess the opportunity of linking efficient use of land tools for municipalities with land-use market tools for the provision of ecosystem services and biodiversity.
- Economic Development, specifically;
  - Develop an agriculture policy that lays out the role of agriculture, including clarity in what land inputs and food outputs are desired, and the respective land-use policies that should be considered as a result of the industry's role.
  - In combination with providing municipalities with further support for community planning decisions, consult and consider what expertise support and market tools need to make difficult choices in land development.

AEPA Comments:

- Market tools such as transfer of development credits help municipalities manage agricultural land fragmentation and conversion, while protecting and respecting landowner property interests.
- Using a market for ecosystem services and biodiversity drives innovation, competitiveness, creates jobs and knowledge, and helps to diversify and grow the rural economy.

We believe the Regional Plan needs to be forward thinking, and therefore it is important to consider the integration of food production, sustainability, and financial viability for agricultural landowners.

We appreciate the opportunity to provide feedback to the RAC Recommendations. Continued engagement between policy makers and landowners is critical to ensuring agricultural interests are reflected in land-use planning, which is ultimately for the public good and of benefit to all Albertans.

If you have any questions about our feedback, I can be reached at 780-645-2159 or via email at [DShepert@albertapulse.com](mailto:DShepert@albertapulse.com). Alternatively you can contact Janet Dietrich, AEPA General Manager, at 780-427-3629 or [janet.dietrich@gov.ab.ca](mailto:janet.dietrich@gov.ab.ca).

Sincerely,

<signature>

Don Shepert  
Industry Co-chair

- cc. Ms. Ronda Goulden, Assistant Deputy Minister, EP/AEPA Advisory Committee Member  
Mr. Dave Burdek, Assistant Deputy Minister, AF/AEPA Advisory Committee Member  
Ms. Karen Wronko, Executive Director EP/AEPA Advisory Committee Member (Alternate)  
Mr. Sean Royer, Executive Director AF/AEPA Advisory Committee Member (Alternate)/GoA Co-Chair