



Northern Lights Fly Fishers
Trout Unlimited Edmonton



June 17, 2015

Honorable Shannon Philips
Minister of Environment and Parks
Government of Alberta
E-mail: ESRD.Minister@gov.ab.ca

Re: Upper Peace-Smoky/Upper Athabasca Land and Water Management Crisis and Solutions

Dear Minister Philips,

For over thirty years concerned Albertans and organizations have been engaged in trying to ensure the necessary balance between economic growth and environmental stewardship in the Upper Athabasca and Upper Peace-Smoky River basins of north western Alberta. The region is home to numerous endangered or threatened species including woodland caribou, grizzly bears, Athabasca rainbow trout, bull trout and arctic grayling. The region contains some of the most threatened ecosystems and species in Alberta. There is little to show for countless volunteer hours spent by conservation-minded Albertans over the last decades, but sustainable solutions are still within reach.

Today, the current pace, scale and scope of energy development overlying the Duvernay hydrocarbon reserves is unprecedented, adding to the existing extensive energy and timber harvest impacts. The fiber reserves in the area are controlled by a number of companies either in the form of forest management or quota agreements. These commitments have shown that over allocation of the timber resource exists when faced with other issues and impacts.

In the Little Smoky River basin this has exposed our failure to have in place water and land management plans in advance of such development. The potential exploitation of these reserves was not a sudden

discovery. There have been numerous attempts in the past to develop a land use plan and framework, including the Fox Creek-Knight Integrated Resource Plan, Little Smoky Boreal Forest Primitive Area, Special Places 2000 and several west central caribou planning processes. None of these processes led to any significant change due to an industry lobby supported by economic ministries within the Government of Alberta to manage the area based on “standard guidelines and practices”.

The Alberta Energy Regulator has developed the west central Duvernay pilot “Play Based Regulation” approval process to streamline the application process for industry and at the same time manage the cumulative effects footprint. However, this approval process is not supported by a long term vision or overarching land and water management plans that establish protected areas, maximum linear and spatial disturbance levels and environmental base flows in rivers, streams and outlets of lakes based on unique and local conditions. As a result, the cumulative effects from development continue to degrade the productive capacity of the ecosystem and limit the long term value for other uses.

We are asking for a meeting with you to discuss solutions to the long standing issues that have been identified regarding the sustainable management of this area. These include:

- Fast tracked regulatory water and land use plans
- Stricter surface disturbance limits to motivate innovative lease development and spur restoration actions
- Regional fiber sharing to enable long term timber harvest deferrals in caribou ranges
- Watershed based approach to water withdrawals, including environmental base flow and temperature (thermal spike) cut-off values at each withdrawal location
- Defer all winter water withdrawal until necessary science obtained
- Defer further issuing of term water licences within Little Smoky Watershed except for municipal use until approved regulatory water plan in place
- Industry, government and AER becoming proactive to address data gaps and concerns of public
- Compliance monitoring and enforcement, including real time online monitoring and reporting of flows and water withdrawal throughout the basin
- Integration of economic, social and environmental policy

This area is the last refuge of arctic grayling, bull trout and woodland caribou in the lower foothills ecoregion of Alberta. Better decisions today are possible and will greatly improve the legacy we leave to our children. Our organizations have a long history of representing the interests of Albertans from all walks of life. We thank you for the opportunity to address our concerns, and we look forward to your reply to our meeting request at your earliest convenience.

Yours sincerely,



Dr. Darryl Smith
Alberta Fish and Game Association



Barry Unger
Alberta Trappers Association



Carolyn Campbell
Alberta Wilderness Association

Art Jackson
Athabasca Bioregional Society



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