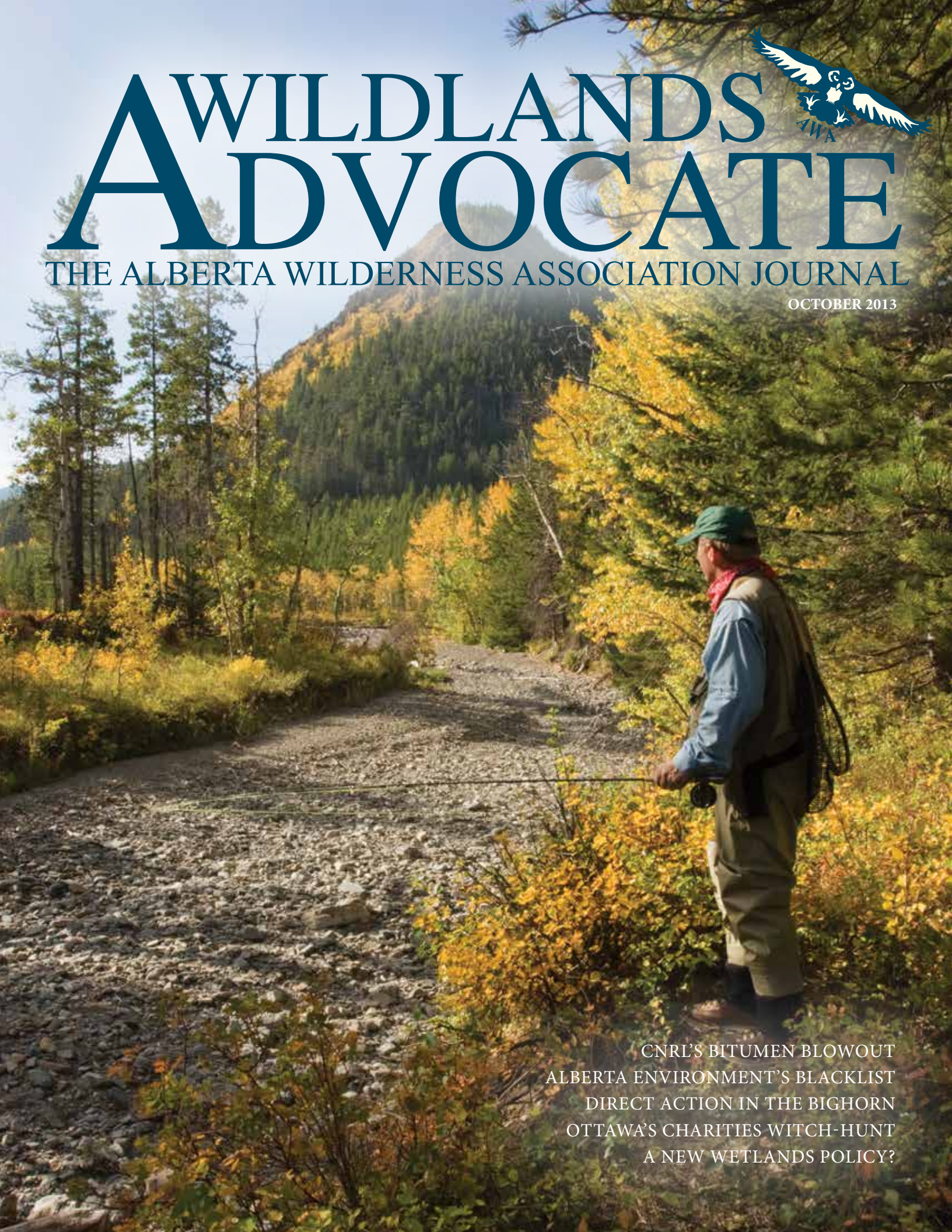


A WILDLANDS ADVOCATE



THE ALBERTA WILDERNESS ASSOCIATION JOURNAL

OCTOBER 2013



CNRL'S BITUMEN BLOWOUT
ALBERTA ENVIRONMENT'S BLACKLIST
DIRECT ACTION IN THE BIGHORN
OTTAWA'S CHARITIES WITCH-HUNT
A NEW WETLANDS POLICY?

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COVER PHOTO

Fishing Gone? Vic Bergman used his camera's timer to take this self-portrait as he stood alongside a small trout stream void of water. This photograph emphasizes the importance of water to all living things. It was selected by the Alberta Society of Artists for the Planet Earth display that appeared at the Leighton Art Centre outside of Calgary and the display's subsequent two-year traveling exhibition. PHOTO: © V. BERGMAN

FEATURED ARTIST

Featured Artists: Dana Bush, Amanda Oberacher, Elisa Sereno-Janz
In April AWA welcomed the exhibit, A Shifting Balance, by Dana Bush, Amanda Oberacher, and Elisa Sereno-Janz to Hillhurst Cottage School. In this issue we are pleased to offer you a glimpse of their work alongside Christine Thomson's excellent interpretive essay.

AWA respects the privacy of members. Lists are not sold or traded in any manner. AWA is a federally registered charity and functions through member and donor support. Tax-deductible donations may be made to AWA at Box 6398 Station D, Calgary, AB T2P 2E1. Ph: 403-283-2025 Fax: 403-270-2743 E-mail: awa@abwild.ca www.AlbertaWilderness.ca

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Blacklists and Witch-hunts:

CONSERVATION BECOMING EVEN MORE TRICK THAN TREAT

Fall is usually my favourite time of the year. The colours, crisp mornings, smell of fallen leaves, memories of chasing grouse and pheasants with my dad – I love what the season brings and the memories it conjures.

This year governments are getting in the way of my appreciation of the season. In early October Justice R.P. Marceau of Alberta's Court of Queen's Bench released an Alberta Environment briefing note showing that, in 2009, environmentalists who opposed exploiting the oil sands were *persona non grata* when it came to submitting statements of concern under the province's environmental laws. That memo has guided the department's actions since then.

In more honest times than these we used the term "blacklist" to talk about the type of treatment the Oil Sands Environmental Coalition received beginning in 2009. Since coalition members (Pembina Institute, Fort McMurray Environmental Association, AWA, and Toxics Watch Society) were "one of them" – the "them" being uncooperative organizations or people who say negative things about the oil sands – OSEC's concerns, by definition, were illegitimate; the substance of their concerns wasn't worthy of the government's consideration. Should

this sort of discrimination appall citizens of a 21st Century liberal democracy? I think so. You'll find the briefing note reprinted in its entirety here.

Sadly, this sort of government behaviour isn't as exceptional as it should be. From my desk, the state's efforts to close the door on public participation are as numerous as the leaves outside under the bird feeder.

This issue of the *Advocate* features a second example of government efforts to keep the public out of public policy making. This one is federal and started in earnest last year – it's the witch-hunt against environmental and other social justice charities. Natural Resources Minister Joe Oliver claimed that the people who oppose the Northern Gateway pipeline were trying "to hijack our regulatory system to achieve their radical ideological agenda;" Senator Nicole Eaton started a Senate debate, an inquiry, characterized too often by unsupported allegations that the dollars some Canadian environmental groups receive from outside Canada were the strings foreign puppet masters used to make them dance. Those who opposed the way our oil sands have been exploited were simply "anti-Canadian." I'm certainly not alone in suggesting that these sorts of

actions were intended to silence the public, to make charities reconsider advocating for policy change.

Instead of trying to frighten conservation and other charities away from the important advocacy work they've done our governments should be thinking of ways to encourage Canadians to increase their commitments to the charities sector. Remember that charities have been at the forefront of activities to curb acid rain pollution, to reduce cigarette smoking, and to fight drinking and driving. Canadian Conservatives, federally and provincially, would be wise to heed the words *The Huffington Post* attributed to Prime Minister David Cameron, their British cousin: "the voluntary sector and social enterprise sector will be a bigger part of government than ever. But we have to involve your organizations, and work with you and through you." Bigger, more involved, working with the voluntary sector – now there would be a real Halloween treat for Canadian charities.

- Ian Urquhart, Editor

Cold Lake, Hot Bitumen:

CNRL'S BITUMEN BLOWOUT



by CAROLYN CAMPBELL, AWA CONSERVATION SPECIALIST

S ometime this spring the boreal forest north of Cold Lake erupted, not with the calls of songbirds, but instead with toxic, hot, pressurized liquefied bitumen. Over 1.6 million litres of bitumen has bubbled to the surface at four different sites over 10 kilometres apart at Canadian Natural Resources Limited's (CNRL's) Primrose oil sands operation. This serious incident confirms AWA's conviction that risks to ground water, the land, and wildlife from *in situ* (underground drilling) tar sands projects are not being properly assessed and managed.

The Primrose operation is about 350 kilometres northeast of Edmonton, on the Cold Lake Air Weapons Range. It is in the 'bitumen alley' portion of the Range that Alberta leases to oil sands companies. In what was roadless, intact boreal forest only 20 years ago, multiple *in situ* oil sands leases now fragment these forests and wetlands. Webs of seismic lines, pipelines, roads, well sites and steam plants cover the landscape. These webs of human disturbance are the major threat to the survival of the Cold Lake caribou population. According to Environment Canada, 72 percent of its range had been "disturbed" in this way by 2011. With loss of intact habitat has come increased caribou predation and essentially no recent calf survival.

When bitumen is too deep to mine

in situ (meaning 'in place') extraction methods are used. Multiple wells are drilled and injected with enough high pressure steam to make the bitumen flow. *In situ* oil sands projects currently account for about half of Alberta's oil sands production, with the other half coming from mines. But *in situ* production is the future of oil sands exploitation. *In situ* methods could eventually be used to access 80 percent of the oil sands resource. At Primrose, CNRL was permitted to use High Pressure Cyclic Steam Stimulation (HPCSS). HPCSS applies high enough pressure to spur higher flow rates by fracturing the bitumen reservoir. Using this technique depends on having one or more strong caprock layers in which to contain the high pressures. These four spill sites are evidence that the pressurized bitumen somehow breached the caprock layer and rose up to surface from the bitumen-bearing formation 500 metres below. The bitumen migrated up through an unprotected freshwater aquifer 75 to 100 metres below ground and emerged at ground level in long fissures.

Flowing bitumen, with its hydrocarbons and heavy metals, is a toxic stew to life. It has contaminated peat soils at three sites; at a fourth site, a fissure was opened up at the bottom of a small lake and contaminated its water. Early leaked photos of a spill site showed snow still on the ground and also showed that the

bitumen had sprayed two feet up a tree trunk and gives you some idea of the initial force of the eruption. The spill has killed wildlife. As of September 19, 2013 at least 105 amphibians, 49 birds, two beavers, and 49 small mammals had been claimed by this industrial accident. As required by regulators, CNRL is removing contaminated soils, vegetation and bitumen.

At the small lake, clean up has been considerably more difficult. CNRL used booms to contain and skim the contaminated water and set up wildlife deterrents to reduce mortalities. As the bitumen continued to flow into the lake, CNRL sought and was granted permission September 24 to take the unusual step of dewatering about 2/3 of the lake's water by mid-October. Alberta Environment and Sustainable Resource Development (ESRD) issued an environmental protection order directing CNRL to contain the water in a pit and in part of the original lake. The company will then recover the bitumen from the fissure site, and try to prevent and remedy further surface and groundwater contamination. If there's a silver lining here it rests in the fact that, because of the emergency protection order, there may be more transparency and ENGO/First Nations involvement on the clean up and impacts at this site. But more transparency is needed with respect to the other sites and on the broader causes and impacts.

Public disclosure around the spills has been poor. Though the Alberta Energy Regulator (AER) states that CNRL informed it on May 20 of two spills, on June 6 of a third spill, and on June 24 of the fourth spill into the lake, the public was first informed via an AER news release June 27 – more than one month after the first spill was noticed. After receiving widespread criticism for its secretive handling of the incidents, CNRL didn't issue its first press release until late July. The company organized a media tour on August 8 of two of the Primrose spill sites which I attended as a writer for *Wild Lands Advocate*.

On the Primrose site tour, I learned that CNRL discovered the first

leaks by chance from a seismic crew that was in the area, not from any systematic regular ground inspection. There was no detectable pressure drop in the operation of the facility. After the first discoveries, CNRL conducted a thorough grid search and found the other two spills. A company spokesperson stated that, judging from the way vegetation was affected on site, the first spills may have been happening for several months before they were discovered in May.

We were bussed to the third spill site, a 159 metre long fissure according to company officials. The emphasis throughout the tour was on clean-up procedures. Two months after the spills, much of the contaminated soils and vegetation had been removed from the third site, leaving the fissure with oozing

bitumen. In one part of the fissure, CNRL let the bitumen accumulate so we could see that about 100 litres settled in that section over approximately a two week period. We were also taken to the fourth site, the small lake. There we stood on the shore opposite to where the bitumen fissure was, serenaded by bird deterrent cannons. The fissure there site was estimated to be 30 metres long. We were not taken to the first two spill sites, which were very close to the site of a January 2009 spill to surface at the Primrose East operation.

No company investigative experts joined us on the tour. Two senior executives came with us and deferred any questions we posed to them until a 10 minute ques-



CNRL official talking to media August 8, beside a map of the small lake on the Primrose South operation. CNRL will drain 2/3 of the lake to excavate the fissure where hot bitumen continues to flow up from underground.

PHOTO: © C. CAMPBELL



Spilling through a 159-metre long fissure, hot pressurized bitumen comes up to surface. A CNRL official points to a day's accumulation of bitumen at this section where top soil has been scraped away.

PHOTO: © C. CAMPBELL

tion and answer scrum at the end. Then CNRL President Steve Laut answered questions. Colin Woods, AER Team Leader from the Bonnyville Field Office, answered the questions I posed to him throughout the tour. After CNRL's Laut departed, Woods also participated in a media scrum for about 15 minutes, after which we re-boarded the buses and left the Primrose site. From Woods, I learned that steaming restrictions have been applied for one kilometre around the spill sites. They've judged this distance to be sufficient until they determine the cause of the spills. The AER doesn't know if CNRL exceeded prescribed pressures, doesn't know the extent of fresh groundwater contamination, and doesn't know when the bitumen flow to the sur-

face will stop. There is no known method to stop the bitumen from surfacing aside from waiting until it depressurizes, cools, and reverts to its natural viscous, non-flowing, state.

"In a spectacularly dramatic illustration of poor government disclosure, the energy regulator at the time (the Energy Resources Conservation Board) only released its report on CNRL's 2009 spill in January 2013. There the regulator resembled bitumen in its natural state – very hard to move."

On January 3, 2009, during early steaming of Primrose East operations, CNRL and the boreal forest also suffered a bitumen surface

spill. In that case, the bitumen spilled up to, then flowed out, a well pad identified as Pad 74. AWA learned of this spill through an anonymous tip January 26, and in subsequent days issued a news release outlining its concerns about 'in situ' risks illustrated by the spill. CNRL didn't release any information about the causes of the spill or its groundwater impacts to AWA. In a spectacularly dramatic illustration of poor government disclosure, the energy regulator at the time (the Energy Resources Conservation Board) only released its report on CNRL's 2009 spill in January 2013. There the regulator resembled bitumen in its natural state – very hard to move.

The ERCB's 2009 spill report noted that on January 3, CNRL immediately stopped steam injection, initiated a procedure to depressurize the formation, notified the regulator and agreed steaming would not resume without ERCB approval. By contrast, an AER document dated June 14, 2013 (which was leaked to the Toronto Star) orders CNRL to stop steaming operations in a township area at Primrose East where the first three spills were discovered, over 3 weeks after CNRL first discovered and reported the 2013 spills. This delay and change in procedure has not been explained and there doesn't appear to have been any urgency in taking precautionary measures; the delay in ordering the steam injection shut in is particularly troubling given that the first two reported spill sites are very close to Pad 74.

In 2009, bitumen flowed into the fresh groundwater Bonnyville aquifer. Higher than usual pressure as well as bitumen were detected at

four Bonnyville aquifer monitoring wells. "There remains uncertainty about how the bitumen emulsion will break down over time with heat from further steam injection and about what constituents may be released into the Bonnyville Aquifer," the regulator admitted. This aquifer is the source of some water wells further south and it ultimately drains into Cold Lake. CNRL has prepared a plan to "further understand the effect of heating from steam injection on the movement of bitumen contamination within the Bonnyville Aquifer." These findings should be made public.

In 2009, CNRL was injecting steam at significantly higher pressures than had occurred previously in its Primrose and Wolf Lake operations, because the well spacing had been reduced. The regulator concluded that "this likely contributed to the bitumen emulsion surface release." CNRL was then limited in the steam injection volumes it could inject per cycle.

The ERCB found that the pressurized bitumen's path through the caprock Colorado Group was likely either from a wellbore "or a series of pre-existing faults." One of the most serious concerns about the Primrose project found in the 2009 ERCB report is that the project lies in an area of geological weakness. One hundred metres below the bitumen-bearing Clearwater formation in the Primrose East area are Devonian salt formations that are dissolving and subsiding. These features make it likely, according to the ERCB, that fractures and faults could develop in upper layers, including the caprock. While CNRL didn't identify fractures or faults in the caprock, the ERCB believes that could be because the tools used cannot detect them. They may be evading detection given our current technological capabilities

Another possible pathway through the caprock was from a wellbore with failed cementing or casing that allowed the bitumen to travel

Hot pressurized bitumen spills to surface through soil and vegetation at the same spill site on CNRL's Primrose oil sands project, August 8.

Fencing deters wildlife from entering a section with a leakage amount of about 100 litres that CNRL left to accumulate over a period of two weeks, to compare to the leakage of one day.



PHOTO: © C. CAMPBELL

up the bore. Old well bore locations are not always easily detected (as in the case of the Total *in situ* explosion to surface in 2006) and the integrity can be lost over time due to repeated exposure to high pressures.

“The ERCB issued a draft directive in 2012 dealing with wellbore integrity issues but has not implemented those proposed rules. Given the existing uncertainties and risks of the Primrose operation, the AER should not have allowed production to resume there.”

In response to the 2009 CNRL release, the ERCB said that it would review and assess its requirements for both caprock and wellbore integrity issues with respect to steam injection operations. The ERCB issued a draft directive in 2012 dealing with wellbore integrity issues but has not implemented those proposed rules. Given the existing uncertainties and risks of the Primrose operation, the AER should not have allowed production to resume there.

On August 13, 2013, AWA joined over 20 organizations in calling on the AER to undertake a broader inquiry into CSS and SAGD steam injection operations. They asked the AER to reassess *in situ* tar sands technology and regulations in light of the ongoing CNRL spill incidents since these latest incidents reflect unresolved risks from the 2009 spill. An Environment Canada spokesperson stated in early September that the department is investigating the CNRL spill sites with respect to federal environmental and wildlife laws. In mid-September scientists Kevin Timoney and Peter Lee

released a report criticizing the corporate and regulatory management of the risks posed by these spills. They recommended all HPCSS operations should be suspended until the major knowledge gaps are addressed.

CNRL’s Primrose project should never restart because of possible pre-existing faults in the caprock, because of the difficulty of ensuring well bore integrity, and also because of unacceptable impacts to caribou and other sensitive wildlife such as old-growth or wetlands-dependent migratory birds. At a minimum, Primrose should not restart until the following problems, and solutions to them, are documented

publicly with third party review: groundwater contamination; reclamation of wetlands and uplands; wildlife mortality; the causes of the blowouts; a much stronger approach to preventing future blowouts; and finally, a much stronger approach to detecting and reducing impacts of any future blowouts

There are many other unanswered questions about risks to northern Alberta waters and lands arising from *in situ* oil sands projects. Hopefully, these spills will produce an impetus for the provincial and federal governments to substantially reduce these risks. ♣



PHOTO: © C. CAMPBELL

Hot pressurized bitumen leaks into the bottom of a small lake through a 30-metre long fissure. Wildlife deterrents, including “bitu-men,” have been set up to try to prevent migrating birds from landing.

Blacklisted:

PEMBINA INSTITUTE V ALBERTA

(ENVIRONMENT AND SUSTAINABLE RESOURCE DEVELOPMENT), 2013 ABQB 567



by IAN URQUHART

“Since as a matter of policy the Director was told to consider whether the Statement of Concern filer was cooperative and whether it had published negative media about the oil sands in coming to the Director’s conclusion, the reasons are fatally flawed.”

- Justice R. P. Marceau

On October 1, 2013 the Alberta Court of Queen’s Bench struck an important blow for public participation in Alberta environmental decision-making. Justice R. P. Marceau ruled the Regional Approvals Manager, Northern Region (the Director) of Alberta Environment violated fundamental principles of natural justice when he refused to allow the Pembina Institute and the Fort McMurray Environmental Association to file a statement of concern regarding Southern Pacific Resource Corporation’s application to construct and operate an *in situ* oil sands project (the McKay river project). Justice Marceau agreed with the environmental organizations that the Director “breached the principles of natural justice by taking into account improper and irrelevant considerations” when he rejected the statement of concern they tried to file as members of the Oil Sands Environmental Coalition (AWA also was a member of the coalition regarding this project).

Crucial to Justice Marceau’s decision was a 2009 briefing note prepared for the Department’s Deputy

Minister. That briefing note, reproduced in its entirety below, is shocking. The Oil Sands Environmental Coalition’s statement of concern regarding a Syncrude application in 2009 was rejected because the Oil Sands Environmental Coalition was no longer as cooperative as it had been in the past and the Pembina Institute, one of the Coalition’s members, had published “negative media on the oil sands.” This policy to reject out of hand the Coalition’s effort to submit the Syncrude Statement of Concern was subsequently applied to the Coalition’s attempts to file Statements of Concern regarding other oil sands applications under the *Environmental Protection and Enhancement Act* and the *Water Act*, including the one at issue in the Southern Pacific Resource application.

What is as distressing as Environment’s decision to put the Oil Sands Environmental Coalition on a blacklist is the government’s response to Justice Marceau’s decision. Minister McQueen doesn’t

think that her officials did anything wrong in systematically shutting the Oil Sands Environmental Coalition out of environmental decision-making. Premier Redford didn’t show any contrition either; she said it was the “prerogative” of the government to decide who was directly impacted by a project and who wasn’t.

Professor Nigel Bankes of the University of Calgary’s Faculty of Law believes both the Premier and Minister are mistaken. The Premier doesn’t have any prerogative at all to decide that an uncooperative party isn’t directly impacted by a project; that decision must only be made according to the law and judicial interpretation of the law. As for the Minister, Professor Bankes wrote: “it is simply not open to Minister McQueen to say that government officials did not act improperly when the Justice Marceau has ruled that the Director did act improperly. In making that claim Minister McQueen is ignoring both the concept of the separation of powers and the rule of law.”

I would go further than Professor Bankes and suggest what's also distressing is to hear the Premier, a lawyer herself, misspoke when she outlined who can intervene under Alberta's new law, the *Responsible Energy Development Act* (REDA). She said: "you'll know that we've also changed our legislation to insure that we're continuing to allow people who self-identify as being directly impacted to intervene in processes."

This is not the legislative situation at all. In fact, the language in the new law likely makes the ability to file an environmental statement of concern more difficult for potential interveners. This is because the test

is not, as the Premier said, whether a person is "directly impacted." Section 32 of the REDA states that a person who believes she "may be directly **and adversely affected**" (my emphasis) may file a statement of concern with the Alberta Energy Regulator, the regulatory replacement for the Energy Resources Conservation Board. To be directly affected is insufficient; you must be adversely affected as well. Shaun Fluker, another University of Calgary Law Professor, argues that, unlike the law prescribed in the *Energy Resource Conservation Act* (the provincial statute replaced by the REDA) the Alberta Energy Regulator is not obliged to hear directly and affected persons. This

decision "is now completely up to the discretion of the AER." If you're looking for statutory support for the Premier's musings your search will be in vain.

Make no mistake then – Alberta's environmental organizations have been blacklisted since at least 2009 when it comes to filing statements of concern about exploiting the oil sands and there's no guarantee the new legislative regime will treat any better our concerns about the risks this type of development poses to the natural heritage of our province. The 2009 Briefing Note, the contact person for which now works for Suncor, is reproduced below.

BRIEFING NOTE TO THE DEPUTY MINISTER OF ENVIRONMENT FOR INFORMATION.

SUBJECT: Statement of Concern Rejection of Oil Sands Environmental Coalition

Court of Queen's Bench of Alberta

DATE: August 12, 2009

Citation: *Pembina Institute v Alberta (Environment and Sustainable Resource Development)*, 2013 ABQB 567

ISSUE:

Alberta Environment is rejecting the Oil Sands Environmental Coalition as a Statement of Concern filer for the Syncrude Southwest Sand Storage Conversion Project Environmental Protection and Enhancement Act and Water Act applications.

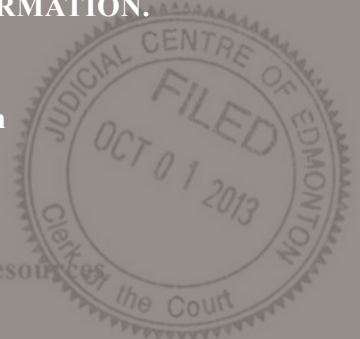
BACKGROUND:

The application for the Syncrude Southwest Sand Storage Conversion Project was advertised on January 14, 2009 with Statements of Concern due to Alberta Environment by March 20, 2009. The department received 21 submissions, only four met the Statement of Concern requirements. There was an obvious coordination amongst the environmental community to respond to the notice, with specific reference to the Energy Resources Conservation Board tailings Directive.

- and -

The Oil Sands Environmental Coalition has traditionally been accepted as a Statement of Concern filer for oil sands mine project applications. The Oil Sands Environmental Coalition is composed of three environmental groups: The Fort McMurray Environmental Association (with 40 members from Fort McMurray

Respondents



Date: August 12, 2009
Docket: 1203 18391
Registry: Edmonton

and Anzac); The Pembina Institute (with 56 staff & 31 members from across Alberta); and the Toxics Watch Society (with 3 staff & 15 members from across Alberta). The Pembina Institute has published documents about the oil sands for several years.

The Oil Sands Environmental Coalition has been a consistent Statement of Concern filer over the past decade, for most major mineable oil sands projects. There had at one point been an internal decision to accept them, setting some precedence for continued acceptance. Considerations for accepting them in the past included: the Fort McMurray Environmental Association was quite active in local multi-stakeholder groups like the Cumulative Environmental Management Association for the Wood Buffalo Region and the Wood Buffalo Environmental Association; many of the members of the Fort McMurray Environmental Association live in and around Fort McMurray; they have been relatively simple to work with as Statement of Concern filers (they've never appealed a decision); the Oil Sands Environmental Coalition has engaged in the Statement of Concern process since its early stages, when the "directly affected" test had not yet been fully established; and they were given the benefit of the doubt. The Oil Sands Environmental Coalition and its member organizations have since withdrawn completely from the Cumulative Environmental Management Association, and as reflected in the Pembina Institute's recent publications about the oil sands, are now less inclined to work cooperatively.

After consulting with Alberta Environment's legal team it has been concluded that information provided is insufficient for the Oil Sands Environmental Coalition to meet the test of directly affected. Alberta Environment is rejecting the coalition as a Statement of Concern filer. It has been decided that we should continue to ask the Oil Sands Environmental Coalition to prove how they are directly affected on future applications.

We have been more consistently applying the directly affected test to the groups or individuals who submit Statements of Concern. With more parties providing submissions, there is a need to identify the groups or individuals who are truly directly affected, and this test needs to be fairly applied between the stakeholders.

The Oil Sands Environmental Coalition may criticize this decision. Given their withdrawal from the Cumulative Environmental Management Association, and the Pembina Institute's publication of negative media on the oil sands the following actions may result from this decision: the Oil Sands Environmental Coalition could make statements that Alberta Environment is pushing the public out of the Statement of Concern process; they could do a membership drive to gain more members in Fort McMurray and area who could then claim to be directly affected; it could trigger statements from groups such as Greenpeace or Sierra Club or it could trigger the Oil Sands Environmental Coalition to take a more legalistic approach where opportunities arise, including asking the Environmental Appeals Board to review its directly affected status.

Alberta Environment Executive, Communications, and other relevant staff need to be aware of the decision to reject the Oil Sands Environmental Coalition as a Statement of Concern filer on this application and why it was made, so that we are able to defend our position clearly.

The Fort McMurray Environmental Association may be able to meet the directly affected test on its own (outside of the Oil Sands Environmental Coalition banner) for some future projects.

RECOMMENDATIONS:

Executive and Communications should be prepared for any question raised by the Oil Sands Environmental Coalition and its member organizations by this decision.

Isn't this Where We Came In?

SLAPPING A BAND-AID OVER
THE BIGHORN'S CANARY CREEK

by SEAN NICHOLS, AWA Conservation Specialist





Several km of new trail ploughed straight through forested areas without concern for existing vegetation.

Sometimes one writes a story, then sits back thinking the task complete, only later to revisit it with the new understanding that what was initially assumed to be the entire story is but the introduction to a larger set piece.

A YEAR AGO

The tale of the Canary Creek in the Bighorn's Hummingbird area is, regrettably, one of those stories.

In 2012 AWA visited Canary Creek and adjacent valleys to survey the state of the trails as part of our Bighorn Wildland Recreation Monitoring Project (BWRMP), now in its tenth year. What we found was disappointing to say the least. We discovered that almost the entire trail system was closed to all vehicles due to extreme erosion (for details and photos see my article in the August 2012 issue of *WLA*). Then I wrote that “the access trails have

been so badly affected by erosion from this year's runoff that they have caved in, becoming impassable to all but the more determined foot users.”

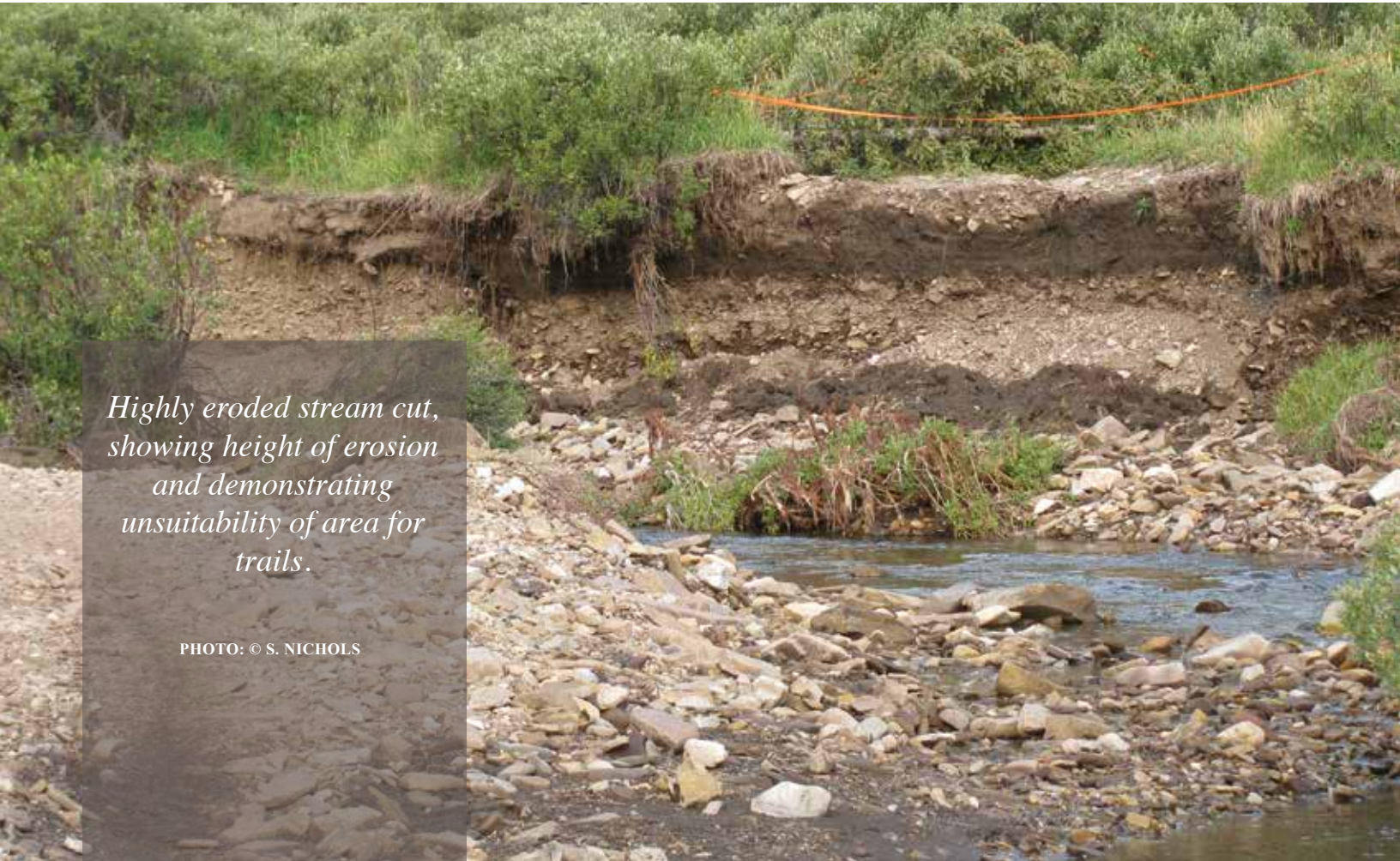
My article further deliberated on AWA's conclusion that the erosion was not due merely to higher than normal runoff occurring in increasingly-frequent “high water event” years, a theory proposed by some Land Management officers working for Alberta Environment and Sustainable Resource Development (AESRD). Rather, I posited, “the wet weather does nothing but exacerbate (...) damage that has already been occurring.”

AWA's position was then and still is now that the terrain in these valleys cannot support this type of use. The ground in the river valley bottoms is boggy and porous, easily eroded, and prone to washouts. Attempt-

ing to put OHV trails through these systems aggravates the situation by channeling waters and creating paths for intense erosion.

Last year's article ended with the suggestion that the 2012 washouts might be a blessing in disguise. Perhaps AESRD would use the washouts as an opportunity to re-examine the appropriateness of the trail system and consider not re-opening the trails at all. Could AESRD take the bold, but necessary, action they had failed to take during the previous high water event year in 2006, when a section of the network was similarly washed out?

At the end of July 2012, we presented these same concerns and the same proposal to AESRD's Lands Area Operations division along with our observations. These observations were included in a 2012



Highly eroded stream cut, showing height of erosion and demonstrating unsuitability of area for trails.

PHOTO: © S. NICHOLS



Example of flagging used as directional “signage” on new trails.

PHOTO: © S. NICHOLS

update report produced as part of the BWRMP (and available on the AWA website at www.albertawilderness.ca/bighorn).

In this meeting, AESRD admitted that “in a perfect world” the Canary Creek trail wouldn’t exist. AESRD also cautiously suggested that some Hummingbird Area trails might not re-open at all that year. Officials noted:

- Every year AESRD finds new trails they have to close that they have never had to before;
- They could possibly see the day when the trails would indeed be closed down altogether due to rising costs.

In conjunction with this second point, AESRD pointed out that they had limited resources for performing maintenance on trail systems

such as those in the Hummingbird and that any maintenance or reconstruction would therefore need to be performed by volunteers. This latter possibility concerns us: while AWA prefers to see the closed trails remain closed, if they are to be re-opened this should not be done on an ad-hoc basis where reconstruction decisions are left up to volunteer groups. Rather, there needs to be a comprehensive plan in place for tackling trail reconstruction efforts and the Bighorn Backcountry Steering Committee needs to have a set of guidelines in place surrounding those efforts.

Nevertheless, less than a month following last year’s meeting, Hummingbird and Canary Creek were back up and open for business; all trails were completely re-opened.

DÉJÀ VU

This brings us to 2013.

AWA intended to re-survey the trails along Canary creek and the effects of reconstruction early this past summer. These plans were postponed due to yet another “high water event” and yet another trail closure. Last year’s supposedly rare event happened again.

Thus delayed until late August, the monitoring trip gave AWA the opportunity to observe any reconstruction that had taken place following this year’s flooding.

The cumulative effects of the floods, the erosion, and trails reconstruction have devastated the Canary Creek valley. Corroborating AWA’s analysis of the soil systems and terrain, the creek has now carved deep channels along



The cumulative effects of the floods, the erosion, and trails reconstruction have devastated the Canary Creek valley.

the valley floor. New and redirected watercourses have altered the lie of the land to the point where the existing OHV trails have become not so much impassable, as completely erased. Nature has obliterated them. New channels are up to three metres or more deep; the widths of some of these channels is in the tens of metres. The valley has been reconfigured, re-sculpted.

Where the new channels haven't erased trails the erosion has made the trails impassable for considerable distances. What has happened on the land this year surpassed what we saw in 2012.

The most disturbing aspect of the flooding, however, has come from human hands: the attempts at reconstruction.

No minor shoring up of eroded edges or buttressing of water crossings here. And how could there be, with the existing trails completely vanished?

Instead the traveler up Canary Creek encounters several kilometres of brand new trail (a precise measurement of the trail length is difficult as the radically altered landscape has changed numerous landmarks and it is sometimes hard to determine where an old but reconstituted trail ends and a new one begins).

Occasionally running immediately adjacent to the old but washed out trail, and occasionally taking wide detours along the valley's edge, one traverses many lengths of newly cut, newly trampled and newly

bulldozed trail through the vegetation and riparian areas.

The vegetative damage is extensive. Trees and underbrush have been pushed aside and piled up with seeming abandon. This destruction has even occurred in areas where their removal is not even necessary to build a trail.

Tree roots are exposed, rubbed raw, dug up and broken.

Tire and tread tracks are everywhere and slopes are gouged in an eagerness to get the trail back up and once again supporting traffic.

Little pieces of fluorescent pink flagging tape are everywhere. They



mark the new routes, however, there is no signage from the government or anyone else directing people to stay on the trail or out of sensitive areas. Indeed there is no longer any clarity, any indication, where sensitive areas might be and whether a new trail might not simply run straight through them in the first place. As a Land Management officer observed last year: “without signage, there is a green light to go.”

More frustrating than any of the above, even more so than the apparent lack of any attempt at an environmental assessment before reconstruction began, is the fact that all this damage amounts to little more than a big, long Band-Aid® over symptoms of a problem that remains unaddressed.

This is made immediately apparent when you consider the composition of the “new” trails. For significant distances, they run straight over soft grassy soils with little to no

structure for supporting the continued burden of OHV traffic. It is obvious that it will be but a matter of time, and a short amount of time at that, before they are dug into the ground and channeling water. One heavy rainfall and we can expect to see dangerous fissures opening up under the approaching vehicles.

In other areas where such fissures have rendered the old trail impassable, the new one is built immediately alongside it, on the same type of ground and subject to the same kinds of pressures and effects. It takes no great insight to see that the same fate will befall the new trail before long. We will be right back where we started and Canary Creek will be the worse for it.

ISN'T THIS WHERE WE CAME IN?

We need to stop going around and around in circles. We need to recognize that the exit from this cycle of damage and destructive rebuilding is to bite the metaphorical bullet, to recognize that *this* is not the area

for these trails and next time, to keep them closed and enforce their closure.

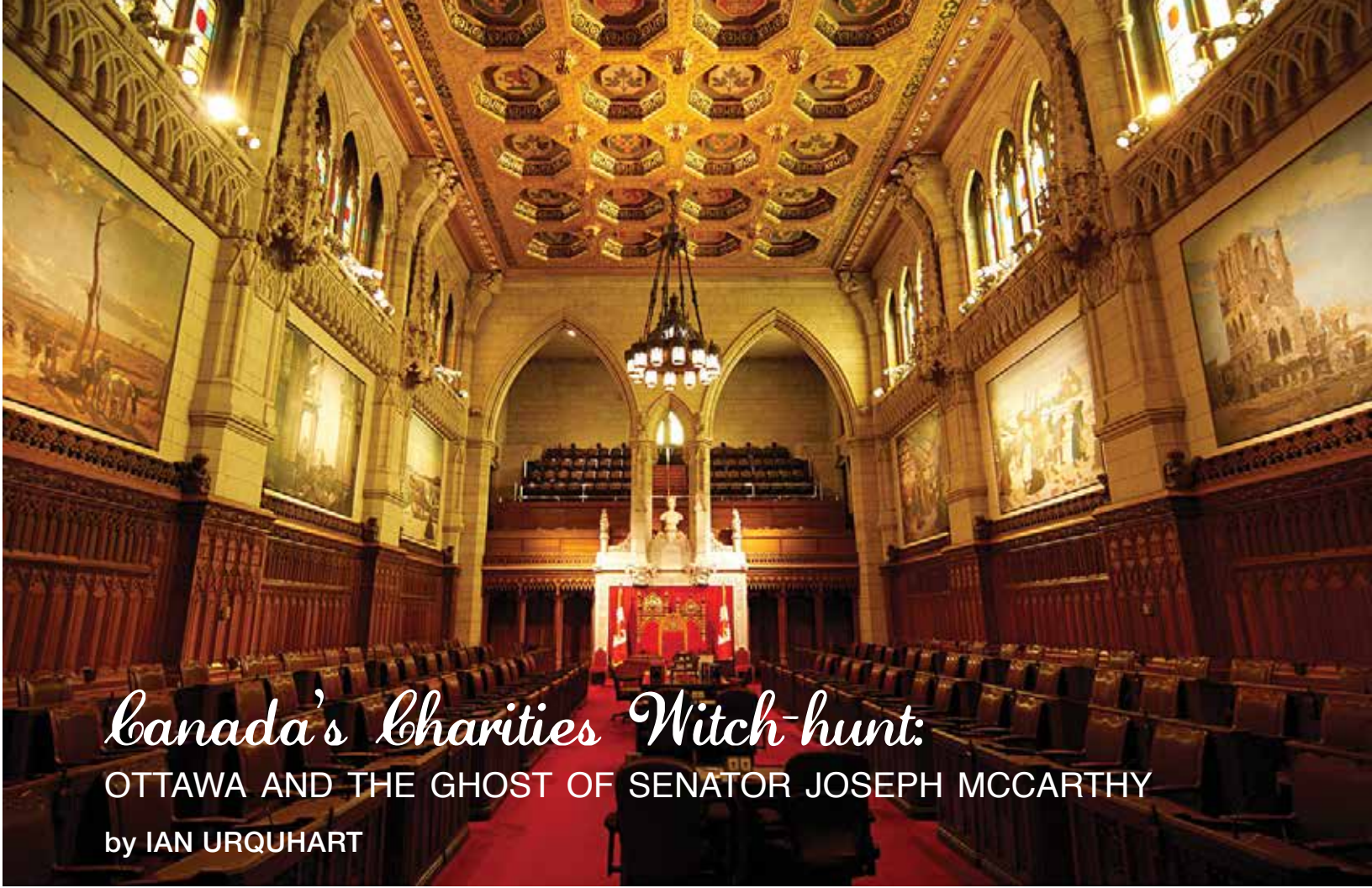
On September 13, 2013, AWA once again met with AESRD’s Lands Area Operations division and presented our concerns. We received substantially the same response we did in 2012. It looks like this merry-go-round is going to continue. ▲

PHOTOS: (from left to right)
PHOTO: © S. NICHOLS

Example of what happens to trails without adequate protection against erosion.

Example of trail-building practices employed on Canary Creek.

New trail beside old. Without protection from erosion, there is no reason to believe it will not end up in the same state.



Canada's Charities Witch-hunt:

OTTAWA AND THE GHOST OF SENATOR JOSEPH MCCARTHY

by IAN URQUHART

One of the ironies of liberal democracies such as the United States and Canada arises when democratic political institutions behave in ways that limit democratic rights. By democratic rights I mean those rights fundamentally important to the public's ability to participate in political debate and political decision-making. According to this logic, rights to freedom of speech and association are among the most vital democratic rights.

Both Canadian and American histories are blighted by government attacks on these rights. For example, in 1937 William Aberhart's Social Credit government passed the *Accurate News and Information Act in Alberta*. This Act attacked freedom of the press. Among other anti-democratic provisions it proposed to give the authority to the Social Credit Board to force news-

papers to reveal their sources and to publish any clarifications or corrections the Board chose to make regarding a newspaper's assessment of government policy. Newspapers breaking the law would be fined; they could be banned from publishing. Fortunately, the courts struck this offensive legislation down in 1938.

Premier Maurice Duplessis, Aberhart's Québec contemporary, also was not a friend of speech he disapproved of. The same year Aberhart demanded "accurate news and information" from critical newspapers Duplessis's government passed the Padlock Law, formally known as the *Act to protect the Province against Communistic Propaganda*. This law gave the Québec government the power to close for 12 months any building used to disseminate "communism

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or bolshevism" (the terms were never defined), to seize and destroy any material that propagated communism, and to imprison for one year, without appeal, anyone who printed, published, or distributed this literature. This assault on free speech stood for 20 years until Canada's Supreme Court struck the law down in 1957. Three of the eight justices in that judgment declared the Québec law constituted "an unjustifiable interference with freedom of speech and expression essential under the democratic form of government established in Canada."

MCCARTHYISM

The fear of communism also inspired one of America's most



U.S. Senator Joseph McCarthy (standing) questioning Joseph Welch, Counsel for the U.S. Army, at the Senate Subcommittee on Investigations' hearings, June 9, 1954.

PHOTO CREDIT: United States Senate

notorious campaigns against freedom of speech and thought – McCarthyism in the 1950s. Senator Joseph McCarthy's "freewheeling style" as chairman of the U.S. Senate's Permanent Subcommittee on Investigations shifted that committee's traditional concern with government waste and corruption to focus instead "almost exclusively on Communist infiltration." "Disturbing excesses" – that was the phrase Senators Levin and Collins used to characterize the history of the Subcommittee under McCarthy's chairmanship. In 2003, when the transcripts of the McCarthy Subcommittee were released to the public, these two Senators wrote that McCarthy's "browbeating tactics destroyed careers of people who were not involved in the infiltration of our government."

McCarthy's 1950 speech in Wheeling West Virginia punctuated well his practice of making groundless charges as he crusaded against un-American behaviour (homo-

sexuality joined communism on the Senator's agenda). He held up a piece of paper to his audience. He alleged it contained the names of 205 State Department employees – "bright young men who are born with silver spoons in their mouths" – who also were members of the Communist party. Were McCarthy's allegations true? No. A special Senate subcommittee investigated them and concluded they were "a fraud and a hoax." The truth didn't matter when it came to Tail-Gunner Joe and his witch-hunt.

SENATOR NICOLE EATON'S INQUIRY

In 21st Century Ottawa a witch-hunt of sorts has begun; the focus in our capital isn't on communists, it's on conservationists. It began when federal Natural Resources Minister Joe Oliver tried to warm Ottawa up on a cold January day in 2012 with an open letter about promoting Canada's economic interests. History will more likely view his letter as a brutal attack

on Canadian conservationists. Minister Oliver's charges were so absurd that to debate them gives his words a legitimacy they don't deserve.

Minister Oliver's wild claims about environmental organizations using foreign funding to sabotage the Canadian economy struck a receptive chord among some Conservative Senators in Ottawa. Less than a month after Oliver's comments Senator Nicole Eaton announced she would launch a Senate inquiry into "the interference of foreign foundations in Canada's domestic affairs and their abuse of Canada's existing Revenue Canada charitable status." The Rules of the Senate define an inquiry as: "A procedure used for the purpose of drawing the attention of the Senate, through debate, to a particular matter." Inquiries are Senate debates; they should not be understood as tribunals that may call witnesses; they also do not produce a decision by the Senate on the subject matter of the inquiry.

Senator Eaton's speech was a fitting complement to Oliver's invective. Initiatives opposing the oil sands were "anti-Canadian" according to Senator Eaton: "Take the oil sands. We allowed international interests to frame our oil sands industry with myths, misinformation and catchy slogans like "tar sands" and "dirty oil." We can learn from that experience and we can strike back. We need to make it clear that they cannot come here to our country and incite Canadians to turn against us, or even worse, pay agitators to come here and provoke demonstrations and protests against our own country." Most of the other Conservative Senators who participated in her inquiry echoed Eaton's sentiments. To the now infamous Senator Duffy, oil sands opponents were "anti-Canadian." "It should

never be considered a charitable act,” Senator Finley asserted, “to attack Canada’s oil sands.”

Other Conservative participants in this debate such as Senator Nancy Ruth and Senator Hugh Segal delivered more tempered contributions – more of what we might demand from a chamber of “sober second thought.” “Restrictive tax audits,” Senator Segal offered in his defence of free speech, “fuelled not by impartial application of the tax laws but by one set of views versus another, have no place in a free society.” (I should add that Senator Segal did not believe the Harper government had engaged in politically motivated audits)

Regarding the demand that public participation in the Northern Gateway pipeline hearings should be restricted Senator Ruth said: “What is really being advocated is that some groups should have influence and others should not. What is really being advocated is that some points of view cannot be questioned, while others are a waste of time and cause delay.”

Liberal Senators questioned the propriety of the Eaton inquiry. Senator Cowan, the Liberal leader in the Senate invited Canadians to sign a petition: “It is wrong for Conservatives to use their position in the Senate or in Cabinet to make serious accusations without providing an opportunity for those accused to present their side of the story. In our opinion, it is that kind of behaviour that is anti-Canadian.” Alberta’s Grant Mitchell decried the singular focus on charities. If the federal government had a legitimate concern about lobbying then it also should look at the advocacy work of corporations and other organizations.

At least one of the organizations tarred with accusations of impropriety, the Sierra Club of Canada, contacted Senators and asked for the opportunity to respond to the charges. “They describe what they were doing as an investigation,” John Bennett, Sierra Club Canada’s Executive Director, told me. “They made accusations, but they never gave the accused an opportunity to respond.”

PUBLIC PARTICIPATION FORECAST: INCREASINGLY CHILLY

The public record suggests Senator Segal was correct in noting that the Harper government had not launched any politically motivated audits of charities. However, provisions in the 2012 federal budget not pertaining to audits per se certainly looked as though they were inspired by the comments of Minister Oliver and Senator Eaton. Eight million dollars from the Canada Revenue Agency’s (CRA) budget would be spent over two years on the “political activities of charities” file. Regarding political activities, the CRA would “(e)nhance its education and compliance activities.” It also would “(i)mprove transparency by requiring charities to provide more information on their political activities, including the extent to which these are funded by foreign sources.”

Imagine Canada, a national registered charity with a mission to strengthen and support the non-profit sector, was concerned this CRA budget initiative would produce “a further advocacy chill.” Ethical Oil, a petroleum industry support group that sees little wrong in the current pattern of oil sands development, did its best to capitalize on the political mood in the federal government. In 2012 it filed

complaints with the Canada Revenue Agency against Environmental Defence, the David Suzuki Foundation, Tides Canada, and the Sierra Club of Canada Foundation. It alleges that Environmental Defence and the David Suzuki Foundation engage in impermissible political activities. In addition to this charge, Ethical Oil accuses Tides Canada and the Sierra Club Foundation of being conduits, of funneling money to other organizations without having any real or demonstrable control over how those funds were spent.

With respect to the Tides Canada complaint, Ethical Oil’s legal counsel used surprisingly incendiary language in its submission; Tides Canada “is laundering tax-privileged funds to non-charitable organizations for non-charitable activities.” (my emphasis) To launder money is “to transfer funds of dubious or illegal origin, usu. to a foreign country, and then later to recover them from what seem to be ‘clean’ (i.e. legitimate) sources.” Here Ethical Oil’s representatives seemed to follow the dubious lead of the Hon. Peter Kent, the then Minister of Environment. Kent didn’t hesitate to offer and then stand by the unsubstantiated charge that Canadian charities were used “to launder offshore foreign funds for inappropriate use against Canadian interest.”

DÉJÀ VU

Reflecting on the events since January 2012 conjures more than analogies to McCarthyism. They also invite readers to consider the similarities between this attack on charities and the use of SLAPPs (Strategic Lawsuits Against Public Participation). SLAPPs have been used by powerful interests, often large corporations, in both Canada

and the U.S. to try to deny less well-financed organizations such as public interest groups or individual citizens the ability to participate in public policy making. SLAPPs chill public participation by raising the spectre of expensive litigation. They were a prominent feature in B.C. environmental politics in 1990s where companies such as MacMillan Bloedel and Fletcher Challenge sued environmental groups and citizens for injuring the companies' business interests through political actions.

Accusations against charities may chill participation too; they may lead charities to conclude that activities they genuinely regard as making, what the 2012 federal budget called, "a valuable contribution to the development of public policy in Canada" might instead be viewed as impermissible political activities. As John Bennett pointed out to me, the audit threat launched by Ethical Oil against charities is much broader than a SLAPP. SLAPPs focus on single projects (for example, a single forest management agreement) whereas a strategic audit against public participation targets the entire suite of a charitable organization's activities.

The emergence of Ethical Oil and its complaints about Canadian charities they don't like also reminds us of events in the recent history of American politics. In 2005 the Internal Revenue Service audited Greenpeace. The IRS audit had been requested by a group called Public Interest Watch, a group that turned out to be funded almost entirely by Exxon Mobil. Ethical Oil's complaints to the CRA resemble the tactics of Public Interest Watch. We cannot say whether Ethical Oil, like Public Interest Watch was, is funded primarily by

Canadian energy companies – its contributor list is confidential.

WHERE ARE WE TODAY?

It's now been more than 20 months since Minister Oliver first alerted an unsuspecting public to the grave threats Canada faced from "environmental and other radical groups" who were using "funding from foreign special interest groups to undermine Canada's national economic interest." Where do we stand today?

CRA's audit of Tides Canada, an audit started roughly a year before Oliver's open letter, was still ongoing in the late spring. Officials "remain confident that we are in full compliance with all Canadian charitable regulations." The charity's President and CEO did not want to be interviewed on this subject. As of June 2013 Sierra Club Canada had not had any communication with CRA regarding the Ethical Oil complaint. MetroNews reported in May 2013 that the CRA had completed approximately 880 audits of charities in the preceding year and only one charity, Physicians for Global Survival, had its charitable status revoked for exceeding the law's 10 percent limit on political activity. That audit was initiated in 2006. No data were released about how many charities, if any, may have received less severe reprimands regarding excessive political activity from the government.

One outcome I don't believe Senator Eaton expected from shining her searchlight on the charity sector was evidence that both the foreign funding and the political activities of Canadian charities are very inconsequential. On the foreign funding front the research conducted by Imagine Canada seems persuasive. It used data from the Foundation

Center in New York to report that, according to the Center's 2010 figures, the largest U.S. charities and foundations donated \$36.8 million to Canadian charities (given U.S. donation filing requirements the \$36.8 million total is likely to be higher). This was less than 0.5 percent of the total funds donated to Canadian charities in 2010.

Narrowing their focus to charities working on environment-related issues Imagine Canada reported that about four percent of the total revenue of these charities came from outside Canada. An estimated one-quarter of this four percent came from the U.S.

On the extent of charities' political activities the Canadian Press analyzed the CRA charities database. There they found that 450 of Canada's 85,000 registered charities, one-half of one percent of this sector, reported spending funds on political activities. For Canadian Press, this evidence "raises questions about the Conservatives' motivation for further restricting these activities."

TOWARDS A BETTER FUTURE FOR THE ADVOCACY WORK OF CHARITIES

There are other paths to follow for those who believe the advocacy work of charities is one source of the opinion diversity that's a hallmark of a healthy democratic spirit and society. Earlier this year AWA's Cliff Wallis urged members of the House of Commons Standing Committee on Environment and Sustainable Development to use the tax system to make donating to conservation and other charities more attractive to Canadians. The federal government, for example,

level the tax credit playing field between Canadian charities and federal political parties. A \$1,275 donation to a federal political party generates a non-refundable federal tax credit of \$650; the same donation to a charity results in a federal tax credit of \$341.75.

In February 2013 the Standing Committee on Finance issued the report “Tax Incentives for Charitable Giving in Canada.” December’s issue of the *Advocate* will report on the extent to which this report was sympathetic to the type of path Cliff was recommending. ♣

U.S. SENATORS MCCARTHY & SMITH

On the Senate’s Role in the anti-Communist movement of the 1950s

“As you know some of us in Washington...have been trying to slowly dig out and expose to the public view those who would destroy this nation... you are seeing today an all-out attempt to marshal the forces of the opposition using not merely the communists but the fellow travelers the deluded liberals, the eggheads, and some of my good friends in both the Democratic and Republican parties who can become heroes overnight in the eyes of the left wing press if they will join in the, join with the jackal pack.”

- Republican Senator Joseph McCarthy, Speech to the Irish Fellowship Club of Chicago, March 1954.

“As a United States Senator I’m not proud of the way in which the Senate has been made a publicity platform for irresponsible sensationalism. I’m not proud of the reckless abandon in which unproved charges have been hurled from this side of the aisle.”

- Republican Senator Margaret Chase Smith, United States Senate, June 1, 1950.

CANADIAN SENATORS EATON & RUTH

Speaking During Senator Eaton’s Inquiry Into the Involvement of Foreign Foundations in Canada’s Domestic Affairs

“There is political manipulation. There is influence peddling. There are millions of dollars crossing borders masquerading as charitable foundations into bank accounts of sometimes phantom charities that do nothing more than act as a fiscal clearing house. They dole out money to other charities without disclosing what the money is for. This inquiry is about how billionaire foreign foundations have quietly moved into Canada and, under the guise of charitable deeds, are trying to define our domestic policies... It is about has-been and wannabe movie stars trying to defibrillate their flatlined careers. It is about anything to undermine the credibility of the Canadian brand — our Canadian identity in Canada and around the world. However, do the charitable and non-governmental organizations that accept enormous amounts of money really represent the interests of Canada, or do they pander to the interests of their foreign masters?... Cleverly masked as grassroots movements, these interests are audaciously treading on our domestic affairs and on Canadian sovereignty, all under the radar.”

- Conservative Senator Nicole Eaton, *Debates of the Senate (Hansard)*, February 28, 2012.

“What concrete evidence substantiates the claim that foreign foundations have pushed Canadian groups into taking positions that they would not otherwise have taken? I doubt these groups are ciphers for foreign interests, having only opinions and no expertise. Those calling for an inquiry have made allegations of interference, abuse, political manipulation, influence peddling, money laundering, support for terrorism and active engagement in elections. Such serious charges must be substantiated with concrete proof.”

- Conservative Senator Nancy Ruth, *Debates of the Senate (Hansard)*, March 29, 2012.

ALBERTA'S NEW WETLAND POLICY: BABY STEPS IN AN ADULT WORLD

By Jason Unger

After a very long wait a new wetland policy for the province was released yesterday. The policy is a step forward in managing Alberta's wetlands as it is the first time a policy applies to the Green Area (public land) of the province. Beyond that only time will tell if environmental outcomes are supported at all by the policy. There is simply too much wiggle room in the policy to validate it as an effective mechanism to protect wetlands of significant biodiversity and ecosystem function. The lack of certainty for environmental outcomes certainly doesn't bolster social licence arguments about the sustainability of activities in Alberta.

First, there is no overarching goal to maintain wetland area (as espoused by the non-consensus recommendations of the Alberta Water Council) let alone to maintain or restore wetland function. Rather the stated policy goal is to "sustain the benefits they provide to the environment, society and economy." Interpret that as you will.

Second, there is a significant amount of uncertainty about how the policy will be implemented. This uncertainty can be seen in the following aspects of the policy:

- 1) Relative wetland value (RWV) – the policy outlines a system of management based on the government attributing "values" to the various wetlands on the landscape. The RWV is based on criteria including biodiversity, water quality improvement, flood reduction, human value and abundance. By framing value in this way the policy is likely (if not certain) to attribute lower values to more remote wetlands, which may play minimal roles in water quality improvement, flood reduction and human value but have high biodiversity value. Furthermore, the use of abundance as a criterion to determine value appears to be included to simply justify decreased valuation. There is no rationale or science based justification that more abundant wetlands may be impacted without decreasing their value, particularly when it comes to maintaining the functions that wetlands play on the landscape as a whole. I question whether the government (or anyone else for that matter) can ascertain what is the "right" abundance of wetlands to perform various functions and maintain biodiversity.

- 2) Avoidance and the wetland mitigation hierarchy – the policy outlines a hierarchy of wetland mitigation, which starts with avoidance (not disrupting wetlands) followed by minimizing impacts and, finally, offers the option of wetland replacement. While the hierarchy is laudable in theory (and mimics many wetland policies in North America) avoidance measures are often quickly bypassed by proponents and regulators alike.

Under the policy the proponent of an activity must assess whether they can avoid impacting a wetland. Where the proponent determines that avoidance is not "practicable" they must "adequately demonstrate that alternative projects, project designs, and /or project sites have been thoroughly considered and ruled out for justifiable reasons." This approach is full of uncertainty in what will be deemed "practicable," what constitutes an "adequate" demonstration of considering alternatives, and what constitutes "justifiable reasons." These issues are left to future policy guidance or government discretion.

Past research has indicated a failure to generate meaningful avoidance using similar policies in other jurisdictions, which begs the question, how will this be different?

This is particularly the case where one considers the framework for replacement ratios set out by the policy. For an impact on a high value wetland the replacement ratio is set at 8:1. The cost of replacing such a high value wetland is not specified but the policy sets out specific criteria to generate the amount that must be paid for replacement. I would argue that in order to act as an effective avoidance

motivator the replacement cost must exceed any feasible economic gain from wetland drainage by a significant margin. It seems unlikely that replacement costs will exceed the benefits of many activities, which begs the question “How much weight will economic reasons be given by the regulator in determining whether avoidance is practicable?” Only time will tell.

Third, compensation paid for wetland losses may be used in a variety of ways that may not contribute at all to wetland conservation. The policy allows “non-restorative replacement” which would see money being committed to public education and outreach, and a variety of research and data collection options. Presumably then we could teach people about the wetlands destroyed to bring them that educational opportunity and collect ever diminishing data about vanishing wetlands.

Finally, the policy is silent on how the wetland policy will apply to approved activities that have on-going impacts on wetlands. The assumption is that such policies will not apply retroactively, which begs the question of how much wetland destruction effectively escapes the purview of the policy. There will be opportunities to revisit compensation for on-going wetland destruction where Water Act approvals must be renewed; but again, there is no indication that these projects will be brought within the policy. For many areas, this means on-going wetland losses barring discretionary action to require wetland avoidance and mitigation as part of existing approval conditions (if it is feasible at all). This is particularly troublesome for the working landscapes in the Green Area where significant areas are subject to existing approval, where proponents have benefitted from the government’s delay in getting the wetland policy passed.

In the end, in giving up on the concept of no-net loss of wetlands and providing gaping discretionary measures to allow for the destruction of even highly valued wetlands, the new wetland policy directly undermines any claim that Alberta is a world leader in environmental management.

Jason Unger is Staff Counsel at the Environmental Law Centre in Edmonton. This article was published originally on the Environmental Law Centre blog on September 11, 2013 <http://environmental-lawcentre.wordpress.com/2013/09/11/albertas-new-wetland-policy-baby-steps-in-an-adult-world/> It is reprinted with the permission of the Environmental Law Centre.



PHOTO: C. Olson

Three Artists Who Give Voice to the Silent



by CHRISTINE THOMSON

Alberta Wilderness Association's offices played host to a timely exhibit in April earlier this year. The exhibit was titled *A Shifting Balance* and featured three Alberta emerging artists with a focussed directive. The art of Dana Bush, Amanda Oberacher, and Elisa Sereno-Janz worked as a cohesive exhibit at a most appropriate venue. To enter into the AWA's offices was less like entering into a white walled box gallery, and more like being welcomed into the warmer environs of an artist's studio. The lighting and wood floors added to the intimate feeling of the exhibit, as the artists wanted less to hit you over the head with their message, but to educate and beguile the viewer with the imagery and their reality of shifting balances in the environment.

The background of the three artists lead them to take different approaches to their subjects. Bush, as an ecologist and biologist, takes as her subject matter the interconnectedness of the species. Oberacher, like Bush a recent graduate of the Alberta College of Art and Design, focuses her paintings on the effect of environmental abuse on wildlife. Sereno-Janz is still a student at ACAD, but the maturity garnered from her professional career as a musician is evident in her masterly paint strokes, and the lyrical sinuous lines of her paintings.

Dana Bush's three mixed media pieces in the show were entirely concerned with ecosystems and the delicate balance of relationships. From *Only 13 Males Left* (Greater Sage-grouse)(2011, Silk, natural dyes, mordants, and wood) which outlines the tragic status of the sage-grouse on the prairies, to her *Sweetness of Bees* (2013, silk, natural dyes, mordants, soywax, maple and cherry wood) detailing the intricate role that bees play in the pollination and success of the development of fruiting plants, she gently steers the viewer to a greater awareness and appreciation of her message. Incorporating "didactic panels" with her work, Bush seeks to educate her viewer scientifically, while illustrating her message in visually arresting format. Using compostable products such as silk, natural dyes, and organic subject matter, Bush shows a sensitivity about her belief system that is intrinsic to the subject matter.

Amanda Oberacher is a painter who critiques the abuse of the animals and mammals who inhabit this earth with humans, and yet systematically lose in the human quest for "progress". Her work concentrates on current environmental issues such as oil exploration into caribou calving grounds and the effects of oil spills on marine life and water fowl. Her painting *AT1 Transients: Prince William Sound* (2012, recycled acrylic paint,

acrylic paint and polybitumen, 48" x 96") is a stunning canvas of a pod of Orcas striving to break through a thick surface crust of polybitumen. Research into the title shows us that prior to the 1989 Exxon Valdez oil spill, there were over 22 whales in the AT1 group. This AT1 Transient Killer Whale group was one of the most frequently encountered groups and in the 1980s was sighted year round in Prince William Sound, Alaska. Scientists estimate that there are only 7 killer whales remaining in this group. Her dramatic representation of this pod, struggling to breathe through the thickly encrusted layer of oil, while tear shaped droplets of oil coat their bodies and sink in the sea around them, is visually arresting and heartbreaking.

Elisa Sereno-Janz's work was the least representational of the three artists exhibited at AWA's Hillhurst Cottage and thus complements and allows for a moment of quiet reflection between the other artists' work. Her oil on wood panel paintings are abstractions of Google Earth satellite images of prairie river valleys that she has walked, hiked, and known intimately. Her love of the earth and fascination of the role of prairie rivers in the arid climate of Alberta informs and shapes her paintings. The symbol of a river as it cuts through her paintings are read as such, but the hay fields, grain farms and evidence of



Only 13 Males Left (Greater Sage-Grouse)

PHOTO: © D. BUSH

the human hand are almost romantic in their rendering. We wander with her in the valleys of her memories, and the paintings are dreamy reflections with initially little statement about man's effect on his surroundings. In *The Bow River, South of Bassano* (2013, Oil paint on panel, 48" x 48") we are beguiled by the colours and shapes she creates on her panel. It is only when we break out of this state that we notice the shapes of the fields as created by human-kind and of our impact on the ecosystem. Sereno-Janz's musings reflect the force of water and flooding (as we so recently experienced in June earlier this year) and comments on the intractable capriciousness of waterways and the



Area 1002

PHOTO: © A. OBERACHER



A Sweetness of Bees
PHOTO: © J. Kelly

effect of human intervention. What did it look like before the imprint of the human hand?

In experiencing the three artist's work in the exhibit, one comes to a horrifying realization that the viewer is complicit in the disasters that are crippling the artists' subject matter. In the quest for more oil and industrial development on the prairies, the habitat of the greater sage-grouse is being destroyed. Between 1988 and 2006, 90 percent of this species' population died out. Although we have succeeded through the courts in forcing the federal government to issue an emergency protection order for this iconic species we still wonder

if actions will be taken in time to save the sage-grouse. Tanker routes off the coasts of Alaska and British Columbia invite human error and, if it occurs, the destruction of sea life. And the hand of man again plays in Sereno-Janz's paintings as she reflects on the manner in which we reshape our environment to suit our needs and too infrequently the needs of the animals that depend on natural grasslands, woodlands, and clean water.

The three artists in the show *A Shifting Balance* tried to illustrate to us what is happening to our planet and our relationship to it.

Their practice is concerned with illustrating and educating their viewer to become more than a bystander. Become instead an active positive force for protecting those who have no voice in their destruction. In their poignant and arresting art, Bush, Oberacher, and Sereno-Janz have succeeded in bringing the message to us that we need to be active in protecting those that have no voice and our shared environment.



Christine is a fourth year student at ACAD with a practice concerned with social and environmental issues. Her most recent exhibit was part of a reflection on Treaty 7, entitled Past, Present and Imagined. A professional costume designer for film, she spends as much time as she can exploring Alberta's wilderness with her horse. 🐾

PHOTOS (from top to bottom):

ATI Transients, Prince William Sound

PHOTO: © A. OBERACHER

Red Deer River, South of Schrader Creek

PHOTO: © E. SERENO-JANZ

Bow River, South of Bassano

PHOTO: © E. SERENO-JANZ



Back to the Future for the Bears:

ANOTHER FIVE YEARS FOR ALBERTA'S GRIZZLY RECOVERY PLAN

by SEAN NICHOLS, AWA Conservation Specialist

In April 2008, following years of hard work and informed by some very good science, the Government of Alberta (GoA) approved the Alberta Grizzly Bear Recovery Plan 2008-2013. This document accompanied the listing of the grizzly as Threatened in Alberta and was intended to provide a blueprint for recovering the species to sustainable levels. As with all species recovery plans in Alberta, a five-year time frame was explicitly built into the document. This time frame expires at the end of this year and so the plan is now up for review and renewal.

Looking back over the last five years of grizzly recovery efforts, what do we then see? Like Marty McFly discovered when he voyaged back in time in the movie "Back to the Future," taking a trip to 2008 shows that sometimes the more things change, the more they stay the same.

In June 2008, barely two months following the approval of the recovery plan, the government disbanded the recovery team that was expected to implement the plan. In a news release following that action, AWA's Nigel Douglas wrote: "Everybody believed that it would be the role of the Recovery Team to see that (the Recovery Plan) was actually implemented. Six years of grizzly recovery has resulted in a 68-page plan, a suspension of the grizzly hunt and more than \$2 million spent on counting bears. Unfortunately it has also seen precisely nothing done to protect grizzly bear habitat."

Some striking parallels can be drawn between that statement and the situation today. While the plan remains in effect until the end of the year (and is anticipated to be renewed for another five years early in 2014), and the grizzly hunt remains suspended, we are still counting grizzlies in Alberta and actual grizzly habitat in the province remains just as open to disturbance and fragmentation as it was in 2008.

To be sure, there has been some good work done with conflict avoidance and attractant management. However without a dedicated recovery team in place, such efforts have been patchwork across the province and highly dependent on the efforts of one or two key local, dedicated volunteers.

In November 2008 AWA and other ENGOs across the province participated in a series of GoA workshops on human access management that resulted in a number of excellent recommendations. These recommendations echoed and expanded on those found in the Recovery Plan calling for specific limits of 0.6 km/km² (in core grizzly habitat) and 1.2 km/km² (in secondary grizzly habitat) on the density of open routes (including roads, railroads, cut lines, pipelines, etc.) into grizzly habitat. In the five years since then, AWA and other participants have called on the government to officially release the results of those workshops. For five years the government has stonewalled.

Despite assurances that the workshop results feature in the South Saskatchewan Regional Plan (SSRP) and other pieces of government policy, for all practical purposes, those recommendations have disappeared into a regulatory "black hole."

SO WHERE DOES THAT LEAVE THE RECOVERY PLAN?

There may be some light on the horizon. Alberta Environment and Sustainable Resource Development (AESRD) has committed to renewing the plan for another five years. In a meeting last October with AESRD Minister McQueen, AWA was informed that it would be renewed with only minor changes; however it now seems that the changes may end up being more substantial.

Will the changes be good news or bad news? AWA believes there is cause for cautious optimism. Members of the original recovery team are being consulted on the plan's renewal, as are wildlife and land managers. AWA hopes this will result in closer cooperation between land managers and the field staff responsible for implementing the plan. Issues such as access management are being explicitly re-addressed and are expected to be surrounded with "stronger language," including clarity on the definition of what constitutes open routes. This definition has not always been consistently applied by all parties, a

matter of some contention in recent years.

Perhaps most importantly, the Recovery Plan renewal will take place more-or-less in conjunction with the unveiling of the SSRP. AWA is pleased to see the draft plan recognize the need to reduce greatly the linear footprint in headwaters and grizzly habitat. The same linear access threshold numbers described above appear in not only the Grizzly Bear Recovery Plan, but also in literature describing habitat requirements for other species throughout Alberta's Eastern Slopes. An increasing body of science is arriving at the same conclusion – that similar limits on access density are important for ecosystem intactness across the board. Unlike in 2008, there is now scientific data from Alberta supporting this conclusion.

Other aspects of the recovery plan may be overhauled as well: one is the introduction of a “social component” to the plan. This component would recognize explicitly that a recovery in population numbers is not sufficient. This must be accompanied by public support for the ideals behind grizzly bear conservation.

There are also some more questionable changes being mooted for the plan's update: specifically the introduction of management zones. Grizzly habitat would be divided into zones ranging from a Recovery Zone – where grizzly population recovery would be considered paramount – through to a Dispersal Zone – where the presence of grizzlies would not be required. The understandable intent behind the zones would be to prioritize limited staff resources. However the ramifications may be cause for concern:

since a grizzly in the Dispersal Zone would no longer be contributing to its population, then any mortality in the Dispersal Zones would not count toward mortality numbers in the associated Bear Management Area (BMA). This general approach has been used with some success in other jurisdictions (notably in the USA), but the contextual specifics of the Alberta approach gives AWA pause.

The details of these and other anticipated changes to the Recovery Plan have yet to be revealed. A draft version of the updated plan is expected out near the end of this

year (after the draft SSRP has been released), with a public feedback period stretching into early 2014. The final release of the Plan, updated for the next five years, would follow. In the meantime, the existing Recovery Plan from 2008, will continue to be in effect.

So in a sense, we're back where we started. But like what Marty McFly was given in his return to the past, there's an opportunity now to try again. We will have the opportunity to make changes that will promise a brighter future for Alberta's Threatened grizzlies. ♣



PHOTO: © C. OLSON

Louise Guy Poetry Prize

Julia Borden is the 2013 winner of the Louise Guy Poetry Prize, an annual competition held in conjunction with the Climb and Run for Wilderness, for her poem *Gifts of Nature*. Julia is seen here accepting her award from Dr. Richard Guy.

GIFTS FROM NATURE

The wind in the trees
Beautiful song of nature
A gift from the woods

Beauty of birdsong
Such a wondrous melody
A gift from the wild

Sun and summer breeze
A warm and radiant light
A gift from the sky

A sparkling stone
Shining from the river bed
A gift from the hills

First flower of spring
Open as the white snow melts
A gift from the earth



PHOTO: © K. MIHALCHEON

2013 WILD WEST GALA



By BRITTANY VERBEEK, AWA Conservation Specialist



PHOTOS (This page):

AWA Board Director and Emcee Jim Campbell encouraging people to partake in the bucket raffle
PHOTO: © K. MIHALCHEON

Little Smoky taking a break
PHOTO: © K. MIHALCHEON

(Right Page, clockwise starting top left):

Last minute set up for Vivian Pharis' silent auction garden basket
PHOTO: © K. MIHALCHEON

Action at the ever-popular grizzly bear balloon pop
PHOTO: © K. MIHALCHEON

A few of our staff and volunteers getting into the spirit displaying an item in the live auction
PHOTO: © K. MIHALCHEON

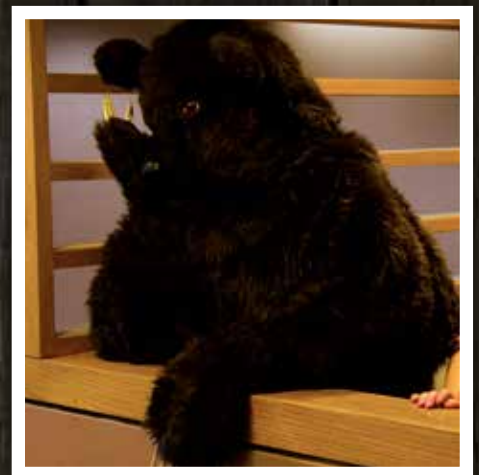
A great turn out for the 25th Annual Wild West Gala with some 250 guests
PHOTO: © K. MIHALCHEON

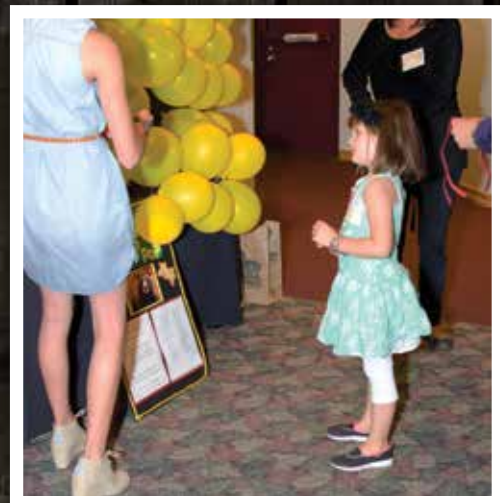
Hold onto your cowboy hats because news from this year's AWA Wild West Gala is going to blow you away! It was another spectacular evening filled with friends, festivities, and appreciation for Alberta's wilderness. Everything went off without a hitch, with over 250 people corralled at the Red and White Club in Calgary on September 20.

Between the fall harvest decorations and the western gear were hints of silver to celebrate the 25th anniversary of this event. A quarter of a century has gone by since the beginning of this annual gala and yet the spirit of Albertans caring for our wild spaces is as strong as ever.

Each corner of the room emanated delicious fragrances, from the fresh basil in the bountiful baskets to the homebaked goods donated by some of our staff and volunteers. The auction area was buzzing with action along with the other fun activities including the bucket raffle, the Prosecco raffle, and the grizzly bear balloon pop. Thanks to all of this year's donors there was a plethora of consumable goods, exquisite art work, wildlife books, and much more for guests to enjoy.

In true western style, mouth-watering prime rib was served as the main dish to get everyone's bellies full for the excitement of the live auction. Auctioneer Jesse Starling got the room all riled up when the





bidding for several fantastic live auction items was underway.

It was impossible to sit still with the evening's musical entertainment including Barry and Joe Hertz, a lively guitar and fiddle duo; the musical talents of Nathan Godfrey and Wayne Garrett; and the toe-tappin' folk tunes of Walk the Dog.

A great big yeehaw goes out to all the wonderful volunteers and all the people and organizations who donated generously to this event. The Wild West Gala would not take place every year without the many contributions of time, talent, and sponsorship that people make.

I offer a toast then to an evening that was so much more than a fundraising event; it was a chance to visit with old and new friends, to celebrate the year's accomplishments, to be grateful for living in such a wonderful province full of rustic natural beauty, and to be reminded that protecting that natural beauty is a passion shared by many Albertans.



NEWALTA VOLUNTEERS

Lending Their Services

by CHRISTYANN OLSON, AWA Executive Director

PHOTO: © M. DUNN

AWA was thrilled to have the help of seven summer staff from NEWALTA this summer. The curb appeal of the Hillhurst Cottage School was improved significantly when these tireless volunteers helped AWA's faithful volunteers Heather Crone and Margaret Main remove the overgrowth from the front gardens and do a general facelift by painting the front steps and pulling weeds. It was a beautiful day in June that broke into a downpour and unfortunately washed the paint off the stairs. Thankfully the NEWALTA team came back for another day in July and helped finish up what the rain didn't let us complete.



PHOTO: © M. DUNN

Hiking the Table

TO PROTECT THE CASTLE

by BRITTANY VERBEEK, AWA Conservation Specialist



On Sunday morning, September 15, 2013, people gathered around the trail head eager to set off on a three hour climb up to the top of Table Mountain, located in the southwest corner of Alberta in the Castle wilderness. It could not have turned out to be a better day for a scenic hike. We wound around aspens and firs, followed a dry creek bed, and scrambled up the scree, all to savour Table Mountain's stunning views of the Rocky Mountains, Porcupine Hills, and Alberta's plains.

But this hike was about much more than the scenery. Other than blue skies, sunshine, and views what brought 50 of us together then was a common, overarching goal: Protect the Castle. The Castle Crown Wilderness Coalition (CCWC) and the Bert Riggall Environmental Foundation co-sponsored this event to build public awareness and send a clear message to the Alberta Government and to Spray Lakes Sawmills. Enormous banners, emblazoned with the words "Protect the Castle," were packed up the mountain in anticipation of a plane scheduled to fly overhead to take aerial shots of everyone proudly displaying our message. This was no easy task but everything was planned and executed perfectly.

The plane flew by several times so the photographer could get the best shots of all the hikers holding up the words that, to some of those there, have been their life's passion.

The hike symbolized the hard work and dedication of those conservationists who have been trying to protect the Castle wilderness for over 40 years. The Castle was designated as a Special Place in 1998 but was never legally designated as wilderness off-limits to clear-cut logging, mining, and other industrial processes that destroy important wildlife habitat. Specifically, there have been recent public protests over Spray Lakes Sawmills clear cutting in core habitat for grizzly bears, a species designated as threatened under Alberta's Wildlife Act. The message held up on the top of Table Mountain underlined and emphasized the public's concern over the state of the Castle. The Castle wilderness is an area of tremendous ecological and recreational value which surpasses any economic value of timber and fossil fuels.

The Castle wilderness region has been an area of special concern for Alberta Wilderness Association since the birth of the organization. More than two generations later the

struggle continues to defend it from industrial incursion. Christyann Olson, AWA's executive director and one of the hikers, said "the spirit of the people of Alberta was present in those who could climb; Albertans want the Castle protected and legally designated." Board director Vivian Pharis was also there along with Sean Nichols and myself. We were all thrilled to be a part of such a powerful event; it was a spectacular day to enjoy what's left of the majestic Castle wilderness.



Aerial shot of all the hikers proudly holding up the “Protect the Castle” banner. The excitement was evident with everyone cheering and waving at the plane.

PHOTO: © R. PISKO



In the distance AWA’s Christyann Olson takes in the magnificence laid out before her from the top of Table Mountain.

PHOTO: © S. NICHOLS

Castle Crown Wilderness Coalition

RECEIVES ALBERTA PARKS OUTSTANDING GROUP STEWARD AWARD

by BRITTANY VERBEEK, AWA Conservation Specialist

Thanks to all that have been stewards of this environmentally significant area and have fought to protect and restore the region. We will continue the fight to protect the Castle!

Castle Crown Wilderness Coalition (CCWC) was this year's proud recipient of the Alberta Parks Outstanding Group Steward Award. Dr. Richard Starke, Minister of Tourism, Parks and Recreation presented the award at a ceremony in Pincher Creek on the 14th of September. James Tweedie, Conservation Director; Judy Huntley; and Wendy Ryan, Stewardship and Outreach Coordinator were there to receive the honour. It was given to CCWC for providing environmental education and protection at the West Castle Wetlands Ecological Reserve. CCWC, now more than 500 members strong, has been a steward of the Castle area since 1989. The Coalition sponsors volunteer stewardship programs that provide long term monitoring and restoration projects in the Castle wilderness.

The timing of the award was impeccable, as James Tweedie was able to share the good news and celebrate with friends of the Castle the day after the Table Mountain

hike/protest. James commented: "recognition for our work has been a long time coming." The CCWC's hard work was evident as we climbed Table Mountain; trail markers installed along the way helped us find our way up the shale to the top of the mountain. Creating and restoring this hiking trail is just one example of the excellent stewardship the CCWC has provided in

the Castle region for the benefit of fellow Albertans. Their work also includes wildlife monitoring, educational hikes and tours, litter clean ups, reporting inappropriate activities of other users, and invasive species management. Congratulations CCWC from all of us at AWA for your years of dedication to the protection of the Castle!

James Tweedie proudly displays the Outstanding Group Steward Award that he received on behalf of Castle Crown Wilderness Coalition



PHOTO: © C.OLSON

FOIP Response into Hidden Creek Logging Operation Raises Questions about AESRD Decision-Making

On November 7, 2012, AWA put in a request to Alberta Environment and Sustainable Resource Development under the provisions of the Freedom of Information and Protection of Privacy Act (FOIP). We requested materials related to the license granted to Spray Lake Sawmills (SLS) to log in Hidden Creek last winter. At issue are ongoing concerns related to allowing logging to proceed in critical habitat for threatened fish species such as the westslope cutthroat trout and bull trout. AWA also is very concerned about the deviations the government allowed SLS from the company's Operating Ground Rules. Rules regarding logging operations within a sensitive Class 'A' watershed such as Hidden Creek have been ignored for SLS (for more on these and other concerns related to the Hidden Creek logging operation, see Lorne Fitch's article in the June/July 2013 issue and Sean Nichols' article in the February 2013 issue of WLA).

The government repeatedly delayed responding to AWA's requests. On March 4, 2013 the Office of the Information and Privacy Commissioner (OIPC) ruled that the delays constituted "a decision to refuse access to the records." Consequent to this ruling we were informed that we were to receive these FOIP materials by April 4 (see Sean Nichols' update in the April 2013 issue of WLA).

Finally on September 6, 2013, ten months after our initial request,

AWA received the requested materials. Despite earlier promises of a substantial amount of information, the final amount delivered ended up being less than a tenth of what had been expected. The volume of material we were seeking had been one excuse for the government's delays.

Nevertheless the material received gives an insightful and bleak look into decision-making processes within AESRD. The pages comprising the FOIP response describe a process whereby sound science-based judgements are first ignored, then finally overruled in a headlong rush to meet a schedule that satisfies a logging-oriented agenda while washing conservation concerns into the creek along with the sediment from the haul roads.

AWA is continuing to analyse the contents of the FOIP response and hopes to publish a detailed story in an upcoming issue of WLA.

- Sean Nichols

Better Outlook for the Latest Caribou Range Planning?

The final federal recovery strategy for boreal woodland caribou was released one year ago, in early October 2012. Alberta is now required to develop range plans for each of 15 caribou populations on provincial lands. In August 2013, the Alberta government announced plans to start to develop a range plan for the Little Smoky and A La Peche caribou populations in west central Alberta. Later this autumn it will

begin range planning for the Cold Lake caribou population. AWA has decided to participate as an Alberta Environmental Network representative in the stakeholder advisory group the Alberta government has set up for the Little Smoky-A La Peche range plan.

Legal action by AWA and partner organizations helped prod the federal government into finishing the strategy, albeit five years past the "mandatory" deadlines required by the Species at Risk Act. The goal is to achieve self-sustaining caribou populations throughout their current distribution in Canada, to the extent possible. The federal government's boreal caribou scientific advisors stated as recently as February 2012 that recovery of local populations across the country is both biologically and technically feasible. What counts now most of all is political will.

Under strong pressure from Canadians, who submitted 14,000 comments during the consultation period, the federal government significantly improved the final strategy's management approach compared to the draft version it released in 2011. That early draft strategy proposed killing predator species as a substitute for responsible habitat management in highly disturbed ranges. The final management target for the minimum amount of undisturbed habitat for each caribou range is now 65 percent. Experts estimate this will give threatened populations a 60 percent chance of becoming self-sustaining. Provinces are required to develop range plans to show progress every five years towards the 65 percent undisturbed habitat target. This is vital for Alberta's caribou populations since all except the Yates herd on the NWT border is already in serious decline and expected to die out in the next several decades if

nothing is done. The final strategy gives the highest priority to landscape level planning and to habitat restoration. The prioritization is a crucial reason AWA is participating in this range planning exercise.

Fire and insect disturbance create a natural changing mosaic in the boreal forest. Woodland caribou require extensive ranges to be able to occupy the most suitable intact forest and peatland habitat at low densities; the A La Peche caribou also traditionally moved from summer alpine ranges to forest and peat wetland winter ranges in the foothills. The underlying cause of Alberta's caribou decline is clear: the cumulative effects of habitat disturbance caused by forestry, energy development, and associated infrastructure. Human disturbance not only destroys habitat for caribou, it stimulates populations of prey species such as deer and moose and makes wolf travel easier along roads and cutlines. Increasing prey species increases the wolf population and puts more pressure on the dwindling caribou population. In short, human disturbance robs the caribou of the intact habitat they need to isolate themselves from deer, moose, and the wolves that follow.

The historic range of woodland caribou has decreased greatly in Alberta. Agricultural settlement in southern range areas is part of the story. But, in recent decades, a rapidly expanding industrial footprint within the foothills and boreal forest has meant that smaller, fragmented ranges now exist instead of large connected ranges. Unfortunately, the main management tool in the Little Smoky since winter 2005-06 has been killing wolves. Since 2005 approximately 850

wolves have been killed; as well, significantly higher numbers of moose hunting permits have been issued. Habitat disturbance meanwhile has continued to increase to the point where over 95 percent of the range's habitat is disturbed. This is the highest rate in Canada.

The Little Smoky-A La Peche advisory group will meet from August until February 2014 and provide advice to government. We will build on the knowledge gained from the 2006-2008 West Central Caribou planning process. The Alberta government's decisions in May 2013 to defer new mineral rights sales in these ranges and in July 2013 to reduce planned logging in part of the Little Smoky range prior to range plan development were encouraging signals of a newfound commitment to improve habitat conditions for these populations. AWA's goal in participating in the advisory group is to help achieve self-sustaining caribou populations by focusing on habitat protection and restoration. That's where the management focus belongs.

- Carolyn Campbell

Overnight Accommodations at Maligne Lake? Time to Disappear!

As part of its headlong rush to commercialize our national park system, Parks Canada is contemplating the approval of an overnight accommodation "lodge" on the shores of Maligne Lake in Jasper National Park.

The proposed lodge, which looks like a luxury 5-star hotel, would

seem to contradict the ban on overnight accommodations in the Maligne Valley proposed in the draft Management Plan for Jasper National Park.

But, as Meatball reported in our last issue, the pertinent clause disappeared faster than a bowl of her kibble between 2009 and 2010 – when the final plan was released. The ban on accommodations is nowhere to be seen in the 2010 Management Plan.

That ban had been added to help protect the fast-disappearing, Threatened woodland caribou that live in the Maligne Valley. The four remaining members of the Maligne herd were spotted in the vicinity of where the lodge is to be built earlier this summer. Yet developments such as this lodge have a highly detrimental impact on the ability of the herd to survive. Maligne Valley is also important habitat for the grizzly – another Threatened species.

This proposed lodge would then seem to be the latest yank in the schizophrenic tug-of-war over caribou that has been going on in Jasper recently. First a proposal to expand the Marmot Basin ski hill into caribou territory is seemingly given unofficial approval. Then backcountry ski trails are closed to protect the caribou (for more details on Marmot Basin and the ski trails, see Sean Nichols' update in the February 2013 issue of WLA). Now this overnight lodge is being seriously considered. It's enough to make the poor caribou dizzy.

There are hopeful signs, however, that Parks Canada may be willing to reconsider. The "no overnight accommodations in Maligne Valley"

clause in the management plan isn't the only disappearing act we've noticed regarding this issue.

Earlier this year a glossy brochure was distributed promoting the lodge and its proponent, Maligne Tours Ltd. Yet as soon as opposition to the plan surfaced, the brochures quickly vanished from view. Is Parks Canada nervous? Who in Parks Canada will stand up and declare that such developments are not in the park's best interest?

So far the word out of Parks Canada has been that they are interested in "enhancing the visitor experience." Yet as former Banff National Park Superintendent Kevin Van Tighem points out, "well more than 90% of commenters [at Management Plan consultation sessions] want parks to be natural, nature-focused, and providing only basic support services. Not one Canadian asked for, or supported, zip lines or more hotel rooms (at least in Banff's case). I know," he says, "I read them all."

Kevin's complete statement on the general subject of commercialization follows this update. For AWA his strong words need to resonate among local residents, park visitors and indeed all Canadians. All constituencies need to speak up about the ongoing encroachment of inappropriate commercial development into some of Canada's little remaining – and supposedly protected – critical habitat for our threatened species.

Together we can hopefully get that message through, so that the Maligne caribou herd itself won't be the third disappearing act in this story.

-Sean Nichols



Maligne Lake, a Jasper National Park Icon

PHOTO: Courtesy of Jasper Environmental Association

In Whose Interest?: Retired Banff National Park Superintendent Kevin Van Tighem on Limits to Commercial Development

In September 2013 Grant Potter, Jasper National Parks' Business Liaison Officer from 1995 until 2012, wrote to Jasper Superintendent Greg Fenton to register his dismay over where he believes Parks Canada is headed. His letter outlined the ways in which ziplining, special events such as triathlons, the Glacier Discovery Walk, and Maligne Tours' proposal to build a new lodge on Maligne Lake violate the letter and/or spirit of Parks Canada's guiding principles and policies.

The exchange of letters between Mr. Potter and Superintendent prompted retired Banff National Park Superintendent Kevin Van Tighem to congratulate Mr. Potter for a "(b)rilliant bit of policy analysis." Like Potter, Van Tighem is very concerned about the levels of

commercialization Parks Canada seems prepared to entertain. The former Superintendent's comments are reprinted below. The complete exchange between Mr. Potter and Superintendent Fenton is available on the Jasper Environmental Association's blog: <http://www.jasperenvironmental.org/jea-blog/>

- Ian Urquhart

Kevin Van Tighem's Comments:

We are on the verge of losing twenty years worth of hard and principled work by public servants to respond to broad public concern by establishing firm limits on commercial development. There is absolutely no public support or demand for these developments – they serve only the commercial interests of private companies who have access to senior politicians. The management plan consultations, despite the nearly-desperate efforts by some senior park people to smoke out the "silent majority" who would want

new attractions in the parks, found that well more than 90% of commenters want parks to be natural, nature-focused, and providing only basic support services. Not one Canadian asked for, or supported, zip lines or more hotel rooms (at least in Banff's case). I know; I read them all. Social research done in Kananaskis Country showed that new Canadians are among the most unequivocal in their view that parks are primarily for the protection of nature. The public interest, in short, is being sold out in spite of clear messages from Canadians that they don't want more development and diversions in their treasured national parks.

I don't know what can save our national parks from the current political pressure to grant new commercial privileges to party donors, short of one or two high-profile Parks Canada executives committing career suicide by standing up for the public interest. It could happen, I suppose. The only other hope is widespread public outrage – but the deliberately-fostered cynicism now infecting the body politic leads pretty directly to apathy. Which is what the beneficiaries of the privatization of our national parks are likely counting on.

Alberta's New Energy Regulator and Pipeline Breaches: Will We See Better Disclosure?

The pipeline spill in early June 2013 of over 9.5 million litres of industrial waste water north of Zama City raises disturbing questions regarding the Alberta Energy Resources Conservation Board's (ERCB) timeliness when informing the public about this kind of incident.

Ten days – that's the time lag between when Apache Canada reported this spill to government and when the ERCB informed the public. Even then it was only after the spill was reported to a television station that any government announcement was forthcoming.

Responding to questions about that delay, ERCB claimed that they did not initially know the volume of the spill. According to ERCB spokesperson Bob Curran: "If we had known that up-front we would have made the announcement at that time."

Yet Curran is also on the record as saying that, "Volume isn't always indicative of the severity of a spill... You can have small volumes that get into a waterway that are much more problematic than larger volumes that are mostly contained on a lease site."

AWA agrees with this latter statement: it is why we strongly believe that it is in the public interest to have immediate and full disclosure of such spills as soon as they occur. NuVista, a petroleum company operating in Hay-Zama Wildland Park, immediately and voluntarily publicizes even the smallest leak there – a one litre spill inside a controlled berm. Such full transparency and timely disclosure should come, must come from the Government of Alberta.

Both the severity and the volume of the Zama City spill were high. While the level of hydrocarbons in the spilled "produced water" was low, there were still high levels of salt and other elements in the water that are extremely damaging to ecosystems, especially to that area's marshy wetlands. This is not a small problem. Salt water spills may be just as damaging as, or even more damaging than, oil

spills. They kill the vegetation and are difficult to remediate.

That the Zama City spill happened in an area used by First Nations for trapping is yet another indicator of why timely disclosure is so important.

A jurisdictional split between Alberta Environmental Protection (AENV) and the ERCB may help to explain why the disclosure took so long. In his master's thesis Saltwater Spill Site Assessment and Remediation in Northern Alberta, D'Arcy White identifies a memorandum of understanding between the two agencies as "interpreted by upstream producers to mean that any spill report filed with the ERCB meets the reporting requirements of AENV." Yet at the same time, "less attention may be given to saltwater spills than to a more tangible crude oil spill, especially in remote areas. Unless a spill report is made directly to AENV indicating a surface water body is affected, or human health or property is at risk, follow-up and compliance confirmation is neither timely nor consistent between AENV Districts."

White goes on to propose optimistically that the new Alberta Energy Regulator (AER) may help to resolve this schism. AWA would like to share White's optimism. We hope Alberta's new regulator will make more timely and appropriate releases.

Thus far, admittedly, the response from the AER has been wanting. In the case of four blowouts in Canadian Natural Resources Limited's (CNRL's) Primrose oil sands operation, it took up to a month for the AER to pass information about

the blowouts on to the public (see Carolyn Campbell's article in this issue of WLA). While the potential is there we are still waiting to see it realized.

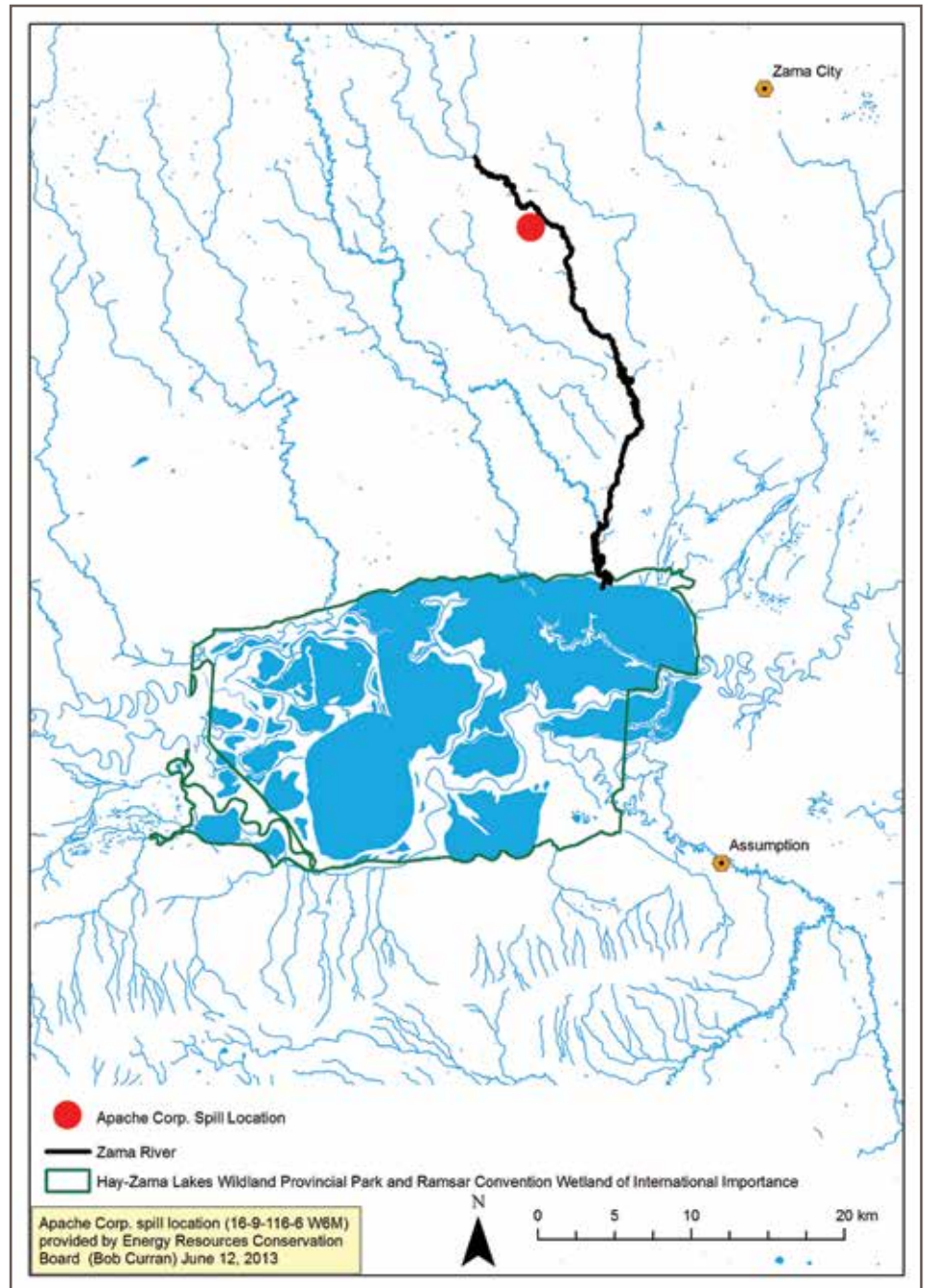
This will likely become more and more important as time goes on. AWA has raised concerns in the past regarding Alberta's aging pipeline infrastructure and the increasing number of annual spills and blowouts that may result.

These ruptures are a direct function of the tens of thousands of miles of pipeline that currently cross Alberta. In total, there are about 400,000 km of pipeline in Alberta and the ERCB estimates that there are about 2.4 failures per year for every 1,000 km of pipeline. Thus we can "expect" to see about 900 breaks per year with the current infrastructure. The Zama City and CNRL spills are just a couple of the more recent, and more visible, accidents.

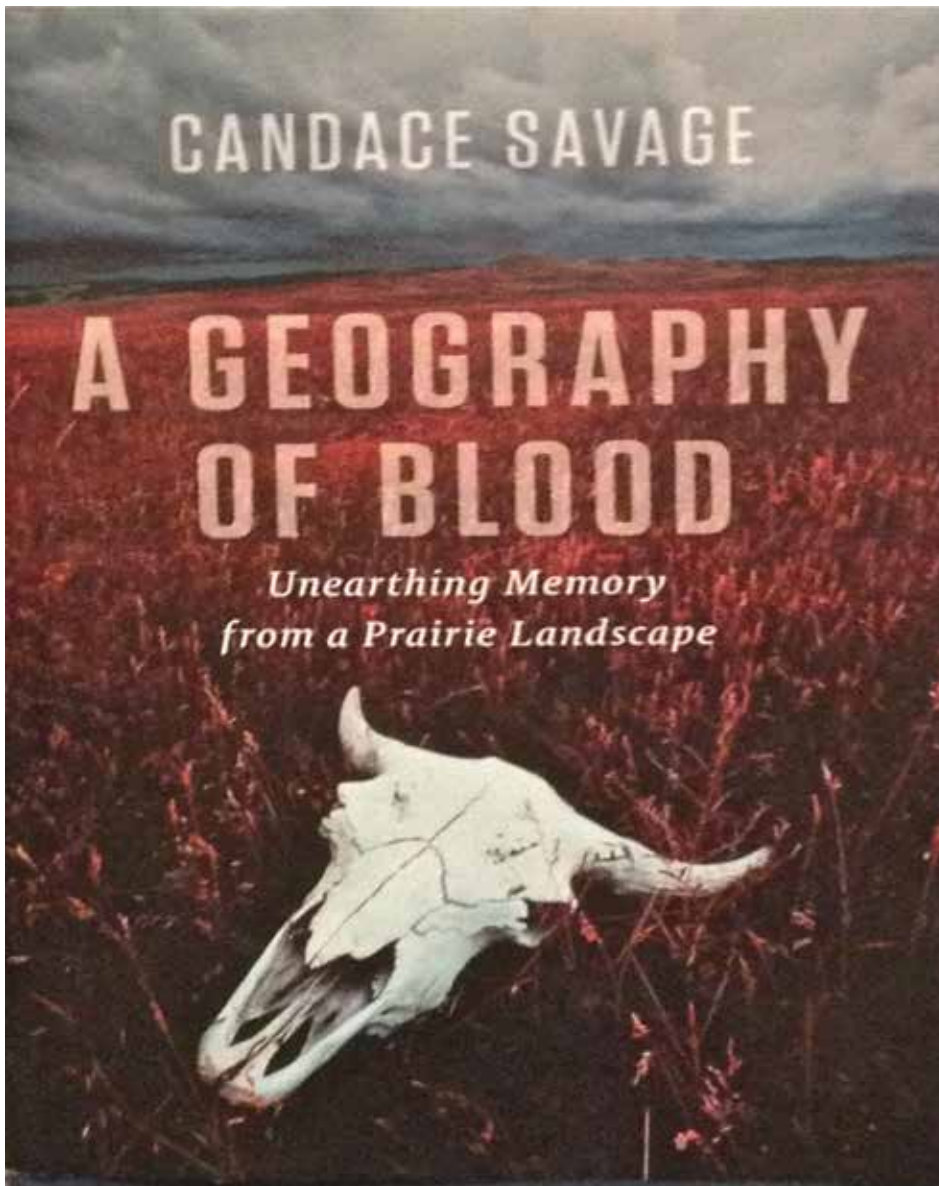
While the majority of those roughly 900 annual failures may be minor the cumulative effect of even the minor breaks nevertheless remains considerable. With that many failures, we can anticipate that there will be several major breaks per year. That number may only increase as more kilometres of pipeline are added to the province's web.

AWA continues to meet with the AER to express our concerns about issues such as this that fall under its newfound jurisdiction. We will continue to press the AER to effect changes regarding how events such as the Zama City spill are investigated and disclosed.

- Sean Nichols



Map, courtesy of Global Forest Watch Canada, indicating the location of the Zama City pipeline spill in northwest Alberta



**CANDACE SAVAGE, A GEOGRAPHY OF BLOOD:
Unearthing Memory from a Prairie Landscape,
(Vancouver: Greystone Books, 2012)**

By Ian Urquhart

Candace Savage's *A Geography of Blood* is a lyrical, poignant, and ultimately hopeful exploration of the histories of the Cypress Hills. When you pick up *A Geography of Blood* you book passage on a voyage of discovery. First we join Savage and her partner Keith Bell as they discover Eastend Saskatchewan – the small town perched on the edge of the Cypress Hills that becomes so central to their lives. Why Eastend? The togetherness and the “stick-to-it-iveness” of the

people who lived in this outpost on the edge of the northern plains were partially responsible. The European settlers' triumph over disease and drought built a sense of community and helped Eastend become a “home away from home” for the author.

But the land itself plays the largest role in their decision to make Eastend a second home. The wildness of the Cypress Hills and the memo-

ries buried in that intact native prairie prove irresistible.

Savage's prose is delightful. Her lyrical and evocative strengths come to the fore whenever she writes about connecting to the natural world around her. Take, for example, her description of a portion of the landscape encountered on a trip to the abandoned hamlet of Ravenscrag:

Here, the hills on either side of the valley are drawn subtly together to define a broad-floored, walled-in trench. At the flatlands at the bottom, the river continues its drowsy meanders, leaving just enough space along its southern margin for a gravel road to scoot past. Up above, on both sides of the valley but especially to the north, steep dissected cutbanks rise to clip the horizon, enclosing a river of sky. You could come this way a hundred times and catch these embankments in a hundred different moods, sometimes towering and majestic, sometimes hazy and withdrawn, sometimes outlined with snow so their bones show.

She paints landscape portraits with more than exquisite details; they imagine the land as a sentient being, with spirit, memory, and voice.

Eastend and the Cypress Hills become portals through which Savage interrogates memory. The land prompts her to interrogate her own memories of growing up in the Peace River country; the land demands she interrogate European settler memories of putting the plow to the prairie. The land remembers and, if you're prepared to listen, will share all of her memories with you.

At several points early in the book Savage hints that interrogating these memories may be a poignant, unsettling experience. Why suggest that a visit to Wyoming's Buffalo Bill Historical Center, with its exhibit of the first scalp Bill Cody took to avenge General Custer's death at Little Bighorn, had anything at all to do with their first trip to Eastend? What did she foreshadow when she wrote the following about the efforts of the U.S. military to expel "British" Indians into Canada: "Voices hang in the air here, speaking of hunger, displacement, and cold, but we do not hear a word." Why detail a mural in an Eastend cafe about civilizing and settling the prairies?

Her purpose becomes clearer in the chapter Ravenscrag Road. There she writes about the geological unconformities of the landscape – where erosion has erased millions of years of geological history. She weaves them into a critique of the human historical unconformities she sees remaining in the Pulitzer Prize winning author Wallace Stegner's autobiography *Wolf Willow* (Stegner spent part of his childhood in Eastend).

Stegner's voice is revisionist in *Wolf Willow*. His family's life in Eastend was hard, much harder than the conventional triumphal

myth of western settlement admits. While Savage welcomes these truths Stegner's message still subscribes to the "march-of-progress myth" and ignores other historical erasures. He glosses over the obliteration of the buffalo and the native cultures that depended on Otapanihowin (this Cree word for buffalo translates as "livelihood" or "the means of survival"). Savage explores these societal blindspots.

The memories uncovered in the Cypress Hills landscape are harsh, horrible. The scale of the ecological tragedy that unfolded on the prairies in the late 19th Century may be unimaginable for some readers. It took less than a generation to destroy a livelihood, an ecology, that had existed for thousands of years. Apocalypse, slaughterhouse, carnage – those are Savage's words for describing the maelstrom that swept across the North American plains. "If one buffalo were magically to reappear on the Great Plains every minute, nonstop round the clock," she writes, "it would take almost sixty years to restore the population to its historic numbers." That's how long it would take to raise the 30 million buffalo from the open graves the pemmican, buffalo robe, and leather trades put them in.

The costs to First Nations peoples of this de facto extinction of their "means of survival" and the Canadian government's complicity in compounding their misery are detailed meticulously. Savage again is evocative and eloquent in depicting the melancholy this human tragedy left in the prairie's memory. Here is her description of Cypress Lake, the site of the hunger camp where the peoples led by Piapot, The Man Who Took the Coat, Little Pine, Lucky Man, and Big Bear, eked out a miserable existence from the winter of 1881 until the spring of

1883 when the government banished them from the Cypress Hills to faraway reserves:

The atmosphere is thick with silence, and when you move, you seem to leave ripples in your wake. You might be swimming through quicksilver. And this unearthly mood is not quite broken by the delight of watching butcher birds – rare loggerhead shrikes – plunging from the trees to the ground to catch grasshoppers, which they then stuff, one by one, into the beaks of their insatiable young. The heaviness doesn't even lift entirely when you gaze across the lake and discover that the bright dots along the far shore, viewed through binoculars, are actually a flotilla of white pelicans, huge and dazzling in the glimmer. Everything that is here carries an echo of something that is not. Trapped between lake and sky, this is a world that has been hollowed out.

How was the government complicit in this prairie tragedy? It starved the people until they abandoned their desire to remain in the Cypress Hills. A police physician was appalled by the condition of the roughly 2,000 Indians at the hunger camp; he wrote Edgar Dewdney, the official in charge of the Northwest Territories, that the people camped outside of Fort Walsh were "literally in a starving condition and destitute of the commonest necessities of life." Others, such as the Indian Agent at Fort Walsh, relished in dispensing insufficient supplies to the thousands of people gathered at the hunger camp. In the winter of 1882 he told Dewdney: "I know they are not getting enough

flour but I like to punish them a little.”

By the spring of 1883 Canadian officials had accomplished through this strategy what their American counterparts achieved through the Indian Removal Act of 1830. That Act was the precursor to “The Trail of Tears,” the forced relocation of Indian nations from the southeastern United States to eastern Oklahoma. A Canadian Trail of Tears started in the Cypress Hills and ended in reserves to the north and the east.

Some might be surprised that Savage doesn’t condemn, as Stegner did, those who slaughtered the buffalo destroyed their way of life. I suspect this is because Savage

doesn’t believe the generations, including our own, who succeeded the 19th century Métis hunters, wolfers, and whiskey traders occupy a moral high ground. Don’t we largely privilege market forces at the expense of other considerations even if this means losing hundreds to thousands of species every year? Hasn’t our civilization’s love affair with “the market” helped raise the spectre of species-threatening climate change?

Lyrical and poignant, *A Geography of Blood* is ultimately hopeful. To help tell the stories of those persecuted in the Cypress Hills Savage seeks the help of their descendants. Expecting bitterness, mistrust, and hostility from the Nekaneet First Nation she finds assistance and

partnership. There is the possibility of talking and perhaps of reconciliation between the white settler and native solitudes that featured in her life growing up in the Peace River country, that was established and enforced by the treaties, and that remains part of contemporary life. Most importantly, I think, Candace Savage’s voyage of discovery opens our eyes to the possibility that, by removing our cultural and societal blinkers, there’s still time to appreciate what the land itself may teach us. The prairie landscape and those who inhabit it would be the better for it. 🍀

LETTERS TO THE EDITOR

REGARDING DAVID SUZUKI’S COMMENTS ON IMMIGRATION

In early July Dr. David Suzuki gave an interview to the Parisian newspaper *L’Express*. Near the end of the interview, an interview devoted largely to the topic of climate change, Suzuki was asked what he felt about Australian environmentalists who were opposed to immigration on the grounds that Australia’s natural resources cannot sustain population growth.

Suzuki, according to the *Huffington Post*, responded as follows: “Oh, I think Canada is full too! Although it’s the second largest country in the world, our useful area has been reduced,” Suzuki said. “Our immigration policy is disgusting: We plunder southern countries by depriving them of future leaders, and we want to increase our population to support economic growth. It’s crazy!”

Suzuki added he felt Canada had a responsibility to take in people who cannot survive elsewhere: “Canada should always open its

doors to those who are oppressed or in cases of emergency,” he said. “When Canada offered refuge to 50,000 boat people in Vietnam in the 1970s, I was particularly proud to be Canadian.”

Jason Kenney, days before leaving his post as Canada’s Immigration Minister, tweeted that he found Suzuki’s views “toxic and irresponsible.” Some media outlets criticized Suzuki for his remarks. Dr. Lu Carbyn’s letter below strongly supports Suzuki’s position.

- Ian Urquhart

I totally agree with Dr. Suzuki’s comments about immigration. Canada needs no more immigrants. Alberta needs no more immigrants. We are rapidly exceeding carrying capacity if we are at all interested in the environment. It is not only a Canadian problem it is a problem

worldwide.

David Suzuki was quoted as having said that Canada has had its fill of immigrants (our population is reaching its maximum capacity) and that it was “disgusting” that a rich country such as Canada plunders southern countries by depriv-

ing them of future leaders. Canada’s former immigration minister Jason Kenney calls that “xenophobic.”

The fact of the matter is that the world’s population is

booming and is likely to reach 9 billion by 2050. Worldwide, that is putting a tremendous stress on both the human environment – famine, pollution, flooding, rising sea levels, climate change and the natural environment. Why have there been TWO catastrophic (once in a century type floods) happening in southern Alberta within a seven-year span? We cannot say for sure, but climate change is a strong possibility. Furthermore, ever increasing human numbers are destroying the natural environment – species extinction, pollution, ocean acidification, and widespread global weather changes. It is an assault on the world’s resources and on humanity. Certainly there are some hopeful signs that modern technology is helping to reduce , slow down or even, in some cases, reverse some of the negative trends. However, the overall trend is very worrisome.

Let us look closer at Edmonton. Look at the urban sprawl along the southern edge of the city –mass destruction of wetlands, agricultural areas, woodlands, and increases in air pollution and traffic jams during rush hour. That is a direct result of population growth. It also is a direct result of the politicians’ clamour for jobs, jobs, and more jobs. People need amenities and they demand the best no matter where it’s produced. Where does much of the best come from? Mexico, Central America, and other places. Most of us drink coffee – more people, more coffee. That means greater destruction of rainforests – one of the “lungs” of the world.

It isn’t hopeful to read about the predicted mass extinction of one of our most sensitive indicators of environmental health – birds. Birds are one of the best indicators on

the changing state of biodiversity on the planet. In a new State of the World’s Birds report, released at this year’s BirdLife World Congress held in Ottawa, it was concluded that 1,313 species (12 % of the world’s bird species) are at risk of global extinction. Burgeoning human populations are at the root of this threat. Canada could lead the world by example and follow Suzuki’s suggestions. We should at least start a debate on the advisability of continuing to promote human population growth in our country. Such Canadian leadership can start by taking a very hard look at the rapid proliferation of the oil sands activities. Oil sands need workers. Workers are brought in from around the globe. Yes, maybe we need that oil, but do we need to extract it as fast as possible? It is not going away, so why the rush?

I drive a car to work. Yes, I like fruit from South America, and I drink at least two cups of coffee a day. There is no need to change everything about us (I am not going to) – but I submit there is a need to stabilize the world’s human population so that future generations will have a healthier world to live in. Suzuki is right on when he infers that professional people are needed to solve the problems faced in underdeveloped parts of the world. It is selfish for us to lure them away from their home countries, developed or undeveloped. It has nothing to do with racism. Immigrants are immigrants, whether they come from India, Africa, China, France, Germany, or England.

Obviously these are strong statements and I am not implying that we should introduce draconian measures to enforce such rules at all times. There are naturally humanitarian reasons where flexibility and good judgment should be

applied. However, Suzuki is saying Canada should look at its policies on these matters and I agree. There is nothing unreasonable or small-minded about Suzuki’s statements. They are just good, plain common sense. Maybe once Edmonton’s flood plains get inundated with water every few years we might see the wisdom in Suzuki’s “xenophobic” ideas in getting our house in order.

- Lu Carbyn, Edmonton, Alberta



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**TALK: GET THE BUZZ
BY MEGAN EVANS
TUESDAY NOVEMBER 4, 2013**

Megan Evans has recently completed a Master of Science at the University of Calgary. Her Master's project involved studying the effects of grazing on floral resources and bees in southwestern Alberta. She will be sharing her results from this study along with some general bee ecology and conservation issues facing bees today.

LOCATION: 455 – 12 Street NW, Calgary
DOORS OPEN AT 7:00 p.m.
TICKETS: \$5.00
REGISTRATION: (403) 283-2025
ONLINE: www.AlbertaWilderness.ca/events

**MUSIC FOR THE WILD
SATURDAY NOVEMBER 23, 2013**

DOORS OPEN AT 7:00, music at 7:30
TICKETS: \$20
PRE-REGISTRATION REQUIRED: (403) 283-2025

GO ASK EARL

One of Calgary's top bluegrass bands with hot instrumentals, tight harmonies, and a blend of traditional and original songs. Go Ask Earl is made up of Brad Lindberg (banjo, vocals), Jack Loree (dobro), Bruce Leinan (fiddle, vocals), Carolin McBrien (guitar, vocals), and Keith Uyeno (up-right bass, vocals). For a taste of what Go Ask Earl will be serving see <http://www.youtube.com/watch?v=TcmfT7vnU4Q>.

OPENING ACT

Allan & Arnell: Jane Allan and Lance Arnell
<http://www.youtube.com/watch?v=1wSzKJYqOMM>

**TALK: COME HELL & HIGH WATER
BY ROBERT SANDFORD
TUESDAY NOVEMBER 26, 2013**

Robert Sandford is the EPCOR Chair of the Canadian Partnership Initiative in support of United Nations "Water for Life" Decade. He is an internationally respected expert on water-related climate policy and will be exploring the recent flooding in Alberta and changes that need to be made to enhance human resilience to accelerating hydro-climate change. Copies of his new book "Saving Lake Winnipeg" will also be available for purchase and signing.

LOCATION: 455 – 12 Street NW, Calgary
DOORS OPEN AT 7:00 P.M.
TICKETS: \$5.00
REGISTRATION: (403) 283-2025
ONLINE: www.AlbertaWilderness.ca/events

**CHRISTMAS MEMBERS'
MUNCH AND MINGLE
EDMONTON**

Details to Follow

We are planning an excellent evening of conversation, good company and time to review AWA's year and plans for 2014

Watch your email for details of this event.

**SSRP
TIME TO SPEAK UP!**

Check out our website
www.AlbertaWilderness.ca

for a quick link to pages with details of when and where sessions will be held, how you can participate, and the comments AWA has on the Draft Plan. This is your chance to be part of land use planning in Alberta.



Sage-grouse have been endangered for many years but governments have done very little to eliminate human disturbances in critical sage-grouse habitat.



[www. AlbertaWilderness.ca](http://www.AlbertaWilderness.ca)

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