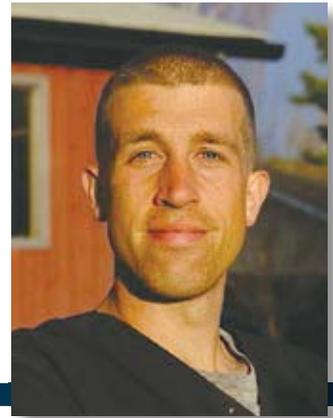


Destruction of McClelland Lake Wetland Complex Flies in the Face of our Climate Change Commitments

By Phillip Meintzer, *AWA Conservation Specialist*



After spending much of the summer of 2021 under a blanket of wildfire smoke and witnessing the extreme fall floods in our neighbouring province of BC, the impacts of climate change are more tangible than ever before. To ensure we minimize the worst effects of the climate crisis, humanity (more specifically - corporations and governments) needs to work to ensure that we stay below 1.5°C of global warming. The pathway to do so has been laid out. It requires meeting the strict emissions targets set by the Intergovernmental Panel on Climate Change (IPCC). These targets include a 45 percent reduction in emissions from 2010 levels by 2030 and reaching net zero emissions globally by 2050. Meeting these targets doesn't mean we will avoid any and all severe impacts from climate change. But it means that future generations should hopefully have a more habitable planet than if we continue with business as usual.

As we are already three months into 2022, this means we only have less than eight years to cut our emissions by nearly half to ensure that we stay on track for preventing the worst possible climate change scenarios: drought, famine, coastal flooding, biodiversity loss, climate refugees and/or resource wars. Given this scenario, society needs to focus our efforts on decarbonization across all activities and industries as soon as possible and as rapidly as possible. If we delay much longer, it will only mean that our transition will need to be much more sudden and severe. This will likely have much more harmful effects on our daily life, our jobs, and all our other societal processes because we will not have adequately prepared ourselves for such

rapid changes.

Given this looming existential threat, we shouldn't be considering adding new fossil fuel infrastructure. In 2021, Alberta set a new annual record for tar sands production (3.1 million bbl/day); record oil sands production pushed Alberta to a new annual oil production record (3.61 million bbl/day). Future expansions likely will only make it more difficult to reduce our greenhouse gas emissions.

This is exactly what is happening in northern Alberta right now with a planned oil sands mine set to begin construction in 2025 that is intended to operate until 2060. How can we commit to reducing our carbon footprint as a province or nation while creating new infrastructure that actively works against those goals? In light of these emissions targets, how can we willingly accept that an oil sands mine can be allowed to operate for ten years past the deadline for transitioning to a net-zero society? Canada has a greater responsibility than the majority of countries across the world because of our substantial per-capita carbon footprint relative to other nations.

Fort Hills Energy Corporation is a subsidiary of Suncor Energy, and the Fort Hills Oil Sands Project (FHOSP) is an oil sands mine that started up in 2018 and is proposed to expand mining preparations (i.e. ditching and draining) in 2025. The creation and expansion of another new oil sands mine is troubling enough on its own. But we also need to consider the area intended for mining and its extreme ecological importance to Alberta in the fight against climate change. The FHOSP proposes to destroy roughly half of the incredibly beautiful and unique wetland

ecosystem known as the McClelland Lake Wetland Complex (MLWC).

The MLWC includes several environmentally significant features including McClelland Lake, a large patterned fen, and sinkhole lakes. The MLWC is important both for its unique aesthetic qualities, as well as its diverse biophysical features and ecological functions it provides. The watershed supports rare plants and provides an important stop-over point and breeding ground for many migratory bird species from across North America. The patterned fen features long rows of peat ridges (strings) separated by shallow pools of water (flarks). Its patterns give it a spectacular beauty. In addition to its biophysical properties, the MLWC and surrounding watershed has socio-cultural importance for Indigenous communities in the region. They have relied on the MLWC as a source of drinking water, an area to harvest traditional foods and medicines, and as a place to practise and maintain their beliefs, customs, history, and languages. It's easy to see why Richard Thomas, the author of the definitive study of Alberta's Boreal Natural Region, called the McClelland fen "a potential World Heritage site."

In 1994, AWA participated in a four-year sub-regional planning process that resulted in the protection of the MLWC from oil sands development. However, in 2002, the sub-regional planning rules suddenly changed at the request of True North Energy (a subsidiary of Koch Industries), which somehow acquired leases for the area in 1998 despite the existing protections for the area. The 2002 decision allowed for mining in half of the wetland complex so long as the

ecological integrity and functionality of the unmined portion is maintained. Maintaining the sustainability of the unmined portion of the MLWC is unlikely as the mining will destroy the topography and the soils that are needed to sustain groundwater flows to and from the rest of the watershed. It will very likely destroy the character of the unmined portion of the MLWC including the lake.

In addition to destroying a pristine and rare wetland ecosystem, Fort Hills threatens one of Alberta's and Canada's largest deposits of sphagnum (or peat) mosses. Peatlands have been described as critical for preventing and mitigating the effects of climate change as they represent the largest natural terrestrial storage for carbon on the planet. Peat mosses store more carbon than all other types of terrestrial vegetation in the world combined. To destroy them is to release carbon back into the atmosphere as well as to hinder our ability to capture more of it as we target a net zero future. The International Union for Conservation of Nature (IUCN) recommends that countries should include peatland conservation and restoration in their commitments to international agreements because of their unique role in fighting climate change.

So why is this mine going ahead? The answer here is the same as for all resource extraction that occurs at the expense of wilderness - profits. Suncor knows they can still make money from the extraction of oil from this proposed tar sands project and they will be proceeding as planned in the absence of any meaningful intervention.

As part of Fort Hills' Water Act and Oil Sands Conservation Act approvals, it was required to submit an Operational Plan for maintaining the sustainability of the unmined portion of the MLWC two years prior to beginning any ditching or draining within the MLWC watershed. On December 15, 2021 Suncor – on behalf of Fort Hills, submitted this Operational Plan to the Alberta Energy Regulator (AER). In light of this anticipated submission, AWA reviewed many of the foundation documents created to guide the development of this oil sands project including (but not limited to):

- The 2002 Energy and Utilities Board Decision Report,
- The December 2015 Alberta government's Water Act Approval No. 00151636-01-00 issued to Fort Hills Energy Corporation,
- Suncor's 2018 Conceptual Operational Plan – also known as the proposal to develop an Operational Plan for the sustainability of the non-mined portion of the MLWC.

Our reading of these key documents has allowed us to recognize four key commitments – among many others – which AER should ensure are satisfied before authorizing Suncor's proposed MLWC Operational Plan. These four commitments are listed below, along with which document(s) they were found within:

1. The proposed mitigation plan and associated design features will protect the unmined portion of the MLWC (EUB Decision Report, Water Act Approval, 2018 Proposal);
2. In defining the functionality of the MLWC – develop a list of indicators, including those which recognize Indigenous traditional socio-cultural needs and values through extensive consultation with local Indigenous communities (EUB Decision Report, Water Act Approval, 2018 Proposal);
3. Agreement by all members of the MLWC Sustainability Committee on the proposed list of indicators and the FHOSP mitigation plan (EUB Decision Report);
4. MLWC Sustainability Committee recommendations should be considered

and implemented in the development of the submitted Operational Plan (EUB Decision Report).

It is AER's responsibility to ensure that Suncor fulfills all FHOSP requirements and commitments, especially the four key commitments highlighted within AWA's letter to AER. The protection of the unmined portion of the MLWC is our primary concern. Suncor's Operational Plan must outline – with a very high degree of certainty – that their mitigation plan and design features will protect this outstanding wetland ecosystem. If any one of these commitments is not adequately addressed, the MLWC Operational Plan must not be authorized until the proponent can provide sufficient evidence to the contrary.

The MLWC and surrounding watershed sustains some of Alberta's deepest soil carbon layers and vital natural water bodies including McClelland Lake and patterned fens. It supports rare plant communities and provides an important stopover point and breeding grounds for many migratory bird species along one of North America's major migratory flyways. Given the unique importance of this wetland ecosystem, Suncor must conclusively demonstrate that their Operational Plan will guarantee the protection of the unmined portion of the complex.

On January 28, AWA was provided with a copy of Suncor's submitted Operational Plan for us to review. We look forward to the reviewing the Operational Plan to ensure that these commitments have been met.

– Phillip Meintzer



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