



## alberta fish & game association

6924 - 104 STREET, EDMONTON, ALBERTA T6H 2L7 437-2342

February 25, 1988

Mike Day  
Assistant Deputy Minister  
Mineral Resources  
9945 - 108 Street  
Edmonton, Alberta  
T5K 2G6

Dear Mr. Day:

I want to thank you for meeting with Hank Holowaychuk and myself regarding the Coal Policy. I am writing this letter to summarize my views of the meeting.

It was generally recognized that the existing Integrated Resource Plans have not addressed coal exploration and development, in sufficient detail, to allow the 1976 Coal Policy to be eliminated. It may be necessary to develop an interim coal policy, until such time as the integrated resource plans have been amended with public input to address concerns related to coal exploration and development. Any such interim policy must be developed with public input.

One possible strategy for developing an interim coal policy would be:

1. Hold a workshop with some of the key groups, including the appropriate government departments and the ERCB, the Coal Association, the Alberta Fish and Game Association, the Alberta Wilderness Association and the Federation of Alberta Naturalists. The purpose of the workshop would be to develop, by consensus, an interim coal policy. The workshop would have to be carefully organized and well facilitated to accomplish this in a reasonable period of time.
2. Take the Draft Interim Coal Policy to a meeting of representatives of more groups, possibly the same groups that comprise AIPAC, for their review and comments.
3. Depending on the outcome of the above meeting, notify the public that the Draft Interim Coal Policy is available for public review and comment.

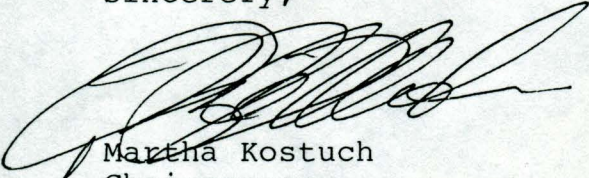
The Alberta Fish and Game Association believes there is a need for legislating the Eastern Slopes Policy, including the Integrated Resource Plans. Until there is legislation, the policy and plans are unenforceable and can be changed without consulting the public.

*Send a copy of this  
letter to Vivian Pharis  
+ a copy of all of my  
info on the coal policy  
to Hank Holowachuk.*



Please let us know if you have any problems with the contents of this letter. Furthermore, let us know what your future plans are in relation to the Coal Policy.

Sincerely,

A large, stylized handwritten signature in black ink, likely belonging to Martha Kostuch, is written over the typed name.

Martha Kostuch  
Chairperson  
Renewable Resources Committee

MK/kb

cc: Douglas McDonald, Chairman, Office of Coal Research and Technology  
Nestor Romaniuk, President, Alberta Fish and Game Assoc.



Martha Kostuch  
845-4667  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

November 21, 1989

Editor  
Edmonton Journal  
P.O. Box 2421  
Edmonton, Alberta  
T5J 2S6

Letter to the Editor

Dear Editor:

Enclosed is a copy of an editorial written when construction of a Kraft-Sulphate Pulp Mill was being considered near Rocky Mountain House on the North Saskatchewan River upstream of Edmonton.

To quote from the editorial, "Some other way than efficiency must be found to keep all pollutants from the proposed mills out of the North Saskatchewan...The mills will provide jobs and diversify Alberta's economy. But they should not be built while there is any chance of polluting the North Saskatchewan."

The City of Edmonton objected to a Kraft-Sulphate Pulp Mill being located upstream of Edmonton because of the toxic chemicals that would be put into the North Saskatchewan River.

Is there any reason that people who live along the Athabasca River should accept poorer water quality than the residents of Edmonton?

sincerely,



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

May 31, 1989

Editor  
P.O. Box 2421  
Edmonton, Alberta  
T5J 2S6

Dear Editor:

Would residents of Edmonton approve of a pulp mill being built at Rocky Mountain House, upstream of Edmonton, which would dump more than a tonne of chlorine containing effluent into the North Saskatchewan each and every day?

If not, Edmontonians should be fighting the Kraft sulphate mills which are planned for Northern Alberta.

The Athabasca river system is being treated as a sewer and residents of the North are being treated as second class citizens because pollution is being allowed there that would never be permitted in the more populated areas of the province.

Furthermore, you are not having any input into the massive sale (more like give-a-way) of what belongs to you.

The forests of Alberta belong to the people of Alberta and yet there is no opportunity for public input before forest management agreements are signed which basically turn over the management of large areas of Alberta's forests to private industry.

Nor do the environmental impact assessments which are being done for the pulp mills consider the impacts of harvesting the forests. What will the impacts of timber harvesting be on water quality? on water quantity? on wildlife? on rare or endangered plants? on sensitive ecosystems? on trappers? on tourism? on native people? We don't know!

We should have learned by now that we can not afford to damage the environment. All of us and our children and their children and the other species that inhabit this planet will suffer the consequences if we do not protect the environment.

We have the right and the responsibility to make sure development is sustainable and the environment is protected.

sincerely,





## alberta fish & game association

6924 - 104 STREET, EDMONTON, ALBERTA T6H 2L7 437-2342

February 29, 1988

Honourable Bill McKnight  
Minister of Indian Affairs  
House of Commons  
Ottawa, Ontario

Dear Mr. McKnight:

The Environmental Assessment and Review Order requires that an environmental assessment be conducted on all proposals that may have an environmental effect on an area of federal responsibility.

The forestry development, proposed by Daishowa Canada Company Limited, for Peace River, Alberta, will have a significant effect on the Lubicon Indians who claim much of the land to be harvested. The Alberta Government has only required an environmental assessment of the pulp mill itself, not of the timber harvesting; the area of greatest concern to the Indians.

Will you order an Environmental Assessment of this proposal?

Sincerely,

Martha Kostuch  
Chairperson, Renewable Resources Committee  
Alberta Fish and Game Association

MK/kb





## alberta fish & game association

6924 - 104 STREET, EDMONTON, ALBERTA T6H 2L7 437-2342

February 29, 1988

Honourable Tom McMillan  
Minister, Environment Canada  
House of Commons  
Ottawa, Ontario

Dear Mr. McMillan:

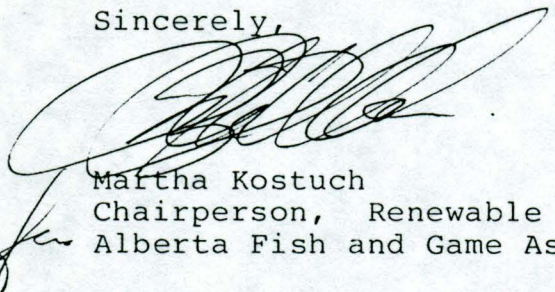
The Federal Government has contributed \$9.5 million through the Western Diversification Office towards a forestry development, proposed by Daishowa Canada Company Limited, for Peace River, Alberta.

The Environmental Assessment and Review Order apply to any proposal for which the Government of Canada makes a financial commitment. While an Environmental Assessment has been done for the pulp mill, itself, no assessment has been done of the environmental and social impacts of the timber harvesting.

Has the Federal Government conducted an Initial Environmental Evaluation of this proposal? If so, what are the results? If not, why not?

Is the Federal Government going to require an Environmental Assessment, which includes timber harvesting, for this proposal?

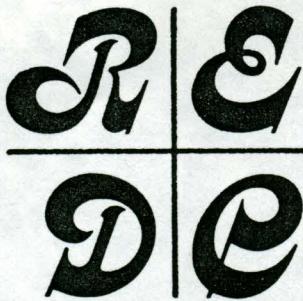
Sincerely,



Martha Kostuch  
Chairperson, Renewable Resources Committee  
Alberta Fish and Game Association

MK/kb



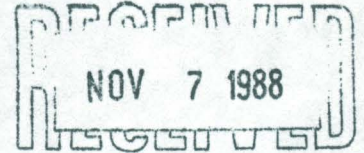


# Regional Economic Development Council

Box 658, Lac La Biche, Alberta T0A 2C0  
Telephone (403) 623-4493, 623-4494



October 18, 1988



## TO WHOM IT MAY CONCERN:

The Lac La Biche Regional Economic Development Council, which serves communities in northeastern Alberta, is currently preparing for environmental impact hearings associated with the development of a kraft pulp mill on the Athabasca River.

While it would appear that the community has little input as to the type of mill that will be established, apparently the opportunity exists to comment on the impacts of a pulp mill on our region's natural resources.

I understand that your organization may have had some experience with forestry development or in general, is concerned about the impacts of industry on the environment. Should you have information that would make us aware of the issues we should be raising at the hearings, please call or send pertinent printed material to:

Derek Pachal, Director  
R.E.D.C.  
Box 658  
Lac La Biche, Alberta  
T0A 2C0  
Phone: 623-4494

In general, we are looking for information on air and water quality, fisheries and wildlife concerns and forest management concerns.

Thank you for your co-operation and interest.

*D. Pachal*  
Derek Pachal  
Director

DHP:kgs

cc: R.E.D.C. Directors  
Blueprint For The Future

*Lyle -  
I will send  
you my comments  
Ask for John Stelfoxes  
& then perhaps you can  
pull it together & send to  
Lac La Biche.  
Please send  
me a copy  
M. Koshul*



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0  
845-3668

February 24, 1987

Letters to the Editor  
Calgary Herald  
P.O. Box 2400, Station M  
Calgary  
Alberta T2p 0W8

Dear Editor:

I am nearly 400 years old. I was born before Canada became a country. I was here before the first white man set eyes on the Canadian Rockies.

I have produced many offspring. I have provided shelter to many generations of wildlife. I have watched this valley become a haven for animals that thrive only in old forests.

I have weathered more storms than I care to remember. I have seen joy in peoples eyes as they wander through this valley.

But now they are logging this valley. Why? Have they done such a poor job of managing forests in Alberta that they can not leave a few special areal like this alone.

I have lived a good life. I only want to die a natural death. I want my branches to return to the earth that has nourished me for so long. Is that too much to ask?

Please help me. Stop the logging in Hidden Creek.



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta TOM ITO  
February 20, 1981

Fred McDougall  
Deputy Minister of  
Renewable Resources  
Energy + Natural Resources  
Petroleum Plaza, South Tower  
9915 - 108th Street  
Edmonton, Alberta  
TSK 2C9

Dear Sir:

According to an article appearing in the Mountaineer on January 14, 1981, the Government is expecting a call for tender to harvest the lumber in the Rocky / Clearwater Forest this spring. Jack Campbell, the M.L.A. for Rocky Mountain House is quoted as saying "we (the government) will invite proposals to that effect."

What are the government's plans regarding timber harvesting in the Rocky - Clearwater Forest?



Will the integrated management plans for the Rocky-Clearwater Forest be completed before the government invites proposals for harvesting timber?

The same newspaper article quotes Fred Sutherland as saying: "I know an inventory is just being carried out in the forest and we have yet to receive any results."

Has that inventory been completed and, if so, is it available?

Is the government concerned about the environmental effects of harvesting timber in the Rocky-Clearwater?

How will timber harvesting affect other resource uses in the area? Specifically, how will timber harvesting affect wildlife, water quality, recreation, and tourism?

Sincerely,

Martha Kostuch

Cc: Jack Campbell



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0  
September 7, 1982

The Hon. John "Jack" Cookson  
Minister of the Environment  
Room 222  
Legislative Building  
Edmonton, Alberta

Dear Mr. Cookson:

I was very disappointed to learn that the Government only intends to call an Environmental Impact Assessment (E.I.A.) on the facilities for a pulp and paper mill in the Brazeau Timber Development Area and that the E.I.A. will not address forestry operations, i.e. road building, clearcutting, etc.

Fred McDougall, Deputy Minister of Renewable Resources, made this announcement at the beginning of the hearings at Rocky Mountain House. He also stated that all environmental impacts dealing with forestry operations would have to be addressed at these hearings. The start of the hearings was a little late



to inform the public that they would have to raise all of their environmental concerns. Even if the public had known this before the hearings, enough detailed information does not exist on either of the major proposals to assess the environmental impacts of the development.

Mr. McDougall also stated that it would be redundant to call an E.I.A. on the Forestry operations since it would be repeating the Public Hearings on the Environmental Effects of Forestry Operations in Alberta held by the E.C.A. and duplicating the integrated management planning currently underway.

In the first place, I don't believe that the E.C.A. ever intended their public hearings to take the place of E.I.A's for specific projects. Following the recommendations contained in the E.C.A.'s report would certainly reduce the environmental impacts from major timber developments but there would still be a need for a full environmental impact assessment dealing with the specific proposal being considered.

In the second place, integrated management planning is a planning tool and not an assessment of the environmental impacts of a specific proposal.



Good planning should help to reduce the conflicts between resource users but there is still a need for assessment of the environmental impacts of specific proposals. In addition, at this point in time, there is only limited involvement by special interest groups in the integrated management planning and no involvement by the general public.

It appears as if, once again, the Department of the Environment has been told to keep out of Energy and Natural Resources way. Even the questions asked by the Department at the hearings pertained only to water quality. Doesn't the department care about the environment of the Eastern Slopes?

The Land Surface Conservation and Reclamation Act, 1973 which authorizes the Department of the Environment to order the preparation and submission of E.I.A.'s specifies factors to be included in the reports such as impacts on the conservation, management, and utilization of natural resources; the prevention and control of pollution; economic factors that relate to environmental matters; and preservation of natural resources for their aesthetic value.



According to the Environmental Impact Assessment Guidelines distributed by your department:

"The Government of Alberta is committed to achieving a balance between resource development and environmental quality. Accordingly, the purpose of the Environmental Impact Assessment System is to provide comprehensive information to facilitate the early identification and resolution of potentially significant adverse environmental effects of proposed resource development before environmental damage occurs."

Surely a major pulp and paper development should be the subject of a full environmental impact assessment if the Government of Alberta is truly committed to achieving a balance between resource development and environmental quality.

Since you and only you as Minister of the Environment have the right to order an environmental impact assessment, I urge you to exercise that right and order a full social and environmental impact assessment covering all aspects of the operation if one of the proposals which includes a pulp and paper mill is otherwise acceptable



For your information, I have enclosed a copy of the summary of the recommendations I made at the public hearings and a copy of the brief presented by the Pollution Study Group of the Public Advisory Committee on the Environment.

sincerely,

Martha Postel

cc: A.D. Greer, Environment Council of Alberta  
Cheryl Bradley, Alberta Wilderness Association  
Roy Ozanne, Alberta Fish and Game Association



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0  
April 28, 1987

Hon. Ken Kowalski  
Minister of the Environment  
132 Legislature Building  
Edmonton, Alberta

Dear Mr. Kowalski:

I understand that companies processing heavy oil in the Cold Lake area are currently using groundwater for steam injection. Countries all around the world including the United States are having problems because of over utilization of groundwater.

I support fully what I understand is the government's position, that is , that water should be piped from the North Saskatchewan River. Will you please confirm if this is still the government's position? When will the pipeline be built?

sincerely,



# Fax Memo

To: Iris Evans, Reeve  
Strathcona County

From: Martha Kostuch  
phone # 845-4667

Date: May 10, 1992

Memo:

Thank-you for asking for my input.

Enclosed is a copy of my submission  
to Towards 2000.

I strongly believe that communities have  
an important role to play in protecting  
the environment and their own economy.

I highly recommend the book "The Economic  
Pursuit of Quality" by Thomas Michael Power.

I also strongly recommend that communities  
develop their own conservation / environmentally sustainable development  
plans. Communities should ask themselves what they  
want to be like in the year 2000; what is  
important to them.

Please call if I can be of any further help.

Sending 4 pages including this cover page.

Please phone 845-4667 if you have problems receiving.



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

January 3, 1988

The Right Honourable Brian Mulroney  
Prime Minister of Canada  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Mr. Mulroney:

re: Environmental Effects of Free Trade

With the Report of the National Task Force on Environment and Economy and its subsequent presentation to the United Nations, Canada has become a world leader in the area of sustainable development.

One of the recommendations from that report is that:

"Canada should explore and promote mechanisms to ensure that environmentally sound economic development is an important component in international discussions and negotiations dealing with development and trade. Canada should also ensure that each international development project in which it participates is environmentally and economically sustainable."

The major mechanism available to ensure environmentally sound economic development is environmental assessments.

Furthermore, the Federal Environmental Assessment and Review Guidelines require that "international agreements reflect the principles of the process [Environmental Assessment]" (sec. 17(a)).

The guidelines also state that "Every initiating department shall ensure that each proposal for which it is the decision making authority shall be subject to an environmental screening or initial assessment to determine whether, and the extent to which, there may be any potentially adverse environmental effects from the proposal." (sec. 10(1)) Has this been done for the Free Trade Agreement?

Following are some of the questions which need to be answered in an Environmental Assessment of the Free Trade Agreement:

Will Canada become a pollution haven for certain industries in which our standards are weaker than the U.S.?

Will Canadian Industries relocate in the U.S. if their environmental standards are weaker than ours for those industries?



Many U.S. industries have been relocating in Mexico because of cheaper labour and almost no pollution control requirements. Will cheap products produced in Mexico by U.S. Industries with little or no pollution controls be allowed into Canada under the Free Trade Agreement?

Will pollution standards be construed as non-tariff barriers?

Will environmental protection subsidies be construed as non-tariff barriers?

How will the Free Trade Agreement affect federal-provincial programs to assist companies in reducing acid rain emissions?

Will the Free Trade Agreement prevent transportation subsidies for moving low sulphur coal from Western Canada to Eastern Canada?

What effects will the energy portion of the Agreement have on our environment?

Will the free trade agreement mean an increase in coal-fired, nuclear powered, and hydroelectric plants in Canada to supply U.S. needs?

Canada has an opportunity to carry out the recommendations contained in the Report of the National Task Force on Environment and Economy and demonstrate international leadership by conducting an environmental assessment of the Free Trade Agreement before it is implemented.

very sincerely,

*original signed*

cc: The Right Honourable Joe Clark  
The Honourable Tom McMillan



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

May 21, 1987

Dr. Dan Krewski  
Chief, Biostatistics  
Environmental Health Directorate  
Health and Welfare Canada  
Box 117  
Environmental Health Center  
Tunney's Pasture  
Ottawa, Ontario  
K1A 0L2

Dear Dr. Krewski:

Thank you so much for meeting with me when I was in Ottawa. I am really looking forward to receiving a copy of your comments on the Southwestern Alberta Medical Diagnostic Review.

The Special Committee on Acid Rain was very interested in the health problems caused by acid forming emissions and, in particular, the problems experienced by people living downwind of sour gas plants. In response to their question about what I think should be done, I suggested they contact Health and Welfare for advice and direction. For your information, I have enclosed the comments related to the effects of acid deposition on health which I presented verbally to the committee.

I believe that before any further investigations are considered, you should meet with the residents living in the plume area ~~and with some of the medical doctors who believe there is a problem.~~ You should hear the residents complaints first hand and find out what they want to have done. You should discuss with the residents the various approaches that could be taken and the advantages and disadvantages of each. I would be happy to help arrange such a meeting.

I look forward to hearing from you.

very sincerely,



Martha Kostuch

Box 1288

Rocky Mountain House

Alberta T0M 1T0

March 29, 1982

Hon. Jack Cookson

Room 222

Legislative Building

Edmonton, Alberta

Dear Mr. Cookson:

I would like to commend your department for co-sponsoring the Symposium - Workshop on Acid Forming Emissions in Alberta and Their Ecological Effects held on March 9-12, 1982. It is very important to bring together all of the scientists working on this topic, to have them review what research has been done and is being done and to make recommendations for future research.

I would like to see another symposium-workshop on Acid Forming Emissions held in about two years. Much of the research reported on in March had not been completed or was in very preliminary stages. It is important to periodically review what is



being done so that areas that are not being investigated can be identified. I would suggest having public representation on the next planning committee. Government, industry, and the public must be aware of each others concerns. The public should be informed about what research is being done. Involving the public in the planning of the Symposium is the best way to ensure that it will be designed with the public as well as the government and industry in mind.

I also feel that there should be public representation on what is now known as the Alberta Petroleum Industry / Government Environmental Committee (APIGEC) and an SCAGE, the Steering Committee on Acid Gases in the Environment. This would have the benefits of better identification of concerns, improved communication, and increased credibility by the public.

I hope that you will consider these recommendations. Please pass my commendation on to the members of your staff involved in organizing the symposium,

Concerned about the environment,

Martha Kostant



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

May 25, 1993

Hon. Elmer MacKay  
Minister of Public Works  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Minister:

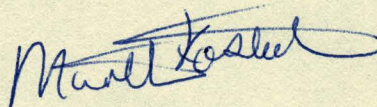
I am concerned about the impact the proposed bridge to Prince Edward Island and its construction would have on the environment and in particular on fisheries, fish habitat and ice movement. I am also concerned about the cost of the bridge to the taxpayers of Canada.

Section 12 of the Environmental Assessment Guidelines Order requires you, as the initiating Minister, to refer the project for public review by a Panel if the impacts of the project are unknown or if they are significant. The impacts of the bridge are both significant and unknown therefore you must refer the project for public review.

Section 13 requires you to refer the project for public review to a Panel if public concern about the proposal is such that a public review is desirable. Certainly there is an enormous amount of public concern regarding this project therefore a public review is desirable.

I look forward to your favourable response.

sincerely,

A handwritten signature in blue ink, appearing to read "Martha Kostuch", with a stylized flourish at the end.



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

March 16, 1992

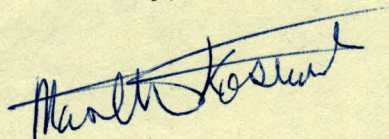
The Honourable Jean Corbeil  
Minister of Transport  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Hon. Jean Corbeil:

Have you or your department received any applications for approvals or requests for exemptions under the Navigable Waters Protection Act for the Parlby Creek-Buffalo Lake Water Management Project in Alberta? Have you granted any approvals or exemptions or are you considering granting any approvals or exemptions for this project? If you have granted any approvals or exemptions, please send me a copy.

I look forward to your response to this letter.

sincerely,

A handwritten signature in blue ink, appearing to read "Martha Kostuch", written over a horizontal line.



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

February 20, 1992

Controller of Water Resource  
Alberta Environment  
2nd Floor, Oxbridge Place  
9820 - 106 Street  
Edmonton, Alberta  
T5K 2J6

Red Deer River Diversion - Buffalo Lake Stabilization  
File Number 25465-2

I wish to object to the application to divert water from the Red Deer River for the purpose of stabilizing Buffalo Lake for the following reasons:

The need for the project has not been established.

The benefits of the project are questionable.

The project makes no economic sense.

The missing information makes it difficult to assess the full impact of the project on rare plants, fisheries and wildlife.

The project would alter, disrupt or destroy fisheries habitat. The mitigation program for fisheries for the first four phases of channelization of Parlby Creek has not been successful. The proposed operation plan would exclude spawning in dry years when pumping would not be done.

The project would have negative impacts on shore birds and, in particular, the endangered Piping Plover.

Please send me a copy of your decision on this application and the reasons for your decision.

sincerely,





Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta TOM 1T0

February 3, 1992

Hon. Ralph Klein  
Minister of the Environment  
Legislature Building  
Edmonton, Alberta  
T5K 2B6

Dear Ralph:

According to the Environmental Impact Assessment Report which was prepared by Enivonmental Management Associates on the Parlby Creek-Buffalo Lake Water Management Project, the proposed intake and pipeline would require construction of a rock weir in the river and the intake structure would present an obstruction in the main channel of the Red Deer River. Approval for this project is therefore required under the Navigable Waters Protection Act.

When do you plan to apply to the Federal Department of Transport for approval of this project under the Navigable Waters Protection Act?

Are you aware that anyone who alters, disrupts or destroys fisheries habitat without the approval of the Federal Minister of Fisheries and Oceans contravenes the Federal Fisheries Act? Are you aware that this project will impact fisheries habitat?

I look foward to hearing from you on this matter.

sincerely,

cc: Hon. Jean Courbeil, Minister of Transport  
Hon. John Crosbie, Minister of Fisheries and Oceans



**Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T4T 1A9**

September 1, 2003

Jackie Jaycock, Advisor  
Alberta Environment  
Strategic Corporate Services  
Freedom of Information and Protection of Privacy Office  
6<sup>th</sup> Floor, South Petroleum Plaza  
9915 – 108 Street  
Edmonton, Alberta  
T5K 2G8  
Fax # 780-427-9838

**Access Request: 03-G-501**

**Subject: Fee Waiver Request for Request for Records Pertaining to the Abraham Glacier Wellness Resort**

Dear Jackie Jaycock:

I request a fee waiver for my August 5, 2003 continuing request for access to information. Included in this request is a request that my application fee be returned.

The following is in support for my request for a fee waiver:

1. Other members of the public including other members of ALERT, the Alberta League for Environmentally Responsible Tourism, other environmental groups and the general public will benefit from disclosure of these records. Many members of the public including the County of Clearwater have expressed concerns about this proposed project. I provide the public including the media generous access to information I have and I will provide generous access to the information I receive under this access request.
2. The records requested will contribute to public understanding of the environmental, economic and social impacts of the proposed Abraham Glacier Wellness Resort on the Whitegoat Development Node and the surrounding sensitive and special areas. I have been involved with protection of the Kootenay Plains Region for over 25 years.
3. The records will contribute to debate on the acceptability of this proposed development and on whether an environmental impact assessment is needed for this proposal.



4. The records will be useful in clarifying understanding of issues which the government has a policy of ensuring are publicly understood.
5. I have a very good history of disseminating information to others including the general public. I refer you to Order 99-015 of the Alberta Information and Privacy Commissioner.  
The records requested relate to the protection of the environment, the economic viability of the proposal and potential costs to the public and to the social impacts of the proposal.  
This information is needed to enable the public to understand what the potential impacts of the proposal are and to enable the public to have input into the review of this proposed project.
6. Disclosure will enable the public to better understand the reasons the government makes the decisions it makes regarding this proposal.
7. Access has been given to similar records such as annual operating plans at no cost. Again I refer you to Order 99-015.
8. Both Sustainable Development and Alberta Environment have made some records available and in discussions with the Information Officer, I have excluded from my request the records that have already been provided to me. However, I and other members of the public are having difficulty understanding the decision of Andy Lamb, Regional Environmental Manager, to refuse to require an environmental impact assessment (EIA). I hope the information requested will indicate if there is a reasonable basis for his decision (and the decision of the Minister of Economic Development to provide a letter of support for this proposal). Having the information provided under FOIPP will ensure that all records related to this proposed development are made public.
9. The information in the requested records does not relate to a conflict between myself and the government except related to a difference of opinion regarding the need for an environmental impact assessment. The requested information will help in determining whether an EIA should be required.
10. The Public Body should have anticipated the need for the public to have the requested records. The information contained in the records deals with the governments handling of a proposed development in a very sensitive, significant and special area.
11. See number 8 above. I have worked with the public body to narrow the request (regarding how far back they need to search and what information I already have) and I am prepared to continue to do so.



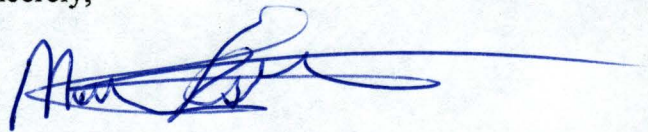
12. The Waiver of the Fee would not shift an unreasonable burden of the cost from me to the public body. I help the Public Body carry out its responsibilities and I do all of my environmental work as a volunteer.

13. I am not motivated by commercial or other private interests.

The records requested relate to the protection of the environment, the economic viability of the proposal and potential costs to the public and to the social impacts of the proposal.

This information is need to enable me and other members of the public to know what the potential impacts of the proposal are and to enable the public to have input into the review of this proposed project.

sincerely,

A handwritten signature in blue ink, appearing to be "Alan [unclear]", with a long horizontal flourish extending to the right.



**Environmental Harmonization Working Group**  
**P.O. Box 1288**  
**Rocky Mountain House, AB T0M 1T0**

The Rt. Hon. Jean Chrétien  
Langevin Block  
House of Commons  
Ottawa, Ontario  
K1A 0A6

January 14, 1998

Dear Prime Minister,

We are writing to you regarding the recently tabled report of the House of Commons Standing Committee on Environment and Sustainable Development on the environmental "harmonization" initiative of the Canadian Council of Ministers of the Environment (CCME).

We understand that the government is now considering its response to the Standing Committee's conclusions and recommendations. This response will set much of the government's environmental direction for its second term in office. It will have major implications for the key environmental challenges facing Canada, including the implementation of the Kyoto Protocol on Climate Change, the renewal of the *Canadian Environmental Protection Act*, and the protection of biological diversity, particularly through the proposed *Canada Endangered Species Protection Act*.

The Standing Committee's findings regarding the CCME initiative confirm the conclusions reached by members of the environmental, aboriginal, health, labour and academic communities through their own research and analyses over the past four years. The proposed agreement is designed to address a problem, namely duplication and overlap in federal and provincial environmental programs, whose existence its proponents have been unable to demonstrate.

At the same time, the proposed Accord fails to establish a workable framework for dealing with the real environmental challenges which Canadians face. Rather, the Accord and Sub-Agreements would significantly constrain the ability of the federal government to fulfil its moral and legal mandates, affirmed by the Supreme Court of Canada in its recent *Hydro Québec* decision, to address these pressing threats to the well-being of present and future generations of Canadians.

The weaknesses of the "national," consensus-based approach to Canada-wide environmental problems which underlies the CCME initiative have been clearly demonstrated over the past few months. The inability of the CCME and joint Energy and Environment Ministers' efforts to develop an international negotiating position on climate change, respond to the growing evidence of the need for significant additional actions to curb acid rain, and to establish and implement a meaningful national action plan to reduce urban smog illustrate the point that these processes cannot produce adequate or timely results.

As the Standing Committee notes in its report, the CCME model provides too many veto points for the adoption of effective action plans, and fails to create adequate accountability mechanisms to ensure that those commitments which are agreed to are actually met.



Given these serious deficiencies, we feel compelled to ask that the federal government not proceed with the signing of the proposed National Accord on Environmental Harmonization, and accompanying Sub-Agreements on environmental assessment, inspections, and national standards, currently scheduled to occur in St. John's, Newfoundland, on January 29-30.

Rather, as the Standing Committee has indicated in its report, there is a pressing need for a thorough, rigorous, and public study to identify the gaps and emerging needs in Canada's environmental management regime, covering the activities of federal, provincial, territorial and aboriginal governments. This is especially true in the light of the dramatic reductions in resources available to environmental agencies across Canada which have taken place over the past few years.

Such an undertaking would yield benefits well beyond the provision of a much-needed examination of the rationale for the CCME initiative. Indeed, it could provide the foundation for a national environmental policy agenda for Canada as it enters the next millenium.

The six months since the United Nations General Assembly Special Session on the Environment and Development have been difficult ones for Canada's environment. They have been witness to a number of serious environmental disasters, including the Plastimet fire in Hamilton, Ontario, and the explosion at the Swan Hills hazardous waste treatment plant in Alberta. They have also seen the release of reports from authoritative international bodies, such as the North American Commission for Environmental Cooperation, indicating that Canada faces significant and growing environmental problems, and that our performance in response to these challenges compares poorly with that of other nations.

The New Year will provide your government with an opportunity for a new beginning on environmental matters. A decision not to proceed with the CCME harmonization Accord would be an important first step in the establishment of an environmental policy framework which provides for genuine collaboration and cooperation between the different orders of government in dealing with the environmental challenges which all Canadians face.

We would be pleased to discuss these matters with you or your staff in greater detail should you wish to do so.

Yours sincerely,



Martha Kostuch  
Chairperson  
Environmental Harmonization Working Group

cc. The Honourable Christine Stewart  
Members of the Standing Committee on Environment and Sustainable Development

Att. List of signatories

2008.015/209



Martha Kostuch  
Box 1288  
Rocky Mountain House .  
Alberta T0M 1T0

Editor  
The Mountaineer  
Rocky Mountain House  
Alberta

Also sent to Red Deer  
Advocate

Dear Editor:

Hunters, fisherman, naturalists and other outdoor recreationists should be aware that Shell is proposing a pipeline to connect 6 wells in the Clearwater Area to the Ram River Gas Plant.

The gathering system would consist of 35 Km. of pipeline which run through much of the Upper Clearwater Valley including the Elk Creek and Cutoff Creek areas. A 17.5 Km. pipeline would connect this gathering system to the Ram River Plant.

Canterra is sponsoring an open house on this proposal on August 20th from 7 to 9 P.M. in the Upper Legion Hall. Canterra should be commended for hosting this open house. It's disappointing that Shell isn't at least co-hosting the open house but apparently they don't consider public involvement~~x~~ important.

If you have any questions or concerns related to the impacts of this project on wildlife, on wildlife habitat, on fish, on water quality or on the environment in general, I urge you to attend the open house.

If you are unable to attend the open house, write or call Ralph Gorby, Shell Canada Limited, P.O. Box 100, Stn. M, Calgary T2P 2H5, 232-3111. Request a copy of the Clearwater Project Information Package, their application to the ERCB, and their Development and Reclamation Plan. You may also want to ask that they sponsor a public meeting after people have had an opportunity to review this information.

sincerely,



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

Phone: 845-4667  
Fax: 845-5377

September 1, 1994

Director of Air and Water Approvals Division  
Department of Environmental Protection  
4th Floor, 9820 - 106 Street  
Edmonton, Alberta  
T5K 2J6  
Fax: 422-4192

Statement of Concern

Application No. RS0682 - Sunpine Forest Products Ltd.

Please send me a copy of the draft approval so I can review it to make sure my concerns regarding emissions and monitoring have been addressed.

Thank you.

sincerely,

A handwritten signature in blue ink, appearing to read "Martha Kostuch", with a long horizontal flourish extending to the right.

cc by fax: Ray Ferris, Sunpine Forest Products Ltd.



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

September 11, 1994

David Spink, Director  
Standards and Approvals Division  
Alberta Environmental Protection  
9820 - 106 Street  
Edmonton, Alberta  
T5K 2J6

Fax: 422-4192

Dear David Spink:

RE: Sunpine Forest Products Ltd. Approval to Operate

Thank you for faxing me a copy of the draft approval to operate.

I have the following recommendations, comments and questions:

1. The approval should only be for five years.
2. With particulate emissions not to exceed 0.2 g/kg of effluent, visible emissions should not come close to an opacity of 40%, should they?
3. Oils and grease should be added to the parameters to be monitored in surface runoff.
4. Phenols, hydrocarbons, tannins and lignins should be added to the parameters to be monitored in groundwater.
5. The approval should require an emergency response plan.

Please feel free to call me at 845-4667 if you have any questions.

sincerely,



P.S. When is the Plant allowed to begin operating?

cc: Ray Ferris, Sunpine Forest Products Ltd.



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

July 3, 1995

David Spink, Director  
Air and Water Approvals Division  
Alberta Environmental Protection  
4th Floor, 9820 - 106 St.  
Edmonton, Alberta  
T5K 2J6

Dear David Spink:

Re: Surface Runoff Management Plan for the Sunpine Strachan LVL Plant

What is going to be done to address the runoff problem from Sunpine's log storage area? Will Sunpine be required to develop a new Surface Runoff Management Plan that complies with Approval No. 94-IND-149 issued under the Environmental Protection and Enhancement Act? When will this be done? Please send me a copy of their revised draft plan before you approve it.

I am concerned that you approved a Management Plan that was in conflict with the approval issued under the Environmental Protection and Enhancement Act. Is this an isolated incident?

Will you conduct a review of all current management plans, monitoring programs, etc. approved by your division to make sure they comply with and do not conflict with approvals issued under the Clean Air and Water Acts and the Environmental Protection and Enhancement Act? Please send me a copy of the results of your review.

Applications for approval under the Environmental Protection and Enhancement Act must be advertised and the public has an opportunity to review the applications and provide comment. The same opportunity does not necessarily exist for Management Plans or Monitoring Programs which is another reason that plans and programs should comply with the approvals.

I look forward to your response.

sincerely,

*Martha Kostuch*



Martha Kostuch  
Box 1288  
Rocky Mountain House  
Alberta T0M 1T0

September 9, 1995

David Spink  
Air and Water Approvals Division  
Alberta Environmental Protection  
4th Floor, 9820 - 106 St.  
Edmonton, Alberta  
T5K 2J6

Dear David Spink:

**Re: Surface Runoff Management Plan for the Sunpine Strachan LVL Plant**

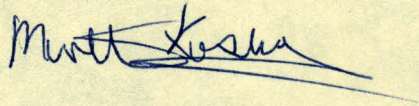
How does Sunpine's surface management plan for their log yard provide for the prevention or minimization of the potential for the release of substances to any water course or groundwater as required by section 3.3.1 of Approval No. 94-IND-149?

Sunpine is having a significant runoff problem from their log storage area. The runoff is having an impact on vegetation for a few miles. The potential for impact on aquatic ecosystems will increase in the spring when the ground is frozen.

I would be prepared and Ray Ferris from Sunpine has indicated a willingness to participate in a meeting with representatives from your division and the pollution control division to discuss options for managing the log yard runoff. Are you interested in organizing such a meeting?

What are you planning to do to deal with this problem?

sincerely,

A handwritten signature in blue ink, appearing to read "Martha Kostuch", with a long horizontal flourish extending to the right.