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Honourable Mel Knight
Minister of Sustainable Resource Development
Alberta Legislature Building
10800 – 97 Avenue
Edmonton, AB T5K 2B6

Re: Logging in the Beaver Mines Lake/Castle Falls Area

Dear Minister Knight,

Thank you for your letter of May 19, 2010 regarding the proposed logging in the Beaver Mines Lake/Castle Falls area. I have a number of comments about the statements you make in your letter.

I would suggest that there *have* been a number of wildfires since the early 1900's, including the very large 2003 Lost Creek Fire, and that there are few blocks of old trees remaining. Historically, perhaps 1/3 of the forest in the Castle was old growth, but that number has now shrunk to less than 9%.

Since 1934, the major fires have occurred in the most heavily-logged drainages. In fact, logging may well *increase* the fire hazard by opening up more country to random camping and motorized vehicles. You may recall that the Castle has been closed in recent dry years due to the fire hazard while the neighbouring Waterton Lakes National Park has remained open. I would suggest that the difference is that Waterton has effective control over backcountry ignition sources (fires, camping, vehicles) while there is no effective control in the Castle.

Of the 80 areas that received a Special Places designation, only the Castle has not been legislated as a protected area. The government's press release of March 18, 1998 announcing the Castle Special Place notes that “*The protection measures for the Castle area reflect the local Committee's recommendations to provide legislated protection for the area while taking into account the region's importance for recreation, tourism and established development.*” (Emphasis mine.)

The designation of the Castle in 1998 as a Forest Land Use Zone (FLUZ) was an *interim* measure to regulate the existing Access Management Plan. The press release continues on, “*Secondly, the government will conduct a full review and update of the Castle Sub-Regional Integrated Resource Plan (IRP), as recommended by the Local Committee.*”

The IRP plan was updated, but was never formally accepted. Even though it hasn’t been accepted, the 2001 IRP clearly anticipates that the Castle would receive some form of legislated protection:

“Existing options for legislating the CSMA were seen to be unsatisfactory by the Local Committee when the Committee presented its recommendations to the Minister of the Environment in 1997. New designation alternatives, to be identified in new protected areas legislation, could be applied to the CSMA in the future.”

“New legislated designations that may be applied to the Castle Special management Area, or specified geographical areas within the CSMA, will specify how these protected areas should be managed. For this reason, a thorough review and analysis of this plan should be deferred until new legislated designations have been applied to the Castle River area.”

“...particular emphasis will be placed on the retention of wildlife populations and biodiversity in review processes”.

Clearly, the Castle was not meant to remain a FLUZ indefinitely.

It should also be noted that the Castle’s nomination was vetted not only by the Local Committee, but also by the Interdepartmental Committee, and by the Provincial Coordinating Committee. The key thing here is that the Castle was supposed to receive legislated protection.

Most careful observers of the situation in the Castle region, including the NRCB in its 1993 decision on the Vacation Alberta Proposal (*Decision Report Application #9201 - Vacation Alberta Corporation*), the EUB in its Screwdriver Creek decision (*Decision 2000-17: Shell Canada Ltd.*), and the joint Shell/CPAWS study (*Selected Ecological Resources of Alberta’s Castle Carbondale: A Synopsis of Current Knowledge, February 2005*) recognize that significant environmental degradation has already occurred in the Castle region. And things aren’t getting better; they’re getting worse.

It’s time to get the Castle legislated as a park.

Another point I would like to make is that rather than providing “economic benefits”, logging in the Castle may well preclude the very real economic benefits that can come from a protected area.

In its April 11, 2006 letter to then SRD Minister Dave Coumts, the CROWPAC committee that was looking at the C5 plan was far from convinced that logging was the best economic use of the forest. The committee said, *“The plan centers on the sustainable harvest of timber while considering other values. This is clearly an economic point of view. However no one has yet been able to provide a reliable analysis of the economic benefits derived from the other ways in which we use the forest. This is an area which is quantifiable and should be addressed if we are looking at the maximizing benefit to Albertans. The forest may be able to generate equivalent revenue in more socially and ecologically friendly ways.”*

The committee was also concerned that environmental values were not adequately addressed and said, *“Important issues such as fragmentation, connectivity and interior habitats have not been addressed in the FMP or in some form of environmental assessment, nor have the cumulative effects been considered in the planning process. We suggest they should be an important component of the forest management plan.”*

From the government’s own research, we know that when compared on hectare-by-hectare basis, the economic return of provincially legislated protected areas are comparable to that of the logging and agriculture sectors.

Further, especially the gateway communities of Pincher Creek and the Crowsnest Pass stand to gain economically from the influx of so-called “Amenity Migrants”. These are people who are either retired, or who can do their work from anywhere, and who choose to live in a particular community because of the amenities that the community offers. Those amenities include the ability to hike, ski, bike, fish, hunt, etc.

As the Economist Jim Johnson (Pacific Analytics, Inc, 2006) notes:

Extensive research into amenity migration has shown that the most important factors influencing amenity migrants are:

- *A community close to protected areas, with the social perspective of conservation that will assure new migrants that the landscape will remain more-or-less intact in future years.*
- *A community with a well-developed planning structure that incorporates direct collaboration of local residents, ensuring that the*

area will not continue to grow unchecked thereby endangering the very lifestyle that the migrant sought out in the first place. This is particularly important in areas that have water shortages.

- *A location relatively close to an airport, linked by a reliable highway system, and offering a developed information and communications support system.*
- *A location with adequate health facilities and, to a lesser extent, educational facilities.*

Communities that have embraced a more sustainable, environmentally-sensitive development strategy have been more successful in attracting amenity migrants and have experience significantly higher economic growth than those communities that have maintained a traditional resource extractive strategy. More importantly, economic and social development in these amenity communities has led to higher per capita incomes, greater employment, higher educational levels, greater diversity of business and occupations, and less cyclical economic patterns.

My wife and I are perhaps good examples of Amenity Migrants. I am a photographer and my wife is a doctor. We could live in virtually any community in Canada, or even easily relocate to another country, but we chose to settle in the Pincher Creek area. While it wasn't the only reason, a major factor in our decision to live here is the proximity of wildlands and wildlife. The continued deterioration in the Castle, which would be exacerbated by the proposed logging, would reduce our desire to continue living here.

In any case, there really shouldn't be any logging south of Calgary at all. The forests are too valuable for watersheds, wildlife, and recreation. The forests should be managed with a light touch, and not with the heavy-handed, blunt, and destructive tool of logging. The logging industry's "social contract" has expired for this area. It's time to move on.

Please direct your officials to stop the proposed logging in the Castle.

Sincerely,

Gordon Petersen

cc: Mr. Evan Berger
Parliamentary Assistant of Sustainable Resource Development
MLA, Livingstone–Macleod