



**WOODWARD & Co.  
LAWYERS LLP**

REPLY TO: MELISSA DANIELS  
Victoria Office  
email: melissa@woodwardandcompany.com

ASSISTANT: BARBARA BARBER  
bbarber@woodwardandcompany.com

Our File: 4733

October 17, 2014

VIA EMAIL: LUF@gov.ab.ca

LARP Review Panel  
c/o Land Use Secretariat  
9<sup>th</sup> Floor, Centre West Building  
10035 - 108 Street N.W.  
Edmonton, AB T5J 3E1

The Honourable Robin Campbell  
Stewardship Minister  
9<sup>th</sup> Floor, Centre West Building  
10035 - 108 Street N.W.  
Edmonton, Alberta

Dear LARP Review Panel and Stewardship Minister:

**Re: Review of Lower Athabasca Regional Plan**

We write on behalf of Athabasca Chipewyan First Nation (“ACFN”) and further to Mr. Gierulski’s correspondence to the Stewardship Minister dated, August 19<sup>th</sup>, 2014. In the above noted correspondence the Government of Alberta (on behalf of the Crown) objected to the information request made by the Panel on July 30, 2014 (“Information Request #1”) stating that the said request was premature and the content requested pertained to matters beyond the Panel’s jurisdiction.

With respect to the Government of Alberta’s allegations, please be advised that the ACFN adopts the following the submissions and arguments:

1. Those contained in Fort McKay First Nation’s August 20<sup>th</sup>, 2014 and September 23<sup>rd</sup>, 2014 correspondence addressed to Minister Campbell and the LARP Review Panel;
2. Those contained in Cold Lake First Nation’s August 20<sup>th</sup>, 2014 correspondence addressed to the LARP Review Panel and Minister Campbell; and
3. Those contained in Chipewyan Prairie Dene First Nation’s September 23<sup>rd</sup>, 2014 correspondence addressed to the LARP Review Panel.

VICTORIA OFFICE:  
844 COURTNEY STREET, 2ND FLOOR  
VICTORIA, BC V8W 1C4

TEL: 250-383-2356; FAX: 250-380-6560  
WEBSITE: www.woodwardandcompany.com

WHITEHORSE OFFICE:  
3059 3RD AVENUE, 2ND FLOOR  
WHITEHORSE, YT Y1A 1E2

TEL: 867-633-5940  
WEBSITE: www.woodwardandcompany.com

The Panel identified in its October 3rd, 2014 correspondence that it will be responding in due course to the concerns raised by both the Chipewyan Prairie Dene First Nation and Fort McKay First Nation in its respective September 23, 2014 correspondence. We understand this decision was made based on the Panel's need to retain legal counsel in order to address "the Crown in Right of Alberta's responses to all applications for review of the Plan, as well as Alberta's response to Panel Information Request".

The ACFN submits it cannot be expected to provide a substantive response in reply to the Government of Alberta on Information Request #1 and the information request made by the Panel to the Government of Alberta on September 3<sup>rd</sup>, 2014 ("Information Request #2).

The ACFN stresses that it continues to be troubled with the Government of Alberta's lack of cooperation and participation in the LARP Review Process (the "Review"). The Government of Alberta has consistently undermined the Panel's authority throughout the Review and its unwillingness to provide the requested information is further evidence which speaks to the same.

In ACFN's view, the Government of Alberta has effectively paralysed the Review by refusing to engage in the very process it created to guide the Review.

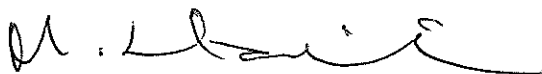
The ACFN believe that considerations of fairness require an extension of time be granted to provide the Panel with an opportunity to receive legal advice and advise the ACFN of how it intends to proceed with Alberta's response to Information Requests #1 and #2 (the "Requests"). As such, pursuant to Rule 2 of the Rules of Practice for Conducting Reviews of Regional Plans (the "Rules"), the ACFN requests for the Minister to vary the timeline established by the Panel in accordance with Rule 32 of the Rules to allow for an extension of time be granted to the ACFN to respond to Alberta's reply to the Requests.

Should the ACFN's request for an extension in time not be granted, please be advised it will be addressing Information Request #2 under a separate cover letter.

Based on the extraneous circumstances as identified above and contained in the Applicants submissions the ACFN adopted in this correspondence, the ACFN kindly requests for the Minister to advise whether an extension of time will be granted at its earliest opportunity.

Please feel free to contact us if the Minister and/or the Panel have any questions or concerns.

Yours truly,  
WOODWARD & COMPANY



Melissa Daniels  
MD/bb

cc: Witel Gierulski: [Witck.Gierulski@gov.ab.ca](mailto:Witck.Gierulski@gov.ab.ca)  
Keltie Lambert counsel to Cold Lake First Nation: [klambert@wittenlaw.com](mailto:klambert@wittenlaw.com)

Mark Gustafson counsel to Mikisew First Nation: [MGustafson@jfklaw.ca](mailto:MGustafson@jfklaw.ca)  
Tarian Rassaghi counsel to Fort McKay First Nation and Chipewyan Prairie Dene First Nation:  
[tazzaghi@henningbryne.com](mailto:tazzaghi@henningbryne.com)  
Will Randall: [wll.randall@gov.ab.ca](mailto:wll.randall@gov.ab.ca)  
Jodie Hierlmeier: [Jodie.hierlmeier@gov.ab.ca](mailto:Jodie.hierlmeier@gov.ab.ca)  
Client