



ALBERTA WILDERNESS ASSOCIATION

*"Defending Wild Alberta through
Awareness and Action"*

The Hon. Ed Stelmach
Premier
Office of the Premier
Executive Branch
307 Legislature Building 10800 - 97 Avenue
Edmonton, AB T5K 2B7

FAX: 780 427-1349

August 8, 2008

Dear Premier Stelmach,

Re: Public Interest Inquiry Requested for Caw Ridge

Alberta Wilderness Association (AWA) officially requests that a public inquiry be held into the matter of resource development and all other values and interests regarding Caw Ridge and its adjacent lands and streams northwest of the town of Grande Cache. The inquiry would determine the best future for this critical wildlife area and the management goals that align most strongly with the public interest. This should be a broad public inquiry offering meaningful participation to all Albertans, interested parties, and representative public interest groups. We believe the inquiry would be best conducted by a joint panel including members from the Alberta Energy Resources Conservation Board, Natural Resources Conservation Board and Canadian Environmental Assessment Agency. As part of this inquiry a cumulative impacts assessment must be commissioned and presented to the inquiry panel, interested parties, and the general public.

Importance of Caw Ridge outside of coal extraction values

Of primary concern to AWA is the significant habitat and migration routes that Caw Ridge and the adjacent lands provide to a diverse range of Alberta's wildlife. Caw Ridge is home to one of the largest herds of mountain goats in the province and provides habitat for bighorn sheep, moose, deer, wolves, lynx, wolverine, and grizzly bear – the last whose numbers are estimated to be below 500 in Alberta, significantly lower than previously thought. In the creeks below the ridge are populations of bull trout, listed as "sensitive" under Alberta's Wildlife Act.

Caw Ridge also bisects the migration route of the Redrock–Prairie Creek caribou herd, a species listed as “threatened” under the Wildlife Act. Although the Redrock–Prairie Creek herd is currently listed as “stable,” further development could jeopardize its security by impeding travel between its summer and winter ranges and through impacts to historical migratory habitat. The nearby Little Smoky caribou herd has dwindled to the point of likely extirpation under habitat pressures exerted from resource development.

Caw Ridge is promoted as a wildlife viewing site by Alberta Sustainable Resource Development and has been called the “Serengeti of Alberta.” It is home to medicinal plants used by the local Aboriginal people and is a popular recreation destination for many Albertans.

Recently, coal mining has been the primary interest acted upon in the area through privately owned development of the coal resources present. However, we believe other interests and issues must be brought to the forefront and considered for the area. A public inquiry would facilitate the acknowledgment and consideration of a wide range of interests and help government officials in deciding the future of Caw Ridge, including whether coal extraction is in the best public interest for this area. Through a full and accountable public inquiry, the Alberta government, which holds this land in trust for its citizens, can make future decisions regarding its management in the very best of public interest.

Historical Precedent

The proposal for a public inquiry into the matter of industrial development on Caw Ridge is not new. In fact, it was the Alberta Energy Utilities Board (EUB, now the Energy Resources Conservation Board, ERCB) which opened the door for an inquiry into the public interest of coal development on Caw Ridge. In a letter from the EUB to AWA dated December 2, 1999, the Board states that it is “generally aware of concerns expressed by several parties with respect to development in the Caw Ridge area.” The letter continues, stating that the Board is “interested in developing a process whereby the views of all parties with an interest in this matter can be heard and discussed” and that the Board is “prepared to hold an inquiry, under the provisions of Section 22 of the Energy Resources Conservation Act.”

AWA is requesting reactivation of this process and asks that it meet the following conditions:

- The inquiry must offer participants meaningful participation with the final report offering evidence of the issues presented and how these issues were addressed in the final recommendations.
- The process must include well-defined and thorough Terms of Reference developed through involvement of the interested parties.
- There must be a written commitment that the inquiry’s findings will be acted upon and subsequent evidence that this commitment has been met.

Further, in the December 2 letter, the EUB states, "Coal development applications with respect to the Caw Ridge area would not be considered until the results of this inquiry are known." This proviso should be reinstated immediately and any approvals for current and future applications must be put on hold until the inquiry is complete.

Unfortunately for Albertans, this previous inquiry was never held. Smoky River Coal, the company that at the time held the lease for Caw Ridge, went into receivership and the EUB deferred consideration of the inquiry. As the current leaseholder, Grande Cache Coal, has begun exploratory drilling for its #16 Mine, which includes Caw Ridge, it is timely and imperative that this inquiry be held as soon as possible before further damage to the ridge is done through resource development without consideration of other interests in the area.

AWA respectfully requests a response at your earliest convenience.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



Chris Wearmouth
Conservation Specialist

cc:

Dan MacFadyen, Chairman, Energy Resources Conservation Board, 640 - 5th Avenue SW, Calgary, AB, T2P 3G4

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