

# PHASE 2 STAKEHOLDER CONSULTATION SUMMARY



## LOWER ATHABASCA REGIONAL PLAN



**Government  
of Alberta** ■





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# 1.0 Overview

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The Land-use Framework (LUF) sets out a 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 regions. Each regional plan will address the current conditions in a region, and will anticipate and plan for relevant development-related activities, opportunities and challenges in that region over the long term.

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

The RAC was asked to provide advice on current and future land-use activities and challenges in the region. The RAC's advice was presented in its document, the Lower Athabasca Regional Advisory Council's *Advice to the Government of Alberta Regarding a Vision for the Lower Athabasca Region*.

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. A draft regional plan will be developed by the Government of Alberta which will be 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.

A regional plan will set a vision of how a region should look over several decades and will consider a planning horizon of at least 50 years. The plan will 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 (such as 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.



## 2.0 Consultation

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In support of the development of the LARP, three distinct phases of consultation with the public, representatives of stakeholder groups and municipalities are being undertaken. These phases are as follows:

- 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 – 2011

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



This second phase of consultation focused on receiving input and comments on the LARP RAC's *Advice to the Government of Alberta Regarding a Vision for the Lower Athabasca Region* document by holding a series of open houses, workshops and meetings with the public, stakeholders and municipalities respectively. Approximately 490 people attended open houses and 270 stakeholders attended workshops held in numerous locations within the region and in several centres outside of the LAR. As well, all Albertans were encouraged to review the RAC advice document and provide their feedback by completing either the online or hardcopy versions of a workbook called *A Workbook to Share Your Views on the Regional Advisory Council's Advice to the Government of Alberta Regarding a Vision for the Lower Athabasca Region*.

In total, 813 completed workbooks were received in the two formats, the majority of which were submitted electronically. There were also 281 partially completed online workbooks received. In addition to these, 108 written submissions were received including from 59 stakeholder organizations and industrial interests to support their workbook submissions. These are broken down as follows:

- 38 industrial organizations and companies;
- seven recreation user groups;
- nine conservation and environmental organizations;
- four government agencies; and
- one other submission.





## 3.0 Consultation Methodology and Format

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### 3.1 Locations

Workshops and open houses were held on the following dates and locations for both stakeholder group representatives and the public:

Location	Date	Venue Names
Bonnyville	Sept. 8, 2010	Centennial Centre
Cold Lake	Sept. 9, 2010	Energy Centre
Fort Smith	Sept. 13, 2010	Pelican Rapids Inn
Fort Chipewyan	Sept. 14, 2010	Mamawi Community Hall
Fort McMurray	Sept. 15, 2010	Sawridge Hotel and Conference Centre
Lac La Biche	Sept. 16, 2010	Portage College – Main Campus
Elk Point	Sept. 20, 2010	Seniors Recreation Centre
St. Paul	Sept. 21, 2010	Recreation Centre
Fort McMurray	Sept. 23, 2010	Suncor Community Centre
Athabasca	Sept. 27, 2010	Athabasca Regional Multiplex
Edmonton	Sept. 28, 2010	Ramada Hotel and Conference Centre
Calgary	Sept. 29, 2010	Glenmore Inn

In each location, stakeholder workshops were held in the morning and public open houses were held in the late afternoon. As noted, these meetings were held both within and outside of the region in order to provide an opportunity for Albertans to attend and provide their input.

### 3.2 Stakeholder Workshops

Stakeholders attended a three hour interactive workshop that allowed all attendees to contribute their thoughts in a group setting. An opening presentation was given, followed by shorter, detail-focused presentations on the main elements of the workbook. The six topics were related to the layout of the workbook: Vision for the Region, Land-use Classifications, Economic Growth and Development, Land Conservation Objectives, Regional Air and Water Thresholds and Human Development Considerations. After each topic was presented, stakeholders were asked to provide their perspectives. This input was captured by table facilitators and reported back to the group as a whole.





### 3.3 Municipal Meetings

Direct meetings with each of the major rural and urban municipalities within the LAR were also held during the Phase 2 consultation period. These meetings, held with the City of Cold Lake, the Town of Bonnyville, the Municipal District of Bonnyville, Lac La Biche County, and the Regional Municipality of Wood Buffalo, focused specifically on the areas of the LARP that are of direct interest to municipal administration. These areas included:

- Collaboration and co-ordination of activities between adjacent jurisdictions;
- Authority over local land-use decisions such as zoning;
- Location of conservation and recreation/tourism areas within their respective jurisdictions;
- Alignment between/with other government strategic policy work (Comprehensive Regional Infrastructure Sustainability Plans (CRISPs), etc.);
- Timeframe for alignment of municipal development plans (MDPs) to LARP;
- Private property rights and the impact of land-use classifications on development plans;
- The Lakeland Country concept and its respective role in implementation;
- Need for affordable housing initiatives across the region to stimulate permanent residency; and
- Infrastructure development within and adjacent to the region.





## 4.0 Summary of Stakeholder Input

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### 4.1 Vision

The RAC proposed the following vision for the Lower Athabasca Region:

*The Lower Athabasca Region is an exceptional mosaic of peoples, communities, forests, rivers, wetlands, lakes and grasslands that are cared for and respected. It is a vibrant, dynamic region that is a major driver of the Canadian economy supported by strong, healthy, prosperous and safe communities. Sustainable economic, social and environmental outcomes are balanced through the use of aboriginal, traditional and community knowledge, sound science, innovative thinking, and accommodation of rights and interests of all Albertans.*

Comments received on the vision have been categorized and summarized below.

#### **Economic**

While some stakeholder concerns were raised regarding too much focus on the economy and that more emphasis should be placed on social and environmental aspects, others felt that economy should drive the vision and it should be worded even more strongly. The reference to “sustainable economic” outcome was a concern for some stakeholders, as many felt the current focus is on non-renewable resources (oil sands development), and it was suggested that renewable resources should be broken out separately within the vision and plan.

Potential impacts and priority for land uses were mentioned by many as requiring more clarity, and that it may not be reasonable to achieve the balance of all outcomes all the time. Overall, stakeholders noted that flexibility within the vision is important due to the timeframe, as well as the need to provide clarity of details as soon as possible – especially for future regulatory approvals.

It was also mentioned by many that transporting energy resources outside of the region needs greater scrutiny and that other resources besides oil and gas require consideration, such as power generation.

A few stakeholders also felt that agriculture, the peat industry, tourism and recreation are missing entirely from the vision and should be mentioned.

#### **Environmental**

Some stakeholders felt that the three main environmental media – water, air and soil – have value beyond that of a resource due to their role in maintaining life and should be maintained, protected and take



precedence over industrial and resource development. Items such as forestry and range management require more clarity and detail regarding their impacts on environmental components such as water. Stakeholders also felt there is a need to address the difference between renewable and non-renewable energy sources.

A need for more detail and clarity about the protection for different aspects of water such as surface water bodies, groundwater aquifers and entire watersheds was expressed by some. Some stated that water affects both the region's development and conservation and it was felt that "planning should be water-centric."

Lastly, it was mentioned by numerous stakeholders that biodiversity is missing entirely from the vision statement, as well as details regarding a timeframe for reclamation.

### **Social**

Positive comments were received from stakeholders that community is mentioned in the vision in regards to community knowledge and healthy communities. Some felt that community is not referenced or explored enough within the advice document. Several commented that social aspects are adequately mentioned while others said they were not addressed enough within the vision and should recognize the region's community and infrastructure requirements. Work done toward healthy communities and possible social challenges identified in relation to work camps were also mentioned as areas in need of further acknowledgement.

### **Balance**

Many felt that the balance between economic, environmental and social values was achieved within the vision. However, concerns were expressed by some that priorities are not stated within the vision, and that it is difficult to please everyone. Ultimately choices/trade-offs need to occur. Some suggested that these could occur through an economic analysis of the RAC proposals and then by determining the trade-offs and balancing of interests.

Most stakeholders stated that clarity on how balance will be achieved and how it will be implemented requires further detail. It was also mentioned that it is important to balance the economic, environmental and social values at a regional level, while at the same time maintaining compatibility with the broader desired provincial outcomes. Stakeholders requested strategies that could directly support the vision and provide the detail that many were looking for.



Specific areas mentioned as missing or needing greater importance to ensure balance in the vision included treaty (aboriginal) rights, safe communities and agriculture.

Comments and questions were raised around sustainability – requests were common for details regarding what “sustainability” means and how it can occur. Many agreed that an integrated approach that balances conservation and economic development should be the norm. Others felt that the plan must take into account proposed activity, and any potential impacts to the environment and habitats. Additionally, they felt the plan should consider tools available to mitigate any adverse economic consequences for industry that will result from the plan, including cancellation of leases, etc.

## Language

Some felt the vision is too long and wordy, and that it must be more concise. Concerns were raised that it was written in the present tense and didn't meet the intent of a vision by looking forward and setting goals. Other stakeholders felt it balanced user groups and issues well. The outcomes of the vision were not clear for all.

Many commented on specific wording within the vision:

- “Cared for and respected” is too vague and subjective;
- Stronger wording is needed such as “protected”;
- “Accommodation of rights and interests” needs to be defined, as it may be hard to achieve as stated, and can easily be misinterpreted. “Consideration” was suggested rather than “accommodation”;
- Vision should include more than just “Albertans” as many non-Albertans are invested within the region;
- “Sustainability” needs to be well defined if it is going to be used within the vision;
- Important to define what “safe” means as well as “strong,” “healthy” and “prosperous”;
- “Sound science” was mentioned as requiring a different adjective;
- Include “crop lands and resources” with the “exceptional mosaic” phrase;
- Importance of the region to Canada and the provincial and national economies is missing for some stakeholders, and some noted that the vision avoids mentioning oil sands directly; and
- Not region-specific enough; it could apply to almost anywhere.



## Additional Comments

Many stakeholders thought overall the vision was inclusive and comprehensive, with many good elements; however, they also felt that some tweaking may be required. Some felt that the vision fails to recognize the potential economic diversity of the region – its potential for metallic and industrial mineral development, hydroelectric power generation and light industrial support industries were all mentioned. Several mentioned maximizing and making more efficient use of resources and avoiding waste (with the goal of being a technology leader).

Some felt that the vision should reflect that people outside the region and province need to buy in and support the vision and, ultimately, the region's economy and environment. Many mentioned that rights, including landowners' rights, are important to all Albertans and the reference to "all" in the vision should be emphasized as many work and play within the region.

Several stakeholders cautioned that the vision needs to reflect flexibility and be careful not to be too restrictive. Many noted that regardless of the wording of the vision, its implementation will be the critical and most scrutinized aspect. There was general agreement that it is important to mitigate the footprint of industrial and recreational users on the land base. Also frequently mentioned was the absence of Wood Buffalo National Park from consideration in this planning region and the potential conservation value that it represents.



## 4.2 Land-Use Classifications

The RAC proposed five new land-use classifications that identify priorities to help guide future land-use decisions in the region. The five classifications are:

- Agriculture;
- Conservation;
- Mixed-use resource;
- Population centres; and
- Recreation and tourism.

The RAC also identified three overlays – land-use classifications that pass through and cross over other land-use classifications – in the region which are:

- Lakeland Country;
- Multi-use corridors; and
- River corridors.



Comments received on the land-use classifications have been categorized and summarized below.

## **River Corridors**

The river corridors overlay and its associated management intent were key points of interest for stakeholders. Specifically, several stakeholders requested clarification of the size of the river corridor overlay as it relates to the actual river (i.e., how large a footprint the actual overlay would encompass in relation to the watercourse and the banks) and what activities would be permitted within the overlay. They also felt river corridors should provide connectivity to the proposed and existing conservation areas within the region, and that by doing so, the corridors would also provide conservation value. The economic potential of the river corridors was also expressed by many as needing to be part of the equation – hydroelectric generation projects, access to process water and high-value timber were all factors mentioned.

## **Management Intent**

A concern frequently echoed across numerous stakeholder engagement sessions and submissions was the need for clarity on the management intent for each of the proposed land-use classifications. In general, the feeling expressed was that a clearly defined set of rules is required for access, activities, timelines for implementation and transitions between land-use classifications. It was also suggested by several stakeholders that management and monitoring of the land-use classifications should be performed by those within the region due to their enhanced knowledge of the land and their proximity to the areas in question. Stakeholders also expressed that flexibility needs to exist within and across the classifications to allow for compatible uses of the land to proceed alongside the primary management intent, as well as aligning with other objectives, such as the proposed cumulative effects management system.

## **Agriculture**

The majority of feedback on the agriculture land-use classification came from locations in which agriculture is a component of the economy – namely, Calgary, Cold Lake, Lac La Biche and Athabasca. Stakeholders at these sessions recommended that the area reserved for agriculture be increased from seven per cent of the total to 10 per cent, that agriculture be given a specific mention in the vision statement, that tree farming be restricted to the most agriculturally marginal soils or moved to Crown land, and that flexibility in the classification will be needed to deal with localized conservation areas. Lastly, there was some support for inclusion of conventional and in situ oil extraction programs as permitted uses in this land-use classification, as it is currently occurring on numerous sites across the region and the province.





## Enforcement

Two main issues were raised by many stakeholders in relation to enforcement – there needs to be very clearly communicated rules regarding uses of the land, including signage; and there needs to be a strong commitment by the government to provide more resources to the enforcement of these rules. It was noted that education should play a large role on this front so that there are fewer misunderstandings of what uses are permitted within a land-use classification.

## Additional Comments

There was strong support expressed by stakeholders for the move to a five land-use classification system from the current two (Green Area/White Area) classification system and the added clarity that it will provide in land-use planning. Suggestions for new/revised classifications included a heritage/historical resource classification, a high-value timber area overlay, a surface mines classification and the move of recreation/tourism from a classification to an overlay. One frequent concern expressed was the transitions between land-use classifications and how they would be dealt with during implementation. Some stakeholders were also concerned that the economics of the proposed land-use classifications, particularly in relation to the new information regarding bitumen deposits on the western side of the region, were not adequately analyzed. This shortcoming could potentially be resolved through a phased implementation program.

Overall, a request for more clarity on the land-use classifications, their potential impacts and costs, priority land uses, etc., was made by many stakeholders. Likewise, it was felt that the traditional uses of the land by the region's aboriginal peoples need to be clearly defined and communicated. Lastly, stakeholders felt that regardless of how the land-use classifications are defined, they must be consistently applied across the province and across all regional plans.




## 4.3 Economic Development

Comments received on economic development have been categorized and summarized below.

### Reclamation

There was general support for the concept of repurposing and progressively reclaiming disturbed land, with the caveat that most land must be reclaimed equitable to initial condition.





Several stakeholders suggested that reclamation requirements and processes and an associated repurposing strategy need further definition. Some believe ongoing processes should be sped up. Others suggest reclaimed areas could include more aggressive recreational uses and that there is potential for recreation areas close to Fort McMurray to meet ongoing demands. Some groups were opposed to repurposing land for more intense uses and would rather this area be restored to original functions like wetlands.

### **Mixed-use Resource Area**

Some groups were concerned that the mixed-use resource classification is too broad and not well enough defined. It was recommended that all resources, not just oil sands, be defined and clearly shown on a map.

### **Surface Mines**

Some commented that oil sands surface mining should be separated out from the mixed-use resource area as a unique land-use classification, as it was felt that the land usage in the mineable area is so intense that other uses are not possible. Others pointed out that mineral surface mining should be included in this classification because there are confirmed deposits.

### **Disturbance Threshold**

There was also considerable interest regarding the disturbance threshold proposed by the RAC, both in support of and against its creation. Concerns included its apparent targeting of the oil sands industry without any focus on other industries or land disturbances (including forestry, labour camps, open pits, cut lines, buffer lands, access roads, etc.). Other concerns include the impacts to economic development and investment in the region, the percentage of disturbed land proposed and how it would be managed, and how reclamation of the disturbed land would affect the calculation. Industry was concerned that the 15 per cent disturbance threshold is an arbitrary number not grounded in science, and that it singles out the major resource with significant economic implications for the province and industry. There was a concern that a 15 per cent threshold is too high, that it will be hard to implement, and some noted the amount of disturbance that would be associated with a threshold of this size is difficult to imagine. Some groups were concerned that an expansion of oil and gas to this threshold will have negative impacts on the forestry industry due to competition for land footprint. Others felt that the percentage is correct if timing and monitoring policies are in place.

### **Partners in Economic Activity**

Some groups wanted to ensure the Department of National Defence and the Government of Alberta are held accountable for the development of natural resources in the air weapons range. It was suggested there be





ongoing collaboration with regional industries and municipalities so a high quality of life for residents becomes a top priority while ensuring strong relationships between these two entities. Partnerships among industry, local and provincial governments were noted as vital for the provision of new infrastructure and that there is a need to incorporate findings from the Athabasca and Cold Lake CRISPs into the LARP.

### **Tourism**

Stakeholders agreed the region has high tourism potential, although some pointed out the draw may be more regional and local rather than national or international. Several respondents noted more remote areas for eco-tourism need to be included in any planning with Lakeland Country. Others pointed out that the Lakeland Country needs to be managed to protect the diversity of experiences. Stakeholders noted the funding for ongoing operations and marketing would be vital for the area to flourish, and there may be the possibility for more oil sands and forestry tourism opportunities. Some groups recommended the potential for more aboriginal owned-and-operated nature-based tourism services and experiences.




### **Forestry**

Comments from stakeholders noted the negative impacts to the forestry industry, such as the introduction of new conservation areas may cause timber shortfalls in the near term; forestry mitigation is expensive and does not mitigate loss of cut in the near term; and the impact to the annual allowable cut (AAC) would be very detrimental to this industry. Some groups would like to see integrated land management (ILM) continue to drive forest management with existing and new partnerships going forward. It was pointed out that those key strategies for mitigating timber shortfalls ranked from highest to lowest importance include the following: implement integrated land management, expand intensive forest management on public land, work to reduce timber losses due to natural factors, increase timber production from tree plantation on private land and require oil sands producers to minimize the size and duration of land disturbance.



### **Oil and Gas**

Several oil companies pointed out that the potential economic impact to oil companies is very high if bitumen-rich areas currently proposed as conservation areas are eventually designated. A commitment to compensation for those tenures would have to be developed and a perceived lack of clear



policy direction from the government has many stakeholders concerned. Some pointed out that in situ steam-assisted gravity drainage (SAGD) technologies and other new extraction technologies better manage the environmental footprint and linear access. They noted that these are new players and they should not be unfairly targeted. Several commented that the associated strategies from the Provincial Energy Strategy, (indicating overall goals or intentions of oil sands development) are missing in the RAC advice document. They believe government's intent for desired scale of oil sands resource development is a key consideration for all other aspects of the LARP.

## **Mining**

There was substantial concern about the perceived lack of significant reference to aggregate/mineral resources and potential. Others were concerned about the future of mineral rights and mineral extraction. Companies stated that decisions to remove large tracts of land from potential exploration should be deferred until an analysis can be made on the potential mineral value of the area compared to its ecological, environmental and cultural significance. The lack of involvement of the Alberta Geological Survey (AGS) was identified as a major oversight.

## **Agriculture**

It was noted by some that conventional oil and gas development should be permitted activities in agricultural areas, as these two industries share land uses today. They felt anticipated population growth will require commensurate growth in agriculture and equal development pressures on this land, which will need a stronger commitment to the use of land for agriculture in the future.

## **Approvals and Process**

Stakeholders mentioned that there is a need to address transportation pipeline links to British Columbia and the Northwest Territories to reflect future economic linkages to India and China. There were concerns expressed that, with the perceived major focus being on oil sands development, forestry is being forced into a secondary role to its detriment.

## **Additional Comments**

Several additional comments were offered. The following summarizes the key points:

- Forestry and oil and gas can co-exist with new economic diversifiers. The plan needs to speak to rebalancing for industry rather than trade-offs;



- The Peace, Athabasca and Slave rivers and Smith Rapids all have hydroelectricity development potential that did not receive a thorough discussion in the RAC's advice document;
- Create development plans that address all species;
- Limit linear access, but allow for mutually beneficial development of the province's resources;
- Best management practices (noted for agricultural sectors), need to be developed and used by all sectors; and
- Strongly agree with proactively planning and developing infrastructure in anticipation of economic and population growth.

#### 4.4 Conservation Areas

The RAC was asked to assess and advise which lands in the region could contribute to a conservation objective of approximately 20 per cent of the region, consistent with the following guidelines:

- Observe the key criteria for establishing conservation lands;
- Demonstrate how the conservation scenario can be met, while minimizing and limiting any negative impacts, including mineral tenure and fiscal implications; and
- Explore the feasibility of meeting a conservation scenario higher than 20 per cent, while achieving the stated economic objectives.

The RAC was provided the following key criteria for establishing conservation areas:

- Areas with little or no industrial activity;
- Areas that support aboriginal traditional uses;
- Areas that are representative of the biological diversity of the area (e.g., landforms, species, vegetation);
- Areas that provide landscape connectivity; and
- Areas of sufficient size (i.e., roughly 4,000 – 5,000 km<sup>2</sup>).

Comments received on the conservation areas have been categorized and summarized below.

#### Wildlife

A number of stakeholders cited the need to protect caribou habitat and to help the species recover. Additional conservation areas and corridors for caribou were mentioned.





The need for predator control, as well as other methods to address threats to all species at risk (e.g., access control), was also mentioned.

One respondent was concerned about the spread of bison diseases if conservation areas were established along the southern border of Wood Buffalo National Park.

Several stakeholders commented on wildlife co-management with the region's aboriginal peoples, as well as hunting rights (aboriginal versus non-aboriginal) in conservation areas.

## **New Recommendations**

Many respondents commented that more conservation areas should be established in the southern portion of the region, even though they will not meet the terms of reference criteria for size.

Rivers and lakes were mentioned by several stakeholders, including suggestions that the Athabasca River and Lake Athabasca (along with all tributaries and buffers) should be included as conservation areas, and that existing environmental reserve riparian setbacks should be factored in. Another suggestion is to include small protected conservation areas around lakes in areas that are close to population centres, especially in the southern portion of the region. Stakeholders also mentioned that conservation areas within oil sands areas are needed, which could potentially be created as special management areas while industrial activity and reclamation is underway, and then transitioned to conservation areas once this is completed. Transition zones between land-use classifications were also mentioned by several stakeholders, in which less intensive forms of industry and recreation could operate.

Many felt that the definition and determination of the "little or no industrial activity" criterion from the terms of reference is not clear and should be explained, as well as the compensation process proposed for those industries facing loss of leased land due to the creation of conservation areas.

With regards to timing, some stakeholders mentioned that setting aside conservation areas should happen before land is leased.

## **Management Intent**

Many respondents commented that an explanation of the criteria and methods used to select these conservation areas is needed, especially regarding the conservation value of each of the individual areas. Some respondents noted that the information the RAC used in its deliberations should be available to review, and there should have been more external input into these discussions.



On one hand, some respondents thought that very restrictive conservation areas are a good idea, while others were concerned about the limitations this would place on industry. For example, one respondent stated that setting up conservation areas makes sense and sends the right message, while it was also commented this may affect investor confidence and that conservation area analysis should be given to impacted industry ahead of time.

A number of questions were also raised, including the following:

- How do integrated resource plans fit into the new planning process?
- Will reclamation activities within conservation areas need to be accelerated?
- Will existing tenures be honoured?

### **Industrial Activity**

There were many comments which either support industrial activity in conservation areas, or wish to exclude industrial activity in these areas. For example, comments included:

- Economic development cannot take place at the expense of land, air and water quality; and
- Forestry should be allowed in conservation areas, since it mimics natural functions such as fire.

### **Twenty Per Cent Conservation Target**

Most respondents were critical of the 20 per cent figure, and wished to know how this number was reached, and what – if any – methodology was behind it.

A commitment to 50 per cent boreal conservation was frequently mentioned in comments.

### **Environmental**

Many respondents stated that a clear biodiversity strategy is needed, and that protection of biodiversity should drive conservation strategies. It was also mentioned that international commitments to biodiversity should be reflected in the plan. Likewise, a number of comments were made that special attention should be paid to sensitive areas, such as fens, muskeg wetlands and other ecosystems that cannot be restored. Special attention to protect the flora and fauna used by the region's First Nations was also mentioned.





There was broad support expressed for the increased use of access management, especially as it relates to safety, enhanced reclamation rates and protection of vulnerable species.

### **Enforcement**

While many comments supported the need to enforce regulations or management intents, a number of questions were frequently raised, including the following:

- Who bears the cost of enforcement and implementation?
- Who will monitor and police conservation lands?
- Who is responsible for management?

### **Recreation and History**

While a number of responses noted that access management is important, some mentioned that sustainable access to areas is needed in order to support traditional uses, recreation and tourism objectives within the region.

### **Area-Specific Comments**

There were a number of comments regarding specific proposed conservation areas. Many of the comments noted that some areas did not meet the conservation criteria set out in the terms of reference. Other comments expressed support for certain areas, or suggested that certain areas not be included as conservation areas. Several respondents referred to the economic impact and potential of specific areas, their current levels of industrial activity or specific aspects of certain areas which made them valuable as conservation land. The McClelland Lake and Fen was suggested by several respondents to be included as a conservation area. A number of respondents asked why Wood Buffalo National Park was not included in the LARP.

## **4.5 Air and Water Thresholds**

The RAC was asked to use the established watershed and airshed thresholds to develop its advice, consistent with the following guidelines:

- Assess the three economic development scenarios with reference to the specified regional cumulative environmental thresholds for air and water; and
- Where both the economic and environmental objectives cannot be satisfied in all scenarios, assess the options and recommend the preferred option.





Comments received on the air and water thresholds have been categorized and summarized below.

### **Existing Frameworks**

Comments ranged from support for the existing frameworks with adaptations to respond to new information, developments and technologies; to concerns that air and water quality thresholds have already been exceeded and require the implementation of new frameworks immediately. Existing frameworks were criticized for being too complex, fragmented across the landscape and should be more localized, especially for air quality. Stakeholders felt any new air pollutant management plans must have clear guidelines to ensure the plans are effect-based, which would ensure that the protection of health in the region is based on ambient air quality requirements supported by science.



### **Triggers and Thresholds**

It was noted that the use of triggers in the monitoring process is important, as well as the process by which triggers and thresholds are developed, what limits are set, how they are enforced and what follow-up actions occur. One respondent stated that establishing air thresholds, triggers and limits indicates that a problem may be imminent and action must be taken to prevent problems. More detail was requested on development of the thresholds and what management actions will be taken if thresholds are exceeded. Some groups recommended that better information sharing and education about regional and local thresholds is required. There was also a need expressed by some to factor in emissions coming from outside of the region, especially big cities. These same stakeholders noted that ambient air quality should respect the same provincial standard, and that regardless of intensity of local operations the region cannot exceed this threshold.

Some groups requested that new triggers be more scientific, based on cumulative effects and be more transparent. To make this possible, it was requested that the LARP provide binding thresholds for wildlife habitat and acceptable levels of disturbance to inform decision-making.



### **New Frameworks**

Numerous suggestions were received about what to address under new frameworks:

- Levels of lead, mercury levels, furans, dioxins, arsenic and other contaminants;
- Soil contamination and land threshold;



- A threshold for biodiversity and ecology, for wildlife, as well as for humans;
- Need to understand geological impacts (i.e., high water and Birch Mountains);
- Need targets and thresholds for wetlands (i.e., for connectivity) – cumulative effect principle;
- A framework to manage regional biodiversity that should be guided by the same design principles noted for the air and water frameworks;
- Linkages to particulate matter and the Ozone Management Framework, Acid Deposition Management Framework, Clean Air Strategic Alliance Electricity Framework and existing facility approval and environmental assessment process.

There was considerable discussion regarding the inclusion of carbon dioxide and other greenhouse gases in a new framework. There was some support for this inclusion, but many noted that these pollutants are already regulated in Alberta through several existing legislations and should be outside the scope of the regional plan.

It was further recommended that new frameworks be developed through a transparent multi-stakeholder process that is science based with access to data by all parties. Other groups requested that a science-based threshold be established on water contaminants and water withdrawals that will protect the long-term health of the ecosystems and people affected by development.

## **Monitoring and Enforcement**

The general feeling among many stakeholders was that current regulations and approved policies/practices have to be followed and enforced much better than they are today. More staff is required, especially within major oil development centres, along with better record-keeping and open, transparent reporting. Some respondents felt that, in cases where human and environmental health are in need of much greater protection, there is a need for clear, enforceable laws and not agreements and incentives to industry. Some stakeholders noted, however, that calls for more stringent legislation and enforcement would include the need for the government to allocate more budget to these challenges, which is unrealistic with today's economic realities. There was general support for the current practice of allowing industry-led monitoring with the recommendation that government needs to do more analysis of the results it receives and take appropriate actions based on these results. Some groups said there is a need to ensure that monitoring is standardized, complementary (i.e., is not duplicating other efforts) and based on sound science, as it is currently being undertaken by several different bodies using several different formats.

Many felt air and water thresholds are manageable; however, some suggested that people and industry are more likely to comply if the same standards are applied across the province. Most stakeholders strongly



agreed with the need to improve regional monitoring and reporting, including long-term monitoring protocols established by independent scientists and local communities.

### **Additional Comments**

The key points put forth by the various stakeholder groups were that air and water frameworks will improve monitoring, transparency and reporting since they provide guidelines for planning of airsheds and watersheds as well as actions for their management. Use of local knowledge within watershed and airshed groups was strongly recommended by stakeholders. Several respondents noted that preservation of trees in municipal and regional areas helps to improve air quality, prevent erosion (as a water quality concern) and ensures evaporation cycle/ocean recharge balance is preserved. Other stakeholders mentioned a need to consider the Northwest Territories and Saskatchewan in terms of water flow requirements.



Some stakeholders expressed concern about how Alberta is perceived across the country and around the world regarding environmental protection, despite the fact that information and results of good work are available. It was therefore recommended that these good results be promoted and made more available to the public. These included modern forestry practices that assist in meeting air and water thresholds, carbon sequestration initiatives and forest renewal.

## **4.6 Human Development Considerations**

Recognizing the inter-related nature of economic, environmental and social objectives, the RAC was asked to:

- Consider options for tourism development with emphasis on Lakeland Country;
- Consider options for recreational development, including advice on effective management of recreation activities on provincial Crown land;
- Provide advice on the general location of major transportation and utility corridors in the region and the considerations that must be addressed by the Alberta government in planning the specific locations;
- Provide advice on the implications associated with the three economic development scenarios as they affect population growth labour needs; and



- Provide advice on the impacts to aboriginal communities as well as treaty and other constitutional rights exercised by members of those communities.

Comments received on human development considerations have been categorized and summarized below.

## **Regional Infrastructure**

### Transportation

Stakeholders suggested innovative thinking on transportation is required to plan beyond roads and include other modes with the infrastructure in place such as rail and air. Many respondents mentioned the creation of a high-speed train to move people from Edmonton to Fort McMurray. However, it was noted that issues such as cost, safety and access must be considered in detail prior to making any decisions on direction.

### Multi-use Corridors

Many agree with the concept and general alignments of the proposed multi-use corridors and their importance in linking the region both internally and externally, but there were many concerns regarding the actual planning process and the need for proper consultation on the actual routes frequently mentioned. Cost, safety and impacts to the environment and wildlife were mentioned again in various respects, and specific ideas were mentioned on how industry could assist in this regard. Stakeholders also stressed that the integration of the region and utilizing existing corridors and infrastructure should be a high priority.

One suggestion made was for transmission or utilities corridors to have their own land-use classification to balance competing land-use interests such as motorized recreation vehicle trails that could also use this alignment.

## **Recreation and Tourism Areas**

### Access

A significant concern for many stakeholders was access to recreation lands and how it will be considered and handled. Connectivity and ensuring the areas are close to population centres were also key points mentioned. Broad support was given for the concept of access management, but how it will be achieved and by whom was frequently commented on. Specific concerns were raised around grazing disposition holders having to provide reasonable access for recreation users and the implications for their operations.



### Camping

Generally, stakeholders commented more campgrounds are needed within the region and all campgrounds (proposed and existing) need to be better maintained. Some suggested that paying contractors to provide this service would be reasonable to ensure maintenance of these amenities.

### Lakeland Country

There was general support for the Lakeland Country concept, with many agreeing that encouraging and managing tourism on a larger scale is greatly needed in the region. However, some respondents did not see the value or attraction to the area. There were some questions raised as to why such a large area was suggested for the Lakeland Country concept and that a smaller one excluding Cold Lake may be more desirable. Numerous stakeholders were concerned with the various types of activity and diversity of uses that will be allowed in the area. Stakeholders requested more information on the allowable activities for this area. Several stakeholders encouraged the creation of a policy to attract recreation and trail users into the Lakeland area through the provision of a network of multi-use trails.



### Trails/Motorized

Motorized recreation is very popular within the region and many stakeholders felt that this activity requires integrated planning, including management, enforcement and maintenance. Concerns were raised by numerous respondents regarding access management by the public/recreation users to existing and future trails. Many comments were received noting that trails must be designed for both motorized and non-motorized users and planned appropriately to reflect best practices in recreational trail design and development.

### Management and Enforcement

Many stakeholders mentioned the importance of education, maintenance and enforcement working together to have successful recreation areas. The question raised by these stakeholders, however, is who should be paying for the necessary education, maintenance and enforcement? One common suggestion was the implementation of trail user fees within the region.



### Area Specific

Stakeholders had various specific concerns and comments about certain areas within the region.



Some felt these areas were missing or need further recreation or tourism areas: Christina River, McKay River, Heart Lake/Logan Complex, Cold Lake, area south of the Cold Lake Air Weapons Range, area north of Moose Lake, Athabasca Delta, Lakeland North and Lakeland South conservation areas, Birch Mountains, Marguerite River Wildland Provincial Park (WPP), Firebag River, the dune complexes in Maybelle River and Richardson River Dunes WPPs, Gypsy Lake WPP (Gordon, Gipsy and Birch lakes area), sections of Grand Rapid WPP - including House River Watershed (Algar south and north), Minnie Lake, Lake Athabasca, Andrew Lake, the Slave River, and the Athabasca River through Fort McMurray and north.

Conflicts or questions were raised by stakeholders as to why certain recreation and tourism areas were selected, including Christina Lake, Winefred Lake, Slave River, Andrew Lake, Lake Athabasca, Otasan Lake, Gardiner Lakes, the Athabasca River, Steepbank Lake complex, Lakeland Country, and Richardson Backcountry. These concerns revolved mainly around the levels of existing industrial activity in the area and future industrial potential in relation to the recreation and tourism potential of this area.

Areas were also specifically mentioned along with suggested designated uses:

- Gregoire, Maqua, Engstrom and Crow lakes for camping;
- Abasand Humpback for trails;
- Marguerite River WPP/Firebag River/eskers, kettles for access, trails and campsites;
- Thickwood Fen/Tower Road Lake for trails and campsites;
- Muskeg River/La Saline Park for trails and campsites;
- Grand Rapid WPP from Horse River or Little Fisheries for trails and campsites;
- Crow Lake WPP for trails, campsites and canoeing;
- Birch Mountain WPP/Namur Lake for access, trails, campsites and canoeing;
- Dune areas for access, backpacking, trails and campsites;
- Hangingstone River/Maqua Lake PRA/Willow Lake traditional trail for trails and campsites;
- Bitumount/Creeburn Lake historical site for trails;
- MacKay River/Ells River with traditional trail to Chipewyan Lake for trails and campsites; and
- North of Highway 55 from Lac La Biche to Cold Lake for snowmobile trails.



### Additional Comments

Several stakeholders commented that the existing parks in the region require improvement and are being over-utilized. Other stakeholders felt that existing and new recreation areas require an assessment of their successful usage that is clear for all to understand. Some support was given to the consideration of using reclaimed land for recreational purposes rather than disturbing additional natural areas. Also, it was noted existing connections between recreation areas should be taken advantage of. Overall, stakeholders felt that there needs to be a balance in the type of recreation areas provided and, if this can be achieved, it will assist in attracting and keeping people in the region. One caveat noted was that the recreation areas also need to be near population centres to be successful.



Concerns were raised about co-existence between industry and conservation areas. Mitigating environmental damage was a concern, as well as honouring existing tenures. It was suggested that perhaps recreation and tourism should be an overlay rather than a classification on its own, which would allow these activities to be permitted within each land-use area. Some stakeholders felt there were too many proposed classifications within recreation and tourism, and a simplified system would ensure it is understood by all.

## **Population Centres**

### Social and Physical Infrastructure


Stakeholders felt that quality of life is a critical component for success and growth in the region, and that this term needs to be well defined within the plan and its challenges made clear.

It was felt that improvements and resources are needed in the following areas to support healthy communities:



- Diversity and quantity of jobs;
- Increased cultural activities and centres;
- More support for local business, including a balance between local stores and franchises;
- Health and wellness including hospitals;
- Social support systems;
- Safety;
- Education;
- More green space, recreation and infrastructure;
- Transportation, roads, rail and airports;



- 
- Child care; and
  - Affordable housing.

Work camps were mentioned by several stakeholders as they have various impacts on communities and also need to be carefully considered. The example of the past and current pressures on Fort McMurray was mentioned numerous times, while still ensuring that the plan does not focus on that area alone.

## **First Nations and Métis**

### Treaty Rights

A few stakeholders commented that First Nations treaty rights should be specifically emphasized in the LARP, and these rights should be specifically distinguished from those of the general Alberta public. It was noted a number of factors, including wildlife and ecological management, compensation, and land use will all be impacted by treaty rights, and in some situations a parallel regulation may be required to integrate treaty rights. Stakeholders also noted the LARP-related treaty rights issues extend beyond the LARP boundaries, and consultation should be conducted accordingly, especially with consideration towards federal regulation and involvement.

### Involvement in the Land-use Planning Process

A number of comments indicate the First Nations and Métis people are interested in being at the table for the land-use planning process, there is a concern about perceived insufficient opportunity for participation through the current planning process and a feeling that traditional knowledge is missing from the LARP planning process to date. Specific suggestions included providing role clarification, support and resources for greater Métis involvement in the process, including a Métis Nation of Alberta (MNA) seat on all future RACs; and involving aboriginal peoples earlier and at a grass-roots level in a manner that engages them without extending into formal First Nations consultation. Several comments assert that regional plans will have an extensive impact on aboriginal persons and identify specific concerns (e.g., hunting, traditional use on all land-use classifications, conservation of traditional lands and sites) and opportunities (e.g., developing First Nations-based tourism, education and training opportunities).

### Traditional Lands and Land Use

A number of topics were raised in relation to traditional lands and land use. Some comments indicate various important traditional and historical lands are not on the maps and these lands should be recognized and respected. There were suggestions that these lands need to be clarified, but not as a separate land-use classification, although the use of a traditional lands overlay is suggested as a possibility.





Other issues were raised, including concerns the traditional use of lands (as mentioned in the RAC's advice) should extend over all classifications, and the traditional use should be respected as a right and not limited by "locked gates." Furthermore, there were a small number of comments reinforcing the importance of First Nations' tradition and spirituality, including one that suggested compensation should be considered for loss of ability to practice traditional uses of the land.

### **Additional Comments**

Some commented the work done to date on population centres was positive and much needed. Others mentioned aboriginal people and their communities need to be considered along with the impacts the growth of population centres will have on their way of life. Several respondents noted the ties between a strong community and a strong economy, feeling that co-ordinated efforts among municipalities, the government and industry will be the key to success. There were numerous calls for using the work already undertaken for the Athabasca oil sands CRISP and the upcoming Cold Lake oil sands CRISP as the basis for this work.

The idea of a transition plan was mentioned to ensure that infrastructure is built, but does not delay potential economic development. The development of the necessary infrastructure will help meet the economic, environmental and social goals of the region by doing the following: maximizing economic value through minimizing inefficiencies; reducing the environmental footprint through minimizing disturbance as a result of capturing synergies which result from effective planning; and improving social well-being by ensuring health, education, recreation and other facilities are made available and consistent with population growth.




## **4.7 Other**

Several other comments were received by stakeholders and have been categorized and summarized below.

### **Co-ordination among Authorities**

The topic of co-ordination among authorities was raised in relation to a number of issues, though most specifically in regard to the relationship between the LARP and other planning tools, initiatives and authorities in the region. These comments also included the air and water frameworks, and





who would be responsible for developing, monitoring and enforcing them. To a lesser degree, co-ordination among authorities was also raised in relation to recreation and tourism, and other areas that will involve regulation and enforcement.

## **Planning Authorities**

Stakeholders recognized that there are a variety of different plans, planning processes and authorities in place already that need to be considered and addressed within the LARP. Participants reinforced the need to consult, collaborate and incorporate and consider CRISPs, integrated resource plans, municipal development plans and other plans in the development of LARP. Stakeholders also mentioned that the region borders other jurisdictions (Saskatchewan, Northwest Territories), and municipalities within and adjacent to the region, and that the appropriate authorities from these regions need to be involved to ensure that the LARP planning is comprehensive and seen to completion.

## **Frameworks**

Stakeholders commented on air and water frameworks (and other regulatory and enforcement topics), suggesting a strong need for the government to examine the best ways and means of integrating both internally and with external authorities. A range of comments note the impacts of the LARP and the suggested frameworks cross the boundaries of a number of provincial government ministries and departments (Alberta Environment (AENV), Alberta Sustainable Resource Development, etc.). It was felt there is a strong need to find a way to maintain a clear focus on the desired outcome and ensure a unified approach and distribution of responsibility to avoid confusion and redundant bureaucracy. Of note is the assertion that there is an extensive amount of data available, especially through industry, which is not currently utilized that could paint a much more accurate picture if used appropriately by the government. There were also frequent comments that the integrated provincial approach has to ensure that all of the regional plans function effectively in relation to each other.

It was noted that, as with the planning authorities, there are a number of authorities already involved in air and water management. AENV, watershed and airshed alliances/councils, municipalities and other jurisdictions, and industry all have significant roles in air and water management. Stakeholders said that collaboration is essential and all should have input in establishing new frameworks and thresholds. Monitoring and enforcement were often mentioned; the key questions raised were:

- Who are the best authorities to conduct monitoring and enforcement?
- How will resources be distributed to enable monitoring and enforcement?
- What is the role of industry and the private sector?



## Compensation

The single most common topic mentioned by stakeholders was the need for fair compensation to industry for any loss of leased lands. Specific concerns included lease termination (immediate versus phased out over time) and equitable compensation based on site-specific circumstances. There were frequent comments existing leases/tenures need to be honoured, and the cost of equitable compensation would be prohibitive to the government.

Many stakeholders felt compensation for lost infrastructure and for future profits on active and not yet active leases should be included. Compensation options that were identified include financial remuneration and lease exchanges. A number of stakeholders felt the true cost of the conservation classification and the lands it applies to is not known, and a full economic evaluation should be conducted before the classification is implemented.



## Process

Some respondents found the workbook hard to understand and complete. Several groups commented there has not been adequate involvement to this point, particularly by recreational groups, mineral disposition holders and aboriginal peoples. Municipalities felt that the municipal election in October 2010 hindered their ability to submit a council-approved response. Some industry representatives noted the RAC was not able to reach 100 per cent consensus on some key areas, especially the location of some conservation areas, and asked that background information made available to the RAC members be made available to stakeholders. This included the inclusion of the Alberta Geological Survey in future planning.

Requests were made to continue to engage stakeholders in the review of the draft plan and clearly explain the decision-making process going forward. Finally, some groups feel many of the items covered to date should be dealt with at the provincial level rather than the regional level.

