



Alberta Wilderness Association  
"Defending Wild Alberta through Awareness and Action"

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Petra Rowell  
Executive Director  
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### **Draft Athabasca River Integrated Watershed Management Plan (IWMP)**

Dear Petra Rowell,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide feedback on the draft *Athabasca River Integrated Watershed Management Plan (IWMP)* developed by the Athabasca Watershed Council (AWC) to ensure the Athabasca River watershed remains healthy and resilient for current and future generations. AWA is an Alberta-based conservation group with 7,000 members and supporters in Alberta and around the world. AWA seeks the completion of a protected areas network and good stewardship of Alberta's public lands, waters and biodiversity to ensure future generations enjoy the abundant benefits they provide.

Upon reviewing and understanding the IWMP, AWA would like to highlight some sections within the document that deserve praise, as well as some sections that we believe should be improved upon. The following sections contain AWA's detailed comments on the IWMP:

#### **General Feedback**

The Government of Alberta (GOA)'s Framework for Water Management Planning<sup>1</sup> released in 2001 included a Strategy for the Protection of the Aquatic Environment, which explicitly states the need to maintain, restore, and enhance present conditions of Alberta's aquatic ecosystems. This strategy was intended to serve as "an intrinsic part of water management planning and must be considered within all resource planning activities that may affect the environment", and therefore AWA feels that this strategy and its associated objectives should be included as part of the Athabasca River IWMP if the IWMP is intended to maintain a healthy watershed.

#### **Goal 2. Aquatic Ecosystems are healthy and biologically diverse**

The strategies and actions within this section mention the desire to understand, or improve understandings of various aquatic ecosystem components including, but not limited to:

- Water and sediment quality (Strategy 2.1)
- State of wetlands and riparian areas (Strategy 2.2)
- Aquatic biodiversity, including invasive species (Strategy 2.3)

Although AWA appreciates the need to cultivate a better understanding of aquatic ecosystems overall, we feel that the strategies and actions related to Goal 2 are insufficient, because knowledge and

awareness does not guarantee any protections and/or improvements to aquatic ecosystems. Having an improved understanding of the issues doesn't necessarily result in a healthier watershed without any concrete actionable tasks that can be completed to prevent further damages to the Athabasca watershed. Therefore, AWA recommends that all parties (agriculture, industry, municipalities, and Indigenous communities) should commit to collaborate on concrete actions that will minimize their impacts.

### **Goal 3. River flows and lake levels meet social, cultural, economic and environmental needs**

We appreciate that the IWMP explicitly recognizes the importance of instream flows within this section, and the need for sufficient instream flows to sustain healthy fish and other components of the aquatic ecosystem. However, the strategies and actions in this section only state the intent to improve upon the understanding of instream flows, but no actions that will result in the protection, maintenance, or improvement of instream flows within the watershed. As noted for Goal 2, an improved understanding of instream flows will be beneficial, but without including any actionable steps that protect instream flows, they remain at risk to further degradation, especially in the face of climate change.

### **Goal 4. Natural land cover is conserved, and cumulative land use pressures are mitigated**

AWA acknowledges and supports the IWMP's recognition of the need to manage and mitigate the cumulative effects of multiple land use pressures as outlined within this section. We support Strategy 4.2 which states the intent to encourage agriculture, industry and municipalities to reduce their cumulative impacts on aquatic ecosystem health. This strategy is strengthened by all three related actions (4.2.1 to 4.2.3) which encourages all stakeholders to reduce their footprint – including the density of linear developments and implementing better agricultural management practices.

### **Goal 5. Traditional Knowledge informs decision-making and planning**

AWA is encouraged to see the inclusion and recognition of Indigenous perspectives in the creation of this IWMP. We appreciate that outreach was conducted in the preparation of AWC's *Traditional Knowledge Overview for the Athabasca River Watershed report*, which examined Indigenous perspectives on Traditional Knowledge in relation to aquatic ecosystems. We support the inclusion of Action 5.1.1 which states that the AWC intends to reinstate an AWC Indigenous Committee and/or host Indigenous Forums in the Athabasca Watershed region. We also support Strategy 5.2 and Action 5.2.1 which seek to identify, promote, and support Indigenous communities with watershed stewardship, monitoring and protection.

Despite our positive reception for the items included above, AWA believes that the inclusion of only two strategies and three associated actions – alone – is insufficient for ensuring that Indigenous perspectives and values on the Athabasca watershed are respected. This is a good starting point for now, but when this IWMP is reviewed and updated in the future, AWA would hope to see increased outreach and collaboration with Indigenous communities to ensure that additional strategies and actions are included that are centered upon their needs and values for the watershed.

### **Goal 8. Sub-basin and lake assessment, planning and stewardship initiatives are supported**

We appreciate the inclusion of Strategy 8.3 which states the intention to support sub-watershed assessment, planning and stewardship initiatives to ensure they have the support, tools, and resources

they need to be successful. We support the inclusion of Action 8.3.2 – Participate in and encourage municipalities, industries, and Indigenous communities to be involved with the development and implementation of local stewardship initiatives.

### **Final Comments**

Overall, AWA considers that the IWMP is an important strategic document that provides direction and a roadmap for future AWC-WPAC and partner activities. The recommendations we have included would further strengthen this document through the inclusion of more meaningful actions to protect the watershed for current and future generations, and we hope that our feedback is considered in the preparation of the final document.

Sincerely,  
ALBERTA WILDERNESS ASSOCIATION



Phillip Meintzer  
Conservation Specialist

### **References:**

1. Government of Alberta. Framework for Water Management Planning [Internet]. Government of Alberta; 2001 p. 44. Available from: <https://open.alberta.ca/dataset/8a08440e-efed-4f38-8516-1c097b8a2442/resource/f5ef848b-49e0-4fed-8a1d-4cfb6bb3d93e/download/2001-watermanagementplan-framework-2001.pdf>