

ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Alberta Environment Director, Northern Region Regulatory Approvals Centre Main Floor, Oxbridge Place 9820 - 106 Street Edmonton, AB T5K 2J6 By fax: 780 422 0154

February 22, 2010

STATEMENT OF CONCERN

RE: NOTICE OF APPLICATION GRANDE CACHE COAL CORPORATION NO. 12 SOUTH B2 UNDERGROUND MINE
ENERGY RESOURCES CONSERVATION BOARD APPLICATION NO. 1632635
ALBERTA ENVIRONMENT ENVIRONMENTAL PROTECTION AND ENHANCEMENT ACT
APPLICATION NO. 006-155804
WATER ACT FILE NO.00250576

Alberta Wilderness Association (AWA) continues to be extremely concerned about the environmental degradation of the Caw Ridge area. Please consider this AWA's official *Statement of Concern* about the above named application. We respectfully request that the permit no. 1632635 be denied until there is completion of a full public inquiry into resource development and all other values and interests regarding Caw Ridge, as recommended by the Energy Utilities Board in 1999.

AWA has a long-standing interest and well-documented concern with the ongoing approval of industrial resource extraction in the Caw Ridge area. In a November 5, 2008 letter sent to the Director, Northern Region Alberta Environment, we warned that "If approval for Phase 1 is given, Grande Cache Coal may argue in the future that successive phases be approved due to having already invested in the first phase." AWA also wrote in August 2009 to Premier Stelmach and Minister Morton requesting that a full public inquiry be held into the impact that expanded resource development will have on other values and interests in the Caw Ridge area.

AWA recently published two articles (attached) in our publication, the *Wild Lands Advocate that* reveal concerns about the future of the wildlife that depend on the habitat of Caw Ridge. As documents obtained through FOIP underline, the province's Fish and Wildlife division is very concerned about the impact resource development will have on the area's wildlife populations. Application no. 1632635 appears as another in a series of applications to expand incrementally mining operations in the Caw Ridge area, without addressing the larger cumulative impact these mining and other resource extraction operations have on the ecological integrity of this area.

Of primary concern to AWA are the significant habitat and migration routes that Caw Ridge and adjacent lands provide to a diverse range of Alberta's wildlife. Caw Ridge is home to one of the largest herds of mountain goats in Alberta, and provides crucial habitat for bighorn sheep, moose, deer, wolves, lynx, wolverine, and grizzly bear.

Caw Ridge bisects the migration route of the Redrock–Prairie Creek caribou herd, a species listed as "threatened" under the Alberta Wildlife Act. Although the Redrock–Prairie Creek herd is currently listed as "stable," further development could jeopardize its security by impeding travel between its summer and winter ranges. Under habitat pressures exerted from resource development the nearby Little Smoky caribou herd has dwindled to the point of being listed as "at immediate risk of extirpation". AWA, like many of the government's fish and wildlife officials, wants to ensure that the plight of the Little Smoky herd does not represent the future of the Redrock-Prairie Creek herd.

The Alberta government's Endangered Species Conservation Committee (ESCC) recommended in 2002 that the grizzly bear be designated a *threatened* species. At the time, there were believed to be around 1,000 grizzlies in Alberta. Following a detailed 5 year DNA population study, the grizzly population is now known to be considerably less. The ESCC will shortly be meeting to review its 2002 recommendation in the light of updated population data.

Caw Ridge is promoted as a wildlife viewing site by Alberta Sustainable Resource Development and has been called the "Serengeti of Alberta." The area is home to medicinal plants used by the local Aboriginal people and is a popular recreation destination for many Albertans. The creeks below Caw Ridge contain bull trout, listed as "sensitive" under Alberta's Wildlife Act. Mining of coal and the related mine spoil can lead to groundwater contamination in several ways: shafts and tunnels can intersect aquifers; exposing coal to oxygen can form sulphuric acid which can degrade water quality; and contaminants from tailings can leach into groundwater.

Coal mining has been, and continues to be, the primary anthropogenic disturbance upon the Caw Ridge area. We believe other interests and issues must be brought to the forefront and considered with respect to resource management in the area. A public inquiry would facilitate the acknowledgment and consideration of a wide range of interests and help government officials in deciding the future of Caw Ridge. Through a full and accountable public inquiry, the Alberta government, which holds this land in trust for its citizens, can sponsor an important public debate about what management directions will best further the public interest.

Yours truly,
ALBERTA WILDERNESS ASSOCIATION

Christyann Olson, Executive Director

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cc:

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Caw Ridge: Two Cheers for Alberta's Fish and Wild<u>life Division</u>

By Ian Urquhart

n the 1993 comedy Groundhog Day Bill Murray plays a weatherman assigned to travel to Punxsutawney Pennsylvania to report when Punxsutawney Phil, the world's most famous weather-forecasting groundhog, predicts winter will end. Murray hates his assignment; he cannot wait to escape rural Pennsylvania. He is trapped, however, in a time loop that sentences him to live his same hellish day over and over again. But over time he learns that, like Scrooge in A Christmas Carol, he has the opportunity to change his life for the better. Change his behaviour and new, admirable possibilities will emerge.

What, you might ask, does this plot line have to do with Caw Ridge, that Grande Cache area home to "one of the most diverse assemblies of large mammals in Alberta." What does it have to do with Alberta's Fish and Wildlife Division?

The answer emerges from poring over hundreds of pages of documents AWA received through an August 2008 freedom of information request to the provincial government. The documents tell a story where year after year, decade after decade, public servants in Alberta's Fish and Wildlife Division defended the present and future health of the woodland caribou, mountain goat, and other large mammal populations who depend on the ecological integrity of Caw Ridge. At every turn, their efforts have been blunted and frustrated by the "development imperative" – expressed by the proposals, plans and policies that spring from the coal lease rights now held by Grande Cache Coal. Fish and Wildlife's convictions that the region's mountain goats and threatened caribou would suffer if coal exploration and development proceed in the vicinity of the ridge's alpine environment have taken a back seat to the company's rights time after time after time.

With respect to Caw Ridge, Fish and Wildlife personnel seem to me to be much like Bill Murray's character



Mountain goats have been studied officially on Caw Ridge since 1989. PHOTO: S. COTE

– sentenced to relive the same hellish experience over and over. Sadly though, there is nothing funny about their circumstances or that of the wildlife populations they try to steward. And, unlike Murray's character, the capacity to change their circumstances is not within their own power. Positive change depends on changing the perspectives, behaviour and/or power of other branches of the provincial government.

What follows is a chronicle of what the records received by AWA tell us about the struggle within the provincial government between the development imperative and a wildlife protection imperative. Unfortunately, the records are incomplete in important respects. The government used several categories of exemptions under the *Freedom of Information and Protection of Privacy Act* to justify excluding portions of the record from AWA.

Two themes are highlighted below. The first is the longstanding concern of the Fish and Wildlife Division over what resource exploitation in the vicinity of Caw Ridge means for a truly special place's wildlife populations. The second is the controversy within the provincial government over Grande Cache Coal's plans to conduct exploration drilling to delimit the coal reserves associated with a potential mine expansion (the so-called No. 16 mine).

A Decade Ago

AWA has called Caw Ridge Alberta's "Serengeti" due to the plentiful and diverse wildlife populations the ridge supports and nurtures. Coal, a fossil fuel we once praised for its contribution to our economic progress but now condemn for its contribution to climate change, rests abundantly underground beneath the trails that wildlife have carved on the ridge over the last millennium. The Caw Ridge story is modern-day Alberta; it presents a clash between the immediate imperative of resource exploitation and the longer-term desire to insure that wildlife and the intact landscapes they depend on are preserved for generations to come.

Our interpretation of the Caw Ridge story here begins in 1999. Then Smoky

River Coal Limited, a miner with mortal financial troubles, applied to the Energy and Utilities Board (EUB) to extend its open-pit coal mining operation – the No. 12 South Mine B2 Pit. Alberta Environment received an unspecified number of letters expressing concerns about what the mine extension would mean for the sustainability of the area's wildlife populations. This application, when combined with other approved and proposed petroleum and forestry activities, posed a risk to the region's caribou population. That risk, according to Alberta Environment, was "approaching a significant threshold."

Such concerns did not impress the EUB. The Board refused three requests to hold a hearing on the application; it approved the application since it thought the extension "was logical from a coal resource conservation perspective." The EUB did not believe any significant additional environmental effects would be generated by the proposal.

Paradoxically, however, the Board acknowledged concerns about mining Caw Ridge and decided it would be wise to hold a public inquiry into those concerns. Alberta Environment was duly invited to discuss its possible role in the inquiry with EUB staff and attend a meeting in January 2000. In a briefing note prepared on the eve of that meeting Alberta Environment was a voice for wildlife. The department stated that "its current position is that mining on Caw Ridge poses significant environmental concerns and these concerns relate to impacts on woodland caribou (an endangered species under the Wildlife Act), mountain goats, carnivores, bull trout, water quality and alpine reclamation." The department's analysis, recommendations, and key messages are censored from AWA and public view. The inquiry never saw the light of day.

Grande Cache Coal's Mine Exploration Program: 2007

But neither did Smoky River Coal. The company never emerged from creditor protection. By the end of July 2000 PricewaterhouseCoopers had sold most of the miner's assets; this year saw the birth of Grande Cache Coal Corporation (GCC). The newborn company purchased the bankrupt company's coal leases. The Grande Cache mine started the new millennium by closing only to be

resurrected by Grande Cache Coal in 2004. GCC generated its first annual profit in the 2009 fiscal year (of \$106.2 million) on the strength of record high coal prices after racking up losses of nearly \$75 million over its first five years.

At the very end of May 2007 Grande Cache Coal gave notice; it wanted to drill a series of exploration holes immediately to the north of Caw Ridge between June and December. In September the Fish and Wildlife officials in Edson's office of Sustainable Resource Development's (SRD) told their colleagues in the Land Management Branch in Edmonton that they had to reject the company's proposal. The exploration area was directly in the path of the Red Rock-Prairie Creek mountain woodland caribou herd – a herd variously described as "in decline" or "threatened." According to Fish and Wildlife the exploration program should not proceed according to the company's timetable. Its application would join others in being reviewed by the West Central Caribou Landscape Planning team "within the next couple of months." A 2007 exploration program was out of the question.

Fish and Wildlife's position, at the very least, frustrated officials in the Land Management Branch. I believe an objective reading of the record released to AWA must conclude that Land Management officials were far less

questioning of GCC's plans than were their colleagues in Fish and Wildlife. A senior official in Land Management, for example, argued when the application to explore was before government in 2007: "I do not believe we can stop all exploration just because of the caribou migration route. There must be a caribou protection plan required and there should be some type of window of opportunity. If there is definitely a no go zone then F & W had better flag it..."

For Fish and Wildlife the issue may have been less a concern to "stop all exploration" than it was to prevent all exploration that the company's own research (mandated by its government approvals) suggested would put wildlife at unacceptable risk. Here, commenting about the proposed exploration program, a Fish and Wildlife official noted how radio-collared caribou had used Caw Ridge when mining operations had shut down. He went on to say about the company's proposed 2007 plan: "this proposal runs right across the eastern face of the ridge and is proposed during the historical migration period of October to December. An obvious conflict that should be avoided and I'm surprised that CGCC included nothing in their application to address this." (sic)

In 2007, the objections of Fish and Wildlife triumphed. The proposed exploration program did not proceed.



Caw Ridge, one of three ungulate areas being studied by a multi-institutional team of researchers, is home to an impressive mountain goat population and is crucial to woodland caribou migrations. PHOTO: S. COTE

GCC's Exploration Program: 2008

This victory was just a reprieve; the next year's developments treated the region's wildlife populations very poorly. In mid-January SRD's Land Management Branch approved Grande Cache's exploration plans.

This approval was a slap in the face to Fish and Wildlife's concerns and recommendations. Three months earlier the Edson office offered a pointed critique of GCC's ambitions. "We are extremely concerned with the proposal," Fish and Wildlife said, "particularly regarding the potential for mining activity to follow the exploration program. GCCL's protection plan aptly outlines the reasons for our concerns..." The exploration program was "directly perpendicular to the migration routes" well-known to the company; these migration routes had been used by up to 70 percent of the Red Rock-Prairie Creek herd in its spring and fall migrations; caribou "all but abandoned these routes" when mining moved closer to Caw Pass; abandoning these migratory routes has coincided with the numerical decline of the herd; and, caribou used Caw Ridge extensively when miners were not blasting away in the B2 pit.

Mining, according to the data, obviously threatened caribou that were so bold, or just accustomed, to tread in areas where coal could be mined. Fish and Wildlife believed, based on the evidence they had, "that mining can have a dramatic effect on migration and, in combination with other industrial activities; it corresponds to the decline in woodland caribou (sic)." Pending recommendations from the West Central Alberta Caribou Landscape Planning Team (WCCLPT) Fish and Wildlife felt it was "premature to approve of an exploration program of this magnitude and significance prior to the review of the WCCLPT's report which will deal with future needs for woodland caribou in this part of the province."

This view grated on Land Management Branch officials. Most viscerally perhaps it appears when one official noted in an email sent mainly to Fish and Wildlife officials that, when challenging the F&W view noted above, the GCC program was for "EXPLORATION AND NOT DEVELOPMENT (emphasis in original)."

In the spring and summer of 2008 the wildlife protection imperative assumed its customary position – defensive first, defeated second. Fish and Wildlife had the nerve to wonder in a July 17th email, in the absence of any previous correspondence they could identify, what impact their October 2007 caribou concerns had on the January SRD approval.

The short answer was "nothing." In the early afternoon of July 18th a Fish and Wildlife official wrote to his colleagues: "I have grave concerns if we are still encouraging exploration and developments of major mines in light of the RedRock/ Prairie Creek declines, but accept that this may be a decision beyond me."

This was an immediate response and call for advice, within an hour, to a fundamental critique of the Fish and Wildlife division. The original critique came from the most senior official in the Land Management Branch. Responding to the Fish and Wildlife question regarding what impact their concerns about caribou had on the January approval of the exploration program the Branch's Executive Director wrote: "Decisions on applications are made based in existing policires (sic) and guidelines. Current policy does allow for energy exploration and development in caribou range. The input that the program not be approved pending submission and eventual implementation of the WCCLPT recommendations in essence places a moratorium on activity. (Text omitted according to FOIPP exemptions). We need to render decisions on applications within scope of current policy and guidelines, not what might be the policy or guidelines in the future."

The province's land managers essentially viewed Fish and Wildlife as obstructionist. Wildlife officials were told to do more than present "just blatant No Go road blocks, to the Land Manager so a decision can be made on how exploration activities may go ahead in a fashion that would minimize the footprint and affect (sic) on wildlife resources." They should face up to the fact that Caw Ridge "is disignated (sic) for coal exploration and development under the Coal Policy and the department has not put any restrictions...that would affect the issuance of coal rights, exploration and/or development activities."

On July 18, 2008 Fish and Wildlife officials dutifully recommended how GCC's exploration could go ahead in a way that would minimize the "affect (sic) on wildlife resources." Grande Cache had proposed three alternative exploration trails to use during their exploration program. The company preferred an 8.4 kilometre route that would take their trucks and equipment through their lease area and onto Caw Ridge itself and would go through and around the mountain goat research area. Caw Ridge has been the site of a long-term multi-university/ Alberta Fish and Wildlife research project currently led by Dr. Steeve Côté of the Université Laval (Kirby Smith of Alberta Fish and Wildlife, along with Dr. Marco Festa-Bianchet, should be credited with sowing the seed for this project in 1988). For GCC "the Caw Ridge access is clearly the best choice from the perspective of minimizing disturbance footprint."

From the Fish and Wildlife perspective, as outlined in the July 18th letter to the Land Management Branch, the Caw Ridge route was the least desirable one to follow. "Due to the sensitive ecology of high alpine areas associated with Caw Ridge," the letter read, "and the large number of Mountain Goats residing on the ridge, it is important to ensure that no highway vehicle access is supported on the ridge." Because of the effects noise would have on the goats it was "critical" to keep traffic off the ridge. The letter identified the "New Creek Crossing Option," a route Grande Cache Coal did not favour at all, as the one that would affect wildlife the least.

How was Fish and Wildlife's effort to identify recommendations that would minimize the affect on wildlife resources rewarded? The Land Management Branch approved the Caw Ridge route, the route that Fish and Wildlife unequivocally argued would have the most damaging consequences for the ridge's wildlife. Efforts from Fish and Wildlife to have this decision reconsidered went nowhere. Clearly, the Land Management Branch foretold, quite accurately, what a final decision would look like when an official earlier remarked: "A land use decision must then be made in light of all concerns not just those of F&W." In this case, however, it would have been more accurate to add that all concerns are not created equal when it comes to balancing

the development imperative with the wildlife protection imperative in Alberta. Concerns related to Grande Cache's exploration plans would trump and fail to accommodate meaningfully Fish and Wildlife's concerns.

Conclusion

So Grande Cache Coal and the Land Management Branch got their way in the end. The company's exploration program went ahead in the summer of 2008. We also should note that it did so without having to respect the longstanding industrial activity deadline of August 22nd set by SRD for identified sheep and goat range areas. This deadline was "standard operating practice for industrial activity" designed to protect female goats and sheep. Perhaps the final indignity our voice for wildlife suffered occurred when yet another crucial Fish

and Wildlife recommendation designed to minimize the impact on wildlife was ignored. Access development needed to avoid disturbing the woodland caribou migration so "such activities must be completed prior to October 15th." Exploration activities took place well beyond that deadline.

And what about the goats? How did they react to the exploration program? Not well. The exploration program altered goat behaviour. In mid-August they had stopped foraging in areas adjacent to where there had been traffic. This additional stressor was especially concerning because the ridge's goat population already was stressed by extreme heat.

As we get ready to bid farewell to 2009 and welcome 2010 here's hoping Sustainable Resource Development Minister Morton will use the following

thoughts from a Fish and Wildlife official as the basis for a New Year's resolution he will follow:

"Fish and Wildlife Division has since the 1990's repeatedly recommended that no coal exploration or development be approved for Caw Ridge. For this latest exploration application we recommended that it not be approved. We were over ruled. We recommended that the ridge top access option proposed by GCC not be approved because the disturbance of goats and caribou and their habitat was too high. We were over ruled.

"The whole development, not just the exploration phase, must be reassessed in light of the public's appreciation and concern for this unique part of Alberta's wildlife resource."

Amen to that.





An Eloquent Challenge

By Christyann Olson, AWA Executive Director

"In January of 1995 I helped carry the first grey wolf into Yellowstone, where they had been eradicated by federal predator control policy only six decades earlier. Looking through the crates into her eyes, I reflected on how Aldo Leopold once took part in that policy, then eloquently challenged it. By illuminating for us how wolves play a critical role in the whole of creation, he expressed the ethic and the laws which would reintroduce them nearly a half-century after his death."

- Bruce Babbitt, U.S. Secretary of the Interior, 1993-2001

changing attitudes to predators and to wildlife in general. AWA has sought, since its inception, better policy and legislation for wildlife. We realized by the 1960s that habitat destruction leads wildlife to suffer. This realization is even stronger today as we grapple with the undeniable truth that habitat destruction not only makes wildlife suffer, but it also reduces our ability to satisfy some basic human needs.

AWA vice president Cliff Wallis, on a mild January evening several weeks ago, described a communitybased biodiversity workshop in Inner Mongolia during an AWA presentation in Lethbridge. The workshop delegates were asked to identify the elements of nature that were important to them and their way of life. Of all the groups represented, including those who work for the Dalai Lake National Nature Reserve where the workshop was held, the herders were the only ones who included wolves in their list. While wolves could be seen as putting their lifestyle at risk, the herders fully understood the importance of having wolves in the ecosystem. AWA believes, and several polls confirm, that most Albertans understand the importance of having the full complement of native species in our ecosystem.

As we begin the year 2010, AWA is energized to bring the truth about the status of Alberta's wildlife populations to the forefront and to help, as Aldo Leopold once did, illuminate the critical role wildlife plays in our lives. Alberta's last wildlife policy was written in 1980 – more than a generation ago. Albertans' desire to protect wildlife is stronger than it has ever been. It is time government delivered a new policy to satisfy that desire.



This nanny and kid displayed amazing agility as they climbed this vertical slope with ease, the doe ever watchful and her kid always on her heels. PHOTO: C. OLSON

AWA believes that the Alberta government, hampered by outdated policy and legislation, has neglected its duty to protect wildlife. The development imperative has trumped the wildlife protection imperative. Consequently, we have witnessed more and more habitat destruction, a decline of some species and a death spiral for others. AWA wants this "War on Wildlife "stopped.

Conklin Bears

AWA was distressed, devastated and disappointed with the dreadful scenario that led to the slaughter of black bears at Conklin (see WLA, October 2009). While we are concerned that Conklin may not be the only place where the garbage storage situation has been allowed to deteriorate, we truly appreciated a

candid and considered response to our August 14, 2009 letter to Sustainable Resource Development (SRD) minister Ted Morton regarding the killing of these bears. Knowing the thoroughness of his assessment of the situation and the breadth of measures taken to deal with the issue helps us to understand the perspective and concern he has for this very serious incident. Through a new decisionmaking protocol the Minister intended to strengthen lines of accountability and insure greater oversight to avoid future episodes such as the one at Conklin. (Whether this survives the recent cabinet shuffle remains to be seen).

Caw Ridge

The Minister's response to our concerns about the Conklin massacre contrasts



While some black bears are curious enough to hang around this bruin was not interested in posing for the camera. Photo: C. Olson

sharply, however, with the refusal to act on another wildlife management issue – one that is much closer to the heart of the development imperative than Conklin. That issue is the threat coal mining poses to the ecological integrity of Caw Ridge. AWA wrote Minister Morton and Premier Stelmach about Caw Ridge on August 17, 2009. Caw Ridge is considered by many wildlife biologists to be one of the single most critical habitats in all of Alberta; some know it as Alberta's Serengeti because of its importance to large mammals such as mountain goats and woodland caribou. AWA considers Caw Ridge and its wildlife to be exceptional. It deserves exceptional management attention.

The package of information we received on Caw Ridge through the FOIP process (see WLA, December 2009) demonstrated, in no uncertain terms, that SRD biologists and wildlife managers share AWA's level of concern for this area. We were therefore disappointed with Minister Morton's refusal to entertain our request that Alberta convene a public inquiry into the future of coal mining

in the immediate vicinity of the ridge. Furthermore, a comprehensive cumulative effects assessment should be done before any future exploration or development activity is allowed in that area.

While the Minister's letter explained that our laws and their administration allow SRD to manage and "mitigate" the impacts of any development on wildlife habitat, Caw Ridge could be the poster child for SRD's failure to manage and mitigate meaningfully. Reading the FOIP documents left us sharing the sense of helplessness one Fish and Wildlife official expressed in the following words.

"Fish and Wildlife Division has since the 1990's repeatedly recommended that no coal exploration or development be approved for Caw Ridge. For this latest exploration application we recommended that it not be approved. We were overruled. We recommended that the ridge top access option proposed by GCC not be approved because the disturbance of goats and caribou and their habitat was too high. We were overruled."

Wildlife Policy and Legislation

One consistent thread running through both the Caw Ridge and Conklin bear issues is the lack of strong legislative tools to allow the province to privilege wildlife concerns. AWA believes such strong protective measures must become part of our legislative toolbox.

Alberta's Wildlife Policy is 30 years old and is not informed by today's science or the public's regard for wildlife. The 1980 policy was written at a time when there was far less regard for the intrinsic value of wildlife, when certain populations were seen as inexhaustible and when the primary consideration was for "wildlife to pay its way." This sort of thinking is seriously outdated and inadequate. Sound legislation complemented by sound regulations could improve wildlife management tremendously. Sound policy could have guided decisions on Caw Ridge that Fish and Wildlife staff agonized over during the last round of coal exploration and could have prevented the Conklin debacle. We need an up-to-date Wildlife Policy and an amended, stronger Wildlife Act.



This Rocky Mountain bighorn ram was "shot" near the hamlet of Cadomin. The magnificence of the rams' full-curl horns may be one reason they have been recognized officially as Alberta's provincial mammal. PHOTO: C. OLSON

What follows are some principles related to wildlife that our association has valued and promoted throughout its past 45 years. In fact, some of these principles animated AWA's birth in the mid-1960s. Some of these principles are also part of Environment Canada's *Wildlife Policy for Canada*. Those values and principles are:

- **1.** Wildlife has intrinsic value in and of itself.
- 2. Healthy natural populations of wildlife depend entirely on the health and abundance of their habitat. Wildlife is an integral part of the environment in which we live and as such is a key indicator of the health of that environment.
- 3. We all share in the responsibility to ensure the retention of the full complement of all living things within healthy, natural ecosystems. Alberta's species at risk are not adequately covered under current policy and legislative documents, and must be.
- 4. Effective conservation of wildlife

- relies upon a well-informed and involved public. Alberta wildlife is a public resource and the Alberta public has a responsibility to be involved and to ensure wildlife decisions protect that resource. Basic and applied scientific research is essential to our understanding of ecosystems and their wildlife components and this must be supported within government, and the costs borne by taxpayers.
- **5.** Wildlife is a source of food and a vital part of the culture and economies of some aboriginal peoples.
- 6. We all have responsibility for the stewardship of wildlife and we all share in the costs of conserving and managing wildlife. Our elected governments are accountable for its management. Those whose actions result in costs to wildlife must bear them.
- 7. Taking care of habitat and the wildlife that depends on it must be our primary goal, rather than belated investment in restoration and recovery.

AWA knows and is extremely concerned that Alberta's Wildlife Policy and Wildlife Act do not protect adequately the province's wildlife. There is an urgent need to have sound and powerful policy and legislation that will protect our wildlife. AWA challenges our policy makers to recognize the error here and correct the mistake. I am extending this challenge to you, the reader, in hopes that each one of you who reads this article will give serious consideration to the need for updated policy and legislation and that you will help us by phoning and writing to help the government hear its constituents. It is time to stop the "war on wildlife" and make things right.