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Hon. Kyle Fawcett
Minister Environment and Sustainable Resource Development
420 Legislature Building
Edmonton, AB T5K 2B6

16 December 2014

Re: Logging of Star Creek Valley

Dear Minister Fawcett,

The Canadian Parks and Wilderness Society – Southern Alberta chapter (CPAWS SAB) would like to express our concern about the proposed logging of Star Creek, and associated road development, as part of the Southern Rockies Watershed Project.

The role of CPAWS SAB is to provide large landscape scale, science-based support and advice for the conservation and protection of Alberta's protected areas and wildlands. We aim to protect wild ecosystems in parks and wilderness, and to preserve the full diversity of habitats and species. We promote awareness and understanding of ecological principles and the inherent values of wilderness while encouraging individual action to accomplish conservation objectives.

CPAWS SAB has taken great interest in forestry planning, management, and operations along Southern Alberta's Eastern Slopes that would prioritize ecological values for this region and have been following the proposed logging of Star Creek. Although we support science and research for the purposes of conservation, we have serious concerns about the location of this project.

Westslope Cutthroat Trout

Star Creek is home to westslope cutthroat trout, a species listed as "Threatened" provincially and federally. This species was once common in Alberta but has experienced drastic declines. Today most populations are limited to the less accessible upstream reaches of streams and rivers in the eastern slopes of the Rocky Mountains.

Ironically, the cover of Alberta's Westslope Cutthroat Trout Recovery Plan shows a photo of Star Creek as example cutthroat trout habitat. This plan indicates that stream sedimentation from erosion as a result of linear features such as roads and developments such as forestry are threatening cutthroat trout.

An area of Star Creek downstream of the proposed logging is identified in the federal Westslope Cutthroat Trout Recovery Strategy as critical habitat for this species. The risk of further threatening the habitat of the small remaining population of westslope cutthroat trout in Star Creek is extremely high.

It also states in the federal recovery strategy that cutthroat trout will need to expand beyond their currently restricted range in order to recover as a species. As such, any logging and road construction in close proximity to critical habitat areas could degrade the habitat quality and further decrease the potential for expansion and recovery. It seems paradoxical, even counter

intuitive to permit more logging in key watersheds like Star Creek when the evidence indicates protection, not more development is necessary.

This logging in Star Creek is only the latest on-the-ground example of how current logging operations along the Southern Eastern Slopes of Alberta are not sustainable. We need to take drastic and immediate steps to reform forestry in this part of the province if the industry is going to uphold a level of environmental responsibility, while ensuring its economic success.

Linear Features

It has come to our attention that as part of this project Canfor logging company has begun the construction of a main haul road in the upper Star Creek valley just south of Girardi Creek (including crossings of its tributaries). A part of Girardi Creek is also identified in the federal Westslope Cutthroat Trout Recovery Strategy as “critical habitat.” The road is on a steep slope approximately 20 metres away from the stream, without any sediment fencing or erosion control. This is very poor practice for any watercourse but particularly for such an ecologically important stream as Girardi Creek.

Alberta Class ‘A’ Watercourses are defined as critical fish habitat protection areas. As Girardi Creek and Star Creek both contain pure-strain westslope cutthroat trout, a species listed as “Threatened” federally and provincially these streams should be classified as Class ‘A’ and treated as such until officially designated.

The disregard for the importance of these streams and the recovery of westslope cutthroat trout at this first stage of this operation is seriously concerning and does nothing to persuade us that the planned logging in Star Creek will be conducted in a responsible and sustainable manner.

South Saskatchewan Regional Plan

The South Saskatchewan Regional Plan indicates that forests in southern Alberta will be managed with headwaters and watershed management as the first priority. As cutthroat trout rely on cool, clean waters, they can act as an indicator of the state of our watersheds and quality of water for human use. The decline of populations in southern Alberta indicates that current logging practices are threatening not only our native fish populations but the ecological function of the landscape.

While we understand that as part of the land-use planning process biodiversity and linear feature management frameworks will be completed, it is irresponsible to ignore the risk to key indicator species and headwaters health from the logging operations in important valleys such as Star Creek, while waiting for completed frameworks.

CPAWS SAB is very concerned that the location of this logging project poses some serious concerns about the Alberta government’s priority for the south Eastern Slopes headwaters. We urge you to stop all logging operations and road construction in Star Creek immediately. ..

Sincerely,



Katie Morrison, M.E.Des., P.Biol.
Conservation Director
CPAWS Southern Alberta