

PHASE 3 STAKEHOLDER CONSULTATION SUMMARY



LOWER ATHABASCA REGIONAL PLAN



**Government
of Alberta** ■



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1.0 Overview



Alberta's Land-use Framework (LUF) sets out the new approach for managing lands and natural resources to achieve Alberta's long-term economic, environmental and social goals. The purpose of the LUF is to manage growth and to sustain Alberta's growing economy, while maintaining a balance with Albertans' social and environmental goals. One of the key strategies established in the LUF for improving land-use decision-making is the development of seven regional plans based on seven new land-use regions. Each regional plan will address the current conditions in a region, and will anticipate and plan for relevant development related activities, opportunities and challenges in that region over the long-term.

The LUF identified the Lower Athabasca Regional Plan (LARP) as an immediate priority. In December 2008, the government established a Regional Advisory Council (RAC) for the Lower Athabasca Region (LAR). The RAC was comprised of 17 members with a cross-section of experience and expertise in the Lower Athabasca Region.

The RAC was asked to provide advice on current and future land-use activities and challenges in the region. The RAC's advice was presented in its document, the Lower Athabasca Regional Advisory Council's Advice to Government Regarding a Vision for the Lower Athabasca Region (RAC advice), and the phase 2 public, stakeholder and aboriginal engagement conducted to gather input on the advice. The input was used to inform the development of the draft regional plan (known as the Draft Plan or LARP), which was then taken out for consultation in phase 3.

The Alberta government's Land Use Secretariat (LUS) oversees the development of each regional plan, providing policy analysis, research and administrative support to the RAC as well as leading the consultation process in each region. The draft regional plan was developed by the Government of Alberta and informed by the RAC's advice, cross-ministry knowledge and the views of residents, businesses, communities, aboriginal communities and other governments that have a stake in the region and its future.

The draft regional plan provides a vision of how a region should look over several decades and considers a planning horizon of at least 50 years. The plan may be reviewed every five years to ensure it is effective. Regional plans set the overall objectives for the region and identify where major activities (such as industrial development, agriculture or recreation) should take place to better co-ordinate activity on the landscape. Regional plans are not intended to describe how a neighbourhood will look in the future or set rules about local property.



2.0 Consultation

In support of the development of the LARP, three distinct phases of consultation with the public, stakeholders and municipalities were undertaken:

- Phase 1 – Awareness – May/June 2009
- Phase 2 – Input on the Regional Advisory Council Advice – September 2010
- Phase 3 – Feedback on the Draft Regional Plan – April/June 2011

Aboriginal consultation is also critical to the success of the plan and has been conducted in an ongoing and continuous fashion throughout the planning process.



This third phase of consultation focused on receiving input and comments on the Government of Alberta's Draft Lower Athabasca Integrated Regional Plan including the strategic plan, implementation plan and proposed Lower Athabasca Regional Plan regulations. A series of open houses, workshops and meetings were held with the public, stakeholders and municipalities respectively. Approximately 460 people attended open houses and 320 stakeholder group representatives attended workshops held in numerous locations within the region and in several centres outside of the Lower Athabasca Region. As well, all Albertans were encouraged to review the Draft Plan and provide their feedback by completing either the online or hardcopy versions of a workbook called Discussion Guide – Draft Lower Athabasca Integrated Regional Plan, A Workbook to Share Your Views with the Government of Alberta.

In total, 349 completed workbooks were received in the two formats, the majority of which were submitted electronically. There were also 119 partially completed online workbooks received. In addition to these, 73 written submissions were received including 55 from stakeholder organizations and industrial interests to support their workbook submissions. These are broken down as follows:

- 36 industrial organizations and companies;
- 10 conservation and environmental organizations;
- 6 government agencies; and
- 3 recreation user groups and/or outfitters.



3.0 Consultation Methodology and Format



3.1 Locations

Workshops and open houses were held on the following dates and locations for both stakeholder group representatives and the public (with the exception of Fort Smith and Fort Chipewyan, which each had public sessions only). In each location, stakeholder workshops were held from the late morning to early afternoon and public open houses were held in the late afternoon.

Location	Date	Venue Names
Bonnyville	April 18, 2011	AFCA Hall
St. Paul	April 19, 2011	Recreation Centre
Cold Lake	April 20, 2011	Energy Centre
Athabasca	April 26, 2011	Athabasca Regional Multiplex
Fort McMurray	April 27, 2011	Keyano College
Lac La Biche	April 28, 2011	McArthur Place
Fort Smith	May 3, 2011	Pelican Rapids Inn (public only)
Fort McMurray	May 4, 2011	Keyano College
Boyle	May 5, 2011	Community Centre
Fort Chipewyan	May 5, 2011	Mamawi Community Hall (public only)
Cold Lake	May 10, 2011	Energy Centre
Glendon	May 11, 2011	Seniors Drop-in Centre
Elk Point	May 12, 2011	Seniors Recreation Centre
Edmonton Centre	May 17, 2011	Ramada Hotel and Conference
Calgary	May 19, 2011	Radisson Hotel – Calgary Airport

As noted, these meetings were held both within and outside of the region to provide an opportunity for Albertans to attend and provide their feedback.



3.2 Stakeholder Workshops

Stakeholders were provided with print copies of the Government of Alberta's Draft Lower Athabasca Integrated Regional Plan, including the strategic plan, implementation plan and proposed Lower Athabasca Regional Plan regulations. All stakeholder sessions were opened with introductions of participants, Government of Alberta employees and Stantec staff, with an explanation that Stantec was leading the workshop facilitation. An opening presentation including process instructions followed the introductions. Participants were encouraged to use the opportunity to share feedback and gather ideas from other participants. They were also encouraged to complete the workbook in its online version, or to complete a hardcopy version to be delivered in the mail via the stamped, pre-addressed envelopes provided.

The session continued with four presentations on key aspects of the Draft Plan, each followed by a 20-30 minute small group facilitated table discussion. The four discussion topics were:

- environmental management frameworks;
- conservation areas;
- recreation and tourism opportunities; and
- regional economic development outcomes.

Discussion was captured by the table facilitators and included all workshop input. The detailed notes from each session were then analyzed for key themes and discussion topics, and a session summary was written on each of the four topic areas.

Government of Alberta staff were available throughout the discussions to answer questions and provide additional information as required. A lunch break was held after the second discussion and before the third discussion began. Participants were asked to change tables in a manner that resulted in different group compositions.

This report summarizes the input collected at the 13 stakeholder sessions, the 54 stakeholder submissions and stakeholder workbook comments not included in the workbook report.



4.0 Summary of Stakeholder Input



4.1 Environmental Management Frameworks

Overall, there was general support for the environmental management frameworks and for cumulative effects management. The management frameworks were viewed as a comprehensive approach to environmental management. However, a number of concerns were raised—largely around wanting more detail, a greater understanding of management actions and intentions and the need for sharing of knowledge regarding the scientific basis for triggers and limits.

Stakeholders saw the approach to cumulative effects management as leading edge, but were concerned that embedding the triggers and limits into the plan may be too restrictive. They suggested this would not allow for revision and accommodation as knowledge increases into the future. There was a request for a mechanism to allow changes required by future conditions, including new technologies. Comments stated this was particularly true regarding situations where the frameworks are not yet complete with identified triggers and limits.

More detail was called for, especially regarding the scientific basis for limits and triggers, and for management actions when triggers and limits are exceeded. Most supported the Draft Plan as a more holistic approach, especially with the biodiversity management framework and disturbance plan used as broad conservation tools applied without the wide-spread removal of conservation land from the economic land base. There was also support for developing a set of management tools that will be available to mitigate and address exceedances to limits and triggers.

Some mentioned that the Cumulative Effects Management Association (CEMA) has completed significant work, which they felt was a good starting point for regional cumulative effects management. They viewed the biodiversity management framework as a way to expand conservation efforts to non-conservation areas, and were interested in seeing the framework and associated disturbance plan being developed with significant stakeholder (including industry) consultation and involvement.

Groundwater

Stakeholders raised concerns about groundwater and how development will impact groundwater in the region. Industry questioned whether investments would be impacted by the frameworks. Many stakeholders voiced concern about the cost associated with reporting, wondering how government would fund it.



Some said they were concerned about how groundwater is used. They stated that there are low water levels but the cause is not always obvious. They felt natural cycles are misinterpreted as industrial use. Some mentioned experiments with recovering water from Steam Assisted Gravity Drainage (SAGD) technology, but the process wasn't implemented. They said there is more effort along these lines in water-starved areas like California. There was some concerns in re-using water.

There were requests for more information about groundwater management in the region. For instance, questions were raised about whether the government will carry out groundwater studies—including quantity, quality, what contamination is present and what are the sources of water. Some suggested that not enough is known about the groundwater resource—or groundwater and surface water interactions—to accurately identify limits and triggers. There was interest in ensuring that historical databases be identified or built to accurately establish baseline measures and sources or levels (including acidification) of naturally occurring pollutants. They felt this would help to avoid situations where limits fall below natural levels. The Beaver River Watershed was identified as having thresholds that should be considered for the LARP.




It was recommended that a placeholder for polycyclic aromatic hydrocarbons (PAH) and naphthenic acids (NA) be implemented to ensure management responses are in place as more information on these compounds is gathered. Some said references to the Regional Aquatics Monitoring Program (RAMP) should be omitted, and they would prefer a water management plan that identifies a science-based ecosystem base flow (EBF).

Further, some stakeholders requested that enforceable regulations be in place to protect non-saline groundwater resources by updating and implementing existing guidelines and definitions. They stated the Government of Alberta should expand its definition of regulated groundwater from the current level of water containing less than 4,000 mg/litre total dissolved solids (TDS) to include water with up to 10,000 mg/litre.



Surface Water

Several suggested establishing more monitoring stations—aside from the one at Old Fort—and that the stations should be placed strategically. Additional station sites recommended are on the Beaver River watershed and



upstream on the Christina River. Some comments said the Old Fort station is too far downstream to detect issues proactively. They also suggested that effluent from each mine be measured to help develop baselines, and there was interest in whether or not aquatic life would be included in any framework.

For surface water quantity it was recommended that the phase 2 Athabasca River framework include an ecosystem base flow cut-off level below which no industry withdrawals would be permitted.

Better industry/environment integration and understanding were encouraged, along with suggestions that more non-potable water be used for industry. Some mentioned that in southern Alberta water was contaminated from cattle activity, with a risk to human health. There was concern that as townships have been changed from Green to White Areas, the Beaver River could be contaminated from more intense cattle/agricultural activity. Some questioned the need for agricultural development, and the perceived erosion of bush land in this area.

With regard to the water management frameworks, participants asked for more information on the triggers and limits, and how they will be developed. Comments were received that the Clearwater-Christina Rivers Management Plan be honoured, and that no industry on the heritage river system be allowed.

Air Quality

The air management framework was seen by stakeholders as the strongest and most developed of the proposed management frameworks. The greatest area of concern they expressed was the adoption of a regional approach and the impact it may have on future development. They felt the regional approach will not equitably identify pollutant sources and that—as a result—operators will feel a lack of incentive to minimize industrial pollutants when not facing future approvals.

Stakeholders recommended air quality be a provincial—not regional—framework, and that air emission limits achieve the World Health Organization (WHO) air quality guidelines. Others voiced air quality monitoring concerns, including about what exactly was being monitored. They mentioned a desire for air particulate measures. Some felt monitoring by industry alone was not enough, but suggested there is a lack of government resources. Some would like to see all management actions incorporated from level 4 (Schedule C, page 52, Draft Plan) into level 3 as possible actions that can be used if necessary to protect air quality from reaching a level 4.



Biodiversity Management Framework

While the biodiversity management framework was seen by some respondents as particularly complex, there was interest in industry, aboriginal and other stakeholders participating in its development. Participants were concerned that moving forward without its completion leaves too much unknown, so there is need to complete the framework and associated land disturbance plan quickly. Participants noted there was a lot of relevant data available from industry, and there are available biodiversity strategies, measures and indicators that could be used.

Some urged the Government of Alberta to move the completion date for the biodiversity management framework to 2011 from 2013. They want clear science-based indicators, thresholds and triggers and the land disturbance threshold included. Others felt the biodiversity management framework is too broad for a single framework and lacks details required to make an informed decision. Overall, they suggested more environmental background, detail and focus are required. They added that wetland and species at risk management frameworks are also needed.

It was suggested that the frameworks need to recognize natural variances and take into consideration non-industrial planning and uses. Stakeholders said the biodiversity management framework needs to be complemented by biodiversity corridors. They want the Government of Alberta to develop a tailings pond policy, and feel the important role of river corridors should be acknowledged.

Finally, many stakeholders stated their concerns about caribou preservation. There was some interest in additional information regarding caribou protection and habitat, specifically in regard to herds in the southern area of the region where there are no conservation areas.

Monitoring and Enforcement of Triggers and Limits

In spite of general support for the environmental management frameworks, there was concern that environmental science and monitoring is complex, and it is critical to get the numbers right—with a clear view of the science they are based on. Suggestions were made that where there is any doubt or uncertainty, the limits could remain in the regulations, but said triggers should be removed to allow flexibility. It was noted that many triggers do not have values yet, so stakeholders suggested the further a measure is from being finalized, the less they would like to see it in the regulations. There was also





interest in identifying the impact implementing all the frameworks will have on future production levels and agricultural operations.

There was significant concern over the management actions when triggers and limits are exceeded. Some wanted to see the management actions firmly outlined in the plan, however, there was also concern that there be appropriate mechanisms to address the management actions if knowledge, technologies or other conditions change.

With the adoption of regional air quality reporting, there was concern the current fence-line reporting may not reliably adapt to regional reporting. It was also suggested there may be a loss of location-based reporting vital to implementing equitable management actions—targeted management action based on use of best available technology, overall output, etc., as opposed to equal/one-size-fits-all—when triggers and limits are exceeded. As a result, there was interest in a technical review of the air monitoring network to ensure accurate information is collected for the regional monitoring concept.

Stakeholders called for monitoring and reporting of environmental variances that is both accurate and trusted. Some suggested there is currently a lack of trust that needs to be addressed. Government is identified as the preferred body responsible for monitoring, but a clear line-of-sight between the monitoring and reporting and the science on which measures are based is required.

Many asked for additional details on the frameworks regarding baselines, impact and interpretation—individually and cumulatively, including water and biodiversity. They added that more testing details for action when triggers and limits are reached are required.

Some said education is required to support enforcement and monitoring efforts, and felt there needs to be ongoing public consultation in the development of future frameworks. Some stakeholders believe more resources are necessary to do the research required to firmly establish the framework foundations, as well as to implement, monitor and enforce the plan and regulations. They said cumulative effects management should be proactive based on projections and moderating pace of development may be suitable.

Some participants said measures are missing in the frameworks (e.g., phosphorous, dissolved oxygen) and the effectiveness of the frameworks will depend on accurate monitoring which should have seasonal differentiation. There was concern with the cost of implementing new standards and with 'designated Minister's opinion'¹. A few felt there was a need for more specifics on the management actions that will be implemented when triggers are exceeded. A few suggested that no new oil sands leases should be granted until environmental management frameworks are complete.

¹ Proposed Lower Athabasca Integrated Regional Plan Regulations, March 2011



In regard to monitoring and reporting, it was generally identified that the monitoring should be done provincially for air quality. However, there was interest in including Watershed Planning Advisory Councils for watershed monitoring. All respondents felt that the monitoring needs to be seen as reliable and trustworthy and that the data collected must be used.

General Environment Management Frameworks Comments

It was noted that mining, agriculture and other industrial activities all support a healthy animal population. Most believe there needs to be a positive recognition of the benefits of development and economic activity. Stakeholders said many activities get along well and are mutually beneficial. They felt the LARP should not be used as a template for the other regions—each region is unique and consultation is needed for all regions.



At the current stage there is some concern that the timelines may rush the product and that firm timelines should not be established until all elements of the plan are completed. The word “environment” should not be mentioned last or second last in every statement (for instance, in economic, environmental and social goals).

Finally, there was interest in ensuring that the province implement integrated and collaborative strategies across its ministries and departments to ensure the plan’s implementation does not result in excessive timelines or additional procedures and regulatory requirements. Rather, there is an interest in seeing streamlined applications and approvals that effectively cross ministerial lines and align with federal regulations and processes.

4.2 Conservation



In regard to conservation areas, the Draft Lower Athabasca Regional Plan was generally seen as an improvement over the RAC advice for many stakeholders. Stakeholders noted this especially in terms of industry planning and development, and with the consideration that the biodiversity management framework and land disturbance limits will prove to be powerful conservation tools. There was some concern expressed as to why Alberta needs to set such a high conservation area standard for the rest of Canada and even the world, while others expressed concern that there is not enough



conservation—pushing for a 50 per cent undisturbed Boreal forest. There is also interest in determining how the LARP will compare to federal conservation and wildlife regulations, and a desire to see greater alignment and decreased opportunity for disputes.

There was some interest that the conservation area boundaries be firmly set in legislation to ensure they remain inflexible. Conversely, there were queries as to the possibility of reclaimed lands becoming conservation areas to off-set allowing proposed conservation areas to open up to industry. There is also concern by some that there is less conservation area in the Draft Plan than in RAC's advice, and recommendations that conservation areas be determined by conservation need—not by size and industrial value.

Area Specific Comments

Some stakeholders suggested the proposed conservation areas outlined do not meet previous commitments to Boreal forest conservation and that use of ecosystem forestry in some areas further distances it from the previous goals. There was also concern that the conservation areas are not fully representative of the region and wanted some conservation areas in the southern part of the region. It was also noted that some conservation areas (especially #3 Gipsy-Gordon Wildland Park) may cut off access to resources in Green Areas. There were comments about the northern location of most identified conservation areas, with eco-system forestry and with measures suggested for caribou protection.

There was interest in conserving the McLelland Lake wetland complex area and suggestions that the Dillon River area be widened to accommodate a caribou range. There was also some concern about the interface with Wood Buffalo National Park given the health issues of bison and how this could impact domestic herds of cattle.

Some felt the conservation areas were too large, and because of that there would be problems monitoring them. The Richardson area was cited as an example, because stakeholders said it has heavy quad use, leading to difficulty implementing any monitoring and enforcement programs.

Stakeholders believed setting aside conservation areas made sense to anchor environmental considerations, but said balance with the economic pillar is necessary. Some recommended existing conservation in the Northwest Territories and Saskatchewan be considered when determining conservation areas for Alberta. Comments suggested there needs to be an appreciation for building on existing rules and regulations, and that similar regulations may be applied to other jurisdictions.

Some stakeholders thought that rather than having a percentage target for conservation areas, the concept of managing to meet biodiversity objectives be instituted. They felt this would allow for adjustments where objectives are not being met to maintain species richness.



Some deemed it important that hunting and fishing be allowed for all users, but want trapping regulations for the new hunting areas clarified. Some felt motorized vehicles should be allowed off trails to recover game. It was stated that many landowners would like to conserve habitat, but need market/credit mechanisms to allow them to do it.

Wildlife

Some stakeholders said the conservation areas do not align with caribou ranges, and recommended woodland caribou protection be strengthened to fulfill legal obligations under federal legislation. They said critical habitats, including for the caribou, must be protected—with an understanding that these habitats may move over time. Although many said they believe the biodiversity management framework will help address caribou—including issues such as predator control and habitat—there was some comment asking for clear definition of what will and will not be allowed in range areas. They added that setting aside what they deemed to be arbitrary conservation areas does not necessarily guarantee biodiversity or species protection.



Monitoring and Enforcement


During discussions it was stated that regulations need to be clear and specific. There was also a desire to ensure industry has opportunity to put forward proposals it feels meet management intent, and to incorporate technological changes in the industry. Many said decision-making tools would be useful as well.

Some mentioned they would like to have buffer zones between conservation areas and water sources, as well as between water sources and areas used for industry. They also think education needs to be a key component in conservation. Some felt there should be opportunity for private groups to assume stewardship of areas, complementing the management intent of conservation areas.



Stakeholders felt clarification was needed on what will be allowed in conservation areas—including an expanded understanding of ecosystem forestry and how areas will be managed and monitored. Questions were raised regarding the land disturbance plan and how it will affect/regulate future industry activity. They believe monitoring and enforcement both need to be made much more robust.

Some suggested integrated land management (ILM) will take resources and co-ordination, and believe there should be a



government commitment to co-ordinate ILM. Questions arose about whether participation in an ILM program will be required for stakeholders, and whether ILM will be conducive to tourism and trapping in the area.

Industrial Activity

From an industry perspective, there was uncertainty expressed regarding compensation and a desire to see clearly outlined details of the compensation process. They asked for details—including calculations and payments—and stated that there is room for more than just financial compensation (timber). Some mentioned linear disruptions need to be minimized.

There was interest in a clear determination of subsurface potential (including saline water) and allowing subsurface access before rescinding any lease, even when no surface rights would be allowed. The possibility of incorporating reclaimed lands into conservation areas to release more industrial area was also suggested. Some proposed that conservation areas could consider “net environmental benefit” uses to give flexibility to some activities. Strategies such as these and land swaps were viewed as a way to minimize compensation costs to the taxpayer. Stakeholders said in order to minimize investor uncertainty, the compensation process should be clear, concise, quick and consistent.

Some suggested establishing regulations and standards for oil sands development in conservation and other protected areas to reduce land surface impacts to acceptable levels already established for conventional oil and gas. They felt this would encourage technological innovation and optimize responsible exploitation of resources in environmentally sensitive areas.

Implementing ecosystem-based commercial forestry outside—not inside—proposed conservation areas was also suggested. Some questioned the reason mining and in situ are mentioned together in terms of operations in conservation areas—with some assertion that in situ has a development footprint more in line with conventional oil and gas, especially the footprint-to-production ratio where conventional operation may be higher than in situ. However, they stated that in situ does have a larger edge effect. Many said there are strategies available to address these, including narrow cuts, reclamation of lines and roads and meandering cut lines.

A few stakeholders said that Energy Resources Conservation Board (ERCB) regulations require higher levels of disturbance for approvals, which makes it hard for producers to decrease disturbance—they would like to see this changed. There was also interest in having the plan be able to incorporate future technologies to expand opportunities in an environmentally sensitive manner.



Some felt conservation areas sterilize an area for industry and suggested the areas should be explored first to develop greater knowledge of future resource potential. They believe there needs to be more information about what will and will not be allowed in conservation areas.

Some felt the conservation areas are overly determined by oil and gas activity, and want the large Green Area split up more.

In the comments there were those who said the plan creates uncertainty for industry, and more creative approaches—instead of cancelling leases—to surface resources in conservation and recreation areas should be explored. They also mentioned that some conservation areas are a source for industrial use water. Some stated there are likely to be significant limitations to forestry based on caribou and setbacks; these may be necessary, but the overall impact should be taken into consideration. They do not want forest management excluded from conservation areas, but instead would like the forest industry allowed to participate in enhancing the values of conservation using adaptive management techniques to achieve land-use goals.



Access Management

Numerous access and management suggestions were offered to allow enjoyment of the areas. Among those were that motorized vehicle use is desirable, but recognition of sensitive areas is necessary. It was noted that motorized vehicle access is also important to those with limited mobility. Some stakeholders suggested that increased access is one of the most important sources of disturbance in areas where linear corridors are the main form of development, so access management is critical.

Comments stated that designated trails are a good idea, and protection of creeks should be a consideration in the designation process. Stakeholders felt park areas need to be protected.



It was mentioned by some that access management policies should be developed in consultation with aboriginal peoples. They added that non-aboriginal users are in direct competition with traditional aboriginal users. They want additional clarification on hunting and trapping access.



General Conservation Comments

Stakeholders said the Government of Alberta has generally been reasonable, fair and open in its consultation. They noted they are appreciative of having new conservation areas in the region, but wonder about the response of aboriginal peoples to the Draft Plan. The conservation areas in the Draft Plan are generally seen as positive and manageable; although some concern was expressed about multi-use corridors (which they felt would likely go into some conservation areas; likewise for recreation areas).

Natural events like wildfires affect these conservation areas, and several stakeholders thought there should be an integrated land management plan, ideally developed with extensive stakeholder involvement. Buffer zones were also identified by some as a desirable means to increase conservation. Some would like the Government of Alberta to consider changing the proposed ecosystem forestry conservation areas into wildland parks managed by Tourism, Parks and Recreation.

It was stated that environmentally significant areas (ESA's) are believed to be largely unprotected under the Draft Plan, that wetland protection and biodiversity off-sets are absent and that conservation areas should be informed by science, not existing mineral lease maps. Finally, they said protected areas should be developed and co-managed with aboriginal peoples.

4.3 Recreation and Tourism Opportunities

Overall, the recreation and tourism recommendations were met with support. There was some interest in understanding how recreation and tourism needs are identified, and that a full needs and cost-benefit assessment be completed to plan effectively. It was suggested that the number and quality of recreation and tourism amenities—including roadside facilities and campsites—has decreased in past years. They believe the result of this is that non-designated areas are then used, causing damage to public and even private lands. It was noted that high-quality recreation and tourism opportunities will be vital to attracting workers to the region.

There was support for the designated trail system, however, there was also recognition that trails can be expensive to develop and maintain. It was noted that Clearwater County recently spent \$100,000.00 on trails, and that the investment was only a start to what was required. There was strong interest in seeing a collaborative approach to planning and implementing the trail system, involving the province, user groups, aboriginal representatives, trappers and others in planning and development. Of particular interest was the co-existence of motorized and various non-motorized uses, and how priority use would be determined.



It was also stated that proactive collaboration and planning with industry could result in greater cross-over capacity, as disturbances such as cut lines can have recreational value which could be planned towards. However, there was concern that ERCB approvals have restrictions that contradict such planned collaboration. There were also concerns that restricting surface access could adversely affect some lease owners and that—based on disturbance levels—it might work better to treat in situ operations in a similar way to conventional oil and gas (as opposed to oil sands mining operations).

Participants suggested the implemented plan would require provincial monitoring and enforcement resources, but expressed concern that these resources could be a limiting factor. Improved signage and co-ordinating user groups and other stakeholders were seen as ways to maximize success.



Area Specific Comments

There was concern that there are too few new locations and opportunities in the southern portion of the region in proportion to the large population numbers there. Support was received for recreation designations and better management of areas. There was some question as to locating recreation and tourism areas beside conservation areas—a few felt this might impede biodiversity, and that buffer zones along boundaries would result in the removal of additional lands from industrial use.

Some believe there is a significant social license in the operation of parks and recreation areas. Stakeholders said the Richardson area will require extensive First Nations consultation and it was noted that the area is rich in uranium. Some felt the wildland provincial park on the Clearwater and Christina rivers is a great idea. They mentioned the confluence of the two rivers is the location of the highest concentration of animals and fish, so suggested making it a wildland provincial park and not available for industry.



Stakeholders said there is a shortage of campsites near Fort McMurray now, and they're concerned this will continue into the future. Regional Municipality of Wood Buffalo residents asked for more campsites in the Six Lakes area, Mountain Rapids on the Athabasca River and at the mouth of the Fire Bag River. Some requested an eastern wildland provincial park to have access for snowmobiles and off-highway vehicles (OHVs), exactly the same as outlined in the original management plan for the area.



The following areas were noted to be of high importance for non-motorized outdoor enthusiasts: (1) Whiskey Jack Lake with a seven km trail, canoeing partnership and primitive camping; (2) Athabasca River Valley between Fort McMurray and Grand Rapids Wildland Provincial Park with a 10 km trail and a historical trail; and (3) Lakeland Country. Lakeland Country is seen as less of a priority due to the distance of the high population base (some felt it would be better to have recreation opportunities within 1.5 hours from urban areas).

Outfitters operating in the area want bear baiting to continue to be allowed in the Richardson and Gipsy-Gordon Wildland Parks—they hope this suggestion was unintentionally left out. Other specific requests included: the Embares Airstrip stay open (important for trappers, fishing and family hunting business); and the size of existing conservation and recreation areas be increased to maximize the potential for backcountry activities. They feel this would ensure sustainability, including (in order of priority): Crow Lake, Gregoire Park, Maqua Lake, Hangingstone Campground and Stoney Mountain, Grand Rapid Wildland Provincial Park and Whiskey Jack Lake.

Opposition was received to a number of proposed recreation areas, including the Richardson Wildland Park because of the potential for uranium development (Maybelle River and Rea projects), with a recommendation to move the area to the east where there is not the same uranium development potential. Opposition was also received for the recreation designation on the Gipsy-Gordon Wildland Park due to oil sands leases held there, and the Kirby Lake area due to a large oil sands resource under it (potential resources may be difficult to access, which some thought would have a large impact on potential royalties).

Monitoring and Enforcement

Many stakeholders said that implementing the plan effectively would require significant monitoring and enforcement resources, as well as resources required to design and build the system. Concern was expressed that limited resources would impede the overall success of the plan. There are several comments that enforcement must be backed up by updated regulation and legislation that give ‘teeth’ to enforcement efforts. Education and collaboration were seen as tools to mitigate resource demands. Participants called for monitoring and enforcement resources, and some wondered if there are ways to recover partial costs from users. Conversely, there is a concern that user fees are not desirable.

There was clear support for designation and better management of areas, along with concern that controlled logging is not being permitted, as they see this practice as supporting integrated land management.



Industrial Activity

Many felt there needs to be more collaboration between industry, government and users in identifying and implementing trails. Some stakeholders said that people respect trap lines and they will respect industry as well if treated with respect. Likewise, a collaborative approach was expected to help with creek protection. They believe there are opportunities to integrate recreation planning with industrial use—if regulators will allow it. Participants said there are ERCB regulations that act as disincentives to collaboration, even though industry would be willing to collaborate with recreation interests to build good will. Industry was generally agreeable to and interested in collaboration.

From an industry perspective, concerns were similar to those for conservation areas. There was concern that without surface recovery, capacity decreases significantly—even with horizontal drilling technologies. There were recommendations that compensation be clearly identified, predictable and quick to help build a stable investment environment.

Allowing existing and new tenure was said to be good, but it was felt there is a need for early consultation. There is also an assertion that in situ is less damaging than mining and should be considered for recreation areas. Some said that infrastructure such as roads could service industry, but must be planned to improve access and build towards a scenic tour route.

Access Management and Trail Use

The regional trail system was seen as a positive—albeit large—task that will require extensive stakeholder engagement to implement. There was special note of the challenge of meeting the needs of both motorized and non-motorized uses. There was interest in seeing some areas set aside as frolic areas where motorized recreation users are not limited to trails. There was also a call to accommodate hunters who may need to go off-trail to collect game.

The province was encouraged to support more development of OHV intensive-use areas as private businesses operating on private land. People want areas where they can “rip and tear” their OHVs, which is hard to control on public lands. Some believed that designating areas for this purpose would help keep OHVs away from more sensitive areas. Education was also thought to be necessary, and would lead to more informed use and public monitoring of recreation areas.





Accessibility was also seen as an issue, with few recreation areas identified in the Fort McMurray area, and with the southern recreational areas a significant distance from most southern communities. Some stakeholders thought that low income was a restricting factor, and that the recreation areas identified did not appear to consider this.

There was support for moving to a regional designated trail system. It was suggested that existing motorized trails be re-aligned or closed to avoid sensitive areas such as wetlands. There was also support for pro-active sport fishery management, such as a tag system to mitigate over-fishing by visitors. They identified value in requiring motorized vehicle users to belong to off-highway vehicle associations.

Many thought motorized recreation needs to have a place, but added that traditional and non-motorized uses are also necessary and include many popular activities that will attract users, especially as the area has excellent trails—many known only by locals. They suggested the environmental impact of recreational uses has to be considered, especially with increasing population and use. Good access was felt to be essential to successful recreation and tourism, adding that roads may need improvement.

Stakeholders said managing access to public lands is necessary and more camping spaces and staging areas would help. They mentioned there is a need for pedestrian and cycling resources.

Lakeland Country

Lakeland Country was generally greeted with mixed opinion; it has economic potential, but the cost in terms of a loss of pristine area may be too great for some local residents. How the economic potential will be managed was a concern for some. A recommended way forward was a facilitated relationship between landowners, recreation interests and industry. There was support for eco-tourism opportunities for Lakeland Country, and some would like to see an expanded border of Lakeland Country beyond the LARP administration boundary.

Several concerns and questions were raised about the Lakeland Country concept, including:

- Could the Lakeland Country plan become a regulation (which would be considered excessive)?
- Were existing scenic views and skylines considered?
- Is involvement in Lakeland Country voluntary?

There was concern the Lakeland Country boundary is eroding and not well enough defined. There was also concern the Lakeland Country concept could result in limiting industry, and a desire to see any terms of reference clearly state that this should not happen. Some suggested the



area does not have the drawing power of an iconic tourism destination, and it may not support intensified recreational use. Some said that many of the lakes are difficult to get to. There was a desire for more clarification as to the process and partners that would be involved. Some worried that if the Lakeland Country concept moves forward, it will become an “elitist” playground. Finally, there were questions about how Lakeland Country would be marketed and how the associated costs would be handled.

Industry stated an interest in being involved in the Lakeland Country planning, which they saw as promising. However, they thought it likely to run into opposition from locals who want to maintain the pristine nature of the area, and from those concerned it will result in land-use changes. Stakeholders said there needs to be a way to become involved in the planning process, a contact person or website so interested stakeholders can get involved from the beginning.



Other Tourism Opportunities

Stakeholders cited the region as having potential for eco-tourism, agri-tourism and even industrial-related tourism, as well as a broad range of recreational activities. It was noted that a number of camping sites and other recreational assets have been closed in recent years, and they believe this has led to increased misuse of public lands. It was felt these existing campsites may need upgrading to meet the requirements of new travel accessories, such as long trailers and motor homes. Some participants said Alberta’s park resources have deteriorated, and priorities should be on improving amenities in high-use areas—such as along highways—as opposed to the remote areas identified in this plan.

Tourism opportunities were recommended that they felt would boost knowledge and use of unique areas in the southern portion of the region. Some would like to see a focus on attracting local users first.



A few stated that tourism development is not a major priority for many municipalities, so it needs provincial investment to make it work. Some said that destination tourism marketing is somewhat at odds with providing for local recreational needs, and municipal needs will likely grow with development.

Several participants said Birch Mountain area should be considered a tourism resource (citing the “Last Stand” war between Cree and Chipewyan people), but there was concern about who would pay for this opportunity. There was some question regarding the viability of tourism in remote areas.



General Recreation and Tourism Opportunity Comments

There were a number of suggestions to improve collaboration between municipalities, industrial stakeholders and the government, including regulators and good faith consultation with both First Nations and Métis. It was felt this would lead to improved recreational opportunities.

Generally, it was stated there is a need for more information and dialogue. Questions were asked about issues like:

- Whether First Nations and Métis history were considered?
- What do First Nations want developed as parks and recreation land?
- Is there a process for challenging decisions?
- Was the recreational opportunities spectrum used in developing this plan?

Some suggested municipal transportation and recreation need to be considered as well.

Finally, some stakeholders said there needs to be allowances for hunting, outfitting/guiding and trapping in recreation areas.

4.4 The Economic Pillar

Overall, it was noted there is a need to appreciate the economic, environmental and social as connected parts of a whole, and the Draft Plan was seen as a positive step forward. Many reported that the consultation strategy used in the planning process helped build a sense of partnership. It was believed the implementation of the plan will require significant resources—including human resources—and concern that resource limitations will adversely affect the success of the plan.

Comprehensive Regional Infrastructure Sustainability Plans (CRISPs)

Concerns were raised that the CRISPs are emerging as parallel planning; stakeholders felt greater integration and co-ordination with the LARP and regional economic development plans were needed, and accountability is critical. They said clear regulations will make implementation more effective and affordable. Discussion pointed to a need for more details on government funding, infrastructure planning, tourism, reclamation and how CRISPs will be integrated.

There was also concern that the CRISPs are lagging behind and that the LARP does not encompass a strong infrastructure plan. A stable investment environment was identified as good for economic development, but also necessary for infrastructure development, especially to the degree that is likely required in the region. It was felt that infrastructure should be designed and built to maximize efficient



resource extraction, but not pushed to levels unwarranted for economically recoverable viability.

Some felt the Draft Plan was lacking in social and economic frameworks. Further, they felt infrastructure should coincide with or lead development. Some statements were made expressing a belief that Conklin and Janvier are neglected for infrastructure.

Forestry

Some stated there are potential opportunities in forestry—such as intensive tree farming on private lands—but there is also concern that other initiatives—such as enhanced forest management—are impractical, as the required land is allocated to oil and gas use. It was recommended that the forest industry be assigned a lead role in site reclamation, as the industry has been practicing ILM and rapid reforestation for decades. Stakeholders said this industry has developed expertise that will be useful in ensuring the rapid return of disturbed lands to a state of ecological integrity.

Questions and dialogue turned to what intensive forestry management is, and whether forestry should be expected to replace losses created by other industries and give more consideration to the long-term maintenance of timber supply.

One stakeholder was concerned about potential impacts of the regional plan on the local sawmills and other regional forest operations if it is implemented as currently drafted. Additionally, there was concern as to whether the forest industry would be put in jeopardy across the province, despite the government's desire to diversify and strengthen the economy for the long-term benefit of all Albertans.

Minerals

There was concern that the plan was too heavily focused on oil and gas, and that it missed other economic opportunities—like mineral development—that help the province achieve economic diversification.

Some suggested that if the rights of existing tenure holders are to be abolished, then the Mineral Rights Compensation Regulation should be expanded to allow for broader compensation, including loss of opportunity and destruction of corporate value. Some felt there was a need to clearly indicate—through amendments to the proposed legislation—that underlying property and mineral rights holders be recognized and grandfathered. In other words, that as long as



the mineral licence exists, the rights of the mineral title holder are given the highest priority.

There was concern expressed that the Alberta portion of the Canadian Shield may not have received a geological investigation prior to being proposed. As such, a recommendation was that a geological evaluation process be completed similar to what is done by the Geological Survey of Canada before any area is turned into a park.

Oil and Gas

There was some industry concern that the Draft Plan continues to extend economic uncertainty, largely due to the elements of the plan that are not completed. It was felt uncertainty will have a harmful impact on economic investment in the province. As a result, stakeholders said priority should be given to finalizing those areas of the plan that currently lack detail and ensuring clear, stable and predictable regulation. There was a desire to see clearly defined timelines for implementation that contribute to a stable investment climate.

Regarding the pace of development, there was interest in striking a balance between meeting a rapid pace that can lead to inflation and infrastructure stresses, and a more planned approach. There was a significant desire to see a more streamlined application process that recognizes and endorses the integration of different uses. Some wanted to see a reduction in the number of application contact points—ideally a single point of contact is preferred. They added that greater co-ordination and collaboration is needed between different provincial ministries, as well as strong alignment with federal regulations.

There were concerns about how economic diversification and “optimization of the oil sands” co-exist, and about oil sands reclamation, especially the long time-lag. Some company representatives expressed concerns with regards to their investments. The companies and others asked for certainty and consistency with regards to compensation when breaking leases, and a transition process so the changes do not come all at once—perhaps a maximum of five years.

Some stakeholders asked for a regional disturbance limit that mandates that no more than five per cent of the region is available to oil sands development at any time.

Agriculture

Some participants saw agriculture as especially vulnerable under the Draft Plan, with concern that there is no incentive for people to enter agriculture. They felt the plan has no ‘teeth’ in terms of limiting municipal encroachment onto lands currently identified as agricultural. They stated that the Draft Plan promotes alternative approaches to earning a living from agriculture land, but said much agriculture has already left the area





and it is increasingly difficult to raise cattle. There were concerns that what is voluntary in the plan now could become regulated over time. They also suggested the White Area below the weapons range seems to be expanding, and at places is only a township away from the Cold Lake Air Weapons Range.

There was concern regarding economic pressure to use agricultural lands for municipal and other development. Stakeholders believe any potential sales should be cancelled to maintain the Green Area. Others commented that agriculture should be considered within cumulative effects management. Some said timber plantations should be considered agriculture, and felt there needs to be an approach to limit conversion from agriculture.

Stakeholders want objectives to maintain and diversify the region's agriculture industry to include the potential for expansion of the agriculture industry. There was appreciation for the recommendation that grazing be a permitted use in most of the new conservation and recreation areas, but there were concerns that proposed regulations preclude fencing and range improvement in these areas.



Municipalities

There were comments that municipalities are often responsible for decisions that affect various forms of development, and that it is important to have them at the planning table as a partner. Comments also suggested that more definitive terms for decision-making are necessary. It was noted that municipalities need to be on-board with the objectives of the regional plan as their decisions will impact its success.

Concerns were raised over not having municipal infrastructure dollars today—and the need for increased funding in the future—as well as over how industry will leave an area after resource extraction is complete.



Some stakeholders think municipalities need funding to develop infrastructure. They said industry is very hard on infrastructure, especially roads. There were remarks that reinstating the railroad would alleviate many problems. There needs to be clarity on the county/municipal role in regard to responsibility for infrastructure.



General Economic Pillar Comments

There were a number of comments on the absence of multi-use corridors in the Draft Plan, with interest in seeing the concept included as an infrastructure element. The proposed Highway 881 expansion to Fort McMurray was not well liked. Some commented that the plan does not address gravel operations.

Some wanted to explore a broader range of energy potential, including hydro and alternative energy. There was concern over the lack of reference to electricity generation and transmission.

There were suggestions that it is critical that the government co-ordinate internal stakeholders in collaborative management, monitoring and regulatory approaches. Some stated there will be costs to the implementation, which the government will have to subsidize.

Stakeholders called for a risk assessment of the Draft Plan. They wanted to know if the LARP will facilitate/fit into regulatory streamlining. Barriers were mentioned—often financial—to accessing the regional business market, and it was felt these barriers need to be addressed to promote diversification. Many were pleased to see diversification in the plan; however, believed there also needs to be a stable regulatory environment, which some felt conservation areas may not promote in their proposed form. The question was raised, “Is the *Alberta Land Stewardship Act* retroactive?”

Some said the region should be enhanced with quality of life elements to support the pace of growth. In 25-30 years the picture may be very different from now, if oil is not as prominent. Comments suggested industries other than oil sands should be promoted, and people could be persuaded to stay in the area, rather than just come for work and live elsewhere. Incentives for diversification were believed to be needed. Stakeholders mentioned that economic activity should be promoted by offering incentives to encourage people and businesses to stay in the region, and some upgrading of secondary industrial activity in the area may be desirable. They said excessive regulation or impediments should be avoided to ensure economic activity is not driven out of the region.

The Draft Plan was seen as reasonable, but lacking focus on social and quality of life issues. The Draft Plan was seen as much more balanced than the Regional Advisory Committee’s recommendations.

Stakeholders saw the Draft Plan as moving towards economic stability, but still lacking in the details and specifics—including the biodiversity management framework and land disturbance plan, management actions and details for limits and triggers—that are desired by investors for a stable investment environment. The risks and triggers were viewed as a good approach, as opposed to caps—which some believe may have huge unintended consequences. This region was seen as additionally



important to the economic prosperity of the province and worth ensuring economic stability. The concern was that there is too much uncertainty for the LARP to guarantee stability in the short-term.

Finally, there were frequent comments that aboriginal consultation needs to be strongly embraced, with a commitment to First Nations and Métis involvement having an impact on the LARP and its various elements. In regard to outcome seven in the Draft Plan (aboriginal involvement), there was some interest in seeing clear objectives and strategies associated with the outcome.

4.5 General Comments

Some stakeholders mentioned that peat lands are natural resource assets within the region that need to be recognized for their ecosystems function (biodiversity), and also their existing and future potential for commercial horticultural use.

There were some concerns the Draft Plan provisions for conservation areas will fall far short of the responsible cumulative effects management of land-based outcomes. Comments were made that the draft regulations provide too much discretion to government decision-makers in determining if the identified limits and triggers have been or may be exceeded.

There were recommendations that an independent science panel be convened to peer-review how the plan's thresholds were developed, and to ensure the limits and land-use zones identified in the plan will achieve their stated outcomes. There was also a recommendation to include traditional ecological knowledge experts from directly affected First Nations.

Some said a clear communication strategy on how and what is to be done is required, and suggested a plain language narrative using publicity and social media tools be developed.

