



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Honourable Diana McQueen
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January 17, 2013

RE: Logging Operations in Hidden Creek, Upper Oldman River Basin

Dear Minister McQueen:

Thank you for your reply of January 4 in response to our concerns and letter written to Premier Redford on November 6, 2012 regarding the then-imminent logging operations in the Hidden Creek valley of the Upper Oldman.

We appreciate your shared concern for the future of the threatened Bull Trout in Alberta, and especially gratified that your department had directed Spray Lake Sawmills (SLS) to treat Hidden Creek as if it were a Class A watercourse, even without that official designation in place.

In the time since our last communication, AWA has had the chance to take a tour of the Hidden Creek site, and subsequently, to meet with ESRD forestry officers. Over the course of these meetings, several facts cause us continuing concern.

First and foremost is the matter of the disturbances taking place within the 100m buffer zone along Hidden Creek. While it is true that only a small portion of cut block 0752 lies within this buffer zone, and is documented in the table of deviations under SLS' Annual Operating Plan, there is an additional very significant length of road 0733A (the main access road for these operations) that also lies within this buffer zone, a deviation that does not appear in the official documentation. The stretch of this road within 100m of the creek is nearly 2km in length, constituting approximately 30% of the road's total length. (See map provided as figure 1.)

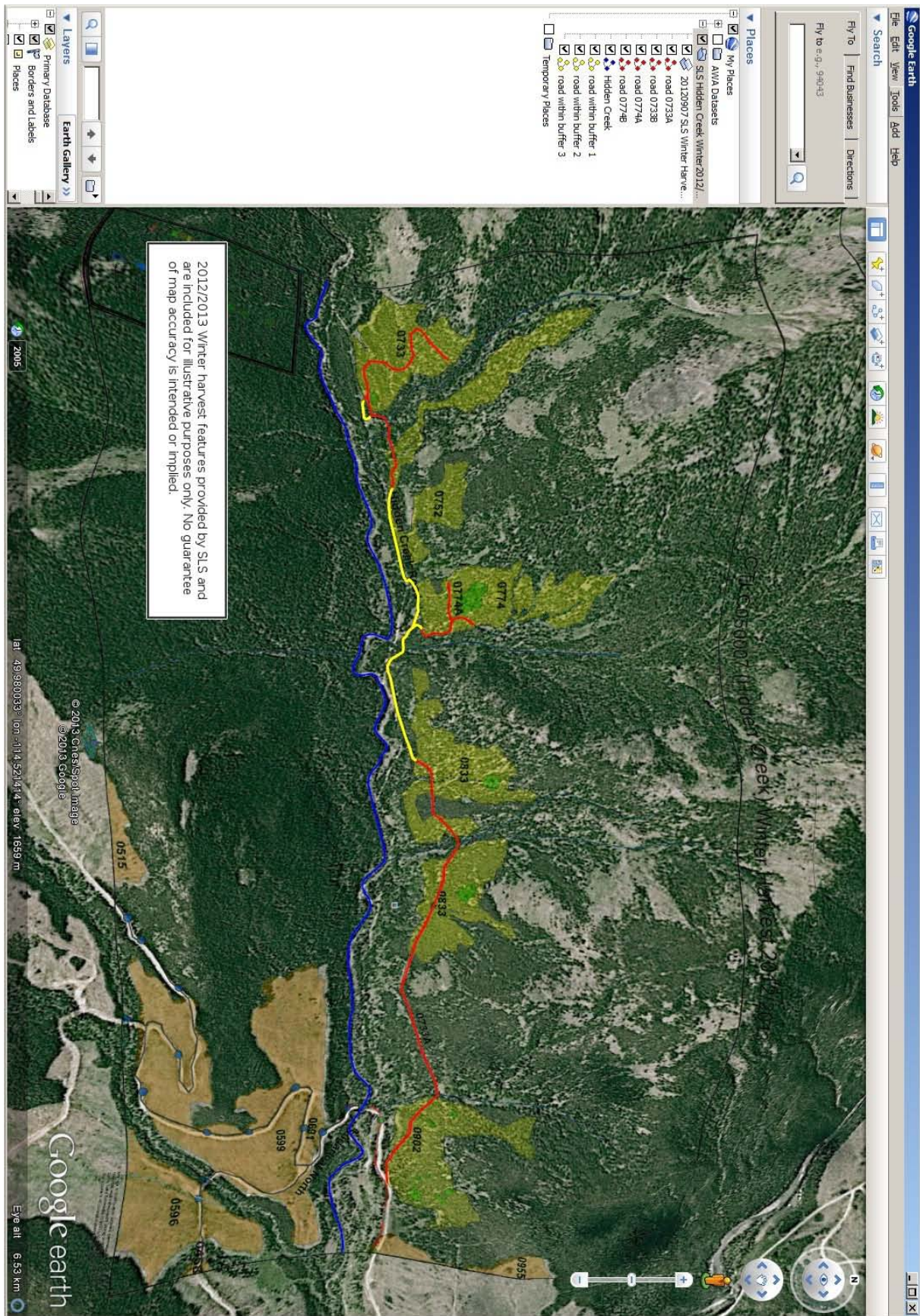


Figure 1: Google Earth satellite view of Hidden Creek with the SLS harvest plan overlaid. The creek is in blue, access roads including 0733A in red, and the section of road within 100m of the creek highlighted in yellow. This is nearly 2km in length, and only the small portion encompassed by cut block 0752 is documented as a deviation in the AOP.

Far from being a “small portion” of road, we consider this deviation to be highly significant, especially when it is not included in the official documentation that requires written justification, and which is then signed off on by Fish and Wildlife officers. In essence, we believe that such a large deviation marks the difference between stating that Hidden Creek is to be treated as if it were a Class A watercourse, and actually treating it as such.



Figure 2: Road proximity to Hidden Creek. The silt fencing is the same in both photographs (seen on the right of the first photo, and on the left of the second). There is nearly 2km of road 0733A that is within 100m of Hidden Creek, in a significant but undocumented deviation of the OGR provisions for Class A designation.

AWA understands the Class A designation to be indicative of a holistic landscape- and ecosystem-based approach to forest and watercourse management, a principle that ESRD has stated an intent to uphold. It appears there was intent to adopt a reasonable standard, and then at the same time the standard was undermined with deviations and exceptions that compromise the habitat so desperately in need of protection.

The discrepancy between the ideal of landscape-based management and the reality being allowed on the ground can also be seen in stretches of road that are outside the 100m buffer zone. Even here, the road is being allowed to cut across extremely steep and bare slopes. In these places, development-related erosion can be expected to result in highly significant amounts of sediment running down the slope and into the creek, where it will have provably deleterious effects on the viability of the Bull Trout and Westlope Cutthroat Trout populations. (See image of slope provided as figure 3.)



Figure 3: Access road cutting across steep slope down to Hidden Creek: before and after. What kind of erosion can be expected to occur here? How will this be reclaimed to its pre-development state? What does this mean for sedimentation of the creek?

We understand the conditions imposed on SLS regarding the wintertime-only operations are an attempt to mitigate such erosion potential. However experience in other similar areas has demonstrated that erosion occurs long after the cessation of actual operations. Even if the road is reclaimed “fully” (an outcome that strikes us as questionable given the nature of the slope and terrain), such effects still persist. SLS representatives on the tour assured us that the silt fencing is intended to check these effects, however similar silt fencing elsewhere (for example in SLS’ operations in the Castle) has quickly deteriorated and proven useless. We especially expect this to be the case again in Hidden Creek as we are unaware of provisions for ongoing monitoring and maintenance.

There are other ground conditions that AWA has observed that similarly point to a divergence between Class A as stated claim and Class A as guiding principle, including the question of tributaries – who decides what designation they fall under, and how is that decision made?

Taken as a whole, all these issues cumulatively point to a larger issue at stake. This issue is illustrated by the matter of the road construction within the buffer zone:

In your letter, you echoed what had previously been said to us by SLS and ESRD representatives: that the deviations to the Class A buffer were allowed “because steep ground precludes construction of new access.”

This is an understandable rationale for not building the road outside the buffer zone. But it raises an obvious question: If the only feasible way to proceed with the harvesting is one that severely undercuts the Class A designation that we agree is needed for this waterway, does that not constitute an argument that this valley should not be logged at all?

AWA is by no means calling for a cessation of all logging everywhere in Alberta. However Hidden Creek is a truly vital spawning ground for Alberta’s imperiled provincial fish – a fact reflected in its re-designation. It is so important for the survival of the Bull Trout in the entire Oldman basin, and indeed all of Alberta, that surely if there is *anywhere* in the province that the unavoidable impacts from logging operations would call into question the propriety of allowing such operations at all, this would be that place.

During AWA’s January 8, 2013 meeting with ESRD Forestry officers, we raised the same question, and were informed that with the approval of SLS’ 20-year Forest Management Plan, or FMP (including the Spatial Harvest Sequence, or SHS) for the entire C5 Forest Management Unit, logging in this area was given sanction, and that was the end of it. With the approval in place, there now seems to be no systematic allowance for any re-evaluation of that decision.

Yet we know that not to be the case: under the Operating Ground Rules for the C5, there is a regime of circumstances that can trigger a Compartment Assessment (CA); precisely the kind of re-assessment of a logging feasibility decision in light of changed ground situations that AWA believes should have applied in Hidden Creek.

Specifically, approval for the Forest Management Plan was given in 2005, before the current understanding of Bull Trout and Westslope Cutthroat Trout habitat, and population pressures, was complete. In the C5 Operating Ground Rules, one of the triggers for a CA is stated as: “**CAs are necessary when major new issues or information that have been identified since FMP approval make the SHS inappropriate.**” A few specific examples are then given, including “*species of special management concern.*”

Given what we now know about Bull Trout and Westslope Cutthroat Trout in Alberta AWA cannot understand why this Compartment Assessment was not done for the Hidden Creek area.

When asked if the threatened designation for Bull Trout would be the kind of change that would trigger a CA, ESRD Forestry representatives allowed that it could happen "if the Minister decided to make it an issue." Minister McQueen, we are asking you to make it an issue. Please treat the designation of a threatened species such as the Bull Trout as a trigger for performing a Compartment Assessment, as the principles of ecosystem-based forest management would dictate.

The operations in compartment MIU2, cut blocks 0733-0902 (Hidden Creek) are already coming to a close, and clearly it is too late to do anything about this specific operation. However there are other compartments identified in the C5 Spatial Harvest Sequence, for example HEU2, where future logging is scheduled to occur within the Hidden Creek watershed system. As well, other important spawning areas for Westslope Cutthroat Trout within the C5 are scheduled for more imminent logging, such as Trout Creek (compartment PTC1).

The lack of requirement for a formal risk assessment prior to harvesting Hidden Creek, especially in light of the changed status of the Bull Trout is at the very least disturbing. If ESRD demands that a watercourse be treated as Class A, but the ground reality precludes logging without undermining that designation, the logging should not be allowed to proceed.

Minister McQueen, please help ameliorate the situation we have described in Hidden Creek before future operations can negatively impact important habitat for threatened species. We look forward to hearing back from you and learning ore about your perspectives on Hidden Creek.

Sincerely yours,
ALBERTA WILDERNESS ASSOCIATION



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Executive Director

cc:

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