

January 20, 2025

Honourable Rebecca Schulz
Minister of Environment and Protected Areas
204 Legislature Building
10800 97 Avenue NW
Edmonton, AB T5K 2B6

Delivered via email to aep@gov.ab.ca

RE: Review of the South Saskatchewan Regional Plan opportunities

Dear Minister Schulz:

On behalf of the Pembina Institute, I am writing to you to provide our perspective on the 10-year review of the South Saskatchewan Regional Plan (SSRP). The 10-year review is an opportunity to restore Alberta's environmental leadership but will require increasing attention towards its implementation and regulating energy development fairly.

Any review of the continued relevance of the SSRP should include a formal assessment of the Government of Alberta's progress in the implementation of the SSRP. Based on the 2023 implementation progress report, only 11 of the 25 strategic commitments identified in the 2014 SSRP have been completed.¹

Land use planning and the SSRP are important

The fragmentation of land, loss of biodiversity and agricultural land, and more frequent droughts creating water use pressures are important policy reasons for regional planning. Alberta's regional planning approach is a critical process borne from the 2008 Land Use Framework, which recognized that Alberta's land management tools and environmental regulations at the time were unable to integrate both local and provincial land use decisions.

Progress has been lacking

It is promising that objectives such as the air quality framework have been implemented, however 14 unaddressed strategic actions remain. Biodiversity Management Framework and

¹ Government of Alberta, "Implementation Progress Report 2023," *South Saskatchewan Regional Plan* (January 2025). <https://open.alberta.ca/publications/luf-ssrp-implementation-progress-report>

Integrated Resource plans – key for protecting the health of the land and natural ecosystems – are ten years overdue. The delay in a groundwater management approach – due in 2017 – has exacerbated growing drought concerns from increasing climatic pressures in the South Saskatchewan region.² There has been limited progress on parks and protected areas; 14 new and expanded protected areas that were identified in 2014 still do not have legal designation.

Consistency is needed

Recent policies to limit renewable energy development are not consistent with the direction of SSRP. Renewable energy projects have created jobs and contributed more than \$38 million in 2024 to municipal taxes and landowner leases in the Southern Saskatchewan region³ and have the potential to generate over \$133 million each year by 2028.⁴ Updates to the SSRP should recognize the critical economic importance of growing renewables and other clean energy solutions in southern Alberta and approach all land use issues consistently.

Next steps

Pembina Institute supports land use planning and are eager to support the Government of Alberta in planning and implementing the SSRP and other regional plans – critical for addressing the various land use issues first identified in 2008. We look forward to meeting with you to discuss opportunities to make progress in these important areas.

Yours sincerely,



Simon Dyer
Deputy Executive Director
Pembina Institute

cc: Sherri Wilson, Deputy Minister, Environment and Protected Areas
Andrew Horton, Assistant Deputy Minister, Lands Division

² Bob Weber, “No recharge: long-term Prairie drought raises concerns over groundwater levels,” *CTV News* (The Canadian Press, January 21, 2024. <https://calgary.ctvnews.ca/no-recharge-long-term-prairie-drought-raises-concerns-over-groundwater-levels-1.6735655>)

³ Business Renewables Centre Canada, “Municipalities see near doubling of renewable energy tax revenues in one year,” August 6, 2024. <https://businessrenewables.ca/news/municipalities-see-near-doubling-renewable-energy-tax-revenues-one-year>

⁴ Business Renewables Centre Canada, “Alberta’s Clean Energy Future: Municipal Renewable Tax Revenue at Risk?,” February 26, 2024. <https://businessrenewables.ca/resource/albertas-clean-energy-future-municipal-renewable-tax-revenue-risk>