

PHASE 3 PUBLIC CONSULTATION SUMMARY



LOWER ATHABASCA REGIONAL PLAN



**Government
of Alberta** ■



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1.0 Overview



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

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

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

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

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



2.0 Consultation

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

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

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



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

In total, 349 completed workbooks were received in the two formats, the majority of which were submitted electronically. There were also 119 partially completed online workbooks received. In addition to these, 73 written submissions were received, including 18 from members of the public.



3.0 Consultation Methodology and Format



3.1 Locations

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

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

These meetings were held both within and outside of the region in order to provide an opportunity for Albertans to attend and provide their feedback.



3.2 Public Open Houses

In each community, public open houses were held in the late afternoon. All attendees were offered hardcopies of the Government of Alberta's Draft Lower Athabasca Integrated Regional Plan, including: the strategic plan, implementation plan proposed Lower Athabasca Regional Plan regulations, and the phase 3 workbook—all of which were also made available online on the LUF website (landuse.alberta.ca). Participants were encouraged to complete the workbook in its online version, or to complete a hardcopy version to be delivered in the mail via the stamped, pre-addressed envelopes provided.

Information regarding the regional planning process—as well as the main areas of the draft regional plan—was assembled into five stations staffed by Government of Alberta staff available to answer questions and provide additional information as required. The five stations were:

- process and overview
- environmental management frameworks
- conservation areas
- recreation and tourism opportunities
- regional economic development outcomes

Discussion was captured as notes by the Government of Alberta staff at each station. Attendees were also encouraged to write their own notes on flipcharts at the stations. The notes from each session were then analyzed for key themes and discussion topics and a session summary was written on each of the five topic areas. Public submissions were also reviewed with additional input added to the summaries.

All sections noted in this public consultation summary in quotation marks (i.e., “The consultation efforts on the Lower Athabasca Regional Plan were adequate”) reflect direct quotes provided by attendees at the open houses.



4.0 Summary of Public Input



4.1 Process and Overview

This station served largely as an information-sharing station and introduction to the rest of the open house.

There were a number of comments expressing general approval of the public engagement focus incorporated into the development of the Draft Plan. Conversely, there were comments that the process included inadequate consultation of relevant stakeholders. Likewise, there was concern that landowners have not been adequately consulted. There were also a number of comments specific to aboriginal consultation, largely noting concern that the aboriginal consultation has not been sufficient and that First Nations and Métis concerns have not been addressed, especially in regard to incorporating treaty rights and allowing aboriginal peoples to practice their traditional way of life. One person commented that, “The Biodiversity section Division 3 18(1) seems to infer that for the First Nations there will be no right to hunt under the Treaties and no right for the Métis to hunt under Powley.”

Comments suggested the need for a formal and meaningful process of consultation with aboriginal peoples and that Métis are to be consulted, “As in the legal definition of the word as it pertains to Métis.” One comment noted that, “Regulations wording seems to trump the Treaties with First Nations, and allow for no appeal once passed by Cabinet.” The phase 2 consultation process with First Nations on the water quantity framework was felt to be good, and could be replicated for access management.

There were also comments that expressed general approval for the draft plan, or elements of it, but noted that it is an extremely complex plan with “Too many initiatives and policies to put into one place; into one plan.” There were calls for the principles of smart growth to be incorporated into the plan and that, “The Government of Alberta needs to work together with the public and stakeholders on a soft implementation approach rather than setting hard specific deadlines to implement new government policies.”

Finally, there were a number of concerns throughout the open house notes and the submissions that additional detail is required for people to make informed decisions. While this was a common theme, it was most frequently mentioned in regard to the environmental frameworks, especially the biodiversity framework and land disturbance threshold. It was also noted in regard to identifying the scientific basis for the decisions that have been made, and in regard to general background information—such as noting an expected increase in oil sands



development of 68 per cent by 2025. One assertion was that failing to identify oil sands as the main economic driver of the region causes the overall vision to fail.

4.2 Environmental Management Frameworks

Water

Many stated that water is a vital resource, and quality and quantity must be maintained. They felt that water quality is generally good in the region. There was interest in the management frameworks and support for the Athabasca and Beaver River Watershed Planning Advisory Councils and Lakeland Industry Community Association; some felt that the Draft Plan has a strong focus on the Clearwater River. The greatest concern was with surface and groundwater quality and quantity issues, with a strong emphasis on the need for more monitoring in northern locations—especially in the Peace-Athabasca Delta, Slave Lake and Slave River regions. Comments were that there have been changes in water quality based on observed changes to the ice structures in recent years.

There were concerns about the quantity of water being removed from the Athabasca River (and others), along with several calls for enhanced buffer zones (200 metres - 1 mile depending on the comment) from rivers. Some felt the heritage river designation lacks legal weight, but is important as a grass-roots initiative: "When it comes to our Heritage River no one wants any industry on it. The people of Fort McMurray have a Clearwater/Christina River management plan for our river. Our Mayor, the council and the people back this plan and the government signed this plan." A number of comments indicated concern or disapproval with hydro-electric power generation and the perceived impacts on the environment.

There were also concerns about management of lakes in the area, including: development around lakes and infraction of regulatory requirements, declining lake levels and impairment of wetlands. Many felt strongly that lakes need to be protected, and cited evidence that protection measures do work. Concern was expressed regarding the use of Cold Lake to supply water to Bonnyville, and regarding pollution levels in lakes, with some noting that chemical monitoring is important.





Air Quality

Most said air quality is generally good in the region, but there were some concerns—such as visibility—that were common, specifically regarding how these concerns will be addressed in the LARP, and how future development in the region will be considered.

There was also comment that the frameworks must be developed with stakeholders who have relevant backgrounds and are given opportunities to provide input and make recommendations.

Biodiversity Framework

The biodiversity framework was felt to be a good idea in principle, but that it has wide-reaching effects which need to be more fully developed before it should be included in the LARP. Additionally, some felt the conservation areas should not be designated until the biodiversity framework is in place. There was comment that, “There must be significant Métis and First Nations presence on any committee, task force and council that drafts that section of the plan. Where threats to Métis and First Nations rights to hunt, fish and gather exist, they must have a strong and representative voice.”

A common sentiment was that the draft plan should not be approved without all thresholds, triggers and limits in place for all frameworks.

Monitoring and Enforcement of Triggers and Limits

There was interest in clearly identifying how monitoring will connect to industrial producers. There was a suggestion that management actions should focus on all sources and move towards “net environmental benefit.” Management actions should consider potential undesirable secondary impacts of any actions. There were also suggestions that the approval process consider impact on identified thresholds, triggers and limits.

A large number of comments on this topic focused on clarifying, defining and building trust in the thresholds, limits and triggers for air quality, water quality and quantity, along with timelines for implementation. They cautioned against considering the triggers and limits in isolation, wanting to reinforce the need for a strong scientific basis and incorporate traditional knowledge while respecting traditional use, and encourage that frameworks be reviewed by an independent panel of scientists and traditional knowledge holders. One suggestion was that monitoring should be consistent with and link to federal government monitoring in the Northwest Territories.

Some felt there is need for resources to ensure monitoring and enforcement—and more details overall regarding how limits are set and what actions occur when triggers and limits are exceeded. Some felt concern that the limits will be seen as a “pollute-to policy”. There was



some uncertainty regarding the government's monitoring, and assertions that third party and citizen involvement is required for monitoring. For instance, one comment suggested to, "Establish a panel of independent scientists and indigenous knowledge to put forth balance of science and traditional knowledge limits". Transparency was felt to be very important, and that there needs to be a process for the public to access monitoring results. There was concern about having the resources to monitor and enforce the frameworks and that the allocation of resources be equitable, suggesting that, "Equal is not equitable". Other comments indicated concern that the taxpayer will bear the responsibility of the cost of monitoring, along with suggestions that exceeding limits should result in severe consequences.

There were regulatory issues and recommendations that existing legislation needs to be enforced. As well, the perceived industry influence in the Alberta Legislature was a concern.

There were concerns about the long-term effects of pollutants already in the environment and about future effects of oil sands development on air and water quality. Suggestions were given that limits and triggers should be set lower and related to historical baselines. There were also a couple of comments suggesting a moratorium on oil sands projects until all thresholds, limits and triggers are finalized.

General Comments

A common theme for this topic was protection of resources (e.g., water, air, timber, the land and rivers, etc.) is needed for all Canadians; and air and water management should be the plan's highest priorities. There was general interest in the frameworks and desire for additional detail on how they were developed, especially regarding why only selected parameters are being chosen for monitoring.

Some felt the plan needs an over-riding environmental sustainability statement/focus, and that any cumulative effects management needs to be comprehensive. One commentator suggested the Northeast Commission plan for community development be revisited. A few requested clarification regarding considerations for temporal exceedances and questioned how non-regulated inputs will be addressed in the plan. Others noted that the impact of recreation (especially motorized) has to be considered as well. Some felt that the draft is not balanced and has too much weight on industrial use, leading to questions on how environmental impact assessments (EIAs) will align with the LARP.





Other comments and concerns included:

- concern regarding any Site C dam development (in British Columbia);
- concern the Draft Plan is too complex for those who must enforce it;
- need clarity of definition for land disturbance and that leases be honoured in good faith;
- need recognition in reclamation planning that not all oil sands technologies are the same; and
- need clarification on what it means to “consider” or “act in accordance” with the plan; and a study was cited that found current water levels in some rivers make 80 per cent of traditional territory inaccessible.

4.3 Conservation Areas

Area Specific Comments

Some comments suggested the areas west of the Canadian Shield and east of Wood Buffalo National Park should be conserved, as well the Slave Rapids and McLelland Lake Fen. There was also interest in seeing a buffer zone along the whole Clearwater River valley and alignment with the Clearwater-Christina Heritage River Management Plan.

Wildlife

A number of comments questioned how the plan supports caribou conservation. There were some calls to increase the conservation area overall to protect diversity, including designating the public land-use zones that have ecosystem forestry areas as wildland parks. Some felt there was a need for wildlife corridors, and that private land should be considered in planning them.

Industrial Activity

There were a number of requests for more clarity around permitted uses, for instance, one comment was, “Don’t lump SAGD with other industrial uses.” There was also concern that exclusion of all industry from conservation areas is a missed opportunity to encourage innovation. However, there was also dissatisfaction with allowing any oil and gas operations within a conservation area. Proposals were made for strict guidelines on tailings and hydrocarbons, and that high oil sands conservation off-set ratios are needed.

Some felt that the draft plan’s impact on the timber industry is significant. There was concern that ecosystem forestry could become a loophole exploited by commercial timber operations. However, there was also



support for ecosystem forestry and intensive forest management if guidelines include:

- long-term investment to ensure permanency of the land;
- increased investment made on highly productive land only, close to manufacturing;
- investment made only where it can be protected (i.e., government needs to pay extra cost of more investment and ensure an accurate off-set for forest industry's cut loss);
- existing intensive land management practices—forestry and oil and gas leases—continue to operate profitably; and
- working with the existing practices, rather than developing new governance.

Access Management

A number of comments indicated concern with damage caused by motorized recreation—including snowmobiles, quads and trucks—noting, “They are too powerful and rip up the land.” However, commentators also questioned how access management will be enforced in terms of resources and logistics.

General Comments

A number of the comments on this section expressed a desire to see more conservation area in the region, with particular concern for conservation in the bitumen deposit areas. The comments tended to focus on targets such as conservation of 50 per cent of the Boreal forest (often stating that the proposed limits are arbitrary) and a desire to see greater protection for caribou.

Some suggested a number of areas for additional conservation, including large tracts along rivers and tributaries, McLelland Lake Fen and similar areas. They suggested as well that conservation areas should be determined by ecological and First Nations' need, as opposed to economic pressures. Many said the long-term ecological cost outweighs shorter-term economic benefit, and raised concerns with uses like gravel, timber and recreation, as well as oil sands development being permitted.

Other suggestions and comments included a desire for greater connectivity between conservation areas; larger buffer zones to promote ecological integrity; protection of riparian areas, “Where about 80 per cent of wildlife lives and where water bodies have their intake purified by vegetation growth;” and a desire to see historical plans that included larger areas of conservation land incorporated into the plan.





Some comments referenced a few reports as offering guidelines and approaches to be followed. Other suggested approaches and strategies include:

- using international guidelines for designating conservation areas closer to 12 per cent overall;
- incorporating integrated resource plans;
- planning for forest succession and fires to sustain ecosystem;
- incorporating a defined conservation off-set process, especially for conservation;
- use of the latest data (e.g., seismic, etc.) for designation purposes;
- inclusion of quantitative Aquaculture Association of Canada (ACC) impacts in the final plan; and
- considering immediate renewal of a conservation area in future plans, and that land should not be considered as part of conservation until full reclamation has occurred.

Some commented they did not support 25-30 per cent of the LARP area being set aside for conservation areas and parks.

A number of comments expressed concern about a perceived lack of involvement or consideration of aboriginal peoples in the process, and identified numerous First Nations and Métis concerns. They questioned how the proposal will affect traditional lands, and expressed a desire to prioritize the needs of the First Nations peoples in Alberta, especially those around oil sands development.

Some suggested there needs to be detailed guidelines for trappers. Specifically, participants wondered how the needs of trappers who live on traplines in the areas are being considered, their ability to grow gardens on their traplines and availability of compensation for people who feel they've been displaced by the oil sands development.

4.4 Recreation and Tourism Opportunities

Area Specific Comments

Some felt there is a lack of recreational opportunities in the south part of the region. One suggestion was to manage the areas between Lakeland Provincial Recreation Area and the Saskatchewan border (Meadow Lake Provincial Park) for recreation/tourism because of its high recreation use and capability. Another was to add North Shore (i.e., Shelter Bay campground area—formerly a provincial parks reserve) to Cold Lake Provincial Park. Another comment suggested that for tourism to be a focus, the proposed Clearwater River Public Recreation Area needs to expand.



There were also suggestions to look at parks and recreation expansion north and south of the Lakeland area—rather than conservation designations—and expand the parks and recreation designation to Beaver Lake. There was a wish for more recreation lakes near Fort McMurray, and for the Lakeland Public Recreation Area (PRA) to be used for conservation.

There is concern that cultural sites in the region (including fur trading) must be accurately and completely documented and included in the parks and recreation areas. There is also a desire to see the Lower Athabasca River, Slave River and Peace Athabasca Delta river channels receive Heritage River status and protection for McClelland Lake, which is noted as having the most patterned fen in the Canadian Boreal Forest.

Monitoring and Enforcement

A number of comments identified a need for clarification on what industrial activity will be allowed on recreation lands. Other comments expressed a need for more regulation and protection for recreation resources of high conservation values. For example, lakes in the region between Cold Lake and Lac La Biche were cited as being damaged by random campers. There was interest in increasing the focus on managing water as a recreation and conservation resource in the area, for instance, designating lakes that have no motorized boating use.

Numerous respondents suggested more rules, monitoring and enforcement are needed, as well as resources to support the plan. Increased education for off-highway vehicle (OHV) users was proposed as a resource-efficient alternative to increased enforcement, noting that education should prove to be the best solution to proper and responsible use.

Including First Nations in the Richardson planning and implementation was suggested as a positive step. There were concerns regarding the optics of allowing industry in public land areas for recreation and tourism (PLART).

Access Management and Trail Use

Participants identified access management as necessary to prevent damage—such as motorized vehicle damage to muskeg. However, comments suggested it should not be overly restrictive, and restrictions should consider differences between snowmobiles and quads—which they considered less damaging than other all-terrain vehicles. Some felt that solutions should not eliminate motorized recreation, as this is





popular with local residents and often significant to lifestyle and employment. There was some disagreement with any plan to create parks that cannot be accessed with motorized vehicles. There was generally support for designated trails and a desire to see them for equestrian and walking use, as well as for motorized vehicles. However, they said there is a need for more information about the designated trails, where they are and how they will be planned. They stated that locals need to be involved. There was concern that some areas—especially the Richardson Backcountry—are commonly subject to damage from motorized and non-motorized activities. It was noted that some provinces charge additional fees to out-of-province users to off-set costs.

It was suggested there be some exceptions to the designated trails rule, specifically for trappers. Comments included, “Trapping is important to the area and is an important wildlife management tool; trappers want to be able to work in recreation as well as conservation areas.” There was concern that trappers will not be allowed on designated trails, and that restrictions for trappers are not equally applied to the public. They felt that limiting motorized access to designated trails only will restrict trapping and is not desirable. Some mentioned that hunters also want to leave designated trails to recover game.

Finally, there was some concern that motorized access to Crown land is being restricted due to grazing and other activities that have seen locked gates in the region. There was interest in ensuring that motorized access to backcountry trails remains available.

Lakeland Country and Other Tourism Opportunities

Comments suggested that residents are very proud of the natural features of the Lakeland area; they enjoy local recreation and are impressed with what is proposed. Most felt that people would prefer not to see it overdeveloped; they prefer a mid-to-backcountry experience. There was mixed support for designation/better management of areas, and concern over how Lakeland Country would be marketed and how associated costs would be handled.

Some suggestions for the area include:

- identifying and preserving traditional trails (e.g., Red River carts, historical use) throughout the LARP;
- Motor boating should continue in Lakeland Provincial Recreation Area and Wolf Lake and new provincial recreation areas;
- a need for more designated camping;
- changing fishing regulations so breeding stock stay in the lake; residents are leaving the province to fish elsewhere (especially in Saskatchewan);



- orchid areas as an example of a tourist attraction that should be promoted; and
- identification of winter roads and lakes on maps.

Some of the suggestions above may also be applicable throughout the region.

There were concerns about how Lakeland Country will be implemented and managed, as some communities are already said to be struggling. Many noted the need to ensure that oil and gas activity is set back from water. There were also concerns about the potential impact the Lakeland Country designation could have on grazing permits. It was felt there was a need for more consultation (i.e., for landowners and leaseholders to be specifically consulted) on the Lakeland Country approach. Some comments suggested a need for additional conservation in the Lakeland area.



In general, recreation opportunities identified included fishing and trails, but it was felt that the locations will be important, and must be selected to avoid environmentally sensitive areas and interference with trapping. Comments noted there is a potential for tourism, but there must be funding and other supports to ensure it develops effectively. There is some concern that increased tourism could lead to additional financial pressures on local residents.

General Comments

General comments for this section noted that it is important to correctly balance the need of recreational users, hunters, trappers and industry. Some questioned if there is an economic advantage to tourism at all, considering damage they feel is done to the land by tourists.

There is some concern that new locations and opportunities are still too low in the southern portion of the region relative to the population numbers, and there must be a balance between structured and unstructured recreational opportunities. There were questions regarding how existing lodges and recreation uses will be affected if they are in conservation or recreation designated areas, and if lease terms will change.



Finally, there were comments and questions regarding the co-existence of tourism and industry. Several suggested these two land uses can co-exist through thoughtful planning and implementation, while others asserted that industry destroys recreation value.

4.5 The Economic Pillar



Aboriginal Consultation

There were several comments suggesting that First Nations consultation has been inadequate, and that aboriginal consultation in general needs to be more effective in their view. Specific comments include:

- concern with protection of treaty rights but not opposed to development;
- First Nations want to be co-managers, partnering with government in decision-making towards sustainable resource development;
- if First Nations do not feel their concerns are addressed, they will fight the plan;
- First Nations engagement and involvement in land-use planning is vital and should be ongoing; and
- treaty rights and protection in the Green Area were noted. Some said the Métis have extensive knowledge and experience over the last several decades, yet felt their traditional knowledge did not seem to be considered in the plan.

Agriculture

The general perception of agriculture in the plan was that it was undervalued. Comments suggested the plan appeared to be designed more for the northern communities than for the southern ones. Some specific concerns were that:

- agriculture used to be the land-use priority—now it seems to be tourism, but people still have to eat; and
- the plan will not control loss of agricultural land.

Comments also stated that the provincial energy strategy asserts agriculture should not impede the development of energy resources in agriculture areas, and there is a proven track record of the two co-existing in the province.

Economic Diversification

Comments in this section largely stated that they felt the draft plan was overly focused on oil and gas, and there was a lack of diversification strategies—including renewable energy and green economy endeavors (e.g., solar and geothermal, local/organic farming, etc.). It was also felt that it would be short-sighted of the Alberta government to hinder potentially economically significant pieces of the Alberta economy with a wildland provincial park. Commentators suggested prohibiting industrial access in conservation and recreation lands will sterilize an important aspect of the Alberta economy.



Other comments asserted that a focus on oil and gas is not ecologically sound and will have damaging long-term consequences.

Implementation

The greatest concern with implementation in the public comments was the perceived cost associated with the plan's implementation, and the funding of economic strategies—including compensation. One comment suggested opportunity costs should be included in compensation. There were also a few comments calling for a moratorium on oil sands development until positive environmental results can be seen. Conversely, others felt that extinguishing tenure does not respect the terms of the provincial energy strategy and should not be an implementation strategy. It was also suggested that, "Oil sands leases should be left as they are. Do not develop for recreation and payout industry for leases."

Some stated that any mineral client with lands where the tenure may be extinguished should have the right to relinquish the mineral rights to the Crown and receive their "pro-rated" staking fees and "pro-rated" bonus bids back.

There were several calls that exceeding limits and industrial damage be met with severe consequences and fines in order to ensure compliance will be preferable to the consequences for non-compliance.

Infrastructure

There was concern that housing in communities such as Fort McMurray is not affordable. It was suggested that there needs to be federal, provincial and municipal dollars going to municipal infrastructure. Some felt there is too much emphasis on the oil sands, and not enough on people and the social infrastructure in the region. "Infrastructure, including social and recreational, is vital to quality of life in the region."

Comments were made that accommodation of multi-use corridors is appropriate to achieve land-use efficiency, and critical to enabling access to recreational opportunities. However, there was concern over not explicitly discussing transmission corridors in this version of the plan.

While several comments suggested that responsibility for infrastructure and ensuring it is in place before more activities are approved belongs to both the province and municipalities, one comment asserted that a lack of infrastructure should not be an excuse to limit industrial development.





General Comments

Comments on the economy ranged from assertions that:

- “the economy increases too fast in the region. Wages are too high, housing is too expensive, there are infrastructure shortages, social concerns like drug use and a poor doctor-to-citizen ratio;”
- a “moratorium on economic growth before it is out of control” should be implemented;
- there is a “need to ensure regulations are drafted to support and align with the regional economic plan;” and
- they appreciate there is a “recognition of importance of oil sands development to regional and provincial economy.”

A few comments stated a need to empower municipalities and ensure they have the tools to make decisions in both a timely and consistent manner. There was an assertion that the emphasis remains too strong on oil and gas, and the language could be clearer in regards to oil sands development. There was a query as to why forestry was built into the plan when the industry has seen—and anticipates further—decline.

There were also comments that:

- the *Alberta Land Stewardship Act* is too vague and open to interpretation; it needs clarification (along with property rights protection) before plans are implemented;
- compensation should be determined by free-market values;
- Regional Advisory Councils should be elected;
- this process allows Cabinet too much power;
- this (plan) could affect sand and gravel operations for local haulers;
- the LARP sets a precedent for other regions.
- the plan needs to acknowledge external constraints (i.e., global trading, operational costs, etc.) on development and diversification;
- there is a lack of detail on the biodiversity framework that will have a negative impact on investment;
- policy and strategic planning elements need to be clearer and more predictable, and decision-support tools need to be available to decision-makers;
- there needs to be more planning and preparation for emergency situations (e.g., oil spill, fires, etc.);
- trapping, wood cutting and spring commercial fishing will be negatively affected by the plan; and
- details are needed on how continuous improvement will occur to improve the balance between economic, environmental and social outcomes.

