



ENVIRONMENTAL GROUPS READY TO ABANDON “SHAM” CONSULTATION PROCESS

By Andy Marshall



Disgust by environmental groups over Alberta's public consultation record has reached such a pitch that some, including the Alberta Wilderness Association, have decided to withdraw their involvement in these processes unless there are direct strategic advantages in doing otherwise.

The expected announcement soon by the provincial government of a new management plan for the Bighorn recreation area, which conservationists fear will destroy existing protection policies for significant pristine wilderness there, is the latest fallout from a process they believe isn't worth their time or effort.

They also cite other recent actions that they contend show how little the government cares for conservationist input, including the following:

- The failure of the government to implement the Alberta Forest Conservation Strategy even after it was accepted by the interested parties involved, including industry representatives.

- The abandonment of recommendations on the Water Act.
- The circumvention without proper consultation of an Integrated Resource Plan (IRP) created after four years of effort for the Fort McMurray-Athabasca oil sands subregion.
- The refusal by the province to heed consensus proposals under the Special Places process.

But at least one government member is urging the AWA and other groups to reconsider their position and to modify their “all or nothing” attitude to get their way when competing interests have to be balanced. A forest industry official also warns that the industry could be hurt without groups such as the AWA at the table.

“Most government-led processes are a sham, and it's getting worse,” says AWA President Cliff Wallis, now looking forward to refocusing the AWA's energy on a marketplace strategy that encourages consumers to pressure industry to abandon unsound operating practices.

Peter Lee, once a government employee and now active with Global Forest Watch in Canada and with World Wildlife Fund, says the new mindset of refusing to be co-opted by the Alberta government's and industries' all-out-for-development agenda is

INSIDE

Reinventing Integrated Resource Management	4
AWA Founder's Legacy Shines Bright	9

Alberta Wilderness Watch

The Bighorn Wildland - An ABSRD Process	10
Water and Wildlife to Suffer in Bighorn	11
Reclamation of ATV-Abused areas in the Bighorn	12
Letter to MLA re Bighorn	13
Halsey Report - McClelland Lake Patterned Fen	14
AWA Working With Shell - What's Going On?!	16
AWA Opinion on Softwood Lumber	17
Game Farm Dilemma - Illegal Trade Revealed	17
The Truth About Convention Centres in National Parks	18
Natural Resource Defense Council Visits Alberta	19
Profile: Ken Ferris	20

Association News

Scenes from Summer Hikes 2002	21
Staff Profile: Philip Clement	21
Annual Lecture: Post Cowboy Economics with Dr. Thomas Power	22
Open House Talks Program	23



Contemplating the Whaleback

(C. Wallis)



like leaving an abusive relationship. "It means you only tackle things when you can set the agenda," he explains.

While he doesn't believe the government will shed many tears over the environmental groups' decision, he foresees embarrassment if a strategic effort is made through an organization like the Alberta Environmental Network to highlight here and beyond the province's borders this huge rift.

"Alberta's poor environmental record is becoming internationally prominent," Lee says, noting that a recent *National Geographic* article pointing out the province's weak protection of its boreal forest is an example of the kind of international opprobrium the province can expect. "Alberta is a potential mecca for environmental advocacy. If you want to be an environmental advocate, you could not find a better career than here."

"The process here is totally corrupt. The government has no credibility with environmental interests," says Richard Schneider, executive director of the Alberta Centre for Boreal Studies. "There's no point in going forward with other issues. We won't engage in other processes."

Schneider played a role in the Alberta Forest Conservation Strategy, achieved after strenuous efforts from all the various stakeholders to agree on new forestry management practices. Instead, Alberta Sustainable Resource Development ignored the findings and produced its own report, a move that shocked even those outside the conservationist movement.

"There are a number of examples where industry and environmentalists have agreed on something, but the government has gone the other way," says Richard Roberts who has worked to improve public consultation through his private company, Praxis. It has done some government work. "I don't understand or know why this has happened," he says of the government record.

"Expectations were raised for the forest conservation strategy. I understand their [the environmental groups'] frustrations," says Bob Demulder, director of forestry for the Alberta Forest Products Association. "We had different expectations, too. It's my experience that these things go back to government and take on their own life."

If groups like the AWA won't now participate, though, "it definitely weakens the process. If we're going to find some balance, we need them at the table."



AWA public forum in Sundre for Bighorn Wildland

(N. Douglas)

The Association is also aware of the potential impact on the industry of environmental groups' new marketplace strategies. For example, lumber certification, only

granted to products from companies adhering to conservationist principles, "is a remarkable tool," says Demulder. "The certification system is almost surpassing government regulation in forcing industry to update," he adds. "If the marketplace says 'we demand certifiable forest products,' we'll have to deliver or go out of business."

The AWA's Wallis confirms groups must exploit the vulnerability of companies in the marketplace. For example, with the government expected to reverse its Eastern Slopes protection policies and allow drilling by Murphy Oil in the critical wildlife habitat zone of Blackstone-Wapiabi in the Bighorn area, efforts will be directed at educating consumers at the retail end (Murphy is partnering with Walmart to sell its refined petroleum products) as to where products come from.

"We will play on that, we have to," says Wallis. The AWA has also launched a national newspaper advertising campaign aimed at what it calls the government "dismantling" of the Eastern Slopes policies in the Bighorn.

Meanwhile, Calgary Mountain View MLA Mark Hlady urges the AWA to participate further in the Bighorn management process. In his position as chair of the standing policy committee on energy and sustainable development, he has been part of that process too.

"They [the AWA] have chosen to be extreme in their position. I'm disappointed they're not looking for a balance at all," he says. "I would like them to be positive and part of the solution. I don't want them alienated out by themselves."

Aside from their opposition to oil and gas activity in critical wildlife areas of the Bighorn, conservationists are particularly frustrated over the apparent recognition of off-highway-vehicle (OHV) and snowmobile trails in prime protection zones that are supposed to be protected under the Eastern Slopes Policy.

Snaith, representing the AWA in the Bighorn meetings earlier this year, says it was obvious from the beginning the government had already made up its mind the trails would be included in new plans for the area. When people suggested industrial surface access should not be, the response from government officials was that they didn't want to hear that, according to Snaith. "It came up every meeting."

When a majority of participants in a vote even supported a ban on OHV trails, the government responded instead with maps that showed the trails, she explains. One condition on which the AWA joined the Bighorn process was that Eastern Slopes policies be upheld and scientific studies could be brought to the table. "Neither of these things happened," says Snaith. "The process was only made to *appear* as though the government was consulting the public. We will have to decide whether it's worth participating in further Government-led processes in the Bighorn."

But with estimates of between 40,000 and 100,000 OHV owners in the province, "you have to have some place for these people to use. You can't sterilize completely . . . you can't allow nothing there unless you're walking," Hlady says. The new government plan includes a management structure dealing with the maintenance of trails and enforcement of keeping people on the trails. Some trails will even be closed, he says.

With Calgary and other large populations close to the Bighorn, "we didn't have a structure before to manage that area," explains Hlady. "Now we do. We need input from groups like the AWA to be positive and proactive in regards to managing it."

The government has to strive for balance between competing interests, he says. But "one group's position of balance is zero, nothing. The government has a considerable interest itself in maintaining the integrity of wilderness areas. Tourism and the environment are special to this government," he says.

With regards to oil and gas activity in the Bighorn, Hlady notes that new seismic and drilling technology can greatly minimize the physical impact.

"If most of our reserves are under the Eastern Slopes, do we say 'OK, we no longer have an oil and gas industry'? I don't think Albertans would stand for that. And that's our challenge as a provincial government: To find the balance and to make sure we maintain and protect our environment."

"The Eastern Slopes Policy was the balance between competing land uses," says AWA's Snaith. "There's plenty of room in Alberta for oil and gas and OHVs without entering the few bits set aside for conservation. We are not suggesting that walking be the only access in the Bighorn, we just want the current policy to be enforced, and that means no OHVs. The Eastern Slopes Policy is about protecting our watersheds, our water. When the policy was written, Albertans were asked what they thought, and it was clear they thought water should have priority."

Hlady did not want to comment on the forest conservation issue. But on Special Places, he notes that 13 per cent of the province's land mass is protected under that program. "More land is protected in Alberta than anywhere else in Canada as a percentage of the land mass."

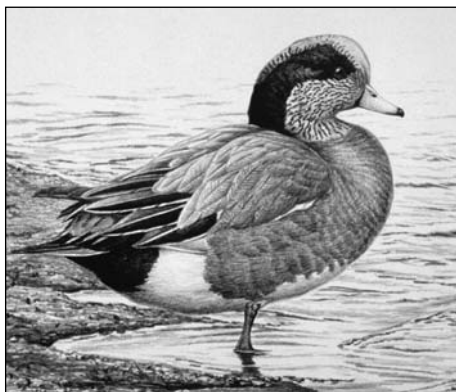
While the conservationists' complaint about the Bighorn process is that it was biased from the start (stacked with government bureaucrats sticking to their predetermined agendas, according to Wallis), the disenchantment regarding the forest conservation strategy was that the government ignored what conservationists considered a reasonable process.

The decision not to implement the strategy was a clear dismissal of the public's will, says Schneider. Junking an agreed-to strategy that would preserve the ecological diversity and integrity of forests after harvesting, the government retained the obsolete principles known as sustained-yield management, he says. Under this method, clearcut areas are replaced with just one species of tree, with little or no regard to maintaining the diversity of an area.

"It seems inconceivable that the government could so blatantly disregard such a clear mandate for change," Schneider says in a published paper on the issue.

After four years of work by environmental groups, industry and other interested parties, clear guidelines were set up for the Fort McMurray-Athabasca oil sand subregion IRP. The guidelines included prohibitions on oil sands development on or adjacent to wetland fens. Following an application by TrueNorth

Energy to proceed with a major oil sands mining development in the Fort Hills near Fort McMurray that would have serious implications for the McClelland Lake Wetland Complex,



American Widgeon

© Ken Ferris

the province quietly amended the IRP guidelines to allow for such development.

Scientist Richard Thomas calls McClelland Lake one of Alberta's natural heritage jewels. In a report for the August 2002 *Advocate*, Thomas has scathing words for Alberta Sustainable Resource Development for "succumbing to political pressure" to initiate the amendments. Thomas is also very critical of the Energy Utility Board (EUB) hearings in the summer into TrueNorth's application. The board panel appeared to signal a clearly predetermined, pro-development outcome for the hearing.

"The panel's performance made me feel ashamed to be an Alberta taxpayer," he says.

Peter Lee agrees the EUB and the Energy Resources Conservation Board (ERCB) processes are "totally oriented to project approval." With applicant companies able to muster small armies of lawyers and so-called experts, it is intimidating for anyone else to participate, let alone voice opposition. "Even though the government says there are opportunities for the public

to register their concerns, it's not a level playing field . . . you are not dealing with an unbiased process."


Not all environmental activists are so unequivocal. Even Martha Kostuch, known for her hard-nosed approach for more than two decades, says the EUB is probably better than many other jurisdictions in the world. Their drawback is not allowing general public interests to be represented. Only parties with direct interests can make

presentations.

Kostuch also has some positive thoughts about other government processes. The Clean Air Strategic Alliance (CASA) process on gas flaring successfully led to the energy industry having to reduce emissions. She is optimistic about a planned second go-around with more stringent targets in sight. She also speaks well of hearings into electrical generation emissions. "There's commitment at a high level in government," she says. "With clean air, maybe the government sees things easier."

On the other hand, the water strategy was an "awful process," Kostuch says. The government ignored all the results of the consultations. Environment Minister Lorne Taylor then launched a new water strategy this year that ignored all other processes under way through various river basin committees. The questions for discussion in public meetings for the new water strategy have also met with widespread scorn because they appeared to lead to predetermined, simplistic answers.

Roberts from Praxis says his company had a good experience with its review on Kananaskis Country. When the province asked the company to take on the job, Praxis insisted on a free hand. It went out of its way to produce unbiased materials and survey questions and to involve as much of the general public as possible. It also insisted on writing the final recommendations to government. Prime among these was that no more large-scale development should be allowed in Kananaskis Country, which the government agreed to. "Everybody was quite happy with the outcome, except for a few developers."

AWA Director Vivian Pharis demurs. What the government came out with in the end was a six-page, typically poorly written document, she says. For a document that guides us into the future, "it is weak." 



Red-Bow Regional Watershed Partnership Conference, Strathmore, 2002

(N. Douglas)



REINVENTING INTEGRATED RESOURCE MANAGEMENT IN ALBERTA: BOLD NEW INITIATIVE OR 'DÉJÀ VU ALL OVER AGAIN'?

By Steven A. Kennett

Introduction

Resource-use conflicts and concerns with cumulative environmental effects have led to renewed interest in integrated resource management (IRM) in Alberta. The latest IRM initiative can be traced to *Alberta's Commitment to Sustainable Resource and Environmental Management*, a policy statement released in March 1999. This initiative has included the creation of the Integrated Resource Management Branch within Alberta Environment and support for prototype "regional strategies" as mechanisms for developing and implementing IRM.¹

IRM has currency outside of government as well. Key industrial players are involved in the Integrated Landscape Management program of the Alberta Chamber of Resources.² Leaders in the agricultural community have identified the need for better integration of decision-making through a provincial land-use strategy.³ Environmental organizations, while for the most part skeptical of current government initiatives, have repeatedly called for changes in environmental and resource management that are consistent with IRM.⁴

Scientific and technological advances are another important part of the IRM picture. The landscape-level implications of the current pace, scale and intensity of development are clearly shown by the ALCES model—A Landscape Cumulative Effects Simulator—developed by Dr. Brad Stelfox of Forem Technologies.⁵ Widely used by industry and government in Alberta, ALCES dramatically increases the ability of land and resource managers to identify, predict, explain and, presumably, address cumulative environmental effects across what Stelfox refers to as "meaningful space and meaningful time."⁶ An Industrial Research Chair in Integrated Landscape Management, held by Dr. Stan Boutin, has been established at the University of Alberta with support from industry and government.⁷ The Alberta Research Council has also identified IRM as a priority.⁸

Taken together, these developments constitute an unprecedented alignment of government policy direction, stakeholder interest, technical capacity and scientific knowledge in support of a more integrated approach to environmental and resource management in Alberta. Perhaps the time has finally come to make IRM a reality?

Amid the current enthusiasm for IRM, it is worth noting that this concept is not new. IRM was explicitly promoted as a cornerstone of environmental and resource management in Alberta throughout much of the 1970s and 1980s. By the mid-1990s, however, the limitations of this IRM policy were

increasingly evident and support for it had eroded both within and outside of government. When evaluating the prospects for IRM in Alberta, the uneven record of past efforts to achieve integration is instructive.

This article examines the current IRM initiative in light of key lessons from the past. On this basis, it identifies specific criteria for assessing the strength of the Alberta government's commitment to IRM and the likelihood that its new IRM policy will yield significant and durable improvements to environmental and resource management. A more detailed examination of these issues is found in a paper entitled *Integrated Resource Management in Alberta: Past, Present and Benchmarks for the Future*, published in February 2002 by the Canadian Institute of Resources Law.⁹

Lessons from the Past

IRM is an idea with a relatively long history in Alberta. Its origins go back to 1947, when the governments of Canada and Alberta established the Eastern Rockies Forest Conservation Board. The integrative capacity of this Board diminished over time, however, as the Alberta government increased its control over resource development.¹⁰ By the early 1970s, the results of sectoral fragmentation in resource management were evident as development pressures increased

and significant land-use conflicts emerged.

The catalyst for action was a report by the Environment Conservation Authority in 1974 that identified an urgent need for strong and effective land-use policies to improve coordination in provincial resource management.¹¹ In response, the Alberta government initiated the integrated resource planning (IRP) process for public lands, adopted the Eastern Slopes Policy, and created the Resource Evaluation and Planning Division within the Department of Energy and Natural Resources.

IRM was actively promoted as government policy from the mid-1970s until at least the early 1990s. For example, a document entitled *Alberta Public Lands*, published in 1988, affirmed that "integrated resource management has been established as the fundamental approach to decision-making for public lands and resources of Alberta."¹² IRPs were the principal instruments of this IRM policy.

A government publication released in 1991 explained the role of IRPs and outlined the stages of the planning process—from resource inventories and initiation, through the plan development and approval processes, to final implementation and monitoring.¹³ The responsibilities of government departments and the opportunities for stakeholder participation



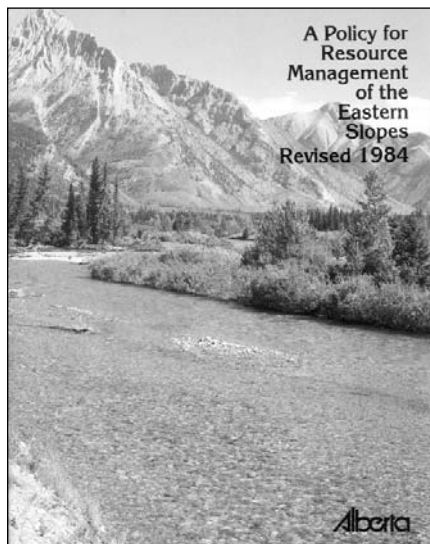
Gas well in foothills

(C. Bruun)



were also described. The document concluded with the observation that “Alberta’s integrated resource planning process is recognized by both government agencies and the public as being an effective decision-making mechanism for the management of public land and resources.”¹⁴

This optimistic assessment was not borne out by the reality of environmental and resource management in Alberta throughout the rest of the 1990s. The IRP process lost political support and momentum, and was eventually starved of resources.¹⁵ IRPs were not systematically updated and their coverage was never extended, as had been promised, to all public lands in the province. The Resource Planning Branch disappeared in a series of departmental reorganizations that continually destabilized environmental management within the Alberta government. In fact, land-use planning was for a time effectively removed from the environmental and resource management lexicon in Alberta in response to an ideology of deregulation and government “down-sizing.”



There is no doubt that IRPs, the Eastern Slopes Policy and other components of IRM that date to the 1970s were progressive in their time. A strong case can be made that they resulted in better decision-making than would have occurred in their absence. Nonetheless, it became increasingly clear throughout the 1990s that IRM and the IRP process as implemented in Alberta were inadequate to address the growing pressures on the province’s land and resource base.¹⁶

In particular, the multiple-use orientation and reliance on zoning in IRPs made these plans of limited assistance to decision-makers faced with intensifying resource-use conflicts and concerns with cumulative environmental effects.¹⁷ The IRP process and the policy commitment to IRM also lacked the ability to withstand countervailing pressures from within and outside of government.

While the definitive analysis of the rise and fall of Alberta’s IRM policy and IRP process has yet to be written, it is possible to identify two key characteristics of this experience that yield important lessons as Alberta embarks on another IRM initiative. These characteristics contributed to the inability of IRM to meet the new challenges of environmental and resource management and sustain support and momentum over time.

The first notable feature of the earlier IRM policy was its failure to penetrate to the structural level of legislation, institutional arrangements and decision-making processes. IRM was pursued within a pre-existing legislative and policy framework that was never systematically reviewed and amended in order to achieve structural integration. The IRM policy and planning veneer could not, in the end, conceal the fact that Alberta’s regime for environmental and resource

management remained structurally fragmented along numerous sectoral and administrative fault lines.

The focus of IRM on coordinating—as opposed to truly integrating—sectoral resource management meant that it was an “add-on” rather than a core mission for key decision-makers. Furthermore, this policy overlay cut, in important respects, against the institutional self-interest and sector-specific mandates of the departments and agencies whose behaviour it was intended to modify. Since IRM was not internalized in decision-making through structural change and lacked a powerful institutional champion, it was vulnerable to ideological opposition, interest group pressure and funding cuts.¹⁸

Furthermore, the failure of IRM to achieve structural integration may help to explain the difficulty in moving beyond the “multiple-use” paradigm that promises all things to all people. The generality of many IRPs is consistent with a process that is capable of aggregating, but not integrating, land-use objectives. The IRP process apparently lacked the integrative mechanisms that are necessary to address cumulative effects and reconcile competing demands on land and resources within overall landscape objectives and constraints.

The second key characteristic of the experience with IRM was the absence of a developed legal framework for IRPs. Flexibility, not certainty, was the hallmark of land-use planning in Alberta. The entire legal basis for the IRP process is a few words in section 10 of the *Public Lands Act* that enable the minister to “classify public land and declare the use for which he considers different classes to be adaptable.” The Eastern Slopes Policy, as revised in 1984, includes statements that it is “sufficiently flexible so that all future proposals for land use and development may be considered” and that “no legitimate proposals will be categorically rejected.”¹⁹ Furthermore, the absence of legislative planning requirements made it easy to scale down the process and allow IRPs to become outdated without triggering accountability mechanisms.

These features of past IRM policy are significant for the current initiative for two reasons. First, a failure to address structural fragmentation and provide a legal framework for land-use planning is likely to reduce the effectiveness of the initiative and increase its vulnerability to the inevitable resistance from sectoral and administrative interests. Second, an unwillingness to act decisively in these areas may signal a lack of commitment on the part of the government to take IRM principles to their logical and necessary conclusions for environmental and resource management.



Logging

(C. Bruun)



IRM Today

Alberta's Commitment to Sustainable Resource and Environmental Management (the Commitment Document) identified IRM as one component of the government's overall approach to sustainable development.²⁰ Interdepartmental coordination and comprehensive planning processes were noted as mechanisms for improving integration in decision-making across a broad range of land and resource uses. The government also affirmed the need to ensure that its policies, laws and regulations "reflect the principles of sustainable development and integrated resource management."²¹ The Commitment Document did not, however, contain a detailed roadmap for achieving IRM in Alberta.

In the three years since the Commitment Document was released, the Integrated Resource Management Branch has held stakeholder workshops and issued publications that explain IRM principles and highlight efforts to promote IRM within Alberta.²² Government and other stakeholders have devoted considerable effort to pilot "regional strategies" in the Northern East Slopes and Athabasca Oil Sands areas of the province.²³ These measures have increased awareness of IRM, but have not yet resulted in either a detailed template for IRM in Alberta or a comprehensive implementation plan.

Regional strategies have a central role in the IRM initiative. A draft document entitled *Regional Strategies for Resource and Environmental Management: An Alberta Framework* (the Draft Framework), was released in January 2002 in order to establish "provincially consistent direction on the content of regional strategies and on the process to be used in developing them."²⁴ The Draft Framework identifies the role of regional strategies as providing a bridge between the legislation and policies that apply throughout the province and the operational plans and regulatory approvals that are the practical tools of resource and environmental management. It notes, however, that the final strategy documents are to be statements of policy, intended to guide—but not "fetter"—operational decision-making.²⁵



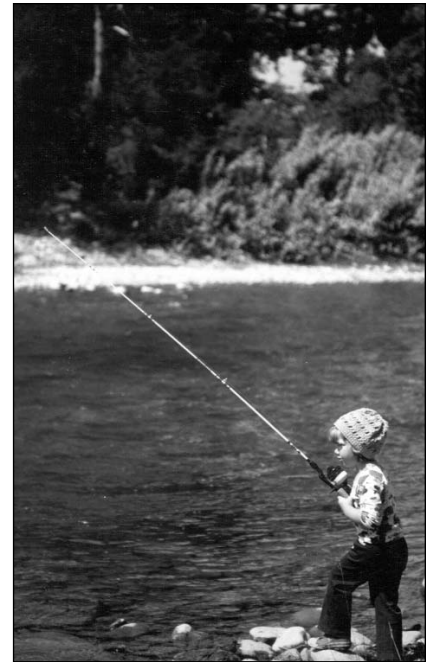
Trail Riding Ya Ha Tinda, 1991

(R.P. Pharis)

While the Draft Framework contains a reasonable level of detail regarding the procedural and substantive characteristics of regional strategies, three important issues receive a more cursory treatment:

- (1) the broader context for regional strategies;
- (2) the formalization of comprehensive regional planning; and
- (3) the implementation of IRM at regional and provincial levels.

First, it is evident that provincial legislation and policy will define, in important respects, the context within which regional strategies will be developed and implemented. The Draft Framework briefly describes this context, but does not discuss fully its implications. A key question for IRM is the extent to which meaningful integration can be achieved through improvements in operational coordination and "on-the-ground" management practices at the regional level.



Fishing

(K. van Tighern)

The importance of this issue is acknowledged in a key passage in the Draft Framework:

Many of the current laws and policies were developed independently of one another for different purposes. This makes achievement of broad, integrated goals difficult and results in overly complex decision processes. The Alberta government is committed to reviewing the entire policy and legislative context for resource and environmental decision-making. Where inconsistencies and conflict among policies and legislation surface during regional strategy development, they will be identified for resolution in the provincial process.²⁶

The IRM initiative is therefore poised to expand from a primary focus on regional strategies to include an examination of provincial legislation and policy. To date, however, no details are available regarding this provincial process and the extent to which it will be coordinated with the development of regional strategies.

A second issue that warrants more attention is the formalization of land-use planning. To be effective, IRM must be a process rather than a "snapshot." While some elements of planning through regional strategies are set out in the Draft Framework, the ongoing planning and adaptive management processes that are essential for IRM are not described in detail. Furthermore, there is no indication that these processes will be formalized through legislation or given a powerful institutional champion within government.

A third issue requiring elaboration is the implementation of regional strategies. The Draft Framework notes that "past planning programs often failed because of inadequate attention to their implementation."²⁷ Regional management systems are identified as the mechanisms to oversee the implementation, monitoring and maintenance (i.e., review and amendment) of strategies and to address new issues as they arise. The design of these systems, however, is characterized as a "work in progress."²⁸ The Draft Framework indicates that they may be examined as part of the provincial regulatory review.



The ultimate success of IRM depends on effective implementation. Lack of detail on this point is, therefore, a concern—particularly when the entire IRM initiative to date relies on policy commitments and planning processes that lack well-developed legal and institutional underpinnings. The risk is that regional strategies as integrative mechanisms will be subordinate to legal mandates, regulatory regimes and management priorities that do not fully reflect the principles and operational requirements of IRM. For example, the pivotal role envisaged for interdepartmental Environmental Resource Committees consisting of regional managers may be undermined if the organizational structure of line departments fosters a sectoral mentality and if key decisions on matters such as resource dispositions and project approvals are made elsewhere without due regard to IRM objectives.

Alberta's IRM initiative has now entered a critical stage. Its success will depend in part on the steps that are taken to refine and implement policy guidelines for regional strategies.²⁹ The next version of the Draft Framework, due before the summer, should provide some indications of the government's intentions in this regard.

Additional guidance should be forthcoming from the final report of the Northern East Slopes Strategy, expected by the end of 2002. Progress on regional strategies, however, will not by itself deliver IRM. How the IRM initiative unfolds in other areas will be equally important.

Benchmarks for the Future

The principles and objectives guiding Alberta's current IRM initiative are a good basis for progress, as is the Draft Framework. In particular, there are indications that some of the principal deficiencies of IRPs may be addressed in the regional strategies. References to landscape objectives and environmental thresholds, for example, are encouraging.³⁰

Nonetheless, the similarities with Alberta's earlier IRM policy and with the IRP process are striking—and worrying. IRM thus far remains a policy process that is directed to improving integration in environmental and resource management but that does not address the root causes of fragmentation within legislation, institutional arrangements and decision-making processes. The lessons from the past suggest three principal benchmarks for the current IRM initiative.

The first benchmark is implementation of the commitment in the Draft Framework to review "the entire policy and legislative context for resource and environmental decision-making."³¹ This review should provide a detailed and comprehensive assessment of Alberta's current regime from the perspective of IRM. In particular, one would expect a review process with broad terms of reference, high-level political and interdepartmental support, a solid analytical component, and effective mechanisms for involving key stakeholders.

This legislative and policy review should lay the groundwork for tangible progress towards structural integration, the second significant benchmark for IRM. Alignment of legislation, institutions and decision-making processes with principles of IRM will be a complex task that

will take some time to complete. Nonetheless, a clear plan of action and decisive steps in this direction are essential if the current IRM process is to avoid the pitfalls of the past.

Sectoral fragmentation is a key area requiring attention. Decision-making on the basis of narrow sectoral mandates is the antithesis of IRM, yet is institutionally entrenched in the legal regimes and administrative arrangements that govern land and resource use in Alberta. The differences between decision-making processes and standards across industrial sectors and types of land use are well known.

For example, a recently published paper by Monique Ross of the Canadian Institute of Resources Law examines the legislative and policy regimes that govern forestry and oil and gas operations in Alberta.³² This analysis shows that planning requirements, resource disposition regimes, project review processes and regulatory instruments all result in the application of different standards and time frames to activities in these two sectors—despite the fact that these activities occur

on the same land base, contribute to the same cumulative environmental effects, and in some cases impinge directly on each other.

The third important benchmark is the legal entrenchment of land-use planning and the formalization of linkages between planning and other stages of decision-making. Building on the policy direction sketched out in the Draft Framework, next steps could include the following:

- enacting a statutory basis for planning that addresses issues such as the time lines for preparing and revising plans, the rights of interested parties to participate in these processes, information disclosure, and the mechanisms for amending plans and determining whether or not proposed or ongoing activities are in conformity with them;
- ensuring that land-use plans go beyond vague "multiple-use" language and provide clear direction to decision-makers in the form of landscape objectives, indicators, thresholds and other tools for managing cumulative environmental effects;
- establishing a relatively simple hierarchy of land-use policy and planning with a view to promoting certainty and consistency in the relationship between provincial legislation and policy directions, regional planning processes, and planning that occurs through sub-regional and sectoral processes; and
- strengthening linkages between land-use planning, resource dispositions, project review processes, and regulatory decisions—in order to give some "teeth" to planning decisions and to ensure that integration along this axis yields an efficient, transparent and relatively predictable process for environmental and resource management.

Through an appropriate mix of legal and policy mechanisms, a balance between certainty and flexibility in planning can be achieved. Legal entrenchment of planning would increase accountability and reduce the likelihood of *ad*



Motor bikes on Mount Gass, Upper Oldman

(R.P. Pharis)



hoc decisions that undermine the process and make IRM vulnerable to the very pressures of fragmentation and incremental decision-making that it is designed to counteract.

Conclusion

The current IRM initiative could significantly improve the Alberta government's ability to manage cumulative environmental effects and address land-use conflicts. Achieving its full potential, however, will require overcoming the obstacles that hindered past efforts at integration. The disappointing record of earlier IRM policy can be traced, at least in part, to a failure to achieve structural integration at the level of legislation, institutional arrangements and decision-making processes. The weak legal foundations of integrated land-use planning were also a major deficiency.

Tangible progress towards structural integration and the formalization of land-use planning are therefore important benchmarks for IRM. Given the extent and intensity of human activity on the landscape in Alberta and the potential for that activity to produce adverse ecological impacts and resource-use conflicts, there is every reason to hope that these benchmarks will be reached. Progress towards sustainable environmental and resource management in Alberta requires a bold IRM initiative that responds to the lessons from past attempts at integration. Without attention to these lessons, there is a risk that the end result of efforts to reinvent IRM will be little more than "déjà vu all over again." ❧

(Mr. Kennett is a Research Associate at the Canadian Institute of Resources Law. The research for this article was funded by the Alberta Law Foundation. This article was originally published in *Canadian Institute Of Resources Law, RESOURCES*, No. 77 – Winter 2002, reprinted with permission. Mr. Kennett is also the author of *Integrated Resource*



Golfing at Mt. Kidd

(AWA files)

Management in Alberta: Past, Present and Benchmarks for the Future, available from the Canadian Institute of Resources Law, 35 pp. 2002. Occasional Paper #11, Phone: 403.220.3200, Fax: 403.282.6182, Email: cirl@ucalgary.ca, Website: www.cirl.ca)

Notes

- Information on the IRM initiative can be found at <http://www3.gov.ab.ca/env/irm/index.html>.
- See <http://acr-alberta.com/Projects/integratedlandscapemanagement.htm>
- Land Use Core Action Team, *Towards the Development of a Provincial Land Use Strategy for Alberta*, Discussion Paper (December 2001). IRM and related issues featured prominently on the agenda at "The Land Supports Us All" Land Use Conference, Edmonton, Alberta, January 14-16, 2002, hosted by the Rural Education and Development Association (www.landuse.ab.ca).
- See, for example, Gail MacCrimmon & Thomas Marr-Laing, *Patchwork Policy, Fragmented Forests: In-situ Oil Sands, Industrial Development, and the Ecological Integrity of Alberta's Boreal Forest* (Drayton Valley, Alberta: Pembina Institute for Appropriate Development, 2000); Alberta Wilderness Association, *Albertans for a Wild Chinchaga*, Canadian Parks and Wilderness Society [Edmonton Chapter], and the Federation of Alberta Naturalists, *Structural Impediments to FSC Certification in Alberta: Overcoming Barriers to Well-Managed Forests* (November 2001) (available at: www.borealcentre.ca).
- See www.foremtch.com.
- Quoted in Andrew Nikiforuk, "Laying Down The Land" (December 2001) *Alberta Venture*, 94.
- See www.biology.ualberta.ca/boutin.hp/boutin.html.
- Personal communication from T. G. Neraasen, 20 February 2002.
- Steven A. Kennett, *Integrated Resource Management in Alberta: Past, Present and Benchmarks for the Future*, CIRL Occasional Paper #11 (Calgary: Canadian Institute of Resources Law, 2002).
- See Pierre Walther, "Against Idealistic Beliefs in the Problem-Solving Capacities of Integrated Resource Management" (1987) 11(4) *Environmental Management* 439.
- Environment Conservation Authority, *Land Use and Resource Development in the Eastern Slopes: Report and Recommendations* (Edmonton: 1974), discussed in Walther, *ibid.*, 441.
- Alberta Forestry, Lands and Wildlife, *Alberta Public Lands* (Edmonton: 1988), 25.
- Alberta Forestry, Lands and Wildlife, *Integrated Resource Planning in Alberta* (Edmonton: Resource Planning Branch, 1991).
- Ibid.*, 21.
- For commentary on the IRP process, see Environment Council of Alberta, *Policy Advisory Committee, Our Dynamic Forests: The Challenge of Management*, A Discussion Paper Prepared for the Alberta Conservation Strategy Project (Edmonton: December 1990), 48; Roger Creasey, *Cumulative Effects and the Wellsite Approval Process*, Thesis submitted to the Faculty of Graduate Studies in partial fulfillment of the requirements for the degree of Master of Science, Resources and Environment Program, University of Calgary, December 1998, 78-80, 155-157; Steven A. Kennett & Monique M. Ross, "In Search of Public Land Law in Alberta" (1998) 8 *Journal of Environmental Law and Practice* 131: 151-159.
- For a summary of commentary on IRM and IRPs, see Kennett, *supra*, note 9, 8-12.
- See Steven A. Kennett, "Cumulative Effects Assessment and the Cheviot Project: What's Wrong with this Picture?" (1999) 68 *Resources* 1.
- See Walther, *supra*, note 10, 339; 444-445.
- Government of Alberta, *A Policy for Resource Management of the Eastern Slopes, Revised 1984* (Edmonton: Alberta Energy and Natural Resources, 1984), iii.
- Government of Alberta, *Alberta's Commitment to Sustainable Resource and Environmental Management* (Edmonton: March 1999), 4.
- Ibid.*, 8.
- See, for example, Government of Alberta, *Highlights of Integrated Resource Management in Alberta – Year 2000* (Edmonton: Alberta Environment, n.d.).
- For information on these initiatives, see Alberta Environment's IRM website, *supra*, note 1.
- Government of Alberta, *Regional Strategies for Resource and Environmental Management: An Alberta Framework*, Release 1 (January 2002), 2.
- Ibid.*, 10.
- Ibid.*, 4.
- Ibid.*, 14.
- Ibid.*, 14.
- Some suggestions for improving the Draft Framework are outlined in Steven Kennett, Monique Ross & Mike Wenig, *Comments on the Draft Provincial Framework for Regional Strategies Release 1 – January 2002*, submitted to Dave Belyea, Integrated Resource Management Division, Alberta Environment (1 February 2002) (available from CIRL).
- Supra*, note 24, 9.
- Ibid.*, 4.
- Monique M. Ross, *Legal and Institutional Responses to Conflicts Involving the Oil and Gas and Forestry Sectors*, CIRL Occasional Paper #10 (Calgary: Canadian Institute of Resources Law, 2002).



Bald Eagle

© Ken Ferris



AWA FOUNDER'S LEGACY SHINES BRIGHT

By Andy Marshall

The sparks flew whenever Bill Michalsky and the other founding members of the Alberta Wilderness Association met in Bill's Lundbreck ranch house living room to plot strategy more than 34 years ago.

"It was definitely lively," recalls his daughter, Sue, barely seven at the time. "But it took them a while from sitting and complaining to coming up with the idea of starting the AWA."

The seemingly thoughtless destruction of the natural world around them by commercial and industrial interests is what fired this group of outfitters, hunters and ranchers to hold that historic formation meeting on June 19, 1968, in Lundbreck. Bill, voted in that evening as first interim president, called it "the continued and often unjustified shredding of our wildlands."

Bill died six years ago at 76, but the urgency of that message fires up the Association and its membership today. The push to preserve valuable wildlands habitat is an even hotter issue today than it was three-and-a-half decades ago.

And an ember of passion still burns in Sue's heart for conservation principles that she attributes to her father.

"He certainly educated a lot of people about conservation," she says. And regarding her own career with the Nature Conservancy of Canada, managing the 13,000-acre Old Man On His Back Conservation Area in southwest Saskatchewan and working on other conservation management strategies, she notes: "Yes. It's completely his influence." One of the main differences between them, though: "His heart was in the mountains, mine is in the prairies."

"There are still times I have conservation-related questions and I think, 'He would know about that,'" she adds. "I wish he were still around."

Both Sue and her older brother Mike, who helps run the Lundbreck family ranch when he's not working as a mechanic there or operating his eco-tourism business in Africa or pursuing his love of photography, spent many of their formative years in their father's company, joining him in the camps on some of his numerous outfitting tours.

"We both grew up to be very close to the outdoors," she says.

Marian, Bill's loving companion for 46 years of marriage, confirms the commitment:

"We lived conservationism." Eight years younger than Bill, she had grown up in the homestead next to Bill's original family place north of Burmis. A year after their wedding in 1949, the couple took over his parents' homestead, which they ran for 11 years before settling on the Lundbreck ranch.

The sixth child of Polish immigrants—his dad worked as a coal miner in the Crowsnest—Bill left school after Grade 8 to become a trapper and learn about ranching. He even honed his skills as a calf roper, travelling the rodeo circuit and winning day money at the 1947 Calgary Stampede. After being awarded his first big game outfitter's licence in 1955, Bill spent the next 36 years guiding throughout western Canada and even into Alaska.



William Michalsky on a trail ride

At the same time, he and Marian devoted their lives to the family ranch.

While he had a particular fascination for bighorn sheep, his interests embraced all aspects of the natural world, whether it was hunting for fossils, photographing the glorious mountain scenery and its inhabitants or writing about his varied outdoors experiences.

"We were always hardworking people," says Marian, also a frequent companion on Bill's outfitting tours, cooking, tending horses and even guiding. "It's a good way of life." While others were inclined to call him Bill or Willie, incidentally, Marian preferred William.

Marian served as secretary for some of the early AWA meetings. She recalls, too, the long sessions until after midnight in their living room, drinking coffee and sometimes beer. People like Dick Pharis and Floyd Stromstedt were among the frequent visitors in the organization's early years.

"It was worth it to go on a trip to eat Bill's wife's cooking," says Steve Dixon, another key artillery in the firepower that propelled the AWA into active existence.

The AWA's early commitment to challenge the Alberta provincial government's perceived preoccupation with economic development over conservationist values put them toe-to-toe with politicians like Social Credit premier Harry Strom, and later the new Conservative star, Peter Lougheed.

"My father wasn't a big fan of politicians," laughs Sue.

But he possessed the style reminiscent of many of the old-time ranchers. "He wasn't great at addressing a crowd, but he could talk to anybody. He was not intimidated by status or anything like that," she explains.

In fact, in retrospect and with the experience of being married to an Aboriginal, Sue compares her father to an Aboriginal elder. "He would quietly point things out, tell his story," she says. "He liked to do his teaching out on the landscape."

She recalls his broad spiritual beliefs and his pursuit of philosophical ideals. And considering his abbreviated formal education and the fact he never left the Crowsnest area as a young person, "what struck me was how broad-minded he was."

An avid reader, particularly of historical works and explorers' journals, he also spent

a lot of time writing. In his later years, he turned his hand to poetry to describe his life's experiences.

Many of his articles appeared in *Outdoor Life* or *The Western Sportsman* magazines. But, says Sue, sitting in her Eastend, Saskatchewan office with former files bearing such titles as "Cougar Hunts" or "Land Management" close at hand, "a lot of his most interesting material was never published."

Aside from his involvement with the AWA, Bill volunteered with groups like the Friends of the Oldman River, the Castle Crown Wilderness Coalition and the Willow Valley Trophy Club, always with the view of promoting conservationist values. "I don't think those sentiments will go away," says Sue. ✍



William Michalsky measures the largest Douglas fir cut by the Alberta Forest Service

THE BIGHORN WILDLAND – AN ABSRD PROCESS

By Tamaini Snaith, AWA Conservation Specialist



Over the past year I have lost faith in the democratic process in Alberta. I invested a huge amount of time, effort, intellect and emotion in the Bighorn Access Management Process—a process that was supposed to be transparent and representative. It was supposed to take account of public opinion. It was supposed to be informed by science. And it was supposed to uphold existing commitments, policies and legislation. All of

these were in the terms of reference, and were the condition under which AWA participated in the process.

The process was none of these. Quite frankly, it was a disgrace and a waste of everybody's time and money. In my opinion, there was absolutely no genuine effort on the part of the government to consult the public. The decisions were made before the process began. The Blackstone–Wapiabi would be developed for oil and gas, and motorized recreation would be legalized.

It has become increasingly apparent that the Alberta government is not interested in the commitment they made in 1986 to protect the Bighorn Wildland; they are not interested in respecting the Eastern Slopes Policy and the voices of so many citizens that went into its creation; and they are not interested in protecting water, wildlife and wilderness in Alberta.

Apparently the priority of our current elected officials and public servants is to cater to the whims of a small number of Albertans who are rich enough to be able to afford an ATV or snowmobile and believe that it's their divine right to drive up any mountainside in the province.

As an official advisory group member, I faithfully travelled to Rocky Mountain House for six meetings last winter (it snowed every time). At every meeting I had the same conversation. At every meeting the situation got worse.

Although the majority of the advisory group wanted NO ATVs in the Prime Protection Zone, the government drew plans with trails and frolic areas for ATVs and snowmobiles in the Prime Protection Zone. Despite opposition to these preliminary plans by both the advisory group and much of the general public, the government revised the plans to add MORE trails for motorized recreation. These plans violate the Prime Protection Zone, the Bighorn Wildland Recreation Area (which, according to them, doesn't exist anyway), and will require changes to existing Forest Land Use Zone legislation. Why? Because the vocal and well-funded ATV/snowmobile lobby wants MORE.

The majority of the advisory group also voted for no industrial access within the boundaries of the Bighorn Wildland Recreation Area. The standard answer to this position came

from Cliff Henderson, ADM for the Department of Sustainable Resource Development. He basically said, "Sorry, that's not the answer we want." The government had decided in advance that THEY wanted industrial development so the advisory group was not free to provide their best advice. We were simply there to tell them how to develop. It is ridiculous to ask a bunch of public representatives how to construct best practices for industrial development with no technical knowledge or scientific information.

And science was another issue. It was systematically ignored. Among the many outrageous comments, one uttered by Cliff Henderson came when I asked that the group be provided with information about road densities in Alberta, and what science has been done to examine effects of roads on wilderness. Henderson said that "we have had enough of Tamaini's philosophical questions, and we are not going to waste any more time on them." Obviously it was my mistake to assume that the advisory board might need to understand the consequences of the choices we were being asked to make.

The public consultation process was deplorable. Public opinion was collected using a poorly constructed survey. The results were useless because many of the questions were constructed in such a way that the answers were not interpretable. For example, saying "no" to a question that asked if you agreed with a seasonal road closure could mean "no" because the closure is too restrictive or "no" because the closure is not restrictive enough. I raised these issues at the advisory group and the biased questions were objected to by members of the advisory group and revisions were requested, but the survey went to the public with no changes—in fact, when I called the group's facilitator to find out why the questions had not been changed, he admitted that he had not even seen the survey before distribution! Why were these surveys so poorly constructed when the government contracted a professional consultant who specializes in public consultation?

The process was constructed so that a "working group" worked along with the advisory group to provide background information and to write up recommendations based on our advice. Funny, it didn't work out that way. Not only did the recommendations not include the actual advice we gave, but they failed to even represent the scope of discussion. And to top it all off, the advisory group was not allowed to see the final plans that were proposed to the minister: plans that were supposedly based on our own advice! This was hardly "clear and transparent."

After the advisory group wrapped up, the mystery plans moved up through government and made their way to the Standing Policy Committee for Energy and Sustainable Development. Around this time, I called Butch Shenfield, a land manager for SRD, to ask



Tamaini Snaith in the Bighorn Wildland
(C. Olson)



Bighorn Wildland

(C. Olson)

about the process. He actually told me that AWA and other groups were creating confusion among decision-makers and that we were getting in the way of the process! Apparently, in ABSRD, it is better not to let facts or public opinion interfere with good, solid decision-making.

We were asked to make a presentation to the Standing Policy Committee to describe our position and perspective on the Bighorn. If the Access Management process was disgraceful, this meeting was shameful. I was shocked and appalled by the childish and rude behaviour of our elected representatives and government employees. Passing notes during our presentation, throwing up their arms at our comments, and accusing us of “so many misrepresentations I don’t even know where to start.” This last was from the Honourable Ty Lund, who apparently really didn’t know where to start because he didn’t identify a single so-called “misrepresentation” but proceeded to criticize us for at least five or ten minutes without really asking us any questions. The few bits I remember were accusations of being from out of town and coming late to Bighorn issues, and calling us a “travelling roadshow,” referring, of course, to our public meetings. Well, at least we had the guts to engage the public!

But it wasn’t all bad. We found some very strong support from Alana Delong, a Calgary MLA who asked tough questions about the ATV organizations and who had called over 40 of her constituents to find out their opinions on the matter (almost all supported protection and no OHVs, the rest didn’t know).

Last year, when we were assessing the threats to the Bighorn, we perceived the industrial threat as our greatest worry. Leases had been sold, and access approvals seemed imminent in the spectacular Blackstone–Wapiabi valley where AWA maintains the historic Bighorn Trail. Over the months, most of our efforts have indeed been spent working with (against?) oil and gas companies to secure the future of this area. What has the outcome been? I’m not sure, yet for a while it seemed good. Murphy, the largest known leaseholder, seemed interested in talking, but now they have stopped returning our calls, and recent meetings with government officials have led us to believe that Murphy is currently pushing for access.

The off-road lobby, of course, continues to fight. Their favourite line invariably involves the word “proactive” and suggests that we just need to get along. Apparently, if environmentalists would just play nice, we could all share the area happily ever after.

This is not possible for a couple of reasons.

First, it is unreasonable to ask all users to recreate in the same area. A very wise civil servant put it in these words for me:

ACTION ALERT: Water and wildlife to suffer as Government rules in favour of ATVs

The Alberta government passed a plan that will make motorized recreation legal in one of Alberta’s most beautiful and pristine wilderness areas.

Immediate action is required to reverse this precedent-setting decision.

Government backsliding and broken promises will allow the Bighorn Wildland, once promised legal protection, to become a playground for quads and snowmobiles.

Twenty years ago the government consulted Albertans and created the Eastern Slopes Policy, which found a balance between competing resource demands. The Eastern Slopes were zoned so that there was room for everyone: industrial activity, tourism, motorized recreation, non-motorized recreation and environmental and water protection.

Now the government is undoing that balance by allowing motorized recreation in the areas that were originally zoned for protection.

This is a short-sighted response to the loud and well-funded ATV/snowmobile lobby, and it comes at the expense of our water, our wildlife, and our non-motorized recreational opportunities.

This decision exemplifies the government’s complete disregard for water and wildlife conservation. Important watersheds and some of the best areas for wildlife in the province have been sacrificed in this plan.

In the past, government agencies have refused to enforce the prohibition on motorized recreation in the Prime Protection Zone, and there are no assurances that enforcement will improve with this new plan.

It is completely unacceptable to sanction motorized use of the Prime Protection Zone.

ACTION

Please call your MLA immediately to protest motorized trails in the Prime Protection Zone. To find out your MLA’s name and contact information call 310-0000 (free from anywhere in Alberta).

For more information or to receive our Eastern Slopes information brochure, contact Tamaini Snaith, AWA at 403-283-2025 or email awa.scp@shaw.ca

To view the government’s plans for the Bighorn, go to www.bighorn.gov.ab.ca

It’s like smokers and non-smokers. Smokers are more than willing to sit next to non-smokers in a restaurant because they are not affected by the non-smokers. But because the non-smokers are negatively affected by the smokers, it is necessary to have some areas reserved for non-smokers. In Alberta, there is only nine per cent of provincial crown land reserved for non-motorized recreation. There is no justification for asking hikers to share this small area with motorized users because the experience



that many hikers seek is a quiet wilderness experience that is not possible in the presence of motorized recreation.

The other reason is obvious. ATVs and snowmobiles do damage. There need to be areas that are protected from this damage. Bighorn is one of them. Once the area is opened it will quickly be degraded and lose the values we are fighting for now.

A popular argument given to me a number of times by Cliff Henderson, Butch Shenfield and many, many ATVers is that the Eastern Slopes Policy is old. It is outdated and needs to be modernized to account for the greater demands on the landscape (read, the greater demands of ATV riders and the oil and gas industry). The proponents of this argument don't even appreciate its irony, let alone its consequences.

The Eastern Slopes Policy was created to protect our water *for the long term*, precisely so that in the future, clean water (along with wilderness, wildlife and aesthetic resources) will be available for future generations. It is absurd to suggest that such a policy can get old. *It is supposed to get old!* So that's the irony. The consequences, of course, are that these critical resources will not be available for future generations if we allow the policy to be dismantled. If the government continues on its current path, their short-sighted actions to please a small group of high-impact users will have long-term consequences for the rest of Albertans.

After the standing policy committee, the Alberta Cabinet approved the access plans for the Bighorn Wildland, including motorized trails in the Prime Protection Zone. On October 2nd, Alberta Caucus also approved these plans. ☞

The following letter was sent to Premier Ralph Klein, August 15, 2002.

Re: Reclamation of ATV-Abused Areas in the Bighorn

I just returned from my two-week vacation spent in the Hummingbird Equestrian Staging Area in the proposed Bighorn Country. I have never been so disappointed in all my life as when I saw the "solution" your government chose to deal with the ATV damage that I sent you pictures of from last year. Your sustainable resources minister has decided to "repair" the ATV damage by creating even more and uglier environmental destruction in a failed attempt to fix the problem.

I returned to the pass that runs from the Canary Creek over to the South Ram River. Our whole trail-riding party was horrified by what has happened to that once beautiful, grassy meadow pass formerly filled with wildlife. First we noticed the sign pollution and unsightly rock barriers announcing that users must stay on the trail and that this area is now under reclamation, etc.

My first question is "why?" Why does this area suddenly have to be reclaimed? Was it after 200 years of native peoples/hikers/explorers/equestrian use, or after just 5 years of ATV abuse? Why were those destructive people rewarded with a special trail that is totally unsuitable for the low impact users?

Have you seen for yourself what your minister has done to that pass?

Not only has he made the surface unsuitable for any means of transportation other than ATVs, but he has filled the quad-created mud holes with rock, all the soft areas and quad ruts with rock, and the stream crossings with rock (creating a dam and altering stream flow), and he has attempted to block off access to the soft areas and tarn shores with rock. Rock gouged from the sides of the surrounding mountains, creating weak areas for future rock slides. He even dragged in tree stumps from the surrounding burn area to block off some of the deep ruts in the soft areas.

Well, guess what—it didn't work. My pictures show new quad damage going around the signs and continuing to mud-bog to their hearts' content. Who is supposedly patrolling this newly

"reclaimed" area? We cannot understand the stupidity of decisions made when it comes to the "reclamation" methods used in the delicate environment in the alpine regions of the Bighorn. It was obvious that only quad people were consulted as to what kind of trail should be built in the now completely fragmented ecosystem located there. Trees and willows were torn down, undisturbed soil was ripped up and the surrounding mountain slope was gouged out to create this quad trail.

*What a disgusting mess your government has made of that formerly pristine pass. Have you seen it? If not, why not? You need to see what ATVs have done to the hill that the Headwaters Patrol Cabin sits on, too. It is very obvious that your government is influenced by the financial resources and pressure of the selfish and destructive industrial and ATV groups. What a sad tribute during this, the **International Year of the Mountains**, yet. Unbelievable!*

I would also ask that you act fairly before you decide to create special trails for the environmentally destructive ATV groups, especially since they are in that area against your own IRP policies. What your government has done to that pass forces the non-ATV users to go off trail to preserve their own, and their horses', feet. We will not cripple our horse to stay on a special trail created for ATVs. Are you trying to send the non-ATV people a message? Trails that were barely noticeable for hundreds of years have been awarded to ATVs after 5 to 10 years of abuse? Sick!

It certainly is not a "multi-use" trail, that is for sure. And here us low-impact users figured that working to save the environment and keeping it intact would allow us to preserve the historical trails created hundreds of years ago by explorers and native peoples who traveled them on foot and on horseback. Instead, we see history torn to shreds by ATV people and then the trail is awarded to them by forever altering it to suit only their destructive activity—and using MY tax dollars to do it! You, and every department of your government who is involved with that disgusting fiasco, should be ashamed of yourselves.

*Sincerely,
Lorri Stinson
Sherwood Park* ☞



Reclaimed ATV trail

(L. Stinson)



ATV in Hummingbird Creek

(L. Stinson)



The following letter was sent to Janis Tarchuk, MLA, Banff-Cochrane, August 2002.

Dear Ms. Tarchuk:

I'm writing again on the subject of the Bighorn Wildland, a place of critical watershed importance, since it contains key catchments for the Red Deer and North Saskatchewan Rivers.

In my first letter to you on the Bighorn, I emphasized how the opening to ORVs of the Prime Protection Zone is contrary to the Eastern Slopes Policy. Official ORV trails through the Bighorn will mean that this policy is no longer in effect. It will mean that the huge effort by hundreds and hundreds of Albertans in the early 1970s to protect Eastern Slopes watersheds will have been for naught. This is very hard to understand as a new era in water concern is sweeping Alberta.

Today I had the opportunity to discuss this alarming situation with a senior retiree from the Alberta Forest Service. He knows the Bighorn as well as he knows the Eastern Slopes Policy and the history of watershed protection in this province. Like me, he is very worried. We discussed at length what is driving the new politics that appear to have little regard for Alberta's water catchments but much regard for the small minority of the population that recreates with ORVs. This group causes major damage to high elevation riparian areas and streams for frivolous reasons: damage that was halted by the Eastern Slopes Policy in the 1970s, for about 10 to 15 years, until enforcement complacency allowed its deterioration.

One conclusion the retired AFS person and I came to is that few of today's politicians know the history of the Eastern Slopes Policy, much less the history of all the federal and provincial watershed protection that preceded it. There is probably little understanding amongst today's politicians of just how critical this policy is to the water supply, not just for Albertans but right across the prairies.

Citizen watershed committees are springing up along the Eastern Slopes as more and more residents become alarmed about deteriorating water quality in the very headwaters of streams. Of course, major concerns include cattle, farms, clearcutting, oil and gas development, ORVs and urban sprawl into rural areas. Many of these are difficult matters to deal with, but a relatively easy matter to address is maintaining the

Eastern Slopes Policy and enforcing the Prime Protection and Critical Wildlife Habitat Zones. Both should be legislated "off limits" to industry and motorized recreation for several important reasons, but primarily in order to protect water quality. It makes no logical sense to allow the public to frolic in our pristine drinking water.

A recent study of the boreal forest by Dr. Richard Schneider has shown that around 20 per cent of this huge ecoregion is roads and seismic lines. These are being kept permanently open, without forest regrowth, and are contributing to poor water quality through siltation, in large part because of relentless ORV use. The Foothills Ecoregion is even more heavily roaded than the boreal and gets far more ORV traffic. Is it any wonder that cities like New York have spent billions to buy up control over their entire watersheds in order to save many more billions in water treatment? Seattle, Vancouver, Victoria, Prince Rupert, etc. are all following New York's lead—taking control of their watersheds to keep out the loggers, the roads and the off-roaders. By contrast, it appears that Alberta is going backwards by removing watershed controls that have been in place on the Eastern Slopes for most of the past century.

The main message I'd like to leave with you is how important it is for your MLA colleagues to understand the Eastern Slopes Policy and some of the history behind it. This policy is not trivial—it is one of the only land-use policies with broad public input. It is not designed to provide a playground for recreationists; it is designed first and foremost to protect our vital water supply. It was specifically designed to protect water quality from damage by industrial exploration and development and off-road motorized recreation.

I have heard that although cabinet has voted—contrary to its own policy, its own science advisors and its own public advisory committee recommendation—to open the Bighorn to ORV users, caucus must still ratify this decision. I hope that prior to this crucial caucus vote on the Bighorn you will be able to help educate your colleagues who have not had the opportunity to learn about the full importance of the Eastern Slopes Policy and the water that it protects.

Yours sincerely,

Vivian Pharis, Cochrane

In Yellowstone National Park one winter's worth of skidoo exhaust pollution is equal to 55 years of pollution from automotive traffic in the Park. Yellowstone now has the worst carbon monoxide reading of any region in North America.

—from *Petrotyranny* (2000, p. 280)
by John Bacher



Golden Mantled Ground Squirrel

© Ken Ferris



THE HALSEY REPORT AND THE DESTRUCTION OF THE MCCLELLAND LAKE PATTERNED FEN

By Dr. Diana Horton



On April 25th of this year, I received an e-mail that made me reconsider my priorities. Jillian Tamblin, then Conservation Specialist with the Alberta Wilderness Association, wrote regarding the Amendment Review of the Fort McMurray Athabasca Oil Sands Subregional Integrated Resource Plan (IRP) in connection with TrueNorth Energy's proposal to mine in the patterned fen on the west side of McClelland Lake. Someone who knew I had done some ecological research in that fen in 1982 had given her my name.

Jillian directed me to the information on the AWA website, which included a link to the report, *Landscape and Landform Variation in Patterned Fens Within Alberta*, by Halsey, Nicholson, Devito and Vitt. When I looked at the conclusions of that report, I felt sick. This site, the most spectacular patterned fen I have seen in Canada, the U.S. or northern Europe, of which I am reminded on a daily basis because two of the aerial photographs I took there have been hanging on my wall for 20 years, was being characterized as quite unexceptional.

Disturbingly, I knew this characterization would be given credibility because the authors included people who have made significant contributions to our understanding of peatland habitats in Alberta. I became even more troubled when I examined this report with a view towards understanding how the specious conclusion had been reached. All of this made me realize that stopping the destruction of the McClelland Lake patterned fen is more important than anything else in my life.

I have been active in conservation issues in Iowa since I came here in 1983, but Alberta matters to me in a way that Iowa never can. My Father's parents homesteaded on the edge of Elk Island National Park where he was born and both my parents had a deep love and appreciation of Alberta's natural habitats. Thus, in the midst of the chaos of end of term – finals, honours students finishing up research projects, professional meetings – I sat down and wrote a letter on the April 30th deadline, protesting amendment of the IRP.

I also decided then that I must participate in the subsequent hearing of the Alberta Energy and Utilities Board (EUB) in Fort McMurray. My 'holiday' this year was spent driving 5,000 miles to spend a week and a half in the stressful, legalistic environment of that hearing. If only more Albertans had seen this fantastic site, I believe that greater numbers would join in the effort to prevent its destruction.

TrueNorth Energy presented their proposed Fort Hills Oil Sands Project at the Public Hearing of the Alberta Energy and Utilities Board (EUB) held in Fort McMurray from July 2 to 10th, 2002. With respect to the McClelland Lake patterned fen, TrueNorth noted that the "focus of a great deal of our consultation efforts with both aboriginal and non-aboriginal

stakeholders has been McClelland Lake and its associated wetland", because "substantial oil sands resources" had been discovered beneath the western half of the peatland. Although they acknowledged that "the Fort McMurray – Athabasca Oil Sands Sub-regional Integrated Resource Plan included guidelines indicating that oil sands development in the wetland was not permitted", this restriction appears not to have been a deterrent.

TrueNorth related that, "To develop these resources, [they needed] to develop a high degree of knowledge about wetlands and mitigating effects on wetlands", so they sought advice on "the significance of the McClelland Lake wetland" from "leading experts in the field of peatland ecology in the boreal environment". As a result of this consultation, in January 2002,

TrueNorth provided what they regarded as "two key understandings" that supported amendment of the IRP:

- The existence of a large, previously unknown oil sands resources [*sic*] associated with a portion of the wetland
- Information about the significance of the wetland that characterized it as 'representative' rather than 'unique'

Actually, it was the patterned fen portion of the wetland that was designated 'representative', and this pronouncement came from a report, *Landscape and Landform Variation in Patterned Fens Within Alberta*, prepared with funding from TrueNorth by Linda Halsey (Biological Sciences, University of Alberta), Barbara Nicholson (Biological Sciences, Central Connecticut State University), Kevin Devito (Biological Sciences, University of Alberta) and Dale Vitt (Plant Biology, Southern Illinois University) and submitted at the end of October, 2001.

Their conclusion is an extraordinary reversal considering that, in 1991, the second of these authors, Barbara Nicholson, described this fen as having "the most prominent string and flark pattern in the province" and it was one of 54 peatlands given "high priority for preservation" in her report submitted to the Natural Areas Program of Energy and Natural Resources (presently, Sustainable Resources and Development, Alberta Environment). Similarly, Westworth and Associates, in 1990, identified the McClelland patterned fen as a Provincially Significant natural feature of the Eastern Boreal Forest Region of Alberta and also identified McClelland Lake as a Regionally Significant staging area for waterfowl.

Patterned fens are a striking landform characterized by a network of ridges ('strings' - drier microhabitats that may support trees) alternating with pools ('flarks' - \pm aquatic microhabitats), with the long axes of both oriented perpendicular to the direction of water movement. In view of the discrepancy between Halsey *et al.*'s recent assessment of the McClelland fen and the earlier ones, and the key role of this report in amendment of the IRP to allow destruction of half of the fen, there is reason to examine the



McClelland Lake Wetland Complex
(R.G. Thomas)



Halsey report to determine if their conclusions, particularly regarding the status of the McClelland fen, are valid.

Briefly, Halsey *et al.* stated their objective was to “quantify the physical attributes and variation in patterned fens” and to place the McClelland fen and another in the Thickwood Hills (southwest of McClelland) “in perspective to other patterned fens within the province”. They examined 40 fens along a diagonal transect from the Fort McMurray area southwest to the foothills in the vicinity of Rocky Mountain House, and measured structural features of the fens, including string height (relative to the water surface in the flarks) and width, and flark length, width and depth. They also evaluated the type of fen represented by each site. Additionally, Halsey *et al.* evaluated peatland complex size for the McClelland and Thickwood sites relative to all others in the province.

With respect to structural features, Halsey *et al.* reported that statistical analyses of string height showed McClelland to be similar to 95% of the sites examined and Thickwood Hills to 77%; string width of McClelland is similar to 100% and of Thickwood, to 90%; flark width of both is similar to 100%; flark length of McClelland is similar to 100% and of Thickwood, to 36%; flark area of both is similar to 100%; flark depth of McClelland is similar to 64% and of Thickwood, to 74%; and ‘pattern height difference’ (the sum of string height and flark depth) of McClelland is similar to 80% (the similarity value for Thickwood was not given).

When all morphological parameters were combined, Halsey *et al.* reported McClelland is statistically similar to 62% of the sites and Thickwood to 24%. Both McClelland and Thickwood were reported to be brown moss-dominated (as opposed to peat-moss-, or *Sphagnum*, dominated), but McClelland was classified as ‘dry’ (trees present) and Thickwood as ‘wet’ (trees absent).

With respect to peatland complex size, Halsey *et al.* reported that McClelland Lake is the 325th largest of 3,774 peatland complexes in the province and the patterned fen is the 76th largest of 811, and Thickwood Hills is the 203rd largest peatland complex and the 521st largest patterned fen.

Should the results presented by Halsey *et al.*, and their conclusions, be accepted at face value? On the surface, given the relatively high levels of statistical similarity between McClelland and the other fens for most structural features, the conclusion that McClelland merely is “representative” of Alberta’s patterned fens, “and not unique”, might be considered reasonable.

However, there are fundamental problems with the methodology employed in this study. First, two non-patterned fens were included in a study that purports to examine characteristics of patterned fens. Furthermore, for these two fens, measurements of string height and width, and of flark length, width and area are recorded as zero, as might be expected, yet inexplicably, flark depths are recorded for both.

Second, the selection of fens was biased by the primary criterion being ease of access (e.g., proximity to a road or landing site suitable for a helicopter). Third and fourth, within each fen, sampling sites similarly were selected on the basis of ease of access, and only five strings and flarks were measured. Considering the variation that can occur within individual fens, and the constraints imposed by accessibility, it seems highly likely that the data are in no way representative.

For these reasons, the data are fundamentally flawed and the conclusions drawn by Halsey *et al.*, particularly that “McClelland Lake does not represent the ‘best’ patterned fen in the province

but as the analyses of variance indicate is representative”, have no validity and should not be given any credibility.

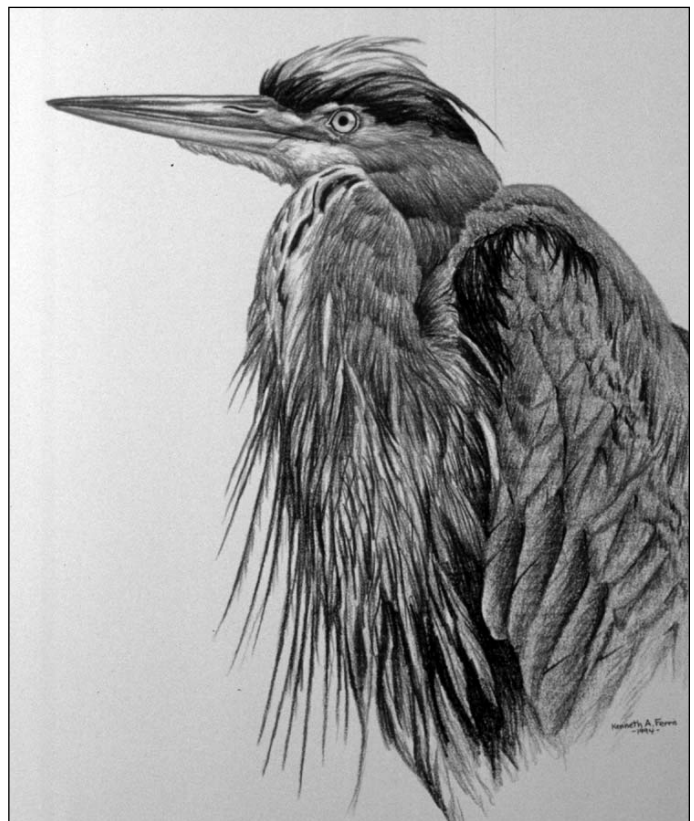
Aside from the fundamental flaws in methodology, there are additional problems with the study by Halsey *et al.* There are numerous careless errors in the report — some statistical similarity percentages are incorrect; some tables are mislabeled and the captions incorrect; and some data are missing.

However, more troubling is the presentation of the results in such a way as to minimize the significance of the McClelland fen. As noted above, McClelland is recorded as the 325th largest peatland complex and the 76th largest patterned fen in Alberta; however, when those figures are converted to percentages, McClelland is larger than 91% of peatland complexes/patterned fens.

On the other hand, Thickwood (recorded as the 203rd largest peatland complex and the 511th largest patterned fen) is larger than 95% of peatland complexes, but only 36% of patterned fens. Halsey *et al.* simply concluded that neither is the largest peatland complex, nor the largest patterned fen, in the province, “although the patterned fen at McClelland Lake is larger than average”.

Was there a conscious decision not to report those figures as percentages, because that would make it obvious McClelland is one of the largest peatland complexes and, more significantly, since patterned fens comprise less than 5% of peatlands, one of the largest patterned fens in Alberta?

Why was Thickwood Hills singled out, along with McClelland? The reason given by Halsey *et al.* was that “it was the other patterned fen identified by Nicholson (1991) as significant”; however, McClelland and Thickwood were two of six patterned fens in the region so identified by Nicholson. Again, the focus on Thickwood Hills serves to minimize the significance of the McClelland fen. Not only do Halsey *et al.*’s data portray Thickwood Hills as being statistically similar to far



Great Blue Heron

© Ken Ferris



fewer sites than McClelland, but they concluded their report with the suggestion that Thickwood Hills is 'unique' among the sites sampled (in contrast to McClelland) because Thickwood is the only one among the 40 sites that is brown moss-dominated and lacks trees on the strings.

While Halsey *et al.* acknowledged the obvious bias in site selection, they nevertheless stated that the lack of similar sites among those studied "suggests that they are uncommon" and proposed that "the patterned fen at Thickwood Hills merits some consideration of significance".

Given this conclusion, it seems an extraordinary coincidence that, at the EUB Hearing, TrueNorth announced that Alberta Sustainable Resources and Development recently has placed a Protective Notation (PNT) against development in the Thickwood Hills site. A PNT would impose "a land use restriction usually due to specific natural features of the

land...including land-form, soil type or vegetative characteristics", according to the definition on the Sustainable Resources and Development (SRD) website.

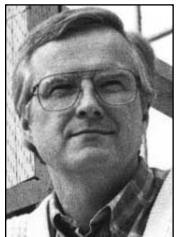
However, it actually was a Consultative Notation (CNT) that was applied for on February 14, 2002 by Linda Halsey for a period of three years, and a CNT doesn't impose any restriction on land use; it simply indicates that an agency, in this case, SRD, "wishes to be consulted prior to any commitment or disposition of the land". Did TrueNorth Energy (erroneously) suggest that Thickwood Hills had been protected to placate environmental concerns about the destruction of McClelland? *✍*

(Diana Horton has a Ph.D. in Botany from the University of Alberta. She is an Associate Professor in Biological Sciences and Curator of the University of Iowa Herbarium at the University of Iowa.)



AWA Working with Shell— What's Going On?!

By Tamaini Snaith and Cliff Wallis



Part of our job as wilderness advocates is to monitor the activities of the oil and gas industry. While we understand that oil and gas is an important component of Alberta's economy, we feel very strongly that development *cannot* proceed at any cost. In some cases, we feel that the environmental costs are simply too high. For example, there should be no surface access for industry in sensitive wilderness. Road building should not be allowed in roadless areas, or in wild areas with too many roads (science tells us that the absence of roads is the best indicator of ecological integrity). In areas where oil and gas development is more appropriate, it must be conducted using the best possible practices to avoid and minimize environmental damage.

We try very hard to keep up to date with industrial activity throughout the province, to assess the likely impacts on wilderness, and to respond appropriately—sometimes we object or recommend different options, but the process available to us is utterly impractical and ineffective.

AWA is normally in the position of having to respond to development plans within a very short time frame, and *after* most development plans are completed. This makes it difficult for us to properly assess a development proposal, and difficult for industry and government to respond. Generally, we have 15 days to respond to a development plan and file an objection with the Energy and Utilities Board (EUB: government body responsible for considering the public good and evaluating objections to proposed developments). In most cases our objections are summarily dismissed by the EUB because AWA is not "directly affected" and the development is in the "public interest." In most cases, we have little recourse to pursue further objections.

We believe that if AWA were engaged at an earlier development stage, we would be able to review plans more

efficiently and offer practical suggestions for reducing environmental impact, and, ideally, industrial operators would then be able to adjust their plans. Of course, there will always be cases where we simply object to *any* form of development due to the sensitive nature of some areas and the need to maintain big wilderness free of development.

But there are many developments taking place every week where AWA could make a valuable contribution to environmental protection. To this end, we will be providing environmental consulting services to Shell on some of their development proposals on a trial basis. This is the work that we already try to do (without getting paid for it) in assessing development plans. We will consider wilderness, wildlife and recreational values and cumulative effects and make recommendations to Shell about environmental issues. This relationship will provide Shell with environmental information that can be incorporated into the early stages of development planning. (Or, it gives AWA a head start on formal objections to the development). We look at it as working *WITH* Shell, not working *FOR* Shell. AWA hopes that we can have a positive influence in the corporate boardroom and in the wilderness.

We know that corporate funding is an area of great concern to our members and justifiably so. AWA is proud of its long history of independent thought and action and is not about to change. There is always the danger of "not wanting to bite the hand that feeds you." For that reason, AWA has a policy that minimizes the total amount of corporate funding we can take. Our independence lies in our continued support from a diversity of sources, primarily from our individual supporters and foundations.

We are sure that our members will tell us if we are getting too soft or if we are taking a responsible approach. We want to know if you think the contract with Shell is a good idea, and whether you have any suggestions on how we can positively influence (and, in some cases, effectively oppose) industrial development in Alberta. Please call Tamaini at the AWA office 403-283-2025 or Cliff at 403-271-1408 or send an email to awa.scp@shaw.ca. *✍*



Shell invites AWA personnel to examine their 3D seismic operation in Panther Corners, Bighorn in 2001.

(K. May)






AWA Gives Opinion on Softwood Lumber to U.S. Dept. of Commerce

By Phil Clement

Canada and the United States are still locked in a trade dispute over Canadian softwood lumber exports. There are serious and far-reaching consequences to any such agreement for Canadians, which could have significant impacts on who controls our forest lands, protection of wildlife and waters, and future employment and public benefits from the forest.

Environmental organizations in Alberta advocate a solution to the softwood lumber dispute that addresses the economic, environmental and social problems related to forestry in Alberta. The following reforms would not only solve the softwood lumber dispute, but would also lead to a more innovative, ecologically sound and publicly beneficial forest sector by reducing corporate control over forest lands, creating opportunities for new entrants, ensuring that we get full value for the forest resource and

ensuring greater public participation and environmental protection in our forests.

To this end, the Alberta Wilderness Association, in conjunction with other environmental groups, is making a submission to the U.S. Department of Commerce, which has requested initial informal input on the softwood lumber issue by October 7. Canadian and U.S. environmental groups are also considering a lobby day in Washington during the Department of Commerce process. 



Spotted Owls

© Ken Ferris

Game Farm Dilemma Deepens—Huge Illegal Trade Revealed

By Shirley Bray

Poaching of wild deer by game farmers is a serious problem. At a recent meeting of the Midwest Deer/Turkey Group Meeting, Conception, MO August 19-20, 2002, the extent of the illegal laundering of wild deer into the captive cervid trade industry was discussed. Terry Dougherty, a warden with Missouri DOC, offered some insights. Much was based on the testimony of a former deer hauler who has turned states evidence. He had hauled numerous loads of illegal deer and elk that were shipped to many states by Michigan brokers.

Untested deer bring premium prices on shooting preserves because they can be laundered for entry into Boone and Crockett Hunting Preserves, a full service, 2000-acre wildlife habitat for the managed field hunting of upland game birds and trophy whitetail in the Midwest. TB-tested deer with ear-tags and shaved necks show evidence of being from game farms and cannot be entered in Boone and Crockett. Gate hunts are going for \$40-50,000 and no record of these hunts appears on the books.

Most of the deer that the deer hauler moved were wild caught deer from Ontario. Ontario deer farmers baited wild deer into pens, and veterinarians supplied false health certificates for wild deer. Twenty-nine were shipped into Wisconsin without testing. Major destination states were Texas, Pennsylvania, Missouri and Mississippi. Deer were brought into the U.S. at a friendly border crossing in Montana. The driver carried two sets of papers, one for the authorities and one for the ranch owner. Untested loads were hauled at night to minimize stress on the animal and to minimize the number of inspections at the border. In Texas, wardens can stop cattle haulers on the interstate for inspection.

Five thousand prosecutable violations have been documented, many from discrepancies between the age of deer and the age on tags. The illegal market is dependent on veterinarians supplying false papers for a cut of the profit. Illegal shipments will continue until there is no market for trophy deer

on shooting preserves. Brokers prefer deer from Canada because of the good exchange rate and lax border enforcement. It is estimated that 25,000 deer per month are being moved throughout the U.S.

One of the largest poaching cases in Canada involved Saskatchewan veterinarian and game farmer John Phillip Murray, who faced charges of fraud this summer for allegedly trapping and selling as many as 1000 white-tailed deer over three years. IFAW has requested that the RCMP expand its investigation into the alleged poaching of wildlife by game farmers. The Canadian Cervid Council has stated that game farming is not a valid wildlife issue. The poaching of public wildlife, in addition to the problems of disease, habitat loss and genetic pollution, clearly refutes this notion.

In the summer a significant number of game farmers approached well-known game farming opponent, Darrel Rowledge, a director of the Alliance for Public Wildlife, and asked for help in getting out of the industry. Conservation groups agreed that game farmers should be compensated provided the industry was shut down. Now these game farmers are considering a class action lawsuit against the federal government and have consulted with one of Canada's leading class-action lawyers.

While Alberta Agriculture encouraged the growth of the industry without a proper analysis, they have attempted to limit their liability by putting a weasel clause into the Livestock Industry Diversification Act, the legislation that legalized game farming. Section 25 reads: "No right of compensation exists against the Crown, the Minister, the Director or any inspector for any act done, or any failure to act, pursuant to this Act."

One of the accomplishments that the Alberta Elk Association listed on their website under "liaison between Government and farmers" is that they "halted [an] environmental review." When game farmers were challenged on this point in one of their web forums, this item was quickly removed. "Why would the industry association boast of NOT protecting the best interests of the Canadian people?" demanded the whistle-blowing participant.





THE TRUTH ABOUT CONVENTION CENTRES IN NATIONAL PARKS

By Ben Gadd



Parks Canada has been condemned by other environmentalists for approving the construction of a convention centre at the Chateau Lake Louise. But let me start by praising the agency. After all, Parks Canada has held steadfast in its quest to protect that rare and threatened creature, the conventioneer.

Who am I to speak about conventioners? Most of you don't know this, but I have spent the last twenty years attending corporate conventions as an undercover operative for environmental groups. I have been able to penetrate deeply into the conventioners' world, not in the guise of an ordinary attendee but as an after-dinner speaker, a highly privileged position that has allowed me to gain a great deal of information. In many cases I have been seated at the same table with the organizers.

What have I learned? A lot. For one thing, it has become clear that conventioners should be recognized as a separate branch of *Homo sapiens*. I have given this variety of human the name *Homo sapiens conventionensis*.

Just as *Homo sapiens neanderthalensis* dwelled mostly in caves, the conventioner subspecies is found mainly at hotels. Its essential habitat has two components. One of these is the hotel room, a temporary den that must have, at its most basic, a hair dryer, a coffee-maker and a large television set housed in a piece of Mediterranean-style furniture. The other habitat component is the convention room itself: a large chamber, typically windowless, in which folding tables have been set up and covered with white linens that prominently display whatever liquids or solids have been spilled by the conventioners.

The conventioners themselves can be identified easily. They all wear name tags. These lend a sought-after sense of belonging, and they allow conventioners to remember their own names after spending too much time in the hospitality room. Other identifiers include the mid-priced suit and tie worn by male conventioners and the perky three-piece outfits worn by female conventioners. During exciting sessions, the males often remove their suit jackets and sometimes loosen their ties. The females, who are watched carefully by all attendees, are not allowed any such comforts.

What do conventioners accomplish at their conventions? At first glance, not much. Decisions are seldom made. Startling announcements are rare. But a lot of laundry is generated, a lot of food is eaten, and a great deal of petroleum is burned in getting the conventioners to their conventions. This is in line with the true purpose of conventions, which is to use up raw

materials and manufactured goods at a far greater rate than they would otherwise be consumed. In fact, I have it on good authority that without conventions the economies of all first-world countries would collapse for lack of stimulus. And, of course, conventions enrich the hotels in which they are held.

This explains why the Chateau Lake Louise desperately needs a convention centre. In the hotel and restaurant business, if you're not getting rich you're going broke. There are no in-betweens. I guess we'll all just have to accept this.

But why is Parks Canada so eager for the Fairmont hotel chain to build this particular convention centre? When you stop to think of it, national parks are really the opposite of convention centres. And conventions don't really need to be held in national parks. For most conventioners, the closest they will come to a wilderness experience is viewing a bear from a bus window or feeling the hair on the back of their necks rise when they glimpse an animal running across the hotel lawn.

So why build a convention centre here, in the middle of Banff National Park? And why build it in the face of so much opposition, especially when its detractors can cite many clear-cut violations of park policy and much evidence to show how damaging the thing will be?

Well, here's the real reason. It may not be what you are expecting to hear. My research has shown that every single Parks Canada bureaucrat from the level of park

superintendent up is a conventioner. Yes! These people may have begun their careers patrolling the park on horseback or cleaning the outhouses, but they are all secretly *Homo sapiens conventionensis*, and they now spend most of their working hours planning to attend conventions, preparing material to be delivered at conventions, or actually going to conventions. It is little wonder that the management of this agency, for purely practical reasons, needs to have convention centres in the parks it manages. Remember that the word "convention" and the word "convenience" have the same root.

By getting major hotel chains to build first-class convention centres in all of Canada's national parks, park administrators will always have the proper facilities close at hand. The parks are nicely arranged across the country for this purpose. And that's part of the plan. Think of the possibilities: one week the agency's CEO and his aides can be trying out the hotel rooms at the Pacific Rim Hilton, the next week the dining facilities at the Fairmont Gros Morne!

So you see, my friends, the true nature of the situation. Top-level decisions have been made for the good of the people of Canada, and our petty objections just don't count.

But there is hope. And it comes from an unexpected source: the park animals.



Extension to Chateau Lake Louise, May 1987

(D. Levia)



It was once common practice for park wardens to shoot wolves, coyotes, cougars and even grizzly bears. Not only did these species indulge in ugly acts of predation, they were known to frighten conventioners. The outright killing of the parks' large carnivores has been greatly reduced, but the fact remains that all forms of wildlife are inconvenient to have around during conventions. Truly, you can't imagine how embarrassing it is for a conventioner to go into a really important session with an elk turd caught in the tread of his Rockports.

Thus, eliminating all wildlife in the national parks has always been an unstated but obvious goal of *Homo sapiens conventionensis*, especially as found within the ranks of the federal government, which is crawling with them. This explains why so many anti-wildlife decisions have been made in the national park system over the years—expansion of ski areas, growth of park towns, twinning of park highways—and lately the incredible pace of development in the national-park hotel industry.

However, Parks Canada has recently come up against a serious stumbling block. Due in no small part to our own efforts as well-paid, tax-supported environmentalists, it has become politically unacceptable in this country to continually attack wildlife. In the past few years Parks Canada has been forced to *study* animals rather than killing them and destroying their habitat. The agency even builds highway overpasses for them. (Well, only two highway overpasses so far. Most of the budget is being spent on conventions about building the overpasses.)

This current lull in the anti-wildlife operation provides an opening for the park animals to strike back. And the park animals have allies: us. As environmentalists, we are on their side and they are on our side. We can work together.

So I have a plan. All of you who would like to see an end to this convention centre stuff in national parks, aren't you in touch with one or two deer in your area? Perhaps a coyote, a few ravens, maybe even a wolverine?

Of course you are. I certainly have been. Along with a few trusted friends. And without giving too much away, let's just say that conventioners in Banff and Lake Louise can expect a few changes in the months ahead. A spate of bird droppings delivered with deadly accuracy. Hotel driveways rendered impassable by coatings of porcupine crap, the slipperiest substance in the world. As the campaign steps up, conventioners will randomly disappear between buildings, only to emerge a few hours later as tiny bone fragments in wolf droppings and owl pellets.

To those who would proceed with the construction of the Chateau Lake Louise Convention Centre, I offer fair warning. What happens on the day the doors open is not going to be pretty. The sight of hundreds of screaming hotel guests, fleeing in fright, never is.

This will be the last convention centre built in any Canadian national park. And the first to be abandoned by conventioners who, having learned their lesson, will henceforth stick to the cities where they belong. ✂

(This article, written in Jasper, September 2002, is based on a speech Mr. Gadd gave on the shore of Lake Louise, 24 August 2002, at a protest rally against construction of the Chateau Lake Louise Convention Centre.)

Natural Resources Defense Council Visits Alberta

By Phil Clement, AWA Conservation Specialist

The Natural Resources Defense Council (NRDC) visited Alberta to gain an understanding of the issues regarding conservation of the Bighorn and Castle wilderness areas, with a particular focus on oil and gas threats. NRDC uses law, science and the support of more than 500,000 members in the U.S. to protect the planet's wildlife and wild places and to ensure a safe and healthy environment for all living things. In Canada, NRDC and other environmental groups persuaded the last timber-industry holdouts to back a plan to set aside a large swath of ancient rainforest on the central coast of B.C. as a sanctuary for the spirit bear and other rainforest animals.



From left to right: Jacob Scherr; Liz Barrett-Brown with Eliza; Matt Price, KC the Bear; Vivian Pharis; Peter Lee; Christyann Olson

NRDC is considering whether it may have a role in the Bighorn and Castle campaigns and/or other wilderness issues in Alberta. NRDC's International Program, lead by Jacob Scherr, recognizes that the U.S. is playing a role in the unsustainable exploitation of Alberta's resources. The U.S. is one of Alberta's main customers of natural resources, and U.S. companies are cordially invited by the Klein Conservatives to come up to Alberta and help themselves to natural resources.

NRDC was represented by Matt Price (Research Specialist), Liz Barrett-Brown (Senior Attorney), Eliza Barrett-Brown (Representative of Future Generation), and Jacob Scherr (Director, International Program). The week-long itinerary from September 22 to 29 was busy for NRDC, including visits with AWA, Martha Kostuch, Alan Ernst (Aurum Lodge), Doug Ritchie (Frontier Lodge), Shell Canada, Louisa Wilcox, Peter Lee (Global Forest Watch Canada), Alberta Fish and Wildlife, Y2Y folks, Helene Walsh, the Castle-Crown Wilderness Coalition, CPAWS and the Stoney First Nation (Bighorn Band).

NRDC also toured the Bighorn and Castle wilderness areas to gain an appreciation of their beauty and importance as magnificent mountain watersheds. With a membership of more than 500,000 people and the capacity to bring international attention to the Castle and Bighorn wilderness areas, NRDC's support in Alberta is highly valued. ✂



Wolf

© Ken Ferris



KEN FERRIS: SELF-MADE ARTIST SHARES HIS LOVE OF NATURE WITH OTHERS

By John Geary

Nature has surrounded Ken Ferris for much of his life, and it is the Prince George, B.C. wildlife artist's love of nature that lies at the heart of his desire to capture it on paper and share it with others.



Growing up in Banff and on Vancouver Island, where his father worked as a game warden, helped Ferris forge a connection with the natural world.

"He always encouraged me to look at all kinds of critters, so I had a real interest in those kinds of things from a

very early age," the artist says. "I enjoy spending time in the field, and I always have a pencil or paintbrush in hand."

While Ferris enjoyed re-creating nature on paper from the first time he picked up a paintbrush in kindergarten, it was not until he graduated from high school that he began earning regular artwork commissions. At 22, he took a six-month's leave of absence from his job as a shipper-receiver in Prince George to see if he could earn a living from painting and drawing.

In the 25 years since he made that decision, his artwork has earned numerous awards: in 1984, Ducks Unlimited Canada named him Artist of the Year (he was the youngest artist to earn that honour); in 1993, he placed first in the invitation-only Wildlife Habitat Conservation Stamp Collection; and in 2000, he became the first artist to win that honour twice.

In 1994, the Bradford Exchange commissioned him to contribute three paintings to its "Treasured Ducks of Canada" collector plate series.



Bighorn Sheep

© Ken Ferris

That's pretty heady stuff for a completely self-taught artist who did not attend art college. He credits a high school art teacher for giving him the confidence to pursue art.

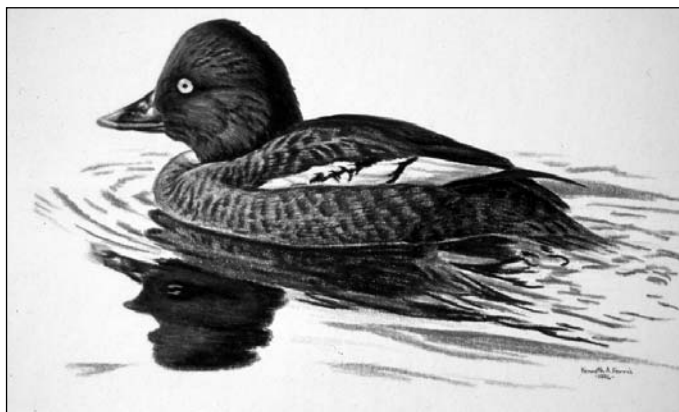
"Halfway through Grade 11, my teacher, Mr. Paulson, said, 'If what you want to do is paint birds, just paint birds.' The rest of the way through Grade 11 and 12, I got my straight A's just painting birds. That really encouraged me."

Ferris uses many types of water-based media, including watercolour pencil, acrylics and gouache. The medium he chooses for a particular picture will depend on the type of image he wants to create. If he wants a softer image, he combines

coloured chalks with watercolour pencil drawings. If he wants the picture to have a harder edge to it, he uses acrylics.

Several exhibitions have featured his art, including the recent 2002 Winter Cities Art Exhibition in Aomori, Japan. His work has twice been part of the "Birds in Art" exhibition in Wisconsin, one of the most prestigious events in the world. From 1500 entries, 100 paintings are selected.

Ferris focuses mainly on North American wildlife and landscapes, although he has painted some exotic species, including several paintings of tigers and leopards for his wife Jasmine, who enjoys paintings of big cats.



Common Goldeneye

© Ken Ferris

"I guess if I traveled to places like Africa, I would probably work more into the exotics," Ferris says. "I paint things I'm familiar with, things I can go out and see in nature myself. That's what I'm most comfortable painting."

In 1998, Ferris decided to produce a book of his artwork, choosing to self-publish it. The hardcover book, *The Rockies: An Artist's View*, features 41 colour plates and 49 black-and-white illustrations depicting the landscapes and wildlife of the Canadian Rockies.

He developed the idea when he decided to do something with his collection of nature photographs taken during numerous trips to Jasper and Banff.

"Many books feature mountain photography, but not many feature an artist's interpretation of the mountains and their wildlife," he says.

Ferris distributed the book himself, something he says required quite an adjustment, changing from an artist to a salesman. It proved to be a very positive experience, though.

"I'd love to do another book. Doing this book was probably the biggest accomplishment of my career."

When not painting or looking for subjects to paint, Ferris teaches art classes to help others develop their skills. Future projects include part-time high school art teaching. He also continues to take commissioned work and produce paintings for competitions.

"There are always things to do. There'll never be enough time in my lifetime to paint everything I want to paint." ✍



ASSOCIATION NEWS



SCENES FROM SUMMER HIKES 2002

Photos - N. Douglas



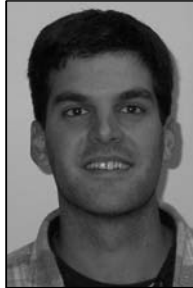
Bighorn Bus Trip, July 2002: This year's bus trip, led by Vivian Pharis, took in a visit to the Bighorn Falls and the Ya Ha Tinda historic ranch, west of Sundre, where our hosts were Sue and Rob Jennings. It was a welcome opportunity to visit the Bighorn Wildland, which AWA is fighting so hard to protect.



Beehive Hike, August 2002: The Beehive Natural Area, in the headwaters of the Oldman River is a spectacular site, where AWA has been working as volunteer stewards since 1987.



Beehive Hike, August 2002: A glorious hike with guides James Tweedie and Judy Huntley that led to awesome views along the continental divide. AWA has recently produced a Fact Sheet for this unique area.



Staff Profile: Philip Clement

Hello. I joined the Alberta Wilderness Association in mid-September as a conservation specialist. And what a wonderful time of year to come to Alberta. Before Alberta, I lived in Sault Ste. Marie, Ontario and worked with the Aviation and Forest Fire Management Program (Ontario Ministry of Natural Resources). I researched the economic feasibility of re-introducing forest fires into Protected Areas and worked with fire scientists to analyze fire cycle regimes and the "fire load index."

Before Ontario, I lived in Halifax, Nova Scotia. While enjoying the beautiful and friendly maritime provinces, I completed a Masters of Environmental Studies from Dalhousie University and worked with Nova Scotia Power and Environment Canada.

My cross-Canada journey started in Victoria, B.C., my hometown, where I completed a Bachelor of Commerce at the University of Victoria. During such a degree one is constantly reminded of the power of the consumer and of marketing: "The customer is always right!" I believe that we underestimate our influence as consumers.

While here I'll be working on forestry issues, particularly supporting AWA's position in the softwood timber dispute and Forest Stewardship Certification. I will be performing research to assist with markets campaigns and looking at the full cost accounting of our forests and natural capital.

I can be reached at the AWA office or at awa.cp@shaw.ca.

I'm looking forward to meeting you all. ✍

"Our destination is a province with the most pristine environment in North America... We cherish the natural blessing of this province."

—Ralph Klein, 1998



Cypress Hills Hike, July 2002: Hyland Armstrong, a rancher and range management specialist, led a fascinating hike in the Cypress Hills, talking about how he has been managing his ranching operation to the mutual benefit of livestock and wildlife.



November 1, 2001
The **Alberta Wilderness & Wildlife Trust**

presents

POST COWBOY ECONOMICS: *Pay and Prosperity in the New West*

with **Dr. Thomas Power**

Are the economic woes afflicting the North American West caused by increasingly strict environmental regulations on natural resource industries?

Will efforts to protect ecosystems and endangered wildlife lead to economic insecurity?

Can protection of wild lands benefit local economies or is resource extraction necessary for economic survival?

How important is the quality of the natural landscape to a community's economic base?

Join Dr. Thomas Power in a discussion of how the west is changing, surviving and thriving.

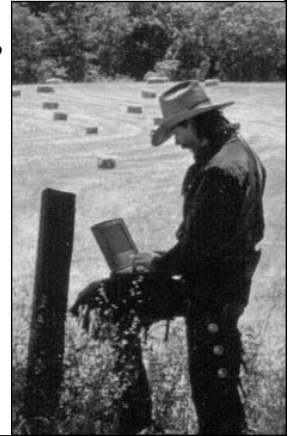
Location: AWA Office, 455, 12 St. NW, Calgary

Time: 6:00 pm - Reception

7:00 pm - Lecture and Alberta Wilderness Defenders Awards

Cost: \$25.00

Call: 283-2025 for information and reservations



Dr. Thomas Michael Power is currently Professor of Economics and Chairman of the Economics Department at the University of Montana. He specializes in natural resource and regional economic development issues.

Professor Power received his undergraduate degree in Physics from Lehigh University where he graduated magna cum laude and Phi Beta Kappa. He did his graduate work at Princeton University on a Woodrow Wilson national fellowship. He received his masters and doctorate from Princeton in Economics.

Professor Power has taught at Princeton, Lehigh, and the University of Montana where he has been since 1968. He has been Chairman of the Economics Department since 1978.

Professor Power's most recent book, *Post-Cowboy Economics: Pay and Prosperity in the New American West*, was published in Summer 2001 by Island Press. In 1996 Island Press published his *Lost Landscapes and Failed Economies: The Search for a Value of Place*. An earlier book, *The Economic Pursuit of Quality* (M.E. Sharpe Publishers, 1988) was revised, rewritten, and published in 1996 under the title *Environmental Protection and Economic Well Being: The Economic Pursuit of Quality*.

In addition he has written a dozen book chapters and over a hundred papers, reports, and monographs in the field of resource economics and regional economic development.

He regularly testifies before state and federal regulatory agencies on energy policy, natural resource development, environmental protection, and local economic development. He is a regular commentator on economic issues on Montana Public Radio and in the national press. He testified in the Hearings for the Oldman River Dam and participated in the Meridian Dam Public Forum in Medicine Hat last year.

Boreal Majesty: An Evening for Canada's Northern Forests

The Canadian Parks And Wilderness Society (CPAWS) is hosting a cross-Canada tour for Canada's boreal forests. Join Wayne Lynch (noted science writer and wildlife photographer) and David Henry (conservation ecologist for Parks Canada and author of many books on wildlife) to experience the magic and wonder of the boreal forest!

Edmonton: November 30, 2002, Provincial Museum 780-432-0967

Calgary: December 2, 2002, John Dutton Theatre 403-232-6686

Tickets: \$10.00

For more information check out the boreal tour website at

<http://www.cpaws.org/boreal/boreal-majesty-book-tour.html>

Saturday November 2, 2002

Calgary Field Naturalists Society Annual Banquet

5:30 p.m. to 7:00 p.m. (No host reception with craft display and craft sales)

7:00 p.m. to 8:30 p.m. Dinner (Great door prizes to be awarded during dinner)

8:30 p.m. to 9:30 p.m. **Guest Speaker: John Acorn** (The Nature Nut)

on tiger beetle species of Alberta

Location: Best Western Village Park Inn

1804 Crowchild Tr. NW (Free underground parking)

Cost: Members \$30.00 per person; non-members \$35.00 per person

Reservations required by October 15, 2002

Contact: Ray Huene, 403-282-7826 Email: rayhuene@shaw.ca



OPEN HOUSE TALKS PROGRAM — FALL 2002

CALGARY

Location: The Hillhurst Room,
AWA, 455 12th St NW
Time: 7:00 – 9:00 p.m.
Cost: \$5.00 per person
Contact: 403-283-2025 for reservations

Tuesday November 12, 2002

Walking the Big Wild

with Karsten Heuer

Environmentalist Karsten Heuer presents his new book about his epic 3400-kilometre hike from Yellowstone to Yukon. He will be discussing his trip and his support for the Yellowstone to Yukon (Y2Y) conservation initiative. The Y2Y vision is to restore and maintain landscape and habitat connectivity along 3200 kilometres of mountains by establishing a system of core protected wildlife reserves that are linked by wildlife habitat and movement corridors.

Tuesday December 3, 2002

Great Horned Owls in Alberta

with Grahame Booth

Grahame has been working for the last six years monitoring great horned owls in Calgary and the surrounding area. Like so many wildlife experts in Alberta, his work is entirely self-funded, inspired by a long-term fascination with these awesome birds. He will be presenting slides of the every day lives of the owls, and information on what they are feeding on and how.

Tuesday January 14, 2003

When do you let the animals out? A fun look at wildlife watching in the Rockies

with Michael Kerr

Michael Kerr is a naturalist, international conference speaker and the former communications manager for Banff National Park. His wildlife stories and insights were recently featured on a nine-part CBC radio series. He is the author of *The Canadian Rockies Guide to Wildlife Watching* and *When Do You Let the Animals Out? A Field Guide to Rocky Mountain Humour*. Over the years he has had the honour of imitating a pika on the Discovery Channel, an elk on CBC radio and a moose on CNN.

EDMONTON

Location: Environmental Resource Centre,
10125 97 Ave, Edmonton
Time: 7:00 – 9:00 p.m.
Cost: \$5.00 per person
Contact: 403-283-2025 for reservations

Wednesday November 6, 2002

Walking the Big Wild


with Karsten Heuer

Pre-registration is required for this talk.

Environmentalist Karsten Heuer presents his new book about his epic 3400-kilometre hike from Yellowstone to Yukon. He will be discussing his trip and his support for the Yellowstone to Yukon (Y2Y) conservation initiative. The Y2Y vision is to restore and maintain landscape and habitat connectivity along 3200 kilometres of mountains by establishing a system of core protected wildlife reserves that are linked by wildlife habitat and movement corridors.

Get on the Ark: Albertans for Ratifying Kyoto

Across Canada and particularly in the west there is a propaganda war being waged by the Alberta provincial government (supported by Saskatchewan, British Columbia, Ontario and most of the large energy/petroleum companies) to discredit and derail the ratification of the Kyoto Protocol by the Government of Canada. To help counter the misinformation and propaganda in this \$1.5 million-plus campaign, a coalition of Alberta ENGO groups have formed called "Albertans for Ratifying Kyoto – ARK."

Visit www.web.net/~ark for more information. 



Zoë Preston with her interpretation of Ralph Klein

Corrections for the August 2002 issue:

- p. 9: #35 million should read \$35 million
- p. 12: "derived decision" should read "desired decision"
- pp. 8-14: photo credits labeled as R. G. should read R. G. Thomas
- p. 16: photo credit should read G. Houston
- p. 18: photo credit for "South Saskatchewan" photo is G. H. Fredeen
- p. 22: the address for the AWA office is 455 12 St., not 122 St.

Editorial Board:
Shirley Bray, Ph.D.
Peter Sherrington, Ph.D.
Andy Marshall
Joyce Hildebrand
Graphic Designer:
Tammy L. Nischuk
Printer:
MRC Document Services

Web Host: qbiz.ca

Please direct questions and comments to:
Shirley Bray
Phone: 270-2736
Fax: 270-2743
awa.wrc@shaw.ca
www.AlbertaWilderness.ca

Editorial Disclaimer: The opinions expressed by the various authors in this publication are not necessarily those of the editors or the AWA. The editors reserve the right to edit, reject or withdraw articles submitted.

VOLUNTEERS NEEDED!

March 8, 2003

Wilderness Celebration in Edmonton

Volunteers Needed for this exciting new event. An evening of good food, entertainment and silent auction.

We have two great organizers in Edmonton for this event and they need your help. Contact our Calgary office 403-283-2025 or awa@shaw.ca



"Our quality of life, our health, and a healthy economy are totally dependent on Earth's biological diversity. We cannot replicate natural ecosystems. Protected areas are internationally recognized as the most efficient way to maintain biological diversity"

- Richard Thomas

The Alberta Wilderness Association (AWA) is dedicated to protecting wildlands, wildlife and wild waters throughout Alberta. Your valued contribution will assist with all areas of the AWA's work. We offer the following categories for your donation. The Provincial Office of the AWA hosts wall plaques recognizing donors in the "Associate" or greater category. Please give generously to the conservation work of the AWA.

Alberta Wilderness and Wildlife Trust - an endowment fund established with The Calgary Foundation to support the long-term sustainability of the Alberta Wilderness Association. For further details, please contact our Calgary office (403) 283-2025.

Membership - Lifetime AWA Membership ☐ \$25 Single ☐ \$30 Family

Alberta Wilderness Association	
<input type="checkbox"/> Wilderness Circle	\$2500 - \$5000
<input type="checkbox"/> Philanthropist	\$1000
<input type="checkbox"/> Sustainer	\$500
<input type="checkbox"/> Associate	\$250
<input type="checkbox"/> Supporter	\$100
<input type="checkbox"/> Sponsor	\$50
<input type="checkbox"/> Other _____	

Alberta Wilderness Resource Centre	
<input type="checkbox"/> Patron - greater than \$1000	
<input type="checkbox"/> Benefactor	\$1000
<input type="checkbox"/> Partner	\$500
<input type="checkbox"/> Friend	\$100



☐ Cheque ☐ Visa ☐ M/C Amount \$ _____

Card #: _____ Expiry Date: _____

Name: _____

Address: _____

City/Prov. _____ Postal Code: _____

Phone (home): _____ Phone (work): _____

E-mail: _____ Signature _____

☐ **I wish to join the Monthly Donor Programme!**

I would like to donate \$ _____ monthly. Here is my credit card number OR my voided cheque for bank withdrawal. *I understand that monthly donations are processed on the 1st of the month (minimum of \$5 per month).*

The AWA respects the privacy of members. Lists are not sold or traded in any manner. The AWA is a federally registered charity and functions through member and donor support. Tax-deductible donations may be made to the Association at: Box 6398 Station D, Calgary, AB T2P 2E1. Telephone (403) 283-2025 Fax (403) 270-2743 E-mail a.w.a@shaw.ca Website <http://www.AlbertaWilderness.ca>

Notice of Annual General Meeting

November 30, 2002

The Annual General Meeting of the Alberta Wilderness Association and the Alberta Wilderness Institute will be held in Calgary on November 30, 2002 at 11:00 am.

Date: November 30, 2002

Time: 11:00 am

Please call the office for further details (403) 283-2025.

All members are welcome to attend.



Mountain Goat Kid

© Ken Ferris



The Alberta Wilderness Association

Box 6398, Station D
Calgary, Alberta T2P 2E1

