

November 01, 2018

The Honorable, Shannon Phillips
Minister of Environment and Parks,
208 Legislature Building
10800 - 97 Avenue
Edmonton, AB
T5K 2B6

Reference: Bow River Water Management Options – Conceptual Assessment

Dear Minister Phillips:

We would like to thank you for your letter dated October 16, 2017 responding to Bow River Trout Foundation's concerns expressed in the document, "The Impact of Water Management Policy and Proposed Mitigations Initiatives on the Bow River Basin Fishery" ⁽¹⁾. We have continued to engage with Alberta Environment & Parks staff on our concerns with Bow River water management policy as it relates to the Bow River sport fishery.

Our principal concerns are related to recent research findings that indicate the Bow River Rainbow Trout population has declined by as much as 50% over a 10-year period from 2003 to 2013 ^(2,3) and the extreme river flow variables we see during the spring flood mitigation water management protocol for the Bow River that impact the sports fishery ⁽⁴⁾. We are very pleased with the AEP South Saskatchewan Region management group that established a stakeholder focus group to address our concerns. A Bow River Fish Population Survey was reintroduced this year and river flows were stabilized following discussion with TransAlta and AEP. Bow River Trout Foundation established a fishing community newsletter entitled, "The State of the Bow River Fishery" that detailed the concerns for the Bow River fishery and ways to improve it.

What has been troubling is the continued commitment on the part of the Government of Alberta to move forward with new dams on the upper Bow River to aid in flood and drought control without a full environmental assessment and consultation process to address the impact of such developments on the social and economic consequence to the river and its water use as well as the long term health of the environment. It is clear that the scope of the Bow River Water Management Project and its recommendations to the Government of Alberta ⁽⁵⁾ are flawed as the principal objective was to address the hydrological impact of water management for the primary stakeholders within the Bow River Basin. The sports fishery and the health of the river was never considered within the terms of reference for the project. There was reference within the report for a need to optimize water management within the current operation mandates, but to our knowledge this has not been done. We were therefore surprised to see the next step in future dam development was made on September 25, 2018 in the release of a tender for Bow River Water Management Options ⁽⁶⁾.

Although we do recognize that the hydroelectric dam system on the Bow River has allowed for a year-round supply of water that supports a world class trout fishery downstream of Calgary. The highly variable daily peak demand power generation protocol at the Pocaterra plant on the Kananaskis River has destroyed the endangered West Slope Cutthroat Trout population that at one time was considered one of the best fisheries in the east slopes of the Rocky Mountains. The same scenario applies to the Ghost plant on the Bow River that has reduced the trout population to an extremely low level.

TransAlta power generation capacity on the Bow river is approximately 330 MW which represents less than 5% of their Alberta capacity. Decommissioning both Pocaterra and Ghost plants or eliminating the variable flow peak generation protocol would enhance downstream aquatic habitat, renew the fishery and potentially allow for better water management for flood and drought control. There are other water management considerations within the Bow River Basin that should be considered to enhance flood protection without the addition of new dams at either the Morley Indian Reservation or the pristine Glenbow Ranch.

We ask for further consultation and evaluation of all existing Bow River water management protocols and future project proposals before a decision is made to move forward on future infrastructure developments. The scope of these investigations needs to expand beyond the current Bow River Working Group.

Yours sincerely:



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The Leading Voice for the Bow River Fishery

References:

1. The Impact of Water Management Policy and Proposed Mitigation Initiatives on the Bow River Basin Fishery. Bow river Trout foundation,2017 [BRT AEP Philips 01 Sept 2017](#)
2. The State of the Bow River Fishery – Trout Population in Decline. Bow River Trout Foundation, 2018. [BRT - Trout Population Decline](#)
3. Multiple Challenges Confront a High-Effort Inland Recreational Fishery in Decline. Department of Biological Sciences, University of Calgary, 2018. [Chris Cahill Paper](#)
4. The State of the Bow River Fishery – A need for Water Management Change. Bow River Trout Foundation, 2018. [BRT - Water Management](#).
5. A report generated out of the Bow River Water Management Project presented to Alberta Environment & Parks Minister Sharon Philips. 2017. [Advice Water Management Bow River](#)
6. Bow Basin Water Management Options Phase 1: Conceptual Assessment (Glenbow, Morley and Expanded Ghost Reservoirs). AEP, 22018. [Bow River Water Management Options](#)