



**ALBERTA WILDERNESS ASSOCIATION**

*"Defending Wild Alberta through Awareness and Action"*

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### **South Saskatchewan River Basin draft Water Management Plan**

AWA recognizes that Alberta Environment has in recent years begun to emphasize how important water is to Alberta and to Albertans, and there have been a number of initiatives which seem to recognize this. The Water for Life Strategy has helped raise appreciation of how important water is to the everyday life of Albertans. Unfortunately, there is a considerable way to go before government policies and initiatives begin to address seriously some of the water management problems which exist in this province due to past mismanagement.

The key goal of the draft plan was to “find the balance between water consumption and environmental protection” in the SSRB. The plan does little to provide a mechanism to achieve these goals. Please consider this letter AWA’s official response to the draft management plan.

### **Water allocation**

AWA fully supports the closure of the Bow and Oldman Rivers to future water allocation. These rivers have clearly been over-allocated for many years, and it is good that this draft plan finally recognizes this fact.

However, this plan does little to allay the fear that the Red Deer River will approach this same severely degraded state before any measures are introduced to put effective caps on future allocations. There does not appear to be any scientific justification for the allocation limit for the Red Deer River of 600,000 cubic decameters.

This draft report barely mentions the Special Areas Water Supply Project proposals to abstract a maximum of 7.08 cubic metres of raw water per second from the Red Deer River to supply (through an inter-basin transfer) a major irrigation scheme in a dry grassland area of southern Alberta. Any substantial flow abstraction with reduced flows downstream will have serious impacts, especially in the low flow season or when higher flows are critical.

The Water Conservation Objective (WCO) for the Bow River (Bears paw to Carseland reach) has been set at the very low level of Instream Objectives (IO) plus 10%. This ignores the good science



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developed and employed by AENV during the planning process. The original recommendations for this reach were for a WCO equal to the Instream Flow Needs (IFN) which represents up-to-date science. Similarly, for the Red Deer River, the WCO of 50% of the IFN does not appear to have any scientific justification. Once again the desires of potential users are being put ahead of the needs of the river. The much lower WCOs proposed by AENV send the wrong signal in terms of arresting the trend towards over-allocation.

### **Water priorities**

Although this plan begins to recognize the problems of over allocation, it still puts insufficient emphasis on establishment of healthy river ecosystems. Most significant is the failure to address the fundamental flaws of the “first in time, first in right” system of water rights. This system is a major cause of the over-allocation problems that now exist in the basin. By adhering to this outdated system, the plan puts the target of respecting historic water allocation rights ahead of the target of achieving healthy river systems. The draft plan is attempting to deal with new and more serious water quantity problems in the South Saskatchewan Basin using the same old tools.

A considerable proportion of the already-allocated water in the Bow and Oldman Rivers is not currently being used. Therefore, even if no new allocations are made, there is still the potential for much more water to be extracted from the rivers in future, and this has not been addressed in this draft plan. The possibility of sale or use of the “paper” water rights of irrigators could have a significant negative effect on future river flows.

Over allocation has led to what Alberta Environment describes as the “poor and declining health of the aquatic environment” in the South Saskatchewan Basin and is a problem that needs a great deal more innovative thinking and action. Unfortunately the draft plan does not provide such an approach. Whether the problem is addressed with new regulations or financial incentives, this very basic obstacle to effective water management in the basin still exists and will still continue to cause the problems unless adequately addressed. There is no reason to suppose that this draft plan will change the fact that the Bow and Oldman Rivers continue to be over-allocated and their aquatic environment will further deteriorate. The 2005 report on “People to Water, Water to People” by the Alberta Institute of Agrologists provides some new ideas on how to deal with water management in Alberta in an imaginative way.

### **Public participation**

The public participation process and stakeholder involvement in the basin planning process have been a disappointment. After more than a year’s input from selected stakeholders through the basin advisory



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committees (BAC), there has been very little dialogue, and some key recommendations have been ignored with little explanation or opportunity for discussion.

The open houses and public meetings for the general public were well prepared and advertised, and useful background material has been provided; the one month extension by AENV of the period for providing comments is also appreciated. However, this "public consultation" exercise has come much too late in the planning process since we understand that AENV intends to finalize the plan within a month of receiving the consolidated questionnaires and comments. This very restricted timescale leaves a question mark on the credibility of this "public consultation."

Similarly, it has been extremely difficult for environmental organizations to participate meaningfully in this process. Representatives of environmental organizations include staff and volunteers. At no point has an equal opportunity been provided by recognizing the time and money that these participants are required to spend to participate in this process. This has led to an unequal access to participation.

Thank you for the opportunity to respond to the draft management plan. I look forward to receiving information about any changes which will be made to the plan to strengthen its objective of finding "the balance between water consumption and environmental protection."

Yours sincerely,

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