PHASE 3 WORKBOOK SUMMARY



LOWER ATHABASCA REGIONAL PLAN



Government of Alberta

Table of Contents







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Overview

Background and Purpose

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 for improving land-use decision-making established in the LUF 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, which was presented to the Government of Alberta (GOA) in August 2010 as the Lower Athabasca Regional Advisory Council's Advice to Government Regarding a Vision for the Lower Athabasca Region (RAC advice). Phase 2 of the LARP consultation plan, undertaken in September 2010, involved extensive public, stakeholder and aboriginal engagement conducted to gather input on the advice. The input was used to inform the development of the draft 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 will set the overall objectives for the region and identify where major activities (e.g., industrial development, agriculture or recreation) should take place in order 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.



Method

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 with the public, stakeholders and municipalities were held. Approximately 460 people attended the open houses and 320 stakeholders attended the workshops held in numerous locations within the region and in several centres outside of the region. As well, all Albertans were encouraged to review the Draft Plan and provide their feedback by completing either the online or hardcopy 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.



The workbook was available for online completion from April 5 to June 6, 2011. Hardcopies were also available at several Government of Alberta offices and at the 28 public and stakeholder phase 3 consultations. Hardcopies were accompanied by a self-addressed, stamped envelope and mailed-in copies were accepted until June 13, 2011.

Quantitative Data

All of the quantitative responses were analyzed using a Statistical Package for Social Sciences (SPSS). The frequencies and other descriptive and statistical measures are



reported in this document. All analysis was conducted on the valid percentage—the percentage of respondents who answered the question—as opposed to the overall percentage of respondents who participated in the survey.

Some demographic categories had numbers too low to conduct demographic comparisons. Where the numbers allow (e.g., age categories under 65, primary residence and working versus not working in the region), demographic comparisons have been conducted and notable differences identified.

The workbook input does not constitute a random sample and as such, the results cannot be statistically generalized to the overall population. The 468 respondents do comprise a self-selecting sample group of persons with an interest in the Lower Athabasca Region. Input covers a wide range of interests and opinions. Both the online and the hardcopy workbook allow for co-ordinated, multiple responses by an individual, organization or interest group. It is evident—particularly in the qualitative comments—that there are a number of co-ordinated responses reflecting a variety of specific interest groups or individuals who may have submitted repeatedly, resulting in duplicate response patterns or comments.

Qualitative Data

Qualitative data provided in the workbook had significant breadth and depth of comment. The information contained in this report is a general summary of those comments, indicating overall trends and response similarities and divergences. Expressions of this summarization—many, most, some, few—are reflective of the overall level of acceptance or frequency of commentary, and is inherently subjective due to the difficulty in conducting quantitative analysis of responses that defy numerical tabulation. Response rates for all questions—quantitative and qualitative—varied by topic, and thus some themes may or may not have the same weight as others. There was also significant overlap in responses to different questions. Where this occurs the identified themes are generally reported in relation to the most relevant of the questions to which they relate.

Presentation of Findings

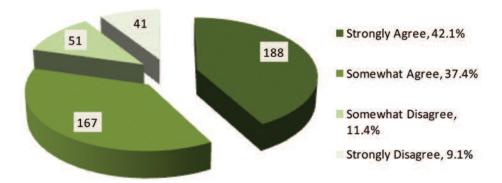
This document contains a summary of all results received from both the online and hardcopy versions of the workbook. Each section is comprised of the quantitative results from the corresponding theme section in the workbook and a summary of the qualitative responses provided by participants. All sections noted in quotations (i.e., "The consultations were...") reflect direct quotes from respondents.



Summary of Workbook Data

Strategic Plan

1. How strongly do you agree with the proposed vision for the Lower Athabasca Region? (447 responses)





Average rating¹: 3.12 Percentage of agreer

Percentage of agreement: 79.5 per cent² of respondents agreed—either somewhat or strongly—with the proposed vision. This showed an increase from 60.6 per cent agreement with the vision proposed in the RAC advice to government, including an increase of 18.0 per cent in those who strongly agree with the proposed vision.

2. Comments (260 responses)

In general, the Draft Plan vision was preferred over the RAC's vision. A number of comments suggested the content of the proposed vision was largely appropriate but it was either too long, insufficiently specific or would benefit from various wording suggestions. There were, however, content concerns as well. Some of the comments were:

- too much focus on government involvement (e.g., regulation, etc.);
- desire to develop a relationship between ecosystem and biodiversity and the health of local communities;
- concern the vision was based on a growth-centric future, had a strong oil and gas focus that may preclude alternative development of other possibilities and did not reflect current practices and outcomes;
- interest in improving the balance of economic, environmental and social pillars;
- desire for a greater focus on sustainability of all three pillars;

- ¹ Average ratings are all out of a possible four where four is the strongest level of agreement and one is the lowest level of agreement. The higher the average rating, the greater the overall strength of agreement.
- ² For reporting purposes, all response percentages have been rounded to the nearest tenth. Empty responses are not included in any calculations.





- should assert the preservation and restoration of healthy natural environments;
- need for additional emphasis on traditional users; and
- indications that trade-offs are required—"We can't have everything."

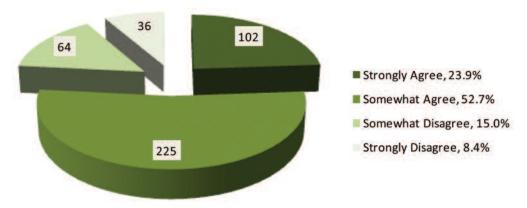
Suggested revisions:

- should be written in the future tense;
- ecosystems (and related comments) should precede economics;
- the word people should be qualified to indicate people of the region;
- descriptions such as world class and abound are hyperbole;
- the words Alberta and Canada are missing; and
- phraseology to express explicit commitments to environmental protection (i.e., land, air, water, boreal forest).

In spite of frequent assertions that the environment needs to take greater priority, there were a number of responses expressing appreciation of the focus and protection this vision provided the environment. Respondents also indicated appreciation for the expression of partnerships and the explicit mention of areas being set aside for conservation.

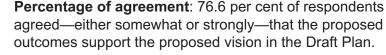
Finally, there was some concern that the LARP vision and overall plan will either "Collect dust sitting on the shelf," or be selectively implemented in a manner that reflects specific government interests at any given time—as opposed to reflecting the overall intent of the vision and the plan.

3. How strongly do you agree these outcomes support the vision for the Lower Athabasca Region? (427 responses)



Average rating: 2.92





4. Comments (270 responses)

Responses to this question addressed all seven of the outcomes individually and as a whole. Overall, there was support for the outcomes. Two issues were repeatedly raised:

- The numbering of the outcomes was viewed as a prioritization of the outcomes. There were a broad range of comments asserting that outcome 1 is too high a priority and that other outcomes are equally or more important; and
- 2. That outcome 1 conflicts with most or all of the other outcomes, making achieving all of the outcomes impossible or cost prohibitive.



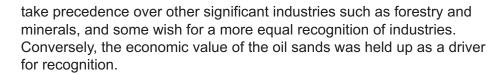
The economic potential of the oil sands resource is optimized.

Oil sands is seen as the economic driver in the region, and there was very little dispute of its economic importance. A number of comments asserted that achieving this outcome can only come at significant cost to the environment and to quality of life. There were suggestions to incorporate a balancing statement such as "With the effects of environment" into the outcome. There were also frequent calls for greater specificity and definition of the word optimize, which was variously viewed as anywhere from market-driven only to responsible use and balanced with a range of human and environmental issues. In spite of its economic value, respondents stated that continuing to develop the oil sands will bring social and economic challenges that needed to be prepared and planned for. There were several calls to manage the rate of development as an overall optimization strategy.



Outcome 2: The region's economy is diversified.

While there were occasional comments that this outcome puts too much emphasis on economic development over environmental and social issues, economic diversification was generally seen as a positive and desirable outcome. A number of comments asserted that outcome 1 effectively negated this outcome; other comments suggested the plan does little to support agriculture and the development of other industries to build diversity. There were also concerns that the oil sands



Outcome 3:

Landscapes are managed to maintain ecosystem function and biodiversity.

Outcomes 3 and 4 were the most frequently identified as needing to be addressed in preference or severe conflict to outcome 1. The proposed biodiversity management framework was generally well received, with a strong desire to see it developed with a strong science basis. There were frequent requests for third-party inclusion in the design and implementation process. The specific issues and concerns were addressed in detail in later questions. Caribou protection was frequently raised as a priority issue.

Outcome 4:

Air and water are managed to support human and ecosystem needs.

While the environmental management frameworks were generally well received, comments also included a wide range of environmental concerns and a firm commitment to environmental protection, along with concern regarding the provincial government's commitment and capacity to manage environmental issues. Water quantity was one issue that was frequently mentioned, as was a strong interest in ensuring the frameworks were firmly grounded in good science with a solid linkage from the science to the thresholds, triggers and limits. There were also some suggestions that outcomes 3 and 4 were closely related and should be aligned with each other.

Outcome 5:

Infrastructure development supports economic and population growth.

Many felt that infrastructure in the region has fallen behind growth, and that a thoughtfully planned approach is required to address the imbalance. There were concerns for funding infrastructure development, particularly about ensuring the cost to build does not become an economic burden on the public or industry. The importance of social infrastructure

(i.e., health, culture, support systems) was also identified as an area that requires planning if population growth is to continue.







The quality of life of residents is enhanced through increased opportunities for recreation and active living.

Outcome 6 was widely supported. The responses indicated some areas of tension, such as conflict between motorized and non-motorized recreational use and access management. Many saw access management as a necessity to protect public lands and the environment, while others viewed it as impeding individual rights. Comments also stated there is a need to map and maintain a catalogue of historical resources and to improve the quantity and quality of facilities such as campsites, along with concern that implementation and enforcement of the plan will require significant resources if they are to be done right. There were also suggestions that outcome 6 should address quality of life as impacted by economic and work opportunities in the region.

Outcome 7: Inclusion of aboriginal peoples in land-use planning.

Opinion was split on this outcome. While many wanted additional assurances about protecting traditional lands and traditional ways of life, in general, the idea of including aboriginal peoples as a separate entity from the population met with opposition. Conversely, a number of comments asserted the importance of recognizing aboriginal peoples as major stakeholders in the region and as having constitutional rights. Several comments suggested the aboriginal way of life is at risk from industrial development and it is vital their needs be explicitly included. Other comments suggested aboriginal knowledge can be an important contribution to planning.

While the vast majority of comments addressed one of the seven existing outcomes, an eighth outcome was also suggested, "Establish an operational framework that becomes a benchmark for interprovincial co-operation toward a co-ordinated strategic plan inclusive of neighboring jurisdictions." There was also some desire for more information about how these outcomes were developed, on what they are based and why they emerged as they have.

Finally, there was also interest in how the outcomes will be implemented as decision-making tools with an interest in clarification of "How decision-makers will manage competing interests and outcomes consistently by addressing regional priorities, and how priorities will be balanced at a project level."

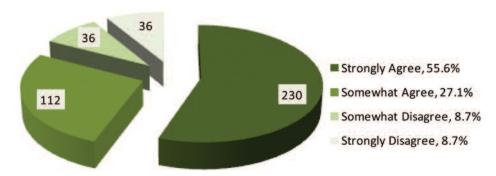


Strategic Directions

Questions 5 - 19 asked how strongly respondents agree with each of the seven strategic directions proposed in the Draft Plan and allowed opportunity to comment.

Strategic Direction 1: Improving integration of industrial activities

5. How strongly do you agree with this strategic direction? (414 responses)



Average rating: 3.29

Percentage of agreement: 82.7 per cent of respondents agreed—either somewhat or strongly—with improving integration of industrial activities as a strategic direction that will improve the ability to balance economic, environmental and social outcomes in the region.

6. Comments (252 responses)

A large number of the people who provided comments in this section saw the strategy as a natural extension of work that is already being done in the region. They asserted that integrated land management (ILM) is widely used in the region and that some operators are recognized world-leaders. However, there were also assertions that the application of ILM practices is not consistent between industries and that government emphasis was also inconsistent. The example provided was that forestry operators are required to submit a long-term plan with mitigation strategies as part of their application, while the same is not expected of oil and gas operators.

There were several assertions that the strategy needs to make mandatory and consistent use of ILM, and it needs to be incorporated into numerous regulatory systems and other planning and enforcement structures. In this regard, there was industry interest in participating in any policy development process that would define a mandatory ILM implementation and address issues such as compliance, consistency across industries, negotiations and agreements guidance, enforcement and dispute resolution mechanisms.



There was also concern regarding ILM implementation complications, and that it may be less effective in areas where agriculture and tourism are significant industries. The general concern appeared to be that the large number of businesses in these sectors may make co-operation and collaboration difficult. Conversely, others felt partnering approaches have proven effective, collaborations by the forestry industry should continue and this approach could be of benefit to trapping, guiding and hunting operators.

Other comments³ and suggestions included:

- ensure enforcement of property owner rights;
- need to track and maximize potential of industrial cutting for non-timber uses;
- concern ILM will have a negative impact on oil sands development and result in delays to the application process;
- need to protect treaty rights (i.e., consider co-management strategies and funding a traditional land and resource use management plan to fill in information gaps on criteria, thresholds and indicators necessary to sustain treaty rights);
- desire to see environmental sustainability as the key factor in allowing industry on the landscape;
- concern about the impact of recreational users on co-operatively planned and implemented roads;
- consideration for future industrial opportunities—including hydroelectric—and incorporating multi-use corridors and other transmission and pipeline routes into shared access approaches;
- desire for assurances that all roads would be open to public and recreational use; and
- concerns about the approach to implementation and cost of enforcement.

Finally, there were a number of statements asserting this strategy does nothing to address social and environmental concerns and it perpetuates the dominance of industry. In some instances these comments asserted the approval process should require greater consideration of the social and environmental consequences of approving each development application.

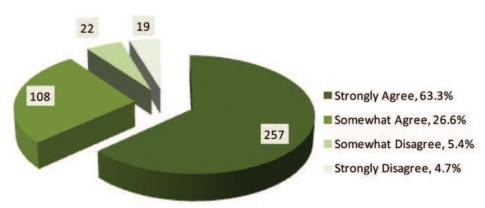




³ Comments indicating specific environmental approaches are addressed in other sections of the workbook analysis

Strategic Direction 2: Encouraging timely and progressive reclamation

7. How strongly do you agree with this strategic direction? (406 responses)



Average rating: 3.49

Percentage of agreement: 89.9 per cent of respondents agreed—either somewhat or strongly—with encouraging timely and progressive reclamation as a strategic direction that will improve the ability to balance economic, environmental and social outcomes in the region.

8. Comments (240 responses)

As indicated by the quantitative responses above, this strategy was very well received. There were a number of suggestions calling for it to be extended to address reclamation of in situ well pads, conventional oil and gas facilities, gravel and sand operations and linear disturbances. Comments suggested this approach should be made applicable to all industries. There were a number of calls for additional information, most commonly a desire for clarification of linear disturbance and additional specificity for timely reclamation. There was also some desire to see clear and strict rules and regulations ensuring proper reclamation, and that reclamation to a non-original state not become a loophole to minimize reclamation cost and effort.

There was a call for additional requirements to use best practice technologies in regard to reclamation, most notably in regard to shortening the reclamation time for tailings ponds. There were a number of calls for a moratorium on developments that require tailings ponds either until all existing ponds have been reclaimed, or potentially in perpetuity. There was interest in furthering the science behind reclamation to improve understanding of the limitations that may be inherent in reclamation, and of how to best proceed with reclamation to bring land as close as possible to its original use.





Progressive reclamation was seen to benefit recreation, as some felt it likely that many sites would be reclaimed to recreation purposes. There was also concern that recreationists may choose to avoid reclaimed sites because of potential lingering effects. Many were interested in seeing alternative reclamation planning in the early stages of development and that—where appropriate—regulatory agencies facilitate this through the regulatory process.

Other comments and suggestions regarding the strategic direction included:

- need for requirements to back reclamation promises with a bond at the initiation of development;
- need for strong monitoring and enforcement, as well as reclamation incentives;
- need to ensure reclamation does not replace the preservation of large tracts of untouched land;
- desire for a tailings management framework for all fluid tailings and which establishes dewatering of existing tailings as a priority;
- concerns that a tailings management framework needs to be in place before LARP is approved;
- interest in co-management strategies that incorporate aboriginal science and stewardship;
- assertion that the current pace of reclamation is too slow and there is a need to develop a measurable performance standard for progressive reclamation; and
- concerns that with a 40+ year timeline for reclamation, this strategy will have little overall impact on the plan.

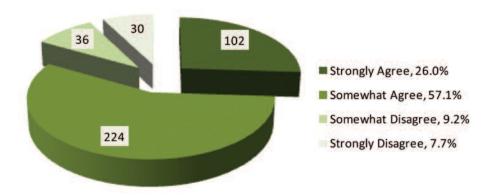
Overall, this strategy was seen as an important priority that should be implemented quickly.



Strategic Direction 3:

Managing air, water and biodiversity and minimizing land disturbance

9. How strongly do you agree with this strategic direction? (392 responses)



Average rating: 3.02

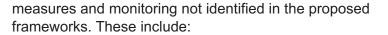
Percentage of agreement: 83.1 per cent of respondents agreed—either somewhat or strongly—with managing air, water and biodiversity and minimizing land disturbance as a strategic direction that will improve the ability to balance economic, environmental and social outcomes in the region.

10. Comments (241 responses)

As is indicated by the quantitative responses above, responses to this question indicated a high level of support for environmental management frameworks in general, although there were a number of questions and concerns raised in regard to specific details. It was commonly stated that the lack of completed frameworks makes comment difficult and premature. Respondents added that completing the frameworks should be a priority accomplished before the plan is submitted to Cabinet. There was also concern the implementation of the frameworks could lead to an excessive, expensive and inefficient management system. There is interest in seeing third-party involvement in monitoring; identification of the thresholds, triggers and limits; and ensuring a clear linkage from the identified measures to the science, including aboriginal science.

There was some concern that monitoring be accurately designed to collect data appropriate to the desired measure or outcome (e.g., regional as opposed to fence-line air measures). However, the monitoring data should facilitate thoughtful, responsible and equitable management actions as required. As well, there were a number of calls for inclusion of





- for air: hydrocarbons, particulate matter, downwind ozone and volatile organic compounds; and
- for water: water level/usage, a wetland framework and additional monitoring stations.

With water measures in particular, there was concern that by the time the various limits have been reached, the damage will be done and is irreversible. There were also suggestions that the framework approach should be extended into the social arena with thresholds, limits and triggers for a number of social issues.

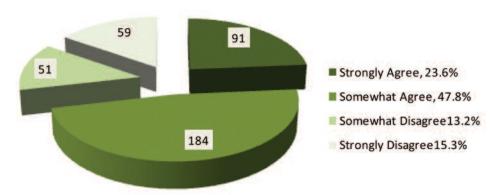
Other factors and concerns include:

- need for a plan or process to be put in place to deal with changes that may occur as the result of climate change;
- need for collaborative strategies to ensure treaty and aboriginal traditional use practices are upheld within the management frameworks;
- need for a clear and robust definition of disturbed lands;
- concern the regional framework approach may decrease accountability for individual operations;
- need for real consequences that give the plan teeth;
- develop a detailed caribou protection framework;
- ensure the frameworks do not become a financial burden on taxpayers, or that waiting on frameworks to be finalized and implementing their requirements does not become an economic burden on industry; and
- need for a place for recreationists—especially motorized—recreation opportunities in the disturbance plan.



Strategic Direction 4: Designating new conservation areas

11. How strongly do you agree with this strategic direction? (385 responses)



Average rating: 2.80

Percentage of agreement: 71.4 per cent of respondents agreed—either somewhat or strongly—with designating new conservation areas as a strategic direction that will improve the ability to balance economic, environmental and social outcomes in the region.

Demographic variations: Those who live in the region were notably less likely to agree—somewhat or strongly—than those who live elsewhere in Alberta, (56.2 per cent and 78.0 per cent respectively).

12. Comments (277 responses)

Conservation areas were criticized as being both too little and too much, along with a number of comments that a reasonable balance or compromise has been achieved. From the too little perspective, various respondents asserted the desire for more conservation area (i.e., up to 50 per cent of the boreal forest), wish for more conservation areas in the central Green Area (i.e., the Athabasca oil sands zone) and a desire for buffer zones around key environmental zones (i.e., including major rivers, lakes and wetlands) and population areas. There was interest in ensuring suitable wildlife corridors and concern that the conservation areas do not adequately protect caribou in the region. There was also disagreement with honouring any existing oil and gas leases in conservation areas.

From the too much perspective, several asserted that the conservation areas approach effectively sterilizes opportunity to recover valuable resources. Many said in situ operations could be allowed in conservation lands with minimal impact, and commercial forestry can enhance conservation efforts. Others noted environmental management can be effectively achieved through means such as the biodiversity management framework without completely closing off lands to industry. With regards to leases being rescinded, there was significant concern over the



compensation process and outcomes. Some felt the conservation areas chosen were overly influenced by oil sands development, with insufficient consideration given to timber and minerals. There was also an opinion that the conservation area designation will increase competition for other lands and have a detrimental impact on agriculture in the region.

Recreationists and related businesses offered some opposition to the conservation areas, seeing them as limiting recreational access to public areas (even for surrounding land owners); this was especially true for those motorized recreationists who did not approve of designated trails. They did not like having their riding options limited, and cited growing popularity as a need for additional space to recreate. There was also concern from outfitters and trappers who indicated their livelihoods could be affected by new regulations (i.e., bear baiting).

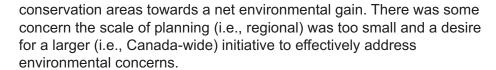
There were notable acceptances of a number of aspects of the conservation area proposal. Designated trails for recreational access (motorized and otherwise) were widely considered positive, as was access management in general. These strategies were seen as a means to minimize damage to the areas while allowing recreational use. Primitive recreational-use in conservation areas was acceptable to most respondents. There was support for the conservation areas adjacent to large contiguous parks—which they said provide areas of habitat for wildlife and other landscape components that support biodiversity—although there was some support for smaller, high-quality conservation areas, as well as the larger ones proposed.

In terms of suggestions, there was comment that "The landscape can be managed (with change in mind) to retain biodiversity and other key indicators by establishing deferred activity areas that move through time, rather than setting up conservation areas with fixed boundaries." There was also concern that First Nations treaty rights should be respected and that "International treaties should trump provincial legislation."

Concern was expressed that not enough is known about the areas, about why they were chosen and about other factors such as caribou management. Areas that were specifically indicated as needing additional conservation protection included: Athabasca and Clearwater rivers; Movie, Meadow, Fox, Marie, Crane, Crow and McLelland lakes; and the Gipsy-Gordon Wildland Park. There was a desire to know more about the biodiversity management framework and disturbance plan threshold and how they may work with

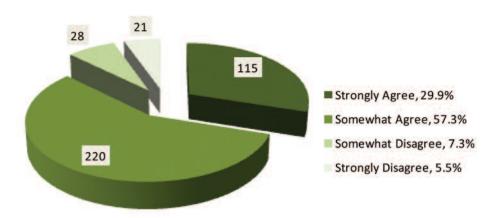






Strategic Direction 5: Strengthening infrastructure planning

13. How strongly do you agree with this strategic direction? (384 responses)



Average rating: 3.12

Percentage of agreement: 87.2 per cent of respondents agreed—either somewhat or strongly—that strengthening infrastructure planning as a strategic direction will improve the ability to balance economic, environmental and social outcomes in the region.

14. Comments (216 responses)

Overall, there was strong agreement that infrastructure planning in the region needs to improve and the Draft Plan suggestions were positively received. Respondents felt a need for advanced infrastructure planning to support future economic and social growth, but repeatedly asserted that it must be based on sound forecasting of the growth, and smart growth principles. There was also strong opinion expressed that existing industry and residents should not be expected to pay the costs to build and maintain this infrastructure. Instead, they felt government should implement infrastructure that is necessary, but manage implementation in a manner that defers costs to future users. There was also some suggestion that infrastructure contributions by industry be considered, with requirements for infrastructure to be in place as part of approvals.

The Comprehensive Regional Infrastructure Sustainability Plans (CRISPs) were seen as a good start, but several comments indicated they need to include assessments of social, recreational, health and cultural infrastructure, as well as physical infrastructure. Another aspect of





social infrastructure frequently identified as needing enhancement in the region was the education system—from primary through secondary to post-secondary, especially in relation to the trades. Many suggested there is opportunity for improved employment opportunities for local residents if they are better able to complete education in the region, especially education that supports work in the oil sands. However, the oil sands was also stated to be a deterrent for some public system students who are believed to leave school early for relatively low-pay, low-prospect oil sands work.

There were a number of comments asserting that municipalities need to be included in infrastructure planning and provided with long-range planning resources. Some suggested community growth in the region should be managed to remain in line with growth of other communities throughout the province, allowing infrastructure to more easily keep pace with the growth.

Other suggestions to help address perceived infrastructure deficits included:

- resource development planning should be aimed at moderate and steady growth to mitigate or eliminate the boom/bust cycle which will help retain workers;
- need for long-term political commitment to infrastructure and not year-by-year decisions and changes of mind;
- promote opportunities for permanent workers (as opposed to camp-based) in the region to better align infrastructure use with the taxation base;
- include accurate projections for industrial infrastructure, electrical generation and transmission infrastructure in planning;
- ensure interconnectivity with other regions and jurisdictions is carefully considered;
- build greener, more sustainable communities that include multi-family dwellings, use recycled materials and enhance public transit; and
- support communities that have high infrastructure requirements with lower industrial tax bases (i.e., Cold Lake).

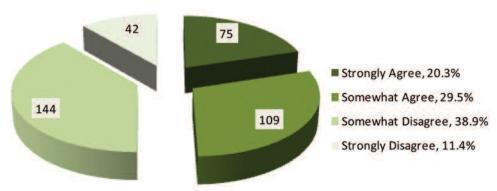
The final item above raised the issue of equitable infrastructure development and funding between municipalities. There was interest in ensuring meaningful involvement of aboriginal peoples throughout all aspects of infrastructure (e.g., physical and social) planning and implementation.



There was some concern that infrastructure was not clearly defined in the plan, and that the Draft Plan requires more details for respondents to make informed comments. Few infrastructure projects were specifically identified, although the Highway 63 twinning was identified as overdue, as were upgrades to the bridge over the Athabasca River in Fort McMurray. An extension to Highway 881 was identified as undesirable.

Strategic Direction 6: Providing new recreation and tourism opportunities

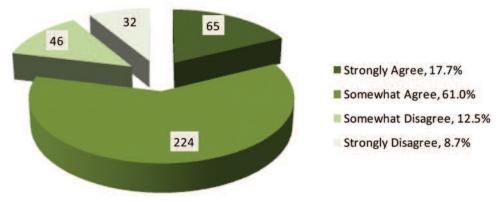
15. How strongly do you agree with this strategic direction (strengthening infrastructure planning)? (370 responses)



Average rating: 2.59

Percentage of agreement: 49.8 per cent of respondents agreed—either somewhat or strongly—that strengthening infrastructure planning as a strategic direction will improve the ability to balance economic, environmental and social outcomes in the region.

16. How strongly do you agree with this strategic direction (new areas)? (367 responses)

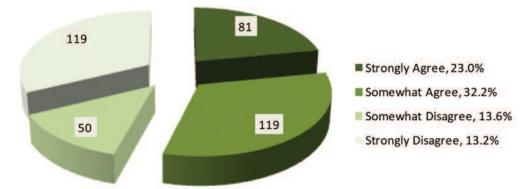


Average rating: 2.88



Percentage of agreement: 78.7 per cent of respondents agreed—either somewhat or strongly—with new recreation and tourism areas as a strategic direction that will improve ability to balance economic, environmental and social outcomes in the region.

17. How strongly do you agree with this strategic direction (Lakeland Country)? (369 responses)





Average rating: 2.42

Percentage of agreement: 55.2 per cent of respondents agreed—either somewhat or strongly—that Lakeland Country as a strategic direction will improve the ability to balance economic, environmental and social outcomes in the region. Notably, 33.8 per cent of respondents strongly disagree with the Lakeland Country strategic direction.

Demographic variations: Those who work in the region were more likely to agree (somewhat or strongly) with this than those who do not (58.2 per cent and 41.8 per cent respectively). Conversely, those who live in Alberta but outside the region (46.3 per cent) were more likely to agree than those who live inside the region (60.0 per cent). People 50 years and over were more likely to agree (62.1 per cent) than those 49 and under (41.0 per cent).



18. Comments (257 responses)

Comments for this section focused on the Lakeland Country designation, although many can be extrapolated to the larger region.

The designation of Lakeland Country as an iconic tourism destination was marked by opposing opinions. While many saw the concept as a positive approach, others were against it. Many wanted motorized recreation to become a major focus, while others wished to see it minimized. Many saw the area as full of tourist opportunities, while others saw it as

having local interest and minimal tourism value outside the region. The one shared opinion was that the area is preferred as a mid-country destination and should not be developed to include large resorts and other upper-end tourism attractions.

The main reasons offered in support of the initiative included:

- · attraction of the lakes and surrounding areas;
- economic potential;
- existing demand for camping and other facilities that exceed what government sites offer; and
- environmental and other damage caused by motorized recreation.

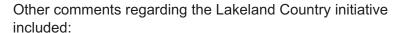
Reasons offered in opposition included:

- · limited access to lakes;
- · some opposition to access management;
- concern the iconic tourism designation does not provide the degree of protection that a park status would;
- concern the area is already over-developed as a whole (i.e., by industry, agriculture, municipal, recreation and tourism);
- opposition to designated trails and any restriction on where motorized recreation can take place (opinion that responsible use is sufficient control); and
- concern increased use will detract from local enjoyment of the area and negatively impact local quality of life.

Some felt it was the Alberta government's responsibility to provide recreational opportunities—including parks—which they said was contrary to allowing private operators from establishing facilities within the region. There was concern about the quality of operations of some private operators, while others expressed concern that the provincial government has the resources necessary to support the region's recreational potential. It was also suggested that privatization can make enforcement more difficult.

Respondents were nearly equally for and against allowing oil operations in recreation areas. Some asserted there is no room for industry in recreation areas and that it will harm the tourism potential. Others commented that select technologies will have minimal impact and can contribute to enhancing the recreation potential if thoughtfully planned from the beginning. There was concern regarding the compensation process—including the calculation for any rescinded leases—and with the loss of accessible resources due to prohibited surface access.



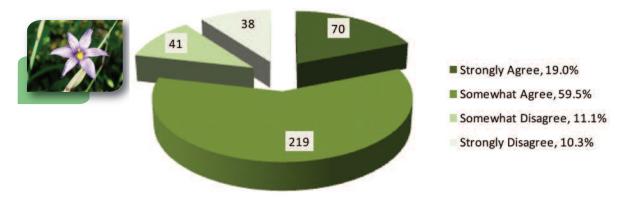


- need for sustainability (i.e., social, economic and environmental) to be a key factor in planning;
- fear that designated trails will result in the loss of local trails that are not mapped and that winter-only trails will also be lost; and
- broadened human footprint will lead to increased risk of wildfire potential.

Suggestions, comments and concerns regarding recreation and tourism opportunities in general included:

- recognition that planning a designated trail system will take time and require the involvement of a wide range of stakeholders:
- concern that economic pressures from oil sands demand puts tourism operators at a disadvantage when compared to those across the country;
- recognition of impact of recreational uses on traditional land use and the practice of treaty rights;
- desire for involvement of aboriginal people in planning and management of recreation and tourism initiatives;
- need to address accessibility and affordability for Albertan families;
- industry concerns that buffer areas not be established around parks and conservation areas; and
- desire for enhanced development of the ecotourism sector.

Strategic Direction 7: Including aboriginal peoples in land-use planning



Average rating: 2.87



19. How strongly do you agree with this strategic direction? (368 responses)

Percentage of agreement: 78.5 per cent of respondents agreed—either somewhat or strongly—that including aboriginal peoples in land-use planning as a strategic direction will improve the likelihood that the economic, environmental and social outcomes in the region will be balanced.

Demographic variations: Those who work in the region were less likely to agree (somewhat or strongly) with this than those who do not, (67.5 per cent and 81.4 per cent respectively). Likewise, those who live in Alberta but outside the region (85.0 per cent) were more likely to agree than those who live in inside the region (62.9 per cent).

20. Comments (209 responses)

Comments in this section demonstrated a strong split between whether or not people believe there should be special consideration of aboriginal peoples in the LARP. A large number of respondents commented that although First Nations should have input, they should not be held to a different standard than the rest of Albertans. Some respondents did specify issues where additional input may be appropriate, largely topics of traditional lands and uses.

Conversely, there were a large number of comments asserting that aboriginal peoples need much more input into the whole plan, not just token elements. These comments were often accompanied by suggestions and comments such as:

- consultation is coming too late in the process;
- need to include all aboriginal peoples, not just those who live in aboriginal communities;
- resources and processes need to be in place to ensure informed consultation;
- aboriginal peoples should be active in developing the area themselves with government guidance and not as recipients of the income from the land use;
- need for strong, cohesive, aboriginal leadership and vision;
- need for LARP initiatives to link to current initiatives of the department of Aboriginal Relations;
- need for a plan to better facilitate and support Métis consultation; and
- First Nations need to be held accountable for producing end results from the funding they receive for consultation and technical resources.

However, there were also comments in support of both perspectives, that aboriginal consultation opportunities have been turned down or ineffectively used by aboriginal peoples and that successful consultation requires positive attitudes and open minds from all parties.



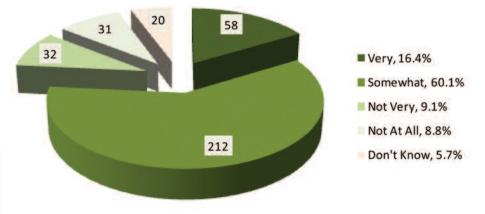
Several comments supported the Richardson Backcountry initiative and referenced other jurisdictions that have had great success including First Nations in environmental partnerships. Many respondents cited the example of Pacific Rim National Park in British Columbia, where First Nations have assumed custodianship of the West Coast Trail and provide trail maintenance and interpretive services. It should be noted that this initiative was also referenced as a menial use of traditional skills and less than ideal. "It is very critical that these initiatives are properly facilitated to ensure that they do not result in a classic government and First Nation confrontation. Before starting the process both sides should clearly communicate what their respective aspirations and objectives are from this process and from the individual site specific negotiations."

Finally, there was comment that the Métis make up a large part of the aboriginal population of the region, yet they are not consulted in the same fashion as First Nations.



Regional Outcome 1: The economic potential of the oil sands resource is optimized

21. How adequately do you think this suite of strategies will meet the regional outcome to optimizing the oil sands' economic potential? (353 responses)





Average rating: 2.89

Percentage of agreement: 76.5 per cent of respondents indicated—either somewhat or strongly—that this suite of strategies will meet the regional outcome of optimizing the oil sands economic potential.

22. Is this Draft Plan missing important strategies to support optimizing the oil sands resource potential? (139 responses)

A large number of comments for this question asserted that the Draft Plan takes too much of a focus on the oil industry and that other aspects of the plan should be prioritized. Many of these same continued that there is a lack of confidence in the provincial government's priorities and commitment to non-economic matters. However, a number of strategies were identified as well.

One of the most frequently mentioned strategies was to develop a plan to improve local, provincial and Canadian hiring opportunities. Other suggestions in this area included:

- establishing local hiring as the highest priority;
- need for additional strategies to build the local market of skilled trades people;
- pacing development to be in line with the labour market (with a note that in line would include minimal planned overtime) and avoiding an over-employed/under-employed cycle;
- encouraging training, hiring and entrepreneurial strategies for aboriginal peoples; and
- implementing a percentage-based Canadian hire policy.

It should be noted that in some instances the comments challenged the notion that Alberta is facing a labour shortage in coming years.

It was suggested there is a belief that the largest factor in optimizing the economic opportunity of the oil sands will be world markets and international supply, along with capacity to get the oil to those markets (e.g., pipelines). Other strategies suggested included:

- reform the oil sands royalty regime so Albertans obtain maximum value from the development of the resources they own;
- incent developments that exceed minimal regulatory requirements;
- ensure flexibility to address external political factors such as a Canadian energy framework or strategy;
- ensure a strong transparent emergency response plan is in place to address accidents that may happen;
- create a single regulator with significant authority to enforce regulations and change, and a watchdog to monitor;
- ensure treaty rights are respected, and include First Nations in regulating and managing the oil sands resource;
- encourage and facilitate the deployment of smaller scale and more environmentally-friendly methods of oil sands extraction (suggested access to conservation areas); and



develop a pacing plan or strategy to keep growth at an optimal and manageable level.

There was also suggestion to incorporate the CRISPs as a strategy in this section, particularly the management of infrastructure needs based on certain thresholds being met. At the community level there was some interest in seeing a community development initiative to build community strength (suggested the region's economy is the oldest in the province and worthy of recognition for its endurance and depth).

23. Are there any implementation considerations we should be aware of? (90 responses)

There was concern that if there is a focus on optimizing the oil sands resource, other potential economic diversification opportunities may be lost. Some that were identified include hydro-electric power generation, forestry and industrial minerals. It was also suggested the Draft Plan will cause Alberta to fall behind other countries that are developing and exporting green energy technology.

Several comments focused on carbon emissions, as well as suggesting that Alberta must be a leader in emissions control or suffer damage to our reputation and decreased demand for oil sands product. Some suggested optimizing oil sands output will require pipelines, transmission lines and other linear infrastructure and that common corridors with minimal impact should be considered (wide, open corridors with high percentages of forest edge that can act as a formidable barrier to many wildlife species).

The region was also identified as home to a significant subsistence economy that is heavily reliant on environmental health and warrants recognition. The theme of green impact was frequently mentioned, with calls for more environmental protection and less focus on economic gain. Specific environmental concerns included water bodies and wetlands, creeks and migratory bird nesting.

In terms of addressing some environmental impacts, it was suggested there is a need to ensure regulatory requirements are met by industry. Additional suggestions included the government to work co-operatively with industry while ensuring legislated responsibilities are carried out in enforcing standards and implementing consequences for violators. Another suggestion was to take advantage of waste wood fuel available from nearby operations to minimize the carbon footprint in operating the oil sands industry.

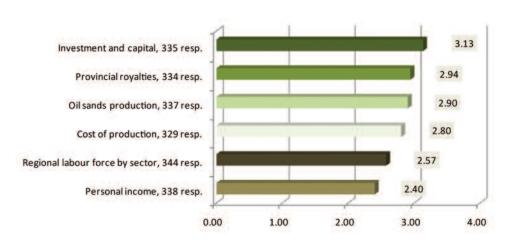




Respondents felt that moving forward with oil sand development needs to be reflected in infrastructure investment (i.e., physical and social, including increased access to both trades and academic post secondary education in the regions) and in commitment to environmental protection. There was an assertion that the oil sands industry has its own significant infrastructure needs (e.g., electrical generation and transmission, pipelines, etc.) that are not considered in the Draft Plan. There was also interest in ensuring the plan interfaces effectively with the existing regulatory frameworks to minimize regulatory overlap and delays. The preferred approach was to see a streamlined regulatory process that eases regulatory burden.

It was also suggested that consideration be given to the developmental timelines of all projects: "It would not be wise to allow all projects to commence all at once. We need to save some for future generations and not just optimize now." There was interest in seeing defined objectives—as opposed to measures without end goals—in order to measure success. Finally, there were some who felt the plan does not effectively take into consideration the full cost of implementation—including monitoring and enforcement resources that will be required.

24. How appropriate are each of the following indicators for informing on the progress being made towards achieving oil sands resource optimization?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.







As with other industry-focused aspects of the Draft Plan, there was considerable concern that the indicators may not adequately address environmental issues. Several suggested that environmental and biodiversity indicators should be linked to oil sands monitoring. Other comments asserted that the indicators are appropriate, but expressed disagreement and concern with the outcome (i.e., optimizing oil sands).

There were also suggestions for a number of other indicators including:

- safety, resident satisfaction (i.e., quality of life), cost of living and health based indicators;
- moderation or elimination of the boom/bust cycle;
- population growth and infrastructure development;
- other measures (i.e., efficiency, profitability, etc.) instead of cost of production;
- cross sector comparisons on reclamation, environmental and quality of life issues;
- · land reclamation and remediation rates; and
- carbon footprint per barrel of output.

As with the previous question, there was a concern that identifying appropriate measures is insufficient if they are not accompanied by measurable goals or outcomes.

There were a large number of comments focused on the Alberta oil and gas royalty regime and a desire to see it revised, along with recommendations that royalties be reported as an indicator. Some of the suggested measures for royalties were:

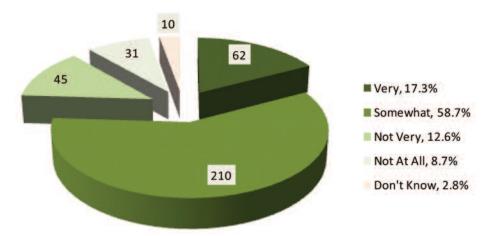
- an equity indicator to highlight the disbursement of profits from the oil sands across the demographics involved— including the corporations, government and workers;
- · comparisons to other industries; and
- corporate-to-provincial growth comparisons.

There were suggestions that additional information on the indictors is required to make informed decision.



Regional Outcome 2: The region's economy is diversified

26. How adequately do you think this suite of strategies will meet the objective: Prevent future shortfalls in the timber industry? (358 responses)



Average rating: 2.87

Percentage of agreement: 76.0 per cent of respondents indicated—either somewhat or strongly—that this suite of strategies will meet the regional outcome of diversifying the regional economy.

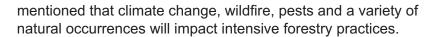
27. Is the Draft Plan missing important strategies to prevent future shortfalls in the timber supply? (203 responses)

The majority of comments for this question were cautious of intensive forest management (IFM) as it was presented. Many asserted that it can have a significant impact. It was also noted that to achieve the intended effect, IFM will have to be complemented by strategies such as rapid reforestation of linear disturbances and lands reclaimed from oil and gas, overall footprint management to minimize loss of forested land and collaboration in minimizing disturbance.

Several comments addressed challenges to IFM, including that it is not perceived as sound from an ecosystem perspective, that it may promote soil depletion, that IFM is typically only practiced on highly productive land with excellent access close to the facility (qualities much of the region does not have) and that it lacks proven effectiveness in colder climates found in the region. There were also assertions that it is expensive and may be economically unviable for some companies. It was also suggested that monitoring and evaluation strategies are lacking.

Conversely, it was stated that Alberta forest companies are already leaders in managing the forests, with a question regarding the need to make such a successful voluntary practice mandatory. It was also





Other strategies that were suggested to mitigate timber shortfalls included:

- promote better woodlot management through improved tax regulations and encourage sustainable practices;
- use urban and private land forests;
- align annual allowable cut (AAC) with capacity of the post implementation available land base;
- incent efficiency in fiber utilization and utilization of best practices from other jurisdictions;
- ensure merchantable volumes of fiber are getting to a manufacturing facility by tracking salvage volumes on large cuts:
- monitor and strictly enforce reforestation and full growth in reforested areas;
- plan reclamation of some oil sands disturbances to support forestry;
- consider that timber harvest may not continue in perpetuity and may be gone or be significantly different years from now; and
- develop a clear strategy for enhanced wildfire suppression.

28. Are there any implementation considerations we should be aware of? (75 responses)

A number of implementation considerations were identified by respondents. Although several suggested strategies encouraging cross-industry collaboration (e.g., timber/oil and gas/recreation were all sited), they said many of the current regulatory processes do not support such schemes. They felt this promotes reactive rather than proactive planning.



It was also suggested that intensively managed stands of trees tend to have less biodiversity and provide fewer ecological goods than natural stands. Furthermore, some said industry will not invest significant amounts of capital in intensive management without guarantees that these lands will be protected from other land uses. However, some stated an increase in intensively managed forest stands may well lead to a decrease in land available for agriculture, which was not seen as ideal. It was mentioned that over-logging and use of timber will have a negative impact on the tourism industry as tourists want to see rustic, natural land, not "clear cut forests".

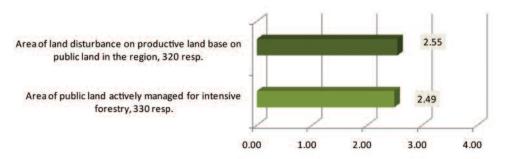


Other considerations included:

- need for enforcement strategies and resources;
- challenges for one industry may be an opportunity for diversification;
- potential utililization of some cut lines remaining disturbed for vehicular and other access;
- potential misinterpretation of intent of International Union for Conservation of Nature (IUCN) Category IV (habitat species management area) as applying to commercial forestry;
- recommendations that conservation areas be as high as 50 per cent of the boreal forest;
- offering fair trade of cut-blocks to forestry companies that lose annual allowable cut; and
- the impact of climate change and population growth on the industry.

Finally, treaty and aboriginal rights were mentioned in this section with an interest in a base condition that cannot be violated through economic growth. Respondents thought this should include an objective to maintain underlying factors and resources that sustain the traditional subsistence economy that aboriginal people depend on. They felt this should include controls on the pace and scale of development that would assist in optimizing land-use opportunities over time.

29. How appropriate are each of the following indicators for informing on the progress being made towards achieving the prevention of future shortfalls in timber supply?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.





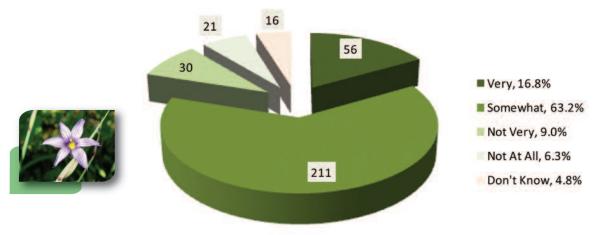
30. Comments (157 responses)

There was some opposition to intensive forestry citing a lack of available knowledge or science regarding its outcomes, and a concern that it will lead to monoculture and a decrease in biodiversity. However, several comments stated that the focus should be on the re-establishment of the productive forest. Using a time-based reforestation indicator for all disturbances (e.g., the amount of disturbed land reforested after two years) was suggested, as was developing a metric for the amount of reforested lands not re-disturbed prior to maturity.

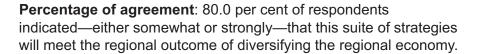
It was felt that the Draft Plan takes a supply-based approach, but some said demand will also be a critical factor in forestry outcomes, and that reliable future modeling is an important tool. There were several comments stating that forest management in Alberta is already strong. There were also many comments encouraging, "Meaningful involvement of First Nations to develop real indicators that can showcase the progress of not only an industrial economy, but also a subsistence one within the Lower Athabasca Region."

There were several comments requesting additional background information, including the scientific basis for selecting indicators necessary to make an informed judgment. There was concern with what some said was an economic focus on environmentally sensitive and important resources.

31. How adequately do you think this suite of strategies will meet the objective: Maintain and diversify the region's agricultural industry? (334 responses)







32. Is the Draft Plan missing important strategies to support the region's agricultural industry?

(95 responses)

Overall, the responses to the question asserted that the Draft Plan's support of agriculture in the region is weak and needs to be strengthened. Many comments focused on the phrase "municipalities are encouraged" commenting that it is not a strategy and there is nothing binding. Comments suggested the environmental impact of residential expansion (a key cause of agricultural land loss) should be considered as well. It was noted that, for many, the movement away from agriculture is an economic decision as other options become more attractive. Comments also stated that "If people are willing to pay high prices for subdivision, how is the municipality going to enforce intensive agriculture?"

Some strategies suggested to strengthen the Draft Plan's approach to agriculture included:

- focus on diversifying agriculture in the region, consider tree farming, market gardens, organics and other specialty items, and attracting agriculture-related secondary industry into the region (e.g., processing);
- need for a policy to limit the influence of developers and to limit urban sprawl, municipal and/or provincial power to limit non-agricultural uses (respondents indicated they saw the southern portion of the region as having greater agricultural value compared to the north);
- develop an arable land map and work with municipalities to focus development on land that is of lower productivity;
- include incentives for wildlife habitat enhancement in agricultural areas;
- recognize livestock grazing as an important aspect of the region's agricultural industry;
- provide financial support for conservation easements on agricultural land:
- prohibit the farming of wild animals; and
- provide financial incentives for sustainable agriculture.

There were a small number of comments stating that the main constraint on agriculture will be the extent to which it is self-sustaining, with an assertion that it is increasingly unprofitable and there should be no subsidizing narrow profit-margin farming.







33. Are there any implementation considerations we should be aware of? (52 responses)

Respondents noted a number of considerations for implementation. They said oil and gas has impacted agriculture in the region with water requirements that may limit use for cattle and farming. Some noted that with directional drilling, the disturbance of agricultural land can decrease significantly.

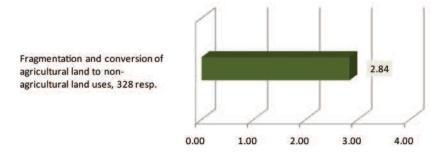
In regard to municipalities, some indicated they realized more tax revenues come from development than agriculture, so there is actually a disincentive to maintain agricultural land. As such, they suggested municipalities may not be the best authority to manage agricultural lands. Some believe there is a lack of consistency in municipal approaches that further complicates their role. It was suggested that municipal oversight may not be appropriate without the technical expertise to appreciate lands in the larger context of adjacent ecological regions and the ramifications of land use. It was also commented that from an ecosystem-development perspective, lands may have more value for protecting ecosystems and thus their highest value is "no use."

Another comment was that agriculture will have a higher presence and profile in most of the other regional plans, leading to increased emphasis that municipalities set out clear directions and protection for agricultural land. Private property rights were raised, with comments such as, "A land owner should be able to choose if breaking up farm land for development is right for him," although there was also an expression of dislike for large non-family farming operations.

Finally, it was commented that "Treaty and aboriginal rights must be mentioned in this section as a base condition that cannot be violated through the expansion of the agricultural industry or the transformation of agricultural land to other uses."



34. How appropriate is the following indicator for informing on the progress being made towards achieving the objective?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.

35. Comments (63 responses)

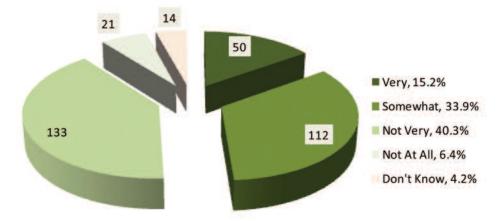
Comments suggested the indicator is acceptable, but needs to offer a more clearly measurable unit of identification and more clarity on how it will be assessed. There were mixed comments on how any loss of agricultural land should be assessed, with some asserting that any loss is negative, and others asserting that any loss needs to be evaluated within the larger regional land use context. There are some suggestions for a process—such as annual air photo or satellite documentation of agricultural land-use changes over time—ideally with a historical record. Several comments suggested the plan does little to minimize fragmentation and conversion of agricultural land and therefore will not achieve the desired objective.

The issue of acreages was contentious, with some suggestions that creating acreages in agricultural areas should be restricted to areas not suitable for productive agriculture (e.g., woodlots). Oil and gas extraction was also considered to have a negative impact, especially with reduced spacing between wells, although some felt directional drilling technologies may alleviate the impact somewhat.

Property rights were also mentioned, with comments such as "land owners should have the right to convert land to uses other than agriculture." There was comment that, "There needs to be a regional balancing of lands in farm production, lands converted to farm production and lands converted to wildlife habitat." It was suggested a no-net-loss scenario would be most suitable for agriculture, and prime agricultural lands should be reserved for agricultural use.



36. How adequately do you think this suite of strategies will meet the objective: Tourism potential of the region is optimized? (330 responses)



Average rating: 2.60



Percentage of agreement: 49.1 per cent of respondents indicated—either somewhat or strongly—that this suite of strategies will meet the objective of the tourism potential of the region being optimized.

37. Is the Draft Plan missing important strategies to support the tourism potential of the region? (206 responses)

The concept of tourism nodes was generally well received, although there was concern about environmental and wildlife impacts. There was some interest in a complete inventory of tourism attractions, activities, amenities and accommodations in order to consider many recreational activities. There was also interest in scenic byways in the area, with the qualification that they require modern amenities to be an attraction. Seeing municipal infrastructure connected to trail networks and other attractions—both as a service to the local public and as an economic opportunity—was also identified as desirable.



Regarding the Lakeland Country concept, there was a preference to see the area remain a mid-country destination and not become a highly developed resort area. There was concern that lakes in this area are being over-fished, along with suggestions they be stocked to attract fishing dollars to the region. Some said the region's lakes are deteriorating rapidly and felt continued growth and development of lakeside residential property are having a negative effect on the lakes. They added this will lead to restricted access, especially for boating activities.

There was mixed opinion as to whether or not industry and tourism/recreation should co-exist in the same areas, with a small number calling for removal of all industry from recreation lands. There was a clear conflict between motorized recreation and non-motorized recreation uses, especially regarding trail networks. There were also several comments suggesting government should not be in the tourism business-except by promoting it through various incentives—especially as there is some concern about the potential for the area. Some wondered about the real value of tourism dollars as it is often considered a low-paying industry. Several commentators saw tourism as an opportunity for private businesses and entrepreneurs. There were also a number of comments arguing against access management on public lands.

Some of the specific strategies named to increase the tourism potential of the area included:

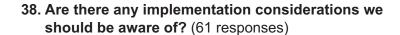
- develop canoe routes on the Clearwater River starting from several different locations;
- develop the Lac La Biche Mission historic resource;
- facilitate development by local entrepreneurs as opposed to direct government involvement in recreation services;
- actively develop eco and agricultural tourism opportunities;
- develop a world-class oil sands interpretative center and related tourism and education opportunities;
- increase the number of campgrounds and camping spaces (some said they are usually full and need to be modernized) and improve and maintain roads and other key infrastructure year-round;
- consultation with local users, municipalities, businesses and other stakeholders (including aboriginal peoples) who will be affected by recreation and tourism development; and
- ensure recreational development does not impact treaty rights.

There were several comments that the environmental preservation is integral to long-term sustainability of the tourism industry in the region. They noted that wildlife, rivers and river valleys, lakes and the boreal forest are all attractive features of the region

Another concern included tourism growing too rapidly, and ultimately undermining its own success. There was also concern the successful implementation of the Draft Plan will require significant resources, but how they will be supplied is unclear.







The two most commonly identified concerns were that recreation and tourism can have a detrimental impact on the environment and that implementation will require potentially expensive resources. This led to concerns regarding cost and value for the investment. It was suggested that recreation and tourism activity can be very vulnerable to external economic factors, which should be taken into consideration.

In general, there was support for rustic, traditional, historic and environmentally-sound recreation and tourism: "Scenic byways are considered attractive, but so are remote, difficult-to-reach areas." There was interest in further development of sustainable tourism, including initiatives such as ecotourism and low impact activities like hiking. There was also a desire to ensure the various recreation designations and regulations do not negatively impact the extensive hunting and trapping tradition and economy in the region. It was felt attracting increasing numbers of users to the region would exacerbate the issue of activity and disturbance on the landscape.

Motorized recreation was reported to be extremely popular, with strong interest in seeing it developed effectively in the region. A few desired unlimited access to public lands, however most comments indicated that managed access and responsible use are necessary, and increased availability of trails, staging areas, trash collection and related amenities is required.

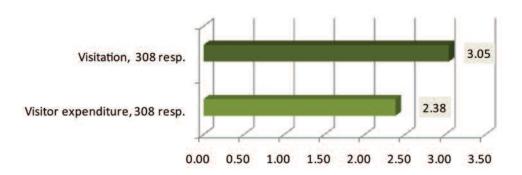
It was noted from an industrial perspective that some of the identified recreation lands may fit the conservation criteria and could be used towards both purposes. Management strategies would need to be developed to allow the dual purpose of recreation and conservation to be established. Some also noted there is potential for conflict between agricultural and tourism objectives.



There was a strong desire to see more camping spaces and facilities. However, some said many such spaces are utilized by transient workers, detracting from the availability of existing recreation and tourism resources. In general, there was a desire for more recreation and tourism resources in the region with areas along the Athabasca River identified as a significant gap.

Finally, the issue of collaboration was raised in a number of cases. It was commented that there are differing perspectives on recreation and tourism in the area, and that getting multiple interests to work together will be a challenge. Some stated that recreational uses are not necessarily compatible with treaty rights. Both municipalities and aboriginal interests indicated a desire to be engaged in the ongoing process with First Nations, suggesting the implementation of co-management boards and co-operative land and resource management arrangements.

39. How appropriate are each of the following indicators for informing on the progress being made towards achieving the tourism potential of the region?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.

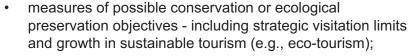
40. Comments (74 responses)

Respondents said since both of the original indicators are largely economic and there is a need for some greater non-economic measures. One respondent said that, "Meaningful involvement of First Nations must happen to develop real indicators that can showcase the progress of not only a profit driven economy, but also a subsistence one within the Lower Athabasca Region." It was stated that the number of transient workers in the region using recreation amenities for both recreational and non-recreational purposes make accurate identification and tourism evaluation difficult.

Participants identified a number of metrics that may be utilized to evaluate success in implementing a recreation and tourism strategy. These included:

- affordability many activities such as camping and local use activities are not high expenditure;
- amenity development including the numbers of campgrounds and camping spaces and development of trail networks and related amenities and facilities;





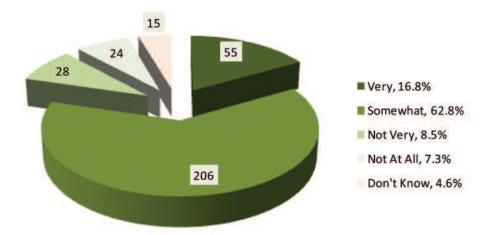
- growth and diversity of the tourism industry including both companies offering tourism-related services and visitor profile; and
- · safety especially around motorized recreation.

It was stated that these measures are only as accurate as the data collection, so care should be given to ensure practical, reliable and valid data gathering methods.

The single most mentioned metric to be considered was visitor satisfaction, which was mentioned several times more frequently than any of the above points.

41. How adequately do you think these strategies will meet the objective: Opportunities for the responsible exploration, development and extraction of energy, mineral and coal resources are maintained? (328 responses)





Average rating: 2.93



Percentage of agreement: 79.6 per cent of respondents indicated—either somewhat or strongly—that this suite of strategies will meet the regional objective.

42. Is the Draft Plan missing important strategies to support the responsible exploration, development and extraction of energy, mineral and coal resources? (87 responses)

Responses to this question were mixed between three different points of view:

- land access should be considerably more restricted, with a greater emphasis on environmental protection and no access in protected areas;
- the Draft Plan is balanced in its approach; and
- need to see greater industrial access (i.e., smaller scale, low disturbance operations) to areas where the Draft Plan currently limits or does not allow access.

The criteria for the latter ranged from allowing low impact, often new technology-based operations in restricted-use areas, to allowing market driven access. There was concern the plan created multiple standards for different industries (including tourism) and an associated desire to see a universal standard.

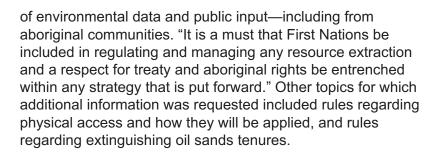
Other recommendations for strategies to support responsible exploration and extraction of energy, mineral and coal resources included:

- identify "no access" areas, such as such as lakes (for things like oil exploration);
- integrate cumulative effects management into all industrial activities;
- incorporate a focus on renewable energy sources (e.g., wind and biomass);
- address the large amounts of energy required for bitumen extraction (some said it's a waste of natural gas and that nuclear energy is not desired);
- exploit disturbed lands for the extraction of multiple resources;
- incorporate a development plan that has timelines and development limits for any given time;
- create a new government agency to assess and monitor industrial operations and applications; and
- include First Nations in regulating and managing industrial operations.

There was a desire to see additional information on various aspects and implications of the Draft Plan. There was concern about whether or not Energy Resources Conservation Board and Natural Resources Conservation Board processes for determining public interest are maintained for these opportunities. There was an assertion that the plan must make absolutely clear that an environmental impact assessment (EIA) is completed in advance of any development approvals. The assertion also stated the EIAs should include the collection of two years







43. Are there any implementation considerations we should be aware of? (56 responses)

Comments included a range of opinions. Several asserted the implementation considerations need to be expanded to include factors such as the impact of the plan on local businesses, employment and lifestyle factors (e.g., availability and quality of outdoor activities). Others placed a strong focus on acknowledging and addressing local knowledge and interests, including aboriginal perspectives. Stakeholders, aboriginal peoples, businesses, municipalities and recreationalists all expressed an interest in being consulted as rules and regulations are developed.

There was concern the tools and resources required for implementation, monitoring and enforcement will be lacking, especially on a regional (as opposed to fence-line) basis. The development of coal resources was seen as especially sensitive regarding effects on thresholds and triggers.

There were a number of comments asserting that biodiversity and healthy ecosystems can not be maintained under this industrial strategy. There was also concern that buried glacial valleys in the Lower Athabasca Region should have development setbacks to protect large potable water resources. Another suggestion was to develop and implement a restricted linear accessibility plan rather than random access roads, allowing for directional drilling in each direction, minimizing wildlife impacts and service traffic/intrusions to recreational use.



There was some concern that the Draft Plan lacks "Direction for decision-makers on how to manage competing priorities for land use and furthermore how competing land uses will be managed across multiple industries and multiple regulatory bodies." There was an assertion that lease cancellations are contrary to the Provincial Energy Strategy and they will damage the investment climate. It was stated that in the event of cancelations, fair compensation needs to be a priority. There were suggestions that fair compensation should include reimbursement of all related expenditures, a fair rate of

interest and potential punitive damages for related time and investment. It was also suggested there is a lack of market-based instruments to offset environmental impacts and incent conservation.

Other concerns and considerations arising from the Draft Plan included the wish to explore hydro-electric opportunities, transportation issues (especially costs to haul large material), more minerals industry involvement, industry felt it was not welcome in the region and a perceived lack of policies promoting investment in the region.

44. Comments (37 comments)

Comments in this section continued with views of prioritizing environmental protection and conservation or prioritizing economic development. Suggestions and considerations for moving forward included:

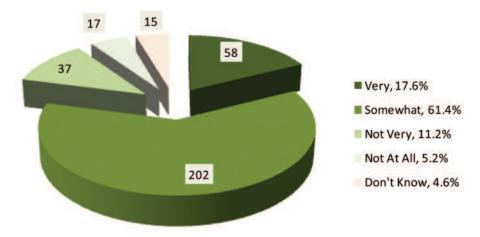
- need for clear procedures for land access to prevent confusion and to protect investments that have been made by existing industrial users;
- incorporate local knowledge, opinion and expertise into planning and management;
- provide a strong commitment to no further designation of conservation or recreation areas and no industrial activities on conservation lands;
- incorporate water use and availability and impacts from industry (including fracturing) on groundwater as a prime consideration for project approvals;
- look at previous experiences (e.g., Arizona and Quebec) and weigh them for the economic value of healthy lifestyles through outdoor recreation:
- develop a policy for preserving farms and ranches in the region; and
- ensure developments are compatible with other land uses before, during and after the life of the operation.

A final suggestion was that physical access and promotion of energy opportunities should only be allowed if the proponent can show in some way, each time, an improvement in the manner in which access was conducted and environmental degradation was mitigated.





45. How adequately do you think this suite of strategies will meet the regional outcome of maintaining ecosystem function and biodiversity? (329 responses)



Average rating: 2.96

Percentage of agreement: 79.0 per cent of respondents indicated—either somewhat or strongly—that this suite of strategies will meet the regional outcome of maintaining ecosystem function and biodiversity.

46. Is the Draft Plan missing important strategies to support maintaining ecosystem function? (190 responses)

Comments were mixed, with several suggesting the proposed amount of protected area was inadequate (recommendations ranged from 32 per cent to 50 per cent and referenced various sources). Some were concerned economics will take priority since much of the proposed protected areas are in the Canadian Shield and highlands while the "Oil sands region is massive and little natural boreal habitat will remain." Others suggested that remedial action is required as well as extensive protective approaches.

Conversely, others suggested that the suite of strategies is very important, but will have to be very carefully managed and developed. Several comments suggested the biophysical studies and biodiversity management framework should have preceded the allocation of land to different uses, or at least been ready with the Draft Plan. They felt these need to be a high priority moving forward. A number of comments asserted





a desire for stakeholders—including aboriginal peoples, industry, recreation users, service providers and local businesses (including trapping, hunting and outfitting)—to be involved in the framework development process.

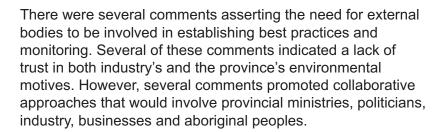
A number of strategies were suggested to enhance this section of the Draft Plan. These included:

- conserve some environmentally important areas within the oil sands area; conversely consider that the region comprises a small portion of the boreal forest and contains a valuable resource;
- develop a comprehensive woodland caribou plan including habitat and predator control, accurate assignation of cause for any population changes (e.g., predators as opposed to industrial changes to land) and a potential moratorium on new mineral and timber allocations in critical habitat areas;
- emphasize emission control over quantitative triggers and limits to promote both growth and reduced emissions;
- ensure policies allow the fostering of practices and businesses (such as hunting and outfitting) that are minimally damaging and can contribute to species management;
- include grazing and farm operations in the disturbance plan;
- create development thresholds to allow for a certain level of development at any given time and tailor reclamation strategies to support biodiversity initiatives;
- create a conservation off-set system with greater flexibility to achieve conservation ends, particularly as it applies to species at risk;
- implement specific levies which could be used to fund innovative and comprehensive conservation projects;
- ensure a net positive environmental benefit and address existing cumulative effects; and
- ensure aboriginal involvement in implementation and monitoring. Use data from traditional use and treaty rights studies so thresholds for treaty rights practice can be established.

A number of comments were provided on recreational use of conservation lands with mixed opinion. While some asserted access management is a necessity; others disagreed and argued it is interference by government into individual citizens' rights. Others suggested the development and expansion of current recreation areas (i.e., Lac La Biche region) will help conserve diversity and ecosystems. They thought this would promote campgrounds with revenues rather than random camping and the associated damage.







There were also a number of calls for greater detail and information on various aspects of the proposal, most notably for definition of the term progressive reclamation, and for reclamation outcomes; processes for determining when reclamation to a different purpose than original use will be allowed; timelines; the scientific basis for thresholds, triggers and limits; and the incorporation of new technologies—especially in the case of tailings ponds. Finally, there was concern about resources required to implement and enforce the plan.

47. Are there any implementation considerations we should be aware of? (153 comments)

Respondents raised a number of considerations for implementation of the strategies for managing landscapes to support maintaining ecosystem function. These generally fell into the categories of external factors, best practices and collaboration.

External factors respondents felt should be considered included:

- natural environmental evolution—the world is constantly evolving and part of that includes changing to meet the needs of its inhabitants;
- capacity to reclaim environments to original ecosystem type;
- competing interests of increased development and increased ecosystem conservation;
- capacity to implement environmental management frameworks with current technology and impact of the same on decision-making;
- changing future climate in the biodiversity management framework—ecosystems will change in the region due to this climate change; and
- addressing riparian areas in the plan.





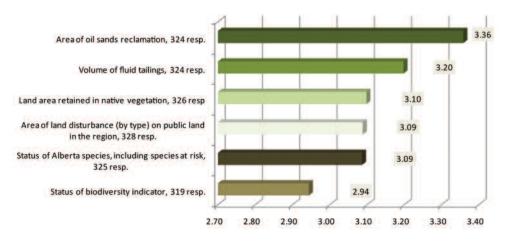
- revise the provincial biodiversity management strategy to reflect climate change risks;
- consider the needs of local populations, not just industry and business;
- plan for new technology—for instance, instead of reclaiming old wells, it may be more cost and environmentally effective to re-use them when new technology becomes available;
- manage road density and linear disturbances to a maximum threshold;
- implement programs to protect feeding and breeding areas and promote awareness;
- · improve site inspections;
- use setbacks to protect the Clearwater and Christina Heritage Rivers;
- focus disturbance limits on activities that are changing the productive capacity of the land (i.e., temporary versus long-term disturbances);
 and
- develop management objectives and strategies specific to each conservation area to maintain the desired values.

Collaboration suggestions to be considered included:

- collaborative development of a revised provincial biodiversity management strategy that reflects climate change risks;
- utilize a collaborative government and industry approach to ensure effective implementation;
- effectively consult, and recognize the complexity and impact of decisions;
- consult with industry in the development and ongoing evaluation and revision of environmental management frameworks;
- develop aboriginal co-management boards and co-operative land and resource management programs; and
- entrench treaty and aboriginal rights within any strategy to maintain ecosystem function and biodiversity. Respondents said the arrangements should be set up with respect to establishing conservation designations, biodiversity management frameworks, land disturbance plans, tailings management frameworks and the progressive reclamation strategy.



48. How appropriate are each of the following indicators for informing on the progress being made towards achieving the regional outcome?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.

49. Comments (148 responses)

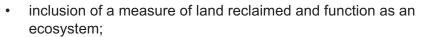
General comments that set the stage for many responses to this question were, "These are complex issues and must be considered in regard to the impact on the area in total and the province in general. The oil sands, although huge, are not the only interests that will be impacted" and that, "While virtually all of the indicators listed above are good ones to consider as a starting point, they may not be sufficient to fully gauge trigger points for ecological limits."

Comments indicated a desire for clarification of the science used in building the indicators and a commitment to building the scientific knowledge in a timely manner, especially in regard to biodiversity. Many said developing the frameworks should be a high priority, but should not be excessively rushed. They felt development should recognize the difference between laboratory and real-world understanding, especially in regulations. Several comments indicated a desire for third-party involvement in developing and enforcing standards.



Other requests included:

- a schedule for development and implementation of a biodiversity management framework (high urgency);
- a reliable indicator of volume and relative area of tailings;
- private land disturbance policy;

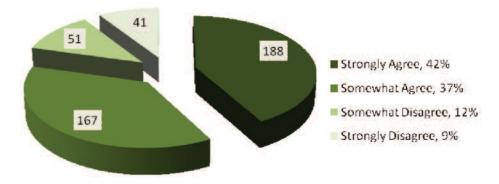


- a more clear definition of land area retained in native vegetation;
- timeliness and rate of abandonment of wells;
- action to protect woodland caribou and greater clarity on species selection for monitoring;
- plans to address natural environmental evolution and how changes will be adapted into the plan; and
- developing thresholds and triggers for the human environment, as well as for air, water and biodiversity.

Regional Outcome 4:

Air and water are managed to support ecosystem and human needs

50. How appropriate are each of the following indicators for informing on the progress being made towards achieving the objective: Releases from various sources are managed so that they do not collectively result in unacceptable air quality?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.

51. Comments (176 responses)

A number of comments emphasized the need to protect air quality and focus on the validity, reliability and trustworthiness of the limits and triggers. These comments indicated limits and triggers must be set using clearly identified scientific data (many suggested these must be independently verified). A number of comments expressed concern that the province does not have the track record or the trust of the people to carry out developing and monitoring the indicators.





There were also concerns the pollutants being measured are insufficient, and calls for measuring the following: CO₂, O₃, benzene, volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons, particulate matter, total dissolved solids, odor and fugitive light and noise. The comments noted that all these pollutants can have significant impacts on human health, the boreal forest and/or the environment at large, including beyond the region's borders. In addition, the damage—particularly environmental—can be detrimental to tourism and non-petroleum based industry (i.e., the impact of acid rain on logging and agriculture).

Some said the overall effectiveness of the air framework is reliant on how air quality monitoring is implemented. They felt there is a need for additional assurances that the planned monitoring approach will be valid and reliable, that monitoring stations are appropriately located and that there is clarity between site-specific and regional reading and interpretation.

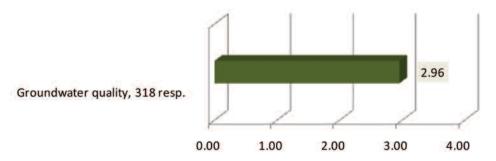
There were also a number of requests for additional information on management actions with several comments that monitoring is not enough. Suggestions for management actions included:

- hold existing industry accountable to limit their emissions and allow other economic development to occur (applicable to all frameworks as an important element of cumulative effects management);
- implement World Health Organization (WHO) guidelines;
- focus on emissions control;
- incorporate data from traditional use and treaty rights studies;
- triggers tied to assessment of net environmental are a benefit to avoid unintended consequences;
- require oil sands operations to use equipment with the lowest available emissions or to deploy best available technology for air emissions reductions; and
- foster young, strong forests to capture carbon to reduce climate change.

There was interest in ensuring an extensive, well-informed collaborative approach to continued development and implementation.



52. How appropriate is the following indicator for informing on the progress being made towards achieving the objective:
Groundwater quality is protected from contamination by maintaining conditions within the range of natural variability and not exceeding established limits?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.

53. Comments (176 responses)

A common concern expressed was that once groundwater quality is compromised, there is little that can be done about it. Limits and triggers must be set accordingly and take a precautionary or proactive stance to management and other best practices. There were frequent comments asserting the need to focus on the validity, reliability and trustworthiness of the limits and triggers. These comments indicated the limits and triggers must be set using clearly identified scientific data (many suggested these must be independently verified and/or monitored).

It was also stated that environmental non-government organizations and industry do not agree on baseline data, and there is much to be learned about the impact of in situ activity on groundwater, adding to monitoring complications. There were also several calls for additional monitoring measures and actions, including:

- clarify that measures apply to non-saline aguifers;
- use historical data on background/baseline containments to avoid immediate exceedences;
- include data from traditional use and treaty rights studies in developing all frameworks;
- address arsenic levels (AsIII and AsIV) that are already higher than drinking water guidelines in some locations;
- monitor groundwater usage, levels and quantity—especially near in situ operations—and do not replace site-based monitoring with regional-only monitoring;





- conduct groundwater mapping and continuous underground water monitoring and reporting;
- require clay or superior lining to prevent seepage:
- ensure accurate benchmarking and effective monitoring and evaluation—including of agricultural, municipal and other non-industry users;
- promote management strategies equitable to those involved (equitable may not mean equal);
- monitor hydrocarbon contamination; and
- monitor downstream water health for accumulation of contaminants (with seasonal emphasis).

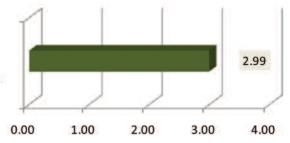
There were some concerns regarding specific water resources, particularly the proximity of the Gipsy-Gordon Wildland Park to the Christina and Clearwater rivers and potential for contamination from industrial use.

There was also concern regarding funding the implementation of the framework, and some said excessive costs to industry would be an economic deterrent and competitive disadvantage. Some felt that too many details remain unknown, both in regard to the basic science (especially for groundwater) and about how the thresholds, triggers, limits and management actions utilize the science. It was suggested that the removal of interim triggers be replaced by the final scientifically supported triggers when available.

54. How appropriate is the following indicator for informing on the progress being made towards achieving the objective: Water quality in the Lower Athabasca River is managed so current and future water uses are protected?



Surface water quality, 319 resp.



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.

55. Comments (170 responses)

A number of responses to this question indicated that this framework is both overdue in its development and that it should be a priority for immediate implementation—especially in oil sands areas. The reliability, validity, baseline knowledge and trust issues identified in the previous environmental management frameworks' comments were also raised for this framework. However, it was also noted that cumulative effects modeling and source management has successfully been in place on the Athabasca River for a significant period of time.

There were a number of monitoring and management actions recommended by various respondents:

- monitor hydrocarbon contaminants (e.g., tailings ponds) and pollutants that will cause increased weed and algae growth (these may vary throughout the region);
- monitor and measure surface water quantity (especially as industrial withdrawals increase);
- recognize that constant monitoring is preferred and frequent monitoring is the minimal expectation;
- consider the naturally-caused water quality changes, including climate-related change;
- utilize dynamic real-time reporting;
- ensure detailed investigation which considers all inputs and generates alternative management actions before implementing management actions;
- develop strategies and indicators, then monitor surface water in tributaries as well as the main rivers (i.e., Athabasca and Beaver); and
- establish a legally enforceable water management plan with a low-flow threshold (below which all water withdrawals cease) for the lower Athabasca River that is science-based.

While many of the comments focused on or assumed the oil sands were the major contributor to contamination, it was also suggested that, "Investigation is critical to avoid assumption that oil sands development is the cause. We must evaluate and prioritize indicators and factors that influence this." This was followed by concern that the framework "Does not properly support regional scope spatially."

Others suggested that when considering surface water quality, "We must be aware of the effects that the major industry has on water quality in the region. Other industry should not be penalized by the imposition of lower effluent limits to assist the industry that has the major effect on water quality in reaching the new limits (polluter pays principle), reinforcing the desire for equitable rather than equal management actions."



Finally, there was concern that too many details remain unknown both in regard to the basic science and how the thresholds, triggers, limits and management actions utilize the science. There were also questions regarding the process to change limits triggers and thresholds.

56. Are there any implementation considerations for management frameworks we should be aware of? (42 responses)

A number of implementation considerations were raised by respondents largely focusing on external factors, such as improving the frameworks and/or their scientific basis and on implementation strategies and technologies.

The following external factors were identified as considerations:

- increasing water temperatures and changing ice cover regimes as a result of changing climatic conditions will impact water quality and provide challenges to water quality management;
- general human impact (as opposed to industrial impacts) need to be considered, as do agricultural practices; and
- there is a lack of knowledge and study regarding natural river contamination due to tar seams in the Lower Athabasca.

The following factors were identified as considerations regarding the frameworks and/or their scientific foundations:

- develop a provincial wetlands policy informing the regional plan:
- co-ordinate and harmonize the different frameworks with the Alberta Monitoring Panel recommendations;
- identify response plans for changes in aquatic ecosystems or elevations of concentrations;
- clarify management actions;
- implement processes to minimize a rush for development and a first-in-time approach;
- consider more historical data. The baseline data is from 1988 to 2008, and therefore not pre-development, meaning some levels may already be exceeded;
- · develop and implement remedial plans;
- increase monitoring, use different criteria (e.g., maximum daily loadings) and impose severe penalties for exceeding limits; and





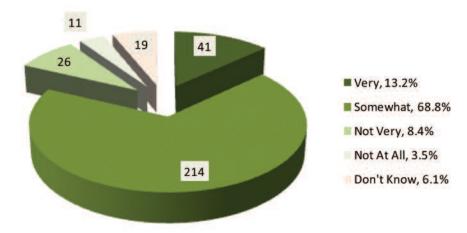
 identify thresholds, triggers and limits, then monitor for additional pollutants including sodium, phosphate, potassium, naphthenic acid and methyl mercury and volatile organic compounds (i.e., benzene, toluene, ethylbenzene and xylenes [BTEX]).

The following technology factors were identified as considerations:

- implement dynamic real-time monitoring systems that enable cost effective province-wide monitoring on water and air quality; and
- utilize technologies that have been proven to reduce water and energy use and emission levels as proactive approaches and management actions.

Regional Outcome 5: Infrastructure development supports economic and population growth

57. How adequately do you think this strategy meets the objective? (311 responses)



Average rating: 2.98

Percentage of agreement: 82.0 per cent of respondents indicated—either somewhat or strongly—that this suite of strategies will meet the regional outcome of infrastructure development supporting economic and population growth.

58. Is the Draft Plan missing important strategies to support the objective? (94 responses)

Common responses to this question were that the region is lacking in infrastructure both physical (e.g., roads, water, transmission lines, etc.) and social (e.g., schools, hospitals, housing etc.). There was a desire to see the Government of Alberta do more proactive planning and implement adequate infrastructure to support economic development and population growth. However, there were also cautions to not overbuild infrastructure in the area and to avoid the development of small, remote,



industry-oriented communities as they are particularly susceptible to economic downturns. Principles of smart growth need to be promoted as well as the utilization of green technologies. Comment was focused on the need to ensure the required infrastructure is in place or started before building a new project.

While the oil sands were identified as a major contributor to infrastructure demands, it was noted that tourism also has an impact on infrastructure in the area, including weekend road congestion into the area and out of it towards Edmonton.

There were suggestions that industry should be part of the development plan and be responsible for portions of the infrastructure funding and development. Other comments suggested the province should be solely responsible for funding or that infrastructure that is constructed beyond current requirements should be funded (i.e., capital and operating costs) by government until new demand warrants the capacity. There were also concerns that the CRISP strategies will not be appropriately funded and suggestion to raise the royalties to pay for the impacts of development.

The following comment was made and captures a number of concerns identified by others, "Whether or not CRISPs can deliver on the desired outcome remains to be seen. The twinning of Highway 63 is frequently pointed to as being too slow, as have upgrades to the Highway 881 corridor. Fort McMurray needs a larger airport terminal building. Housing prices in the region have yet to come down and there are signs that pressures arising from growth may be soon seen again. Whatever the process used, it must be multi-departmental, paced, leveraged with industry information and 'baked' into government planning processes."

There were assertions that the CRISPs need to include assessments of environmental, social, health and cultural impacts. Some commented that the CRISP process needs to address treaty rights and there needs to be meaningful inclusion of aboriginal peoples in all aspects of the CRISP process. There were also comments that CRISPs need to look for synergies with neighbouring jurisdictions, and that they could be effective tools if implemented on a smaller community scale.

Comments also suggested some localized initiatives may be effective in addressing aspects of the infrastructure burden. These included: localized energy production (i.e., minimizing transmission line requirements); and rezoning municipal districts (i.e., Cold Lake). There was also suggestion that





thresholds and triggers be developed for the human environment, as well as for air, water and biodiversity. Examples included language retention and housing indicators.

Other infrastructure priorities identified included wastewater and developing corridors to Peace River and Fort Chipewyan from Fort McMurray. The impact of infrastructure development on the environment was also noted with a reminder that, "If we want the place we live in to be attractive, wildlife and natural areas must be included, not just roads, schools, playgrounds and pubs."

Finally, there was concern that additional information in areas such as population and development projections, policy, regulation, usage statistics, etc. is required to make informed decisions.

59. Are there any implementation considerations we should be aware of? (118 responses)

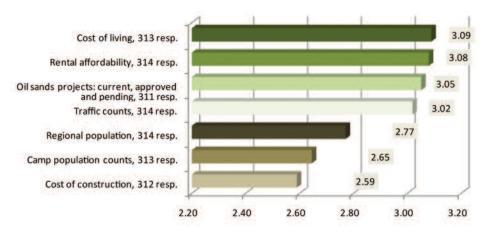
Comments for this question included:

- the province is already behind on infrastructure planning and development, which is an important consideration;
- the pace of oil sands development should not be allowed to become a burden on the province and its infrastructure;
- management of population growth may be a useful tool to provide opportunity to match population and infrastructure development;
- adequate, well-informed consultation is required with the general public and aboriginal peoples to ensure the communities' voices are heard;
- multi-use corridors, transmission lines and pipelines, etc. are not sufficiently addressed;
- sufficient infrastructure promotes development of strong communities, business and economies; and
- the province must be cautious to not overbuild infrastructure in the area and burden Albertans with capital and operating costs of underused infrastructure into the future.

Concerns were expressed about the government's track record for needs identification and planning, with a note that people need to remain the priority. Finally, there were suggestions that the province needs to work closely with municipalities in addressing infrastructure issues.



60. How appropriate are each of the following indicators for informing on the progress being made towards achieving the objective?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.

61. Comments (137 responses)

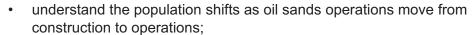
Comments for this question focused significantly on attracting and retaining skilled trades and workers to the region in general. It was also suggested that Alberta is already on the verge of a new worker shortage for both the oil sands projects and the community projects required to ease infrastructure pressure. However, it was also noted that some workers choose not to move their families to the area and choose to commute so the "If we build it they will come" scenario may not be appropriate. Others stated that if industry did not subsidize workers flying in and out of the region, many of these workers would remain in Alberta and move their families to join them.

Other suggestions included:

- need to carefully assess costs to determine if increases are truly reflective of conditions or just maximized to what the market can bear;
- identify a number or proportionality measures to gauge the effective level of infrastructure to use;
- include ratios of doctors, teachers and other social-sector professionals as well as hospital wait times and the availability of community resources;
- include employee retention and turnover measures, particularly of community-based employees;





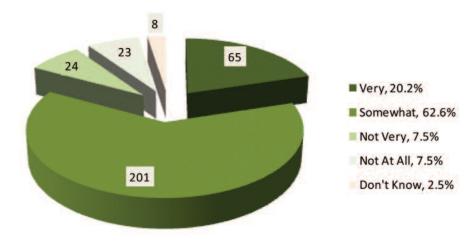


- ensure there is not too much regulation;
- · establish a pacing strategy for development;
- develop housing in the area with the goal of minimizing footprint (e.g., multiple home dwellings, apartments, etc. rather than large lot, single dwelling homes and acreages); and
- identify long-term environmental costs.

Regional Outcome 6:

The quality of life of residents is enhanced through increased opportunities for recreation and active living

62. How adequate do you think these strategies are to meet the outcome? (321 responses)



Average rating: 2.98

Percentage of agreement: 82.8 per cent of respondents indicate—either somewhat or strongly—that this suite of strategies will meet the regional outcome of enhancement of the quality of life of residents through increased opportunities for recreation and active living.

63. Is the Draft Plan missing important strategies to support the regional outcome? (102 responses)

A significant number of the comments for this question either asserted the need for access management and resources to address damage that is done by some users, while a smaller number asserted that access management is undesirable or that increasing recreation in general is not a preferred option. There were some requests for additional details on specific regulations or elements of the plan.





In terms of strategies to support this outcome, there was a desire to see the recreation network in the southern part of the region expanded—with more outdoor recreation activities (e.g., hiking, kayaking, beaches, boat launches, etc.)—and the amenities (including camping spaces) to support the activity. Respondents noted that market mechanisms can also play an important role in increasing opportunities. There was a desire to see the regional trail system expanded to address the needs of both motorized and non-motorized activities in summer and winter. Also, there were comments that the Iron Horse Trail should not be the only major all-terrain vehicle trail system in the region. Multi-use corridors were identified as having recreation potential, and it was noted they were absent in the Draft Plan.

Other suggestions included:

- improve communication with the local population (i.e., residents and users) around recreation and tourism initiatives;
- stock local fishing lakes;
- locate recreational opportunities to increase accessibility for local populations;
- encourage ecotourism;
- allow private operators to provide tourism services in parks;
- focus on education and awareness of environmental protection; and
- research and gather data to better focus improvement efforts.

Some stated aboriginal peoples and their way of life have been impacted by recreational pursuits and interest was expressed in participating in the planning and implementation phases.



There were cautions against too much development in the name of recreation and tourism, overuse of trails (especially in sensitive areas) and providing inadequate monitoring and enforcement resources. There was a desire to ensure studies are valid and reliable, data is publicly accessible and the studies are transparent and accountable in their process and development.

64. Are there any implementation considerations we should be aware of? (133 responses)

Comments for this question identified a number of implementation considerations. These included concern that recreation areas need to be selected with local accessibility in

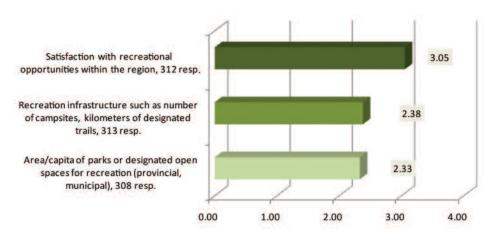
mind and that several of the areas are too far from communities to be practicably accessible in terms of time and affordability. They also encouraged engaging user groups and local residents throughout the planning and implementation process. Some felt new initiatives need to be considered using local data. However, there were comments of caution against giving in to interest groups just because they are vocal, as they are not the voice of many.

There were a number of resource considerations raised by respondents, including ensuring the budgets are in place for planning and implementation, and ensuring adequate monitoring and enforcement. There was concern that limiting motorized access to designated trails is unenforceable and that alternative approaches should be considered. There were also suggestions that despite opposition from recreational users, there needs to be greater regulation of all potentially damaging recreation activities in the region.

There was some concern that the plan will not attract new populations to the region, which would have both budgetary and usage implications. Others thought that overuse—especially in environmentally sensitive areas—could become an issue in regard to wildlife and environmental damage. In related comments, some felt that the province should adhere to the higher percentages of conservation area that are recommended by some non-government organizations.

Regarding industry in the area, there was only one comment that encouraged co-existence between industry and recreation and discouraged treating all oil sands technology with the same severity.

65. How appropriate are each of the following indicators for informing on the progress being made towards achieving the objective?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.





66. Comments (67 responses)

Comments for this question picked up many of the themes and topics mentioned in the previous two comment questions. Topics that have not already been addressed included a caution against striving to meet all recreation demands in favour of striking a balance that offers a range of opportunities. There was also some interest in a plan for long-term connector roads to facilitate access to the identified tourism and recreation areas.

There was interest in seeing future services guided by user input in the form of satisfaction surveys and consultation. There was continued interest in understanding the metrics that the government uses to determine need and a comment that "Need is more than just number." It was suggested that campsites are an example where the numbers do not tell the story. It was added that to effectively meet demand, campsites need to address the size and style of current and future camping equipment (i.e., larger travel trailers). Some said the impacts of use (e.g., refuse, etc.) also have to be addressed, and there was general interest in improving understanding of best practices from other provinces and jurisdictions.

There were comments for increased accessibility and localization of recreation resources, including some trails and a range of amenities. There was a desire to see users, stakeholders and local residents consulted on the planning and implementation. Concern was raised that increasing the attractiveness of the areas to outside tourists and recreationists will have a negative impact on the pleasure local users take in the resources, as well as potential environmental impacts.

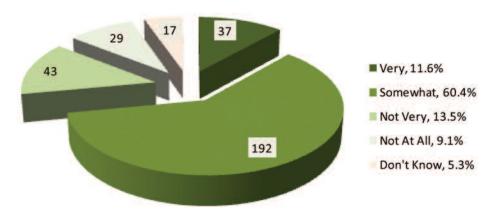
In regard to the Lakeland Country initiative, there was interest in it being preceded by a period of data collection and the inclusion of a complete trail plan (i.e., motorized and non-motorized use) for the region.



Respondents frequently commented that recreation and tourism facilities are vital to quality of life in the region and there is a need for both new and improved recreation and tourism amenities in the region.

Regional Outcome 7: Inclusion of aboriginal peoples in land-use planning

67. How adequate do you think these strategies are to meet the outcome? (318 responses)



Average rating: 2.79

Percentage of agreement: 72.0 per cent of respondents indicated—either somewhat or strongly—that this suite of strategies will meet the regional outcome of inclusion of aboriginal peoples in land-use planning.

Demographic Variations: Those who live in Alberta but outside the region were notably more likely to agree (somewhat or very) that this strategy is adequate than those who live in the region (75.3 per cent and 49.5 per cent respectively).

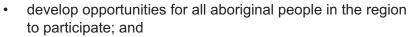
68. Is the Draft Plan missing important strategies to support the regional outcome? (74 responses)

Although the comments indicated that this topic is contentious, there was a general sense that this outcome is supported and there is a desire to see more effective engagement of aboriginal peoples.

Some strategies identified to support the regional outcome included:

- increase the information and accessibility of the information provided to aboriginal peoples to encourage informed and knowledgeable decision-making;
- acknowledge and respect the historical role of the treaties in developing the relationship between First Nations and settlers;
- enhance land stewardship and economic development opportunities;
- develop a Métis consultation strategy separate from First Nations;
- include aboriginal peoples in processes from the scoping phase through to implementation, management and evaluation;





 ensure the plan incorporates court rulings that are expected to be released in the near future.

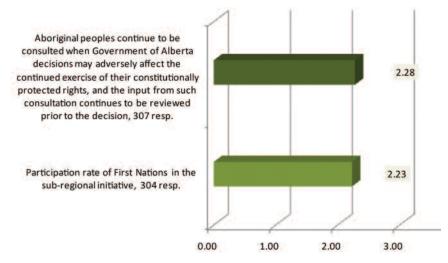
69. Are there any implementation considerations you would like to share? (33 responses)

A number of comments continued the debate on whether or not there should be specific aboriginal rights for involvement in land-use planning. Several respondents indicated a need for more consistent expectations of aboriginal peoples to coincide with other Albertans (e.g., hunting and fishing licences).

Specific implementation suggestions and considerations included:

- research past successes as models to work from;
- develop an implementation mechanism that ensures on-the-ground practice results in meaningful consideration of rights, uses and values;
- use multiple strategies to break down barriers;
- emphasize education for First Nations;
- better funding resources to support aboriginal people in their consultations;
- develop partnerships; and
- increase accountability for the participants in the consultations and planning processes.

70. How appropriate are each of the following indicators for informing on the progress being made towards achieving the outcome?



The strategies in the chart above are ordered from highest to lowest rating, based on the average rating for each strategy. The averages are ranked against a maximum possible score of 4, where 4 is 100 per cent—very adequately—and 1 is 100 per cent—not at all adequately.





71. Comments (50 responses)

Comments for this question ranged between supporting aboriginal rights to consultation and specified land-use rights, and opposing any differentiation of aboriginal rights from the rights of other Albertans. It was also suggested that aboriginal peoples make up the largest single population in the region while others noted the legal requirement for First Nations consultation. Another person said that, "Input from consultations with Native peoples ought to include new or different possibilities for growth, checked by traditions, regulations conducive to healthy living, First Nations culture and rights."

In regard to the indicators, a number of comments addressed the challenges of aboriginal consultation and offered suggestions including:

- · longer or more clearly defined timelines;
- · more knowledgeable consultants;
- increased sincerity and desire for impact from the consultation;
- increased funding for aboriginal consultation resources;
- more effective evaluation of consultation processes;
- "First Nations should be the ones to determine the indicators that best represent progress on including aboriginal people in the land-use planning process"; and
- government action on aboriginal concerns should be the primary indicator.







Part 1: Interpretation

72. Comments (195 responses)

The following statement, "Monitoring, evaluation and reporting mechanisms must be relevant and timely considering the effects on the environment, the public and industrial users" captures much of the sentiment of the comments in this section. Accurate, effective and trusted monitoring, evaluation and reporting were seen as vital to the success of the plan.

There were calls to see independent scientists, industry, non-government organizations and the public involved in establishing and implementing evaluation protocols. There was also a desire to see reporting more broadly and quickly available than is currently the norm. Industry was interested in ensuring monitoring and reporting are efficient, crossing regulatory and reporting lines and agencies, and that they not become an expensive and complicated burden.

Other topics and suggestions that arose were:

- compliance is not necessarily sufficient to ensure harm is not done;
- desire to see the government move beyond compliance reporting as the key monitoring strategy;
- desire to see the Alberta Biodiversity Monitoring Institute and other key scientific institutions funded and contributing to monitoring and evaluation processes;
- implementation of a three year evaluation cycle as opposed to five year. Annual monitoring, reporting and feedback is also valuable;
- assurances the feedback will allow for adaptive improvements in decisions;
- need for evaluation that includes all affected stakeholders;
- interest in a long-term commitment to fund a regional monitoring network to monitor and assess trends in groundwater levels and groundwater quality indicators; and
- a strong commitment to environmental monitoring networks overall.



Part 2:

Conservation of Ecosystems

73. Comments (87 responses)

Many responses to this question expressed concern that more needs to be done regarding environmental protection. Others were concerned about the perceived complexity and uncertainty around policy, regulation, legislation and enforcement. Some felt that policy will have no teeth, while others felt that the judicial system could become entangled in excessive regulation. There was also concern that, "Duplication of authority and responsibility for permitting, etc. is a major deterrent for investment in the province." There was a strong desire to see a simplified—even single point—permitting and application process implemented.

One comment that captured a common sentiment was that, "The Draft Regulations provide too much discretion to government decision-makers. The Proposed Lower Athabasca Integrated Regional Plan Regulations (the Proposed Regulations) are the legal mechanism by which the Draft Plan is to be implemented. However, the Proposed Regulations contain highly discretionary language that will make enforcement difficult when government decision-makers fail to follow the intent of the Plan. Subsections 4(2) and 5(2) of the Proposed Regulations require only that a decision-maker 'consider' the Strategic Plan and Implementation Plan. There is no requirement that the decision-maker comply with the Plan."

Other concerns included:

- the allotments of cost when the implementation results in significant re-alignments of municipal expenditures;
- need for processes to challenge measurements and monitoring results;
- desire for annual reporting and evaluation of the plan;
- concern with challenges that will emerge in aligning existing plans with the LARP;
- entrenchment of aboriginal rights in the policy and legislation;
- reclamation and the completeness of the various frameworks;
- desire to see an effective appeal process due to a concern that the rights of property owners be respected; and
- the reported lack of detail or lack of identifying evidence that the collaborative cross-ministry work to successfully implement the plan has been viewed as important.







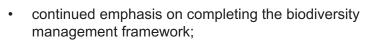
74. Comments (78 responses)

Comments for this question were split between general satisfaction with the environmental management frameworks and limits, and a desire to see more done in regard to monitoring of environmental factors and emphasis on the importance of environmental protection to both short- and long-term health in the region. Several participants indicated a lack of trust in the government's ability (i.e., capacity and/or desire) to monitor environmental output and to enforce regulation. It was suggested that monitoring design should be developed through a consensus-based approach with full stakeholder input and with government implementing final decisions.

Overall, the comments indicated a desire to see more stringent thresholds and limits and increased monitoring. This was particularly true of groundwater monitoring—especially where in situ activity is taking place—and along the Athabasca River where there was a desire for monitoring along the entire watercourse. In regard to surface water, it was suggested that to protect aquatic life and water quality, there should be a low-flow threshold below which all water withdrawals would cease. The province was also encouraged to attend to national and international standards that may be applicable in the region.

There was concern regarding loss of leases or tenure in proposed recreation and tourism areas, along with desire for additional information on compensation and timelines for implementation.

There was concern that the province needs to ensure that adequate resources and cross-ministry collaboration are in place if the implementation is to be successful. Other comments and suggestions included:



- desire for inclusion of a caribou protection plan;
- a desire for greater conservation and environmental protection; and
- treaty rights may not be compatible with conservation area uses and that aboriginal peoples need to be involved throughout the planning and implementation processes.



Part 4: Recreation and Tourism

75. Comments (73 responses)

Comments for this question asserted a need for more campgrounds and recreational amenities in general, and a requirement for those that support traditional activities to be developed for all parties. They generally supported motorized recreation use in the area. Some asserted that there is no need for limiting access at all, while others asserted that upper limits need to be set on use. It was suggested that a large number of the recreational facilities are being used by temporary workers, indicating that worker housing is an issue that needs to be addressed if tourism and recreation are to be further developed.

There was some concern regarding the relationship between tourism and recreation and industry in some designated areas. Some felt that the two can survive successfully and even benefit each other, while others said tourism should not impede industry. Some stated that landowners are also affected by tourism and that they too must be considered in the planning. There was also concern regarding trappers and hunters, with a desire to see the area continue to support their trade.

There was a call for aboriginal involvement and consultation throughout the planning and implementation process. Several commented that the successful implementation of the plan will require significant cross-ministry co-operation. There was a request for more information and specific detail on a number of the elements, especially those that are vital to decision-making, but also clarification of terms such as diversity of recreation.

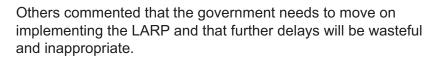
Part 5: Coming Into Force, Related Amendments and Expiry

76. Comments regarding transitional rules for decision-makers (68 responses)

Some asserted that the September 2011 launch date is premature and that the process requires additional consultation and time to be properly completed. Some cited the incomplete status of the different environmental management frameworks as one reason to delay implementation, while others asserted that a phased implementation of the frameworks is appropriate and even desirable.

Others commented that an expiry date is extremely important, as is ensuring the plan is binding on future governments—at least to a degree that it cannot easily and quietly be overturned. There was some concern the plan will allow too much discretion to government decision-makers in determining if limits and triggers have been exceeded.





77. Comments regarding designation of the declared conservation areas and transition requirements (43 responses)

Comments focused on preserving individual and organizational interest. There were demands that conservation areas not result in losses to recreation, especially motorized vehicle trails. There were assertions that no regulations should come into effect until all of the applicable frameworks are completed and ready for implementation.

Consistently, respondents stated a need for more consideration on the process of rescinding statutory leases, with comment that it is harmful to the province's economy to rescind leases that were awarded in good faith. There were also suggestions that the lease holders be granted first right of refusal in the future should the property become open to leases again, that no land should be designated conservation until all interests in the land have been settled and that significant stakeholder consultation be conducted when any statutory consents are facing amendments or being rescinded. Further, they felt regular consultation should be conducted with all stakeholders, including municipalities.

78. Please share any additional comments you may have regarding the Lower Athabasca Regional Plan (39 responses)

Comments indicated mixed satisfaction with the plan and with the process for its development. They ranged from general approval to strong disapproval with the plan overall, with a large number of comments expressing concern that the environmental protection and conservation measures were not strong enough and that there needs to be less focus on the economic drivers in the region. Other concerns included landowner rights, desire for greater inclusion of aboriginal peoples in the planning process, the cost of implementation and compensation for rescinded leases and tenure.

There were a number of comments indicating the importance with which recreation in the area is held, as well as some reinforcing hunting and trapping as vocations in the area and expressing greater clarity on the impact the plan would have on them. There were also requests for clarification on the *Alberta Land Stewardship Act*, its impact on municipalities and how binding the LARP will be on decision-makers.





79. Additional Comments (58 responses)

The bulk of comments in this section have been addressed in previous questions. Several of the comments pointed out that the Draft Plan represented an improvement from the RAC advice, while a few others asserted that the Draft Plan is largely a status quo document. There were a few very specific technical recommendations for thresholds, triggers and limits.

Comments and concerns that were identified included:

- how sub-regional conflicts will be addressed;
- · how existing plans will align with the LARP;
- residents in the southern region (i.e., Lakeland area) were not sufficiently aware of the impact of LARP on them as they are not part of the Lower Athabasca watershed;
- the Draft Plan does not allow sufficient time for management actions to work;
- how the RAC advice was included in the Draft Plan and the basis for post RAC decision-making; and
- the Draft Plan is not consistent with the original terms of reference and it obscures some potential for the region—such as hydro-electric generation opportunities.

There were also comments that the Draft Plan documents and the workbook are excessively long and difficult, which has a negative impact on the quality of response. However, other comments expressed appreciation for the opportunity to be involved in the process.

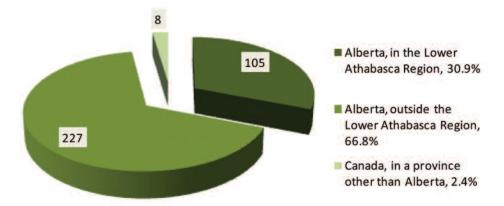
80. Additional Comments on the Draft Plan

These comments have been included in the relevant sections to which they pertain.



Demographics

Primary Residence (340 responses)



97.7 per cent of respondents live in Alberta with 31 per cent living in the Lower Athabasca Region.

Postal Code

Hinton, 19

St. Albert, 5 Grande Prairie, 6

Sherwood Park, 12 Fort Saskatchewan, 1

Eastern Alberta, 70 Wainwright Region, 1 Western Alberta, 3 North Central Alberta, 5 Northwestern Alberta, 15 Kananaskis Improvement District, 2 Central Foothills, 5 Medicine Hat, 1 Lethbridge, 2 Brooks, 1 Calgary, 29 Redwood Meadows, 1 Airdrie, 4 Cochrane, 1 Innisfail, 1 Red Deer, 2 Rocky Mountain House, 1 Edmonton, 52 Drayton Valley, 4 Edson, 1 Barrhead, 2 Westlock, 1 Whitecourt, 21





Vegreville, 1 Leduc, 1

Fort McMurray, 28

Cold Lake, 12

Bonnyville, 14

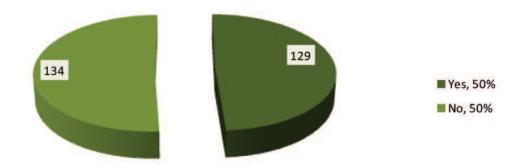
Athabasca, 9

Lloydminster, 1

East Kootenays, 1

Burnaby (BC), 1

Do you currently work within the Lower Athabasca Region? (263 responses)



Are you employed by or associated with any of the following? Check all that apply: (350 responses)

	No		Yes	
Industry (energy, forestry, agriculture, tourism and others)	141	40.4%	208	59.6%
Public sector (federal/provincial/ municipal government)	293	84.0%	56	16.0%
Other	298	85.4%	51	14.6%
Non-governmental organizations (NGO's)	324	92.8%	25	7.2%
An aboriginal community	339	97.1%	10	2.9%



To which age group do you belong? (331 responses)

