



Response to the Alberta Water Council Wetland Consultation Workbook

This response is a consolidation of viewpoints from the Board of Directors of the North Saskatchewan Watershed Alliance (NSWA).

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Although impossible to poll each NSWA member for specific input into this response, members are encouraged to voice their concerns on watershed issues to the NSWA on a regular basis and they do. We believe we have had sufficient input from our members to submit this response as representative of more than one opinion. Members are also encouraged to submit individual or sector responses to government any time they feel they have concerns too specific to be covered by NSWA.

The NSWA provides a forum for sharing information and experience about issues affecting the North Saskatchewan River watershed in Alberta, and supports and initiates activities that impact the watershed in a positive manner. Wetland evaluation and conservation are key categories from which many of these activities emerge.

The NSWA is a grass-roots organization of approximately 270 (as of August 2007) stakeholders resident or with interest in the North Saskatchewan watershed in Alberta. This includes organizations representing municipalities, aboriginal communities, industry, environment and conservation, agriculture, recreation, tourism, culture, federal and provincial governments; education and research groups; and individual citizens.

The NSWA was appointed as the Watershed Planning and Advisory Council (WPAC) for the North Saskatchewan River (NSR) basin in May 2005.

Section 1: Finding the right balance

NSWA strongly agrees to both statements, with the following qualifications. The new wetland policy should be guided by the concept of ecosystem services that wetlands provide. Provision of public needs (i.e. road development) that degrade these services should be planned with consideration for mitigating losses to these ecosystem services, and should avoid foreclosing future abilities for ecosystem services such as pollution abatement or flood protection when possible. The wording of the second question should be that “the costs and benefits of wetland conservation should be a *priority* in land-use planning and decision-making”.

Section 2: A Policy for the Entire Province

NSWA strongly agrees that a unified wetland policy should apply to all areas in the province. The alignment of policies with the Water Act is a priority, as is the overall application of a no-net-loss approach. However, the needs and contexts of wetland conservation and restoration pertaining to industries in the ‘green’ zone may differ strongly from the white area needs and contexts. Tools and programs will need to be sensitively adapted and applied for use across different sectors.

Section 3: Setting a New Provincial Goal

NSWA strongly agrees with the new policy goal of maintaining or increasing wetland area. Placing wetlands as a priority in this manner recognizes both the cumulative loss of wetland area and the importance of wetland conservation and restoration to the proper functioning of watersheds. The goal of increasing or maintaining wetlands can be accomplished through a carefully planned, strategic and collaborative process that sets wetland goals as part of Integrated Watershed Management Planning (IWMP). Multiple tools may be employed, including mitigation requirements and conservation easements, though more will need to be developed. In urban areas, conservation of existing wetlands and restoration or creation of new ones are recognized as critical for multiple ecological goods and services as well as multiple amenities and economic values. In rural and resource development areas restoration approaches will need to be particularly sensitive to the needs of landowners and managers. The emphasis should be placed on adapting and working with current and future practices and strengthening existing regulations through voluntary and incentive-based restoration to reach watershed goals.

Section 4: Tools and Outcomes

Outcome 1: Creating Awareness

NSWA strongly agrees with the outcome that all Albertans are aware of, and value, the functions and benefits that wetlands and wetland riparian areas provide. However, we advocate a process that goes beyond creating awareness to engaging Albertans in social learning, as awareness alone does not induce valuation or action. Instead of developing static educational materials and professional development programs, an active engagement approach would utilize the concept of learning cycles and provide tools and resources for ‘citizen-science’, wetland stewardship, and applied curriculum that allows cohorts of students to learn about wetlands continuously over several years together with other people from the community.

Outcome 2: Improving our Knowledge

NSWA strongly agrees in the proposed outcome. We believe that the process of knowledge creation about wetland value, function, classification, and design needs to actively integrate classification, inventory, and design into a comprehensive research plan that supports wetland conservation and restoration at local, sub-watershed, basin, and provincial scales. More resources need to be put into applied research programs that create knowledge about interactions between land use, land management, groundwater, wetlands, and stream and river systems. Conducting this type of research during the process of watershed restoration planning and implementation will also encourage social learning among multiple stakeholders and help establish trust in the role of science in managing wetlands and watersheds.

Outcome 3: Recommending Wetland Objectives

NSWA agrees that recommendations for wetland protection, conservation and restoration are made across multiple scales and centered in IWMP processes. The development of these objectives, the identification of significant wetlands, and the development of tools to protect and restore significant wetlands are best accomplished by locally-grounded bodies that can engage stakeholders and communities. However, if subsequent planning, management, and regulation processes do not engage the WPAC’s and other local bodies there is a risk that trust will be lost and implementation of IWMP processes will be impeded. Furthermore, we emphasize that the scale-dependant selection of significant wetlands should take into account all wetland classes; small or ephemeral wetlands (that may be considered locally insignificant) collectively and cumulatively contribute directly to watershed health.

Outcome 4: Using Incentives

NSWA strongly agrees that appropriate incentives be created or strengthened and disincentives be removed to promote wetland protection, conservation and restoration. We recommend that a holistic,

consistent and inter-departmental framework be adopted to identify and resolve conflicting incentives. This will require additional consultation with stakeholders in Alberta and managers from other jurisdictions. We also note that utilizing strictly economic incentives and compensation tools may place too much emphasis on land owners and managers; there may need to be additional incentives to encourage stewardship at the community group/sub-watershed scale.

Outcome 5: Coordinating Activities

NSWA strongly agrees that the Wetland Policy and Implementation Plan be successfully integrated into Provincial legislation, policies and programs and its partners in municipalities, First Nations/Métis Nation and Federal jurisdictions. The more effective the integration and coordination, the greater the potential for successful implementation of Integrated Watershed Management Planning undertaken by WPAC's and other bodies.

Section 5: Tools and Approaches for Achieving a New Wetland Policy

#1 The Proposed Wetland Mitigation Approach

NSWA strongly agrees with statements one to four regarding the mitigation approach, equal application to all regions and proponents, and using science-based ratios until we are better able to measure and replicate wetland function. However we disagree that stormwater management and wastewater treatment are equivalent to natural wetland function. Natural wetlands certainly provide pollution abatement and water flow control, but provide many other habitat and ecological services that stormwater and wastewater solutions cannot. However, stormwater and wastewater wetlands provide critical functions for watershed management and should have incentives and mitigation approaches tailored to the impacts of development.

#2 Recognizing the Role of Ephemeral Water Bodies

NSWA strongly agrees that ephemeral water bodies should be recognized as wetlands in Alberta, that they should be included in the wetland mitigation approach, and that education and awareness programs be established to encourage their conservation. There is a very real need for applied research to overcome the uncertainty associated with ephemeral water bodies, and also a need for accompanying extension to landowners, managers and stewardship groups. We also emphasize that the landowners be encouraged through incentives, education, and voluntary programs for implementing management practices that improve the integrity of ephemeral water bodies. Furthermore, it is critical that the cumulative effects of loss of ephemeral water bodies through drainage, filling and development be addressed in wetland restoration objectives at the basin scale during the IWMP processes.

#3 Wetland Restoration

NSWA strongly agrees that wetland restoration is an important and effective tool for ensuring the new Wetland Policy Goal is achieved. To respond to the cumulative loss and degradation of wetlands WPAC's have a clear mandate to promote strategic and effective restoration planning at multiple scales. To support this mandate there must be success resolving conflicting incentives, adjusting incompatible policy and legislation, and adequate leveraging of resources from public and private sectors to fund delivery of wetland restoration.

General Comments

NSWA welcomes the movement towards a comprehensive wetland policy and implementation plan. We recognize the significant challenges facing the effective adoption and implementation of the plan, but we want to reiterate that the resulting policy must be meaningful and productive in supporting the work that the WPAC's provide in developing and implementing Integrated Watershed Management Planning, engaging stakeholders and community, and supporting the overall success of the Water For Life policies and strategies.