Backgrounder
April 8, 2002

McClelland Lake Wetland Complex Integrated Resource Management Plan

TrueNorth Fort Hills Oil Sands Project and Alberta Oil Sands Development
TrueNorth is proposing to build the fourth open-pit oil sands mine in the Fort McMurray area of NE Alberta. Suncor and Syncrude each operate existing plants that have a combined production of nearly half a million barrels of synthetic crude bitumen per day. The Shell Muskeg River Mine is currently under construction.

In addition to approved open pit mining, three steam assisted, gravity drainage projects have already been approved.

McClelland Lake Wetland Complex
The McClelland Lake Wetland Complex includes McClelland Lake and the adjacent wetlands. McClelland Lake's wetlands are valuable in that they include patterned fens; a peat forming wetland characterized by ridges and pools in a distinctive, fish-scale pattern that develops over the course of thousands of years. Fens provide groundwater recharging, surface water filtration, and provide habitat for a diverse community of plant and animal species. Less than 1% of Alberta's land base is covered by patterned fens.

In particular, the McClelland Lake Wetland Complex contains:

- a high abundance and diversity of bryophyte species (mosses)
- ten species of rare bryophytes
- a diversity of habitats due to presence of mature trees
- staging habitat for waterfowl
- habitat for a number of listed species of wildlife

Integrated Resource Plans (IRPs)
Integrated Resource Plans are the product of extensive consultation programs with government departments, municipal authorities, public interest groups and the general public. They are approved by Cabinet and are intended to achieve the orderly, economic and efficient development of natural resources while conserving land and natural resources to meet environmental and recreational needs.

Creating an IRP takes years of work and negotiation. Changing an IRP is supposed to occur with full public disclosure to, and consultation with the public as an essential part of the modification process. This consultation is supposed to be conducted by the proponent but also include a review by 12 government departments. According to the 1991 *Plan Amendment Guidelines*, the amendment process includes a 6-week public review process with advertisements to obtain public feedback and, if there is sufficient]interest, a meeting to bring together the various interests may be convened.

The validity of a decision to change the Fort McMurray Athabasca IRP depends on the quality of consultation, fairness of the process, and the scope of knowledge that informs the decision. The original IRP was the result of considerable review and public input. Over the 25-year history of IRP's these plans have had minor "housekeeping" changes and there have been examples where an entire plan has been updated, for example the Eastern Slopes Policy. However, this would be the first example where an IRP could be significantly amended as a result of a proponent's request to overturn policy.

If we are going to change public policy it should be on the basis of due process, not on the basis of two-page response cards and written submissions that the public has limited time to prepare. For the review of this IRP to be credible, government must provide:

- Due notice: Reasonably timed, informative notice of public meetings
- Access to information: Sufficient, publicly available information to understand the ecological consequences of any change to the IRP.
- Access to decision makers: The opportunity for the public to question government representatives on the information available and the consequences of the decision
- Open and transparent decision-making process. Published criteria on how the decision-maker will weigh the public's input and a report on how it was used.

Furthermore, the government must base its decision using credible, scientifically-based research assessing the ecological uniqueness of the McClelland Fens and not just the potential economic value of the mineral resources beneath it.