NATURAL RESOURCES CONSERVATION BOARD

CALGARY, ALBERTA

**THREE SISTERS GOLF RESORTS INC.**

RECREATIONAL & TOURISM DEVELOPMENT Report on Final

IN THE TOWN OF CANMORE, ALBERTA Cost Awards

- APPLICATION NO. 9103

**1. INTRODUCTION**

The Natural Resources Conservation Board Act (the NRCB Act) was proclaimed on June 3, 1991. It created a Board "...to provide for an impartial process to review projects that will or may affect the natural resources of Alberta in order to determine whether, in the Board's opinion, the projects are in the public interest, having regard to the social and economic effects of the projects and the effect of the projects on the environment." The Act defines certain types of projects that are subject to review and prohibits the commencement of a reviewable project unless the Natural Resources Conservation Board (NRCB), on application, has granted an approval for the project. Included in the Act as projects requiring approval are recreational or tourism projects "...to construct one or more facilities for recreational or tourism purposes for which an environmental impact assessment has been ordered".

Three Sisters Golf Resorts Inc. (Three Sisters or the Applicant) filed an application with the NRCB on October 9, 1991, for a recreational and tourism development consisting of golf courses, hotels, residential housing and commercial buildings on privately owned land in the Bow-Canmore Corridor. On March 9, 1992, the Board held a public pre-hearing meeting at the Canmore Lions Hall to hear representations respecting certain aspects of the hearing to be held to consider the Application. These included requests from potential interveners to be considered as interveners eligible to receive intervener funding and for advance funding. On March 19, 1992, the Board issued a Report of Pre-Hearing Meeting stating that the hearing would commence on June 15, 1992, in Canmore. At that time, the Board recognized certain "individuals or groups of individuals" which in the Board's view "are or may be directly affected" by the proposed project and therefore eligible for intervener funding and recognized specific costs for each eligible intervener. Having regard for the proposals of the eligible interveners the Board directed Three Sisters to provide advances where it was determined necessary to assist interveners with the preparation of submissions. A copy of the Report of Pre-Hearing Meeting is available from either the Edmonton or Calgary office of the NRCB upon request.

The Board issued its approval of the Three Sisters project with conditions on December 8, 1992, and copies of the Decision Report are available from the Board's offices in Edmonton or Calgary upon request.

Pursuant to its Act and Regulations, the Board has received claims for final cost awards from those parties determined to be "directly affected" at the pre-hearing meeting of March 9, 1992, as well as additional parties. This Report on Final Cost Awards will provide the Board's decisions regarding the final cost awards for all interveners who requested funding.

**2. ELIGIBILITY FOR FUNDING OF THOSE MAKING REQUESTS**

The Board wishes to emphasize again that the determination of eligibility of interveners for funding does not in any way deal with the standing of interveners to appear at a hearing to present evidence and to question other participants. In the opinion of the Board, interested persons or groups wishing to provide evidence about an application before the Board or to ask questions of an applicant are entitled to do so. However, to receive an award of funds to assist it in intervening, a party would have to qualify under section 10(1) of the NRCB Act which states:

"Individuals or groups of individuals who, in the opinion of the Board, are or may be directly affected by a reviewable project are eligible to apply for funding under this section."

In its Pre-Hearing Meeting Report of March 9, 1992, the Board stated that to be eligible for funding two questions must be addressed. The first is whether those requesting funds are "individuals or groups of individuals" as referred to in section 10(1) of the NRCB Act and second, whether those individuals or groups of individuals "are or may be directly affected" by the proposed project.

The Board considers the following groups eligible for funding because they are directly affected individuals or groups of individuals, or associations representing groups of directly affected individuals who are members of the associations and wished to be represented by them. The eligible groups are:

⋅ CPAWS Group

⋅ Bow Valley Women's Resource Centre

⋅ BowCORD

⋅ AWA Group

⋅ Bow Valley Naturalists

⋅ Trout Unlimited Group

The Board has received requests for final cost awards from five parties whose eligibility status must be determined. These parties are:

⋅ The Town of Canmore

⋅ The Mount Rundle School Division

⋅ The Federation of Alberta Naturalists (Alberta Naturalists)

⋅ The Stoney Tribe

⋅ Mr. Ray Haimila

**2.1 The Town of Canmore and the Mount Rundle School Division**

The Town of Canmore and the Mount Rundle School Division appeared before the Board at the pre-hearing meeting and requested a determination of their status as interveners eligible for funding under the NRCB Act and Regulations.

Having regard for the first question, whether an intervener is an "individual or group of individuals" and the distinction between "person" and "individual", the Board concluded that "individual" means natural person and excludes entities such as corporations. The Board believes that it was the intention of the legislators in drafting the NRCB Act to narrow the definition of those who may be eligible for intervener funding to include only natural persons or groups of natural persons who have in common the potential for being directly affected by a proposed project. The Board believes the legislators intentionally used the words "individuals or groups of individuals" rather than the word "person" to exclude entities such as profit making corporations that have their own financial resources. The same reasoning causes the Board to conclude the legislators intended to exclude governments, government organizations and other publicly funded bodies that have access to financial resources through mechanisms other than intervener funding.

The Board continues to believe that the Town of Canmore and the Mount Rundle School Division exist and operate as public entities through statute and do not constitute "individuals or groups of individuals" for purposes of section 10(1) of the NRCB Act and therefore are not eligible for funding.

The Board recognizes that the Town of Canmore, on behalf of itself and the Mount Rundle School Division, participated extensively in the hearing and the Board found the information presented by these parties very helpful in rendering its final decision on the Application by Three Sisters.

**2.2 The Federation of Alberta Naturalists (Alberta Naturalists)**

The Federation of Alberta Naturalists has submitted a cost claim to cover its participation in the hearing.

The Board notes that the Alberta Naturalists was effective in presenting information at the hearing. However, the Board concludes that the Alberta Naturalists has not established that it or its members "are or may be directly affected" by the proposed Three Sisters project. The Alberta Naturalists, as distinct from the Bow Valley Naturalists, did not establish that it had members who would be subject to an effect that would meet the criteria set out in the Board's Pre‑Hearing Meeting Report:

"In the Board's view, in order to directly affect an individual or group of individuals, a project would have to cause a detectable effect on it or them. Such an effect could be beneficial or injurious... there must be evidence acceptable to a reasonable person that: 1) a chain of causality exists, 2) an effect would probably occur and 3) the effect would not be trivial, before a potential effect can be considered to have been established."

Therefore, the Board believes the Federation of Alberta Naturalists is not eligible to receive intervener funding.

**2.3 The Stoney Tribe**

The Stoney Tribe has submitted a cost claim for its submission and presentation at the hearing.

It is the Board's view that the Stoney Tribe has not established that it "is or may be directly affected" by the proposed development. The lands to be developed are private lands and are not available for use by the Stoney Tribe. In its Decision Report on the Application, the Board concluded that, provided the conditions it attached to the approval are observed, effects on adjacent unoccupied Crown lands would be minor. The Board concludes that the Stoney Tribe has not established that it is an eligible intervener as defined in the Act.

**2.4 Mr. Ray Haimila**

While Mr. Haimila was present at the pre-hearing meeting on March 9, 1992, he did not seek a determination on his status as an eligible intervener at that time. Mr. Haimila has submitted a cost claim to cover the cost of material and photocopying of his submission to the Board.

In its Report on the Pre-Hearing Meeting, the Board found other individual residents of Canmore to be eligible for intervener funding. Given the nature of this project, the Board finds Mr. Haimila to be eligible for intervener costs under section 10(1) of the NRCB Act because he is a resident of Canmore.

**3. REQUESTS FOR FINAL COSTS FROM THOSE DIRECTLY AFFECTED**

**3.1 CPAWS Group**

The CPAWS Group requested $108,480 at the March 9, 1992 pre-hearing meeting to retain legal counsel and environmental consultants. The Board, at that time, recognized a total cost of $50,000 with $28,000 for expert environmental assistance and $22,000 for legal assistance. The Board noted that there was an opportunity for coordination of environmental experts with other interveners. The Board directed the Applicant to provide $30,000 in advance funding to the CPAWS Group.

CPAWS has requested a final cost award of $73,607, with approximately $12,700 related to the hiring of environmental experts and $60,900 for legal fees. The total request is approximately $23,600 greater than the amount recognized by the Board at the pre-hearing meeting. The CPAWS Group substantiates its request for increased costs, particularly for legal counsel, by noting the complexity of the application, the extended length of the hearing and legal work prior to the pre-hearing meeting.

**3.2 Bow Valley Women's Resource Centre**

The Bow Valley Women's Resource Centre submitted a budget of $41,880 at the pre-hearing meeting for funding to retain legal advisors and experts to assess the impacts of the proposed project on housing and the social and economic effects of the project on women and children.

The Board recognized costs of $35,000 with $18,000 for legal assistance and $17,000 to retain experts. The Board noted that there appeared to be an opportunity for the Centre to pool resources with other interveners in the use of experts. The Applicant was directed to provide $23,700 in advance funding to the Centre.

The Centre has requested a final cost award of $56,562 which represents an increase of approximately $12,900 in legal fees and $8,700 in expert fees above the original costs recognized by the Board. The Centre advises that its increased claim for legal services was due to the extended length of the hearing, new submissions and exhibits filed by the Applicant and Government interveners and lengthy cross-examination by other interveners. The Centre also requested the Board to have regard for the fact that legal counsel had already voluntarily substantially reduced its invoice. Increased expert fees were incurred due to the Applicant filing revised material subsequent to the review and analysis of the Applicant's documentation by experts.

**3.3 Bow-Corridor Organization for Responsible Development (BowCORD)**

BowCORD submitted a budget request of $61,525 at the pre-hearing meeting to retain legal counsel, an economist and an urban planner to examine socio-economic impacts.

The Board recognized costs of $46,000 representing $28,000 for economic experts and $18,000 for legal costs. The Board noted in its March 9, 1992 Pre-Hearing Meeting Report, the potential for coordination amongst interveners in the area of social and economic expertise. The Applicant was directed to provide $15,000 in advance funding.

BowCORD has submitted a final cost claim for $66,903 and advised that the increase was primarily required to cover legal costs. It noted the extended length and complexity of the hearing in substantiating its request for increased funding.

**3.4 AWA Group**

The AWA Group submitted a budget request of $92,635 at the pre-hearing meeting to retain legal counsel and hire experts to assess socio-economic and environmental effects. The Board recognized costs of $50,000 with $10,000 for socio-economic matters, $22,000 for environmental effects and $18,000 for legal assistance. The Board noted at that time that there was an opportunity for the coordination of effort with other interveners in the socio-economic and environmental areas. The Applicant was directed to provide $20,000 in advance funding.

The AWA Group has requested a final cost award for $115,140 with approximately $51,250 in legal costs and the remainder for experts including a hydro-geological consultant ($31,000) which was not specifically contemplated at the pre-hearing meeting.

In justifying its request for increased costs, the AWA Group notes the complexity and extended length of the hearing, disbursements to subpoena witnesses and the necessity to seek additional experts.

**3.5 Bow Valley Naturalists**

The Bow Valley Naturalists submitted a budget request for $39,933 at the pre-hearing meeting to retain an environmental consultant to investigate ecological integrity losses, natural processes, wildlife habitat loss and the biological diversity of the project area.

The Board recognized $22,000 for environmental specialists and an additional $10,000 to cover extra costs which might have otherwise been covered by legal counsel. The Board further noted in its Report of the Pre-Hearing Meeting that there appeared to be an opportunity for the coordination of effort with other interveners, particularly in the area of environmental specialists. The Applicant was directed to provide $20,000 in advance funding.

The Bow Valley Naturalists have submitted a final cost claim for approximately $3,000 greater than the amount recognized by the Board at the March 9, 1992 pre-hearing meeting primarily to cover increased costs for the agent used in lieu of legal counsel. In justifying its request for increased costs the Bow Valley Naturalists note the extended length of the hearing.

**3.6 Trout Unlimited Group**

In its original submission at the March 9, 1992 pre-hearing meeting, the Trout Unlimited Group requested $8,640 to retain an environmental consultant with fisheries expertise to provide a literature review and commentary of the potential impacts of the proposed project.

The Board indicated a willingness to recognize costs of $6,140 for a fisheries biologist, noting that there was an opportunity for this group to coordinate efforts with the AWA Group who also requested funding for a fisheries biologist and the CPAWS Group who requested funding for experts related to water quality and possible aquatic effects. The Applicant was directed to provide $4,000 in advance funding.

The Trout Unlimited Group has requested a final cost award of $12,534 for increased funding for the fisheries biologist and other intervener costs. In submitting its cost claim, the Trout Unlimited Group noted the extended length of the hearing as a factor.

**3.7 Mr. Ray Haimila**

Mr. Haimila submitted a cost claim for $240 primarily to cover the cost of materials and photocopying of his submission to the Board.

**3.8 Views of Three Sisters**

In the view of Three Sisters, all interveners in some way addressed matters beyond the jurisdiction of the Board and therefore a portion of their presentation and submission costs should not be eligible for funding. In addition, arguments presented by interveners about matters not under consideration or matters unrelated to the Application, matters already decided, or Government policy or legislative changes should not be deemed as reasonable for cost awards.

Three Sisters cited the NRCB Funding for Eligible Interveners Regulation which provides that interveners' cost requests are to be reasonable and directly and necessarily related to the preparation and presentation of their submission. In the Applicant's view, intervener submissions should be confined to the assessment of potential direct effects on that intervener and should not duplicate the work of other interveners. It considered that many of the interveners duplicated the efforts of other interveners and that the "pooling" of resources, as encouraged by the Board in its Pre-Hearing Report, did not occur. In addition, the Applicant believes there should be a self-funding component required of each intervention. It also suggested that some of the costs might be paid by the Board, as was done in one other case.

With regard to the use of legal counsel, the Applicant believes that it is a reasonable expectation that all interveners, especially those with legal counsel, should keep the hearing process efficient and non-repetitive. Many interveners noted the extended length of the hearing as a reason for increased cost claims. It was the Applicant's position that in a number of instances, "friendly cross-examination" occurred which in its view was improper and wasteful. The Applicant further noted the extended time interveners' legal counsel chose to listen to presentations of others and disputes that the Applicant should be responsible for these legal costs.

Three Sisters believes that the Board must evaluate the merits of each intervention and to the extent that an intervention did not contribute to the hearing, brought forward unnecessary, irrelevant or improper information, or was intended only to delay or frustrate the process, the intervener should not receive funding.

The Applicant also noted that in several cases, interveners did not limit themselves to costs recognized by the Board at the pre-hearing meeting. It considered that interveners should have an obligation to live within the cost awards recognized at the pre-hearing meeting.

With regard to expert assistance, the Applicant noted that in some cases, interveners chose to bring in experts from other jurisdictions to present evidence irrelevant to the Application before the Board or which duplicated evidence presented by experts retained by other interveners. In these cases, it is the view of the Applicant that costs should not be awarded.

**4. BOARD VIEWS REGARDING FINAL COST AWARDS**

Prior to dealing with the individual requests for final cost awards there are a number of general issues on which the Board believes it should comment. Some of these issues, such as the need for legal assistance, were addressed by the Board in its March 9, 1992 Report of Pre-Hearing Meeting. However, the Board believes it is important to review these issues again to assist interested parties in understanding the approach the Board will take with respect to cost awards.

**4.1 General Issues**

The Board in its March 9, 1992 Report of Pre-Hearing Meeting dealt with requests for advance funding. The Board stated that it believes that funding advances are not intended to cover the entire amount the Board might ultimately award as costs. The purpose is to ensure that eligible interveners have sufficient funds to retain experts and for other expenditures necessary to prepare for a hearing. The Board would not expect to include in advances costs to cover the attendance at hearing, witness fees, and other similar items. These would be included, as appropriate, in the final cost awards. In order to give interveners direction as to those costs likely to be recognized in final cost awards, the Board in its Report on the Pre-Hearing Meeting provided its views on interveners' proposed budgets. The Board also emphasized at that time, that final cost awards would be on the basis of what actually transpired at the hearing and that the Board may make cost awards against the Applicant for an amount greater or less than provided for in the Report on the Pre-Hearing Meeting. In the event that an ultimate award does not equal or exceed the amount of an advance, the intervener would be required to return the portion of the advance not awarded.

The Board also emphasized that when it considers advance funding requests it will provide only for those portions of interveners' preparation and hearing work for which it believes the Applicant for the project should provide costs. In general, the Board anticipated that this would be confined to work necessary to assess potential direct effects on individuals or groups of individuals and which would not needlessly duplicate work done by other interveners.

In the Board's view, the primary purpose of cost awards is to fund the preparation and presentation of intervener submissions at the hearing itself and not for peripheral matters such as the determination of an intervener's status as "directly affected". The Board also believes it is reasonable to expect that interveners in a hearing would typically provide considerable time and effort on a voluntary basis for certain activities, including the preparation and submission of cost claim documentation to the Board.

The Board notes the suggestion by the Applicant that the Board might provide some funding to interveners as was done in one other case. In that instance, there were no interveners directly affected and thus eligible for funding. Additionally, several of the interveners wished to put forward information which the Board believed would be useful and would not otherwise be placed before it. Neither of these circumstances exist with respect to the Application by Three Sisters.

**4.2 Legal Assistance**

The Board in its Report on Pre-Hearing Meeting of March 9, 1992 indicated that it had no objection to interveners being represented by legal counsel and indeed sees many benefits of such representation; however it believes that cost awards should only cover legal costs for those hearings which are legally complex, and then, the costs should only cover legal costs for those functions that require legal expertise. This would include advising on legal matters, ensuring that the submission is legally proper, and preparing those portions of submissions that deal with legal issues. The Board believes it would not be fair to the Applicant to award costs incurred due to the inappropriate use of legal counsel for functions, such as the "coordination" of a group intervention, which could have been undertaken in an equally effective and efficient manner by others, such as the executive of the groups or associations.

In the case of the Application by Three Sisters, the hearing extended beyond the length of time initially anticipated by the Board, the Applicant and interveners. However, it should be noted that at the request of legal counsel for various interveners, the hearing was divided into three portions because it was anticipated that this would result in more effective and efficient use of legal counsel. In fact this may have prolonged the proceedings.

In addition, it is important to note that few interveners participated in all three portions of the hearing. The Board in this decision has had regard for the extended length of the proceedings, the role of the individual intervener's legal counsel and whether legal counsel was required to be in attendance at particular times.

The Board also notes that in some cases legal counsel played a "dual" role serving on the executive of the intervening group as well as acting as legal counsel. In those cases, the Board will have regard for what it views as the appropriate volunteer contribution which a member of the executive would reasonably make to such an activity.

**4.3 Coordination of Efforts Amongst Interveners**

At the meeting on March 9, 1992, and in the Report of Pre-Hearing Meeting, the Board raised the issue of coordination of effort amongst interveners. At the meeting itself, some interveners expressed a willingness to pool resources. The Board believes that coordination of effort where appropriate, is an important component in the consideration of final cost awards and will have regard for efforts made by various interveners to this end. The Board will also have regard for duplication of experts and the value of expert information provided to the Board during the hearing, as part of its overall consideration of the reasonableness of the cost claim submitted.

The Board in its Report of Pre-Hearing Meeting stated that it believes it is reasonable to expect time and effort to be contributed on a voluntary basis, as a component of self-funding by interveners. It is reasonable, for example, to assume that organizations would arrange a schedule to monitor the hearing proceedings through the use of volunteers, thereby reducing the need for such activity by legal counsel. The Board also recognized in its Report of Pre-Hearing Meeting that some interveners may have other sources of funding that may be used to assist in the preparation and presentation of an intervention. In some cases, it is reasonable to expect that some of the work undertaken by an intervener on behalf of that organization would be work the organization would undertake as part of its mandate even if an application was not before the Board. The Board will have regard for all of the above when making its final decision.

**5. BOARD DECISIONS ON FINAL COST AWARDS**

The following are the Board's conclusions with respect to final cost awards to those parties who have been determined by the Board to be "directly affected" by the proposed project and therefore eligible for funding.

These decisions have regard for issues dealt with under section 4 of this Report on Final Cost Awards, as well as the length of the hearing, magnitude and complexity of the Application and all other matters the Board considers relevant.

**5.1 CPAWS Group**

Having regard for the discussion on the use of legal counsel under section 4, the Board is prepared to recognize an increase in legal costs of $15,294. The Board does so noting that counsel for CPAWS Group was particularly effective and efficient in his presentation of evidence to the Board, in the use of experts and in a focused cross-examination. The Board also notes that the final claim for experts was below the amount recognized at the pre-hearing meeting. As a result of the reduction in anticipated costs for experts and the increase in legal costs, the Board reaffirms the costs recognized in the Report of Pre-Hearing Meeting and makes a final cost award of $50,000.

**5.2 Bow Valley Women's Resource Centre**

The Board recognizes that the filing by the Applicant of revised information did have an impact on the Centre as did the extended length of the proceedings. The Board acknowledges and appreciates the effort by legal counsel to voluntarily reduce its billing to the Centre and to be effective and efficient in the Centre's submission and presentation of evidence to the Board. However, it should be noted that the Centre's participation related to only one part of the three part hearing.

In addition to the $35,000 recognized following the pre-hearing meeting, the Board is prepared to include $8,000 for the extra work required by experts for a final cost award of $43,000 to cover expert and legal assistance.

**5.3 Bow Corridor Organization for Responsible Development (BowCORD)**

The Board is prepared to confirm the $28,000 previously recognized by the Board for non-legal costs and an additional $27,000 for legal costs for a final cost award of $55,000. This is $9,000 more than was recognized in the Report of Pre-Hearing Meeting.

In doing so, the Board recognizes that legal counsel for BowCORD was efficient and effective in his presentation before the Board and has only submitted billings for his presentation time though he was in attendance during other parts of the hearing not related directly to his presentation. The Board is concerned however that greater coordination of resources could have occurred with other interveners with respect to expert witnesses and has considered this factor in making its final determination.

**5.4 AWA Group**

While the Board recognizes that the unanticipated length of the hearing did affect all participants, it is the Board's view that legal counsel for the AWA Group could have presented its submissions and conducted its examinations in a more efficient and effective manner. The Board notes in its Report of Pre-Hearing Meeting that the AWA Group was encouraged to coordinate its experts with other intervener groups to avoid duplication in the wildlife and socio-economic areas in particular. However, this did not appear to occur. In addition, in some instances, there appeared to be a lack of coordination between the AWA Group legal counsel appearing at the hearing, resulting in a time delay for all participants. In the Board's view, this lack of coordination and efficiency was a factor in the overall length of the proceedings.

In particular, the Board is not prepared to award costs incurred for the subpoena of witnesses by the AWA Group, particularly since it did not approach the Board to make a determination on this matter.

The Board reconfirms its decision of March 9, 1992, for a final cost award to the AWA Group of $50,000 to cover expert and legal assistance.

**5.5 Bow Valley Naturalists**

While the extended length of time of the hearing did affect all participants, it is the Board's view that the Bow Valley Naturalists' involvement in the hearing could have been more time-efficient and that there were opportunities for pooling of resources with other interveners to make its submission more cost effective. The Board believes that there was a duplication of effort and information by experts which contributed to the overall length of the proceedings.

The Board re-affirms its earlier pre-hearing meeting decision to recognize total costs of $32,000 for the Bow Valley Naturalists.

**5.6 Trout Unlimited Group**

In the view of the Board, there was little effort by the Trout Unlimited Group to pool resources with other interveners and therefore its submission and presentation was not as effective or efficient as it may have been. The Board confirms its original cost award of $6,140.

**5.7 Ray Haimila**

Mr. Haimila has submitted a cost claim for $240 to cover the out-of-pocket expenses of his participation in the hearing. The Board appreciates the efforts of Mr. Haimila in the proceedings and recognizes the full amount as eligible.

**6. SUMMARY OF CONCLUSIONS**

The Board is issuing cost orders directing Three Sisters to make the final cost awards as set out in the following table, less any advance funding that may have been provided.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Intervener** | **Pre-Hearing Recognized Costs ($)** | **Advance Funding** **($)** | **Final Cost Application ($)** | **Final Cost Award** **($)** |
| Town of Canmore | N/A | N/A | 214,344.75 | N/A |
| Mt. Rundle School Division | N/A | N/A | 19,305.37 | N/A |
| Federation of Alberta Naturalists | N/A | N/A | 1,033.10 | N/A |
| Stoney Tribe | N/A | N/A | 22,358.02 | N/A |
| CPAWS Group | 50,000.00 | 30,000.00 | 73,607.36 | 50,000.00 |
| Bow Valley Women's Resource Centre | 35,000.00 | 23,700.00 | 56,562.39 | 43,000.00 |
| BowCORD | 46,000.00 | 15,000.00 | 66,902.82 | 55,000.00 |
| AWA Group | 50,000.00 | 20,000.00 | 115,139.79 | 50,000.00 |
| Bow Valley Naturalists | 32,000.00 | 20,000.00 | 34,997.81 | 32,000.00 |
| Trout Unlimited Group | 6,140.00 | 4,000.00 | 12,533.81 | 6,140.00 |
| Ray Haimila | N/A | N/A | 240.00 | 240.00 |
| **TOTALS** | **219,140.00** | **112,700.00** | **617,025.22** | **236,380.00** |

DATED at Calgary, Alberta, this 12th day of February, 1993.

NATURAL RESOURCES CONSERVATION BOARD

G.J. DeSorcy

Chairman