

Kate Rich  
Stewardship Commissioner – Land Use Secretariat  
9915 – 108 Street, Edmonton, AB T5K 2G8

March 01, 2023

Dear Ms. Rich,

The Canadian Parks and Wilderness Society (CPAWS) Northern Alberta Chapter continues to support the government's intention to create and implement land use plans that balance and reconcile ecological, cultural and economic values. While assessing whether the Lower Athabasca Regional Plan (LARP) remains relevant and effective for the region moving forward, we have listed our recommendations below.

1. The recommendations in the ['Review Panel Report 2015'](#), which was initiated as a result of requests for review of the plan by six impacted First Nations, should be incorporated into LARP. These recommendations include:
  - A Traditional Land Use Management Framework be developed and included as an important component of LARP. The government's argument that the new conservation and recreation areas adequately address traditional land use activities has been deemed insufficient to meet the needs of the affected First Nations.
  - The traditional lands described by each First Nation applicant are being, for the most part, encroached upon and reduced by rapid industrial development. If the cumulative effects management model, as described in LARP, is to be relied upon by all stakeholders, industry, governments and the public, the balance must be more equitable between industrial activity in the region and the recognition of the rights of the First Nations residing in the area.
  - Inconclusive terms such as 'Ongoing', 'As soon as practicable' and 'Continues' are used throughout LARP, and these terms are not very helpful to the public in attempting to understand when such documents are to be completed by the Government of Alberta. It is difficult to ascertain whether timelines are being met under LARP as for many of the Outcomes and Strategies no specific dates have been established indicating their expected completion date.
2. There is a lack of specific Targets within LARP by which to measure the progress of the regional outcomes, strategies, and indicators identified in the plan. Without measurable Targets, it is difficult to assess whether changes in the Indicators are positive or negative with respect to the successful implementation of LARP. Given the advancements in data collection, availability, and monitoring metrics since LARP was drafted, the plan should be amended to include concrete Targets by which to assess the plan's overall performance and to enable more effective analysis of whether the plan is meeting its stated Outcomes.

3. Aspects of the plan related to Healthy Ecosystems and Environment, including the 'Biodiversity Management Framework', 'Water Management Frameworks', 'Air Quality Management Framework', 'Landscape Management Plan for public lands in the Green Area', and the 'Regional Parks Plan for the Lower Athabasca', are important and should be maintained. However, despite LARP now being 10 years old, these key frameworks critical to successful implementation of regional outcomes have yet to be developed, despite having completion dates in the plan for the end of 2013. The 'Biodiversity Management Framework', the 'Landscape Management Plan for public lands in the Green Area', and the 'Regional Parks Plan for the Lower Athabasca' must be completed and implemented as soon as possible. It is concerning that the economic aspects of the plan seem to have been prioritized over other regional outcomes highlighted in the plan, based on the implementation of strategies to date. While the creation of new conservation areas has been a positive step on this outcome since implementation, without these key frameworks there are significant concerns that the regional outcome of 'Landscapes are managed to maintain ecosystem functioning and biodiversity' is not being effectively addressed and is a substantial gap in the plan that needs to be remedied.
4. There is a need for clarity regarding the status of specific tools highlighted in LARP but which were not implemented as described in the original plan or which have seen ongoing delays. This includes the status of Gipsy Gordon Wildland Provincial Park, which is still awaiting confirmation in legislation through an Order in Council yet was already submitted to CPCAD as though it has been designated. This also includes the Public Land Use Zones for Recreation/Tourism, which were seemingly implemented through different policy tools than outlined in the plan. It would be useful for these aspects of the plan to be updated so that any lessons learned since their implementation can be applied to other regional planning processes and so that the public has a clear understanding of how the plan has evolved since its initial inception. In addition to this clarification needed in the Plan, we strongly recommend designation of Gipsy Gordon Wildland Provincial Park immediately.

In summary, we believe that the Land Use Secretariat, in their report to the Stewardship Minister, should recommend that the LARP requires fulsome amendments to effectively address the concerns outlined. Taking such action will help ensure that the regional plan remains relevant and effective moving forward.

Sincerely,



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