



**ALBERTA WILDERNESS ASSOCIATION**

*"Defending Wild Alberta through Awareness and Action"*

December 15, 2014

Honourable Kyle Fawcett

Minister of ESRD

Via Email: [west.yellowhead@assembly.ab.ca](mailto:west.yellowhead@assembly.ab.ca)

Bev Yee

ADM of IRM Planning Division, ESRD

Via Email: [bev.yee@gov.ab.ca](mailto:bev.yee@gov.ab.ca)

Don Kayne

President and CEO Canfor Corporation

Via Email: c/o [arlene.chang@canfor.com](mailto:arlene.chang@canfor.com)

Dear Minister Fawcett, ADM Yee, and Mr. Kayne,

**Re: Logging and Haul Roads in Upper Star Creek Valley**

Alberta Wilderness Association (AWA) has a long-standing interest in the protection of Alberta's south Eastern Slopes and the important headwater forests that make it up. It has come to the attention of AWA that Canfor logging company has begun the construction of a main haul road in the upper Star Creek valley. It currently runs approximately 5km west to east from the tourist information centre west of Coleman. AWA has some serious concerns with this logging project in general and particularly the associated road infrastructure that already lacks sufficient mitigation measures around local watercourses.

The area slated to be logged will adversely impact Star Creek and its permanent and ephemeral tributaries. The haul road, that runs just south of Girardi Creek and crosses several of its tributaries, will have a negative impact as well. In the "Management of Class 'A' Watercourses - Fact Sheet", Class 'A' watercourses are defined as **critical fish habitat protection areas**. Girardi Creek and Star Creek both contain pure-strain westslope cutthroat trout, a threatened species listed federally and provincially. Both creeks are designated as critical habitat in the federal Recovery Strategy (*Recovery Strategy for Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi) Alberta Population*). These two creeks, without a

doubt should be treated as Class 'A' watercourses and afforded the highest level of protection against any disturbance. Despite this, the haul road currently under construction has breached even a minimal level of buffer width next to Girardi Creek. The road is on a steep slope approximately 20 metres away, without any sediment fencing or erosion control. Please see the photos below that demonstrate this insufficient buffer.



**Inadequate mitigation measures along Canfor's haul road will result in slope erosion and sedimentation in Girardi Creek**

In a response letter to AWA from Jean Lussier, Senior Forester, Forest Management South Saskatchewan Region, ESRD, on September 29, 2014, he states in regards to the proposed logging of Star Creek, "Watercourse and watersource buffers are planned in accordance to the regulatory standards to provide protection to watercourses and the maintenance of aquatic and riparian habitats. However, in some locations watersource protection buffers have been exceeded, providing greater protection to aquatic and riparian values and habitats." The logging has not even commenced yet and already this statement does not reflect the construction occurring at the site.



**Lack of a sufficient buffer between Canfor's haul road and Girardi Creek below, about 20 metres down a steep slope**

This project is seemingly going ahead without a proper risk assessment or a cumulative effects area study.

In section 7.6.3 Management and Regulation in the Alberta Recovery Plan, *“MR2: Apply mitigation measures for threats: Evaluate current practices and associated threats to westslope cutthroat trout at both site and landscape/watershed scales, with a view of refining or developing mitigation measures as well as consideration of management and/or regulatory changes. **Avoidance of negative impacts is the first, best, (and sometimes only) option for mitigating impacts on westslope cutthroat trout.**”* The risk of further threatening the habitat of small remaining populations of westslope cutthroat trout in Star Creek and Girardi Creek is extremely high. Also at risk is potential habitat for future population expansions to allow for a successful recovery of westslope cutthroat trout. It states in the federal recovery strategy that “the areas identified as critical habitat will be insufficient to achieve the population and distribution objectives.” Each time logging occurs and roads are built near important tributaries without sufficient buffers, recovery potential for cutthroat populations’ decreases and further threatens the health of aquatic ecosystems.

Westslope cutthroat trout is not the only species that could be detrimentally affected by this logging operation. Western toads are present in riparian habitat along Star Creek and require a 400 metre buffer to adequately protect their habitat. This area is also important habitat for large carnivores and ungulates. Unique and rare plant species increase the ecological importance of this area and provide yet another reason to question the logging operation. Was a full species inventory done prior to operations being approved for the area?

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 Alberta. Another letter of concern was sent by AWA on September 3, 2014 to Honourable Robin Campbell, (then) Minister of AESRD. We are disappointed to see that despite our substantial concerns, and the many other individuals and groups that oppose this logging, harvest plans have continued unabated.

AWA believes Star Creek should not be logged and the haul road under construction next to Girardi Creek lacks acceptable buffers and stream mitigation measures. The location chosen for this logging project poses some serious concerns as to the Alberta government's priority for the south Eastern Slopes headwaters.

AWA considers our concerns serious enough that all logging preparation and plans to log this area must be stopped as soon as possible. We look forward to your timely response regarding this matter.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



Brittany Verbeek, Conservation Specialist

cc:

Jean Lussier, Senior Forester, Forest Management SSR, ESRD, email: [jean.lussier@gov.ab.ca](mailto:jean.lussier@gov.ab.ca)

Michael Wagner, Forest Hydrologist, ESRD, email: [michael.wagner@gov.ab.ca](mailto:michael.wagner@gov.ab.ca)