



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

September 3, 2014

Honourable Robin Campbell
Minister of Environment and Sustainable Resource Development
#323 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6
Via Email: west.yellowhead@assembly.ab.ca

Dear Minister Campbell,

Re: Southern Rockies Watershed Project Logging in Upper Star Creek Valley

Alberta Wilderness Association (AWA) supports the use of sound scientific information for watershed management and other important land use decisions. AWA recognizes the Southern Rockies Watershed Project is a significant research project that has allowed scientific collaboration and has contributed to filling many scientific knowledge gaps. We do not oppose hydrological research along Alberta's eastern slopes; however, for the following reasons, we do have serious concerns about the "experimental" logging of Star Creek.

1. **Westslope Cutthroat Trout** – a federally and provincially listed threatened species – currently occupy only the uppermost reaches of watersheds in isolated patches along the south eastern slopes. In the federal Recovery Strategy (*Recovery Strategy for Westslope Cutthroat Trout (*Oncorhynchus clarkii lewisi*) Alberta Population*), a segment of Star Creek is identified as critical habitat downstream of the proposed forest harvest. Any deviation from classifying this stream as a 'Class A' watershed based on Alberta's *Operating Ground Rules* would be a grave mistake. The risk of further threatening the habitat of a small remaining population of westslope cutthroat trout in Star Creek is extremely high. We are opposed to any logging experiment that may further endanger a native trout species that is barely hanging on to its existence. Also at risk is potential habitat for future population expansions to allow for a successful recovery of westslope cutthroat trout. It states in the Recovery Strategy that "the areas identified as critical habitat will be insufficient to achieve the population and distribution objectives." Each time logging occurs near important tributaries without sufficient buffers, no matter what the purpose, recovery potential for cutthroat populations' decreases and further threatens the health of aquatic ecosystems.

2. **Linear disturbance** thresholds that have long been surpassed in the Castle and Crowsnest area will increase substantially with logging roads and skid trails planned for harvesting upper Star Creek valley. In the draft CTP C050118 Forest Harvest Plan it states “all three operational compartments (Star Creek East, Star Creek West, and McLaren Creek) fall within Core Grizzly Bear habitat and approximately one half of the planned area falls within the Mountain Goat and Sheep Range.” AWA believes strongly that this merits reconsideration of the area dedicated to this research project. The ecological importance of this area should outweigh any forest harvesting that will likely have adverse effects on already strained wildlife. Incomplete components of the South Saskatchewan Regional Plan (SSRP) including the Biodiversity Management Framework and the Linear Footprint Management Plan are intended to monitor biodiversity with measurable indicators and minimize the extent, duration and rate of linear footprint development. Alberta Environment and Sustainable Resource Development halted logging operations in the Castle until the completion of the SSRP, but with these key conservation pieces still missing from the plan, there should continue to be a moratorium on logging along the south eastern slopes, especially in ecologically sensitive areas such as the Star Creek valley.

3. **Monitoring and data collection** of water, soil, flora, and fauna by the researchers needs to provide reliable, empirical and repeatable results. Based on previous hydrological studies in Alberta and other jurisdictions, AWA is unconvinced this will occur. The purpose behind the project is to conduct “research on the impacts of forest management strategies on watershed values in the eastern slopes headwaters region.” It is widely accepted that, overall, forest harvest increases soil moisture and runoff, sedimentation into waterways, peak flows, and water temperature. Yet each watershed can respond uniquely to logging due to local characteristics such as slope, elevation, size, geology, drainage density, groundwater contribution, and runoff timing. This suggests that logging Star Creek will not produce results that necessarily reflect across the entire eastern slopes. Meanwhile the forest harvesting will sacrifice the ecological integrity of the area and may harm rare and threatened species.

4. **Previous similar studies** include a 2011 study done by John Pomeroy with the University of Saskatchewan’s Centre for Hydrology. That study, with a focus on how logging affects water quantity, was conducted in Kananaskis Country’s Marmot Creek basin, barely 100 miles north of Star Creek. The study found that logging does increase water supply in the short term. A study published in 2005 by Craig Nitschke, provided a meta-analysis between studies involving harvesting, wildfire, and comparative studies to identify whether forest harvesting emulates fire disturbance in coniferous-dominated headwater systems. The study concluded that clear cut forest harvesting does not emulate natural wildfire disturbance and may have a more detrimental impact on headwater systems in both the short and long term. To harvest upper Star Creek valley to arrive at similar broad conclusions that are well known and previously studied would be a very irresponsible management decision, especially in a forest area with such high non-timber value.

A letter of concern was sent by AWA on June 11, 2013 to Bruce Mayer, Assistant Deputy Minister for Forestry; Honourable Diana McQueen, (then) Minister of AESRD; Indira V. Samarasekera, President of University of



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Alberta. We are disappointed to see that despite our substantial concerns, logging plans have continued unabated.

AWA believes Star Creek should not be logged. As important as scientific research is, the location chosen for this project poses some serious concerns as to the Alberta's government's priority for an important eastern slopes watershed. We urge you to reconsider the value of this project; using a full-cost accounting approach AWA believes the potential costs of this research project substantially outweigh the benefits.

AWA hopes these comments will be carefully considered and look forward to a timely response regarding this matter.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

Brittany Verbeek, Conservation Specialist