

Oct 25, 2023

Calgary Climate Hub
223 12 Ave SW Unit 212
Calgary, AB T2R OG9

Re: Moratorium on Logging in Southern Alberta for updated Forests Act

To: Tanya Thorn, Mayor of Okotoks

We are a collective group of professionals and concerned citizens from Southern Alberta demanding an immediate pause of the Spray Lake Sawmills (1980) Ltd. (SLS) plan to log 1,100 hectares in Kananaskis Country's Upper Highwood drainage as per their [2021 Forest Management Plan](#) (FMP). This cut has been accelerated from 2026 to December 2023.

We are demanding this pause to allow for meaningful consultation with impacted communities and stakeholders including the Iyarhe Nakoda community of Eden Valley, the Town of High River, recreational users, and downstream water rights and allocation holders. The First Nation and Public Consultation sections of the 2021 FMP are very laughable and should be exposed for being so.

We are opposed to this clearcut and current Alberta Forests Act for the following reasons:

1. The risk of detrimental and irreversible impact on the **source of water** for all communities within the Highwood Watershed. The potential impact on drinking water and irrigation is extreme. Under current, severe drought conditions, the impact of the project may be so severe that Alberta might not be able to provide South Saskatchewan with their agreed-upon interprovincial water allocation responsibilities.
2. This area is home to threatened species including; grizzly bears, Westslope cutthroat trout, and bull trout. Clearcut logging will have serious negative impacts on their habitat. Also, the logging operations will take place during the winter closure of the Highwood Pass, a closure that is meant to protect the winter migration of wildlife in the area. Allowing intense industrial activity and traffic in this area is antithetical to the reasons stated for the road closure. All of which infringe upon the Federal **Species at Risk Act**.
3. The Government of Alberta's First Nation's Consultation Policy on Land Management and Resource Development (2013) outlines the Province's expectations for consultation with First Nations. Industry is required to engage in an open and respectful consultation process with First Nation Communities when proposed projects overlap with traditional territories. Meaningful [Consultation with the Stoney Nakota First Nation](#) and the community of Eden Valley, located on the Highwood River, has not occurred. This clear-cut exposes Eden Valley to greater flood risk and infringes on their rights and traditional uses of the land.
4. The Alberta Government introduced the Kananaskis Conservation Pass in 2021 and now charges Albertans \$90/year to access Kananaskis Country for recreational

purposes. The stated purpose of the Pass was to ensure investments could be made into **protecting and conserving** Kananaskis Country and to provide sustainable funding for the government to keep this special part of Alberta protected for generations to come.

5. Spray Lake Sawmills does **not** have a proven track record of restoring clearcut areas in the timeframe that demonstrates the forest is regenerating; therefore we do not believe their Forestry Management Plan is sufficient.

The above concerns are duplicative for any area where logging may be planned in Southern Alberta; therefore, we are seeking a moratorium on logging in the eastern slopes to consult with First Nations and ecological experts to update and modernize the [Forests Act](#). We believe the Forests Act should be updated to reflect the recommendations of the [Managing Forests, not Forestry: Law and Policy Recommendations for Ecosystem-Based Management of Alberta's Forests](#).

Ecosystem-based management (EBM), as used in this report, reflects a fundamental shift from a focus on sustaining timber supply to recognizing the value of forests as ecosystems. The current forest management plan is destructive and foolish to continue in the face of climate change and potential ecological overshoot and collapse.

We demand a regenerative plan to not only conserve but also restore the biological integrity of the Eastern slope watersheds and **seek your signature of support**. Spray Lakes Sawmills has been responsible for the degenerative clearcut extraction of Southern Alberta's Eastern Slopes over the last 80 years. It is time to stop!

Sincerely,



Jenny Yermiy, P. Geoph
Calgary Climate Hub

Notes and cut sections

The cumulative impacts of the increased temperatures and drought conditions this year in our province, have led to the [lowest levels the Bow River has seen since 1911](#). Of course, in 1911, the glacial and snowpack extent in the mountains would have made the conditions less concerning long-term. Since water is the source of life, we must consider alternative approaches to resource management to ensure the longevity and preservation of our waterways and critical habitats.

Beginning as soon as December 2023, Spray Lake Sawmills plans to log over 1,000 hectares in Kananaskis Country's Upper Highwood region along the headwaters of the Highwood River and its tributaries.