



Engagement Guide | 2026

Created by CPAWS Northern Alberta, Alberta Wilderness Association,
The Alberta Chapter of the Wildlife Society and Nature Alberta

Draft South Athabasca Sub-regional
Plan Public Survey

The South Athabasca Sub-regional Plan (SA SRP) is a draft land-use plan released by the Government of Alberta that outlines how land, natural resources, and industrial activities will be managed in the South Athabasca sub-region, which includes roads, forestry, oil and gas, recreation, and conservation.

It is now open for public review and comment from January 9 to April 9, 2026 before the plan is finalized. The plan is important because it pertains to biodiversity, Indigenous land uses, community interests, and species at risk (like caribou) while providing insight into the government's economic development and environmental protection.

This engagement guide, authored by CPAWS Northern Alberta, Alberta Wilderness Association, The Alberta Chapter of the Wildlife Society and Nature Alberta, supports concerns that the draft weakens previous habitat commitments and could further threaten caribou recovery if not improved through meaningful public input.

Background:

The sub-regional planning process was initiated to meet legal obligations to recover woodland caribou to self-sustaining levels across Alberta. This was an agreed upon process under the Canada- Alberta Conservation Agreement signed in 2020 under S.11 of the Species at Risk Act. This agreement expired in October of 2025.



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Our Concerns

- The plan puts two threatened boreal caribou populations (East Side Athabasca and Cold Lake) at further risk by allowing high levels of industrial disturbance and caribou habitat loss to continue for decades and neglecting to have environmental objectives.
- The draft plan does not commit to restoring or maintaining caribou critical habitat at the minimum 65% undisturbed threshold specified under Canada's Species at Risk Act as being required for caribou recovery.
- The draft plan does not commit to providing the mature and old forests that caribou need to survive and recover.
- The plan enables expanded oil and gas development, including in situ projects, while relying on vague references to long-term restoration, which are uncertain and unenforceable.

In the plan:

- Key access management and disturbance limits do not apply in the areas of highest industrial activity, which significantly weakens protections for wildlife and intact landscapes.
- There are virtually no constraints on development for in situ oilsands leases or any meaningful management provisions.
- The restoration and new development permission has no rationale for its rate or densities. Without clear, enforceable habitat targets and limits on new disturbance, the plan is unlikely to support caribou recovery.

How to use this guide:

The Government of Alberta survey is organized in 5 different sections. In this engagement guide, authored by non-profit organizations, we provide an overview of our reflections on each sections of the survey. You are welcome to take inspiration from “our take” but we highly encourage you to make it your own. Each section asks you how much you support aspects of the plan with opportunity for open-ended feedback. Our perspective throughout this guide is based on our careful reading of the plan.

Section 1: General Impressions

“What are your first impressions of the draft South Athabasca Sub-regional Plan?”

Overall, the draft plan appears to understand that the sub-region desperately needs to lower the levels of cumulative industrial disturbance and address the negative impacts from industrial disturbance in the region.

However, for every policy objective listed in the plan that may improve the environmental condition of the region, there are exemptions and workarounds for industry. This raises significant doubt that the plan will do anything but further degrade the environment.

The commitment to Indigenous-led conservation areas in the Cold Lake Air Weapons Range (CLAWR) and a restoration plan that will see the Bohn region restored to intact habitat are good steps.

The remainder of the plan provides no commentary on the current state of the land or clarity on the projected state of the land following plan implementation. It provides no assurances that recovery objectives for at risk woodland caribou will be met or evidence of improving environmental conditions for other species.

Conservation areas identified in the forestry section that will prevent timber harvest are a positive step for caribou. However, any benefits from this approach will be far outweighed by the plan’s subservience to the energy industry and the removal of the regional objective of caribou habitat recovery to 65% undisturbed.

The SRP is a lost opportunity to change the status quo in Alberta and make meaningful changes in line with the decades of recommendations and feedback provided by stakeholders outside of the energy sector.

Section 2: Feedback on specific aspects of drafts plan and related regulatory details

Landscape restoration

“How supportive are you of managing landscape restoration in this way?”

Mostly supportive.

“How would these changes to landscape restoration affect you?”

Our Take

The landscape is currently too disturbed to support woodland caribou survival and recovery. The SRP’s focus on restoration would be beneficial if it enabled the recovery of the landscape to a more intact forest that in turn will benefit caribou recovery.

- We are supportive of the focus on restoration, especially of the requirement to restore caribou biophysical habitat and wetlands to a landscape capable of producing the same habitat conditions.
- We are concerned that the objective of the restoration is to support choices for future industrial disturbance, rather than to restore ecological integrity and achieve the minimum amount of habitat necessary to support ecological function and recover species at risk, such as caribou.

- The goals of the restoration within caribou range should be to meet a minimum of 65% undisturbed habitat and restore biophysical habitat for caribou.
- Deadlines and targets for inactive or unproductive well-based footprints, as well as commitments to publish progress towards restoration, will enable organizations and members of the public to better hold companies accountable to their restoration requirements.
- The restoration timelines should be shorter in order to better meet caribou recovery objectives.
- There should be consequences for failing to meet the restoration requirements.

The restoration requirements for forestry and the timelines presented appear reasonable but would be improved by being tied to caribou habitat recovery objectives.

The energy industry

"How supportive are you of managing energy development in this way?"

Not supportive at all.

"How would these changes in energy development affect you?"

Our Take

Doubling oil and gas production will diminish future quality of life because it will further threaten biodiversity, the environment and increase and accelerate the impacts of climate change.

- The Go-Zone misses a significant opportunity to manage cumulative effects within the sub-region and reduce the negative impacts on the regional environment.
- The plan proposes to exempt setbacks for new footprints around riparian areas for most development types including energy development. Reducing riparian buffers for energy development is inappropriate when those setbacks are already the minimum for aquatic health and ecosystem integrity.

The plan does include measures of roadway development; however, it does not include provisions for most types of surface disturbance, nor include in-situ areas nor commit to reducing the cumulative disturbance to a level that is survivable by caribou.

- Cumulative disturbance targets by decade should meet caribou habitat requirements (e.g. maximum 35% disturbance considering ALL disturbance types).
- In-situ sites should not be exempt from improving habitat conditions through minimizing disturbances and restoration activities.
- Limiting new or amended surface dispositions within caribou range will be a positive change for caribou critical habitat conservation and caribou recovery.

As it is, the plan will not permit the survival and recovery of caribou.

Forestry industry

"How supportive are you of managing forestry in caribou range in this way?"

A little supportive.

"How would these changes to forestry management affect you?"

Our Take

The plan lacks clarity on how the proposed forest harvest management and forest harvest sequencing will impact caribou habitat.

- There is no evidence provided in the plan that caribou habitat recovery to 65% undisturbed could be met with the proposed harvest timing sequence.
- We are supportive of the proposed conservation areas within the forest harvest sequence as they appear to overlap with areas of caribou use.

Forest harvest sequencing should be proposed for the 'go zone' areas outside of caribou range. There are other biodiversity values present outside of caribou range that are missed by limiting the forest harvest plan to the caribou range.

Access Management

“How supportive are you of managing road access this way?”

Not supportive at all.

“How would these changes to managing road access affect you?”

Our Take

It is unclear how the access management approach of the plan meets environmental goals unless the goals are to maintain the status quo. There are no ecosystem health-based targets for road densities, and many prevalent access types appear to be exempt from the proposed changes.

- The target road densities for each zone do not appear to be related to ecological thresholds for sustainable wildlife populations.
- Integrating primary access roads to reduce road duplication across the sub-region is good in principle. However, the draft plan’s access management approach appears designed to accommodate the road-related needs of forestry and oil and gas development, rather than meaningfully reducing overall landscape fragmentation.
- There appear to be many potential exemptions to the access management provisions of the plan.

- Key access management requirements do not apply within in-situ project areas, where road density outcomes and appended development rules are excluded. Similarly, many forestry roads are not formal dispositions and are therefore not subject to the access management approach. These exemptions significantly limit the plan’s ability to reduce cumulative impacts in the areas with the highest levels of disturbance.
- Allowing roads to cross riparian areas along the most direct and practical routes increases risks to water quality and sensitive habitats. While the plan requires restoration when road density thresholds are exceeded, these requirements do not apply to in-situ projects. As a result, the approach is unlikely to create meaningful reductions in road density or improve long-term ecological integrity.
- We are supportive of preventing new highways or permanent roads to be built within caribou range.

We are concerned that the access management plan will not enable caribou recovery and will further degrade the natural environment.

Recreation and tourism

"How supportive are you of managing recreation and tourism in this way?"

A little supportive.

"How would these changes to recreation and tourism management affect you?"

Our Take

It is important to us that recreational activities are managed in a way that does not contribute to environmental degradation or harm local ecosystems.

- We support the draft plan's commitment to cooperative planning and management of recreation areas with Indigenous communities, including respecting Indigenous knowledge, traditional land use and Treaty rights.
- Recreation and tourism should only be supported where they are truly compatible with ecological values, including wildlife habitat, water protection, and intact landscapes.

- While the plan mentions managing recreation in ways that support caribou recovery and biodiversity, it also allows new recreation trails within caribou ranges, which risks increasing disturbance in an already stressed habitat.
- Without clear thresholds, limits, and exclusions, recreation development could undermine conservation efforts, particularly for caribou and sensitive riparian ecosystems.
- Timing restrictions for OHV access should apply across all caribou range, not solely the White Muskeg

Stronger, clearer limits on recreation and tourism development are needed to ensure that increased access does not come at the expense of wildlife, water, and long-term ecological health.

Conservation Areas

“How supportive are you of establishing new conservation areas in the Cold Lake Air Weapons Range?”

Fully supportive.

“How would establishing conservation areas in the Cold Lake Air Weapons Range affect you?”

Our Take

Establishing new conservation areas is an effective tool for the conservation of nature and the survival and recovery of species at risk, such as woodland caribou. To be effective in safeguarding the environment and protecting species at risk, conservation areas must be managed for those goals.

- Indigenous-led management of the conservation areas is an excellent way to achieve caribou recovery and exercise treaty rights.
- Conservation areas should be managed to achieve full recovery and conservation of critical habitat for caribou.
- The proposed conservation areas within the draft South Athabasca Sub-regional Plan should be designated under the appropriate legislation that supports Indigenous-led management and long-term conservation of biodiversity – public land does not meet protected area criteria.

As currently drafted, the conservation area proposal commits to ongoing energy development. It permits both the renewal of and consideration of new activities that allow oil and gas extraction from the conservation areas, which does not appear to be different from the proposed adjacent ‘go-zone’. Conservation areas should not permit ongoing and new permanent disturbances to the critical habitat of species at risk, such as caribou.

Implementation of Lower Athabasca Regional Plan commitments.

“How supportive are you of changing the designation of this area to a Public Land Use Zone (PLUZ)?”

Not supportive at all.

“How would establishing the Clearwater River Conservation Area as a Public Land Use Zone (PLUZ) affect you?”

Our Take

Many years went into developing and putting forward the Gipsy Gordon Wildland Provincial Park, which was just recently finalized. It would be inappropriate to, at this stage, remove parts of this park and roll back environmental protections.

Multi-use corridor

“How supportive are you of creating a multiuse corridor at this location?”

Not supportive at all.

“How would creating this multiuse corridor affect you?”

Our Take

Creating a multiuse corridor through the Clearwater River PLUZ would not benefit wildlife or improve ecological conditions of the region. While the corridor proposed is outside the caribou ranges and existing protected areas, it would increase industrial access, traffic, and human activity north and south of the river, adding pressure to an already heavily disturbed landscape.

Linear infrastructure corridors fragment habitat, disrupt wildlife movement, increase mortality risk, and create long-term barriers to ecological connectivity, particularly along river systems.

Section 3: Overall success of the plan

Outcome 1: Create economic opportunities that benefit local residents, Indigenous communities, and all Albertans.

“How successful do you think the plan will be in supporting economic opportunities?”

Neutral.

Our Take

Economic activities that permanently and irreversibly change the environment – such as those that prevent the recovery of species at risk or irreparably damage waterways for temporary economic gain do not support long-term economic opportunities for the region.

Outcome 2: Manage development carefully to keep the landscape healthy and intact and to protect plants and wildlife — especially species at risk, like caribou.

“How successful do you think the plan will be in protecting the environment and supporting species at risk?”

Not supportive at all.

Our Take

The draft South Athabasca Sub-regional Plan (SA SRP) is driven by an unwavering devotion to industrial expansion. This is incompatible with protecting what Albertans value most, their environment and the wildlife that should be able to thrive in it.

The draft plan contains no demonstration that its proposed policy changes will support ecological integrity of the area. Environmental health is not prioritized in the permitted activities, nor is it recognized in the many exemptions to restoration or development-limiting policies.

Outcome 3: Support recreational, cultural, and traditional land uses, including constitutionally recognized rights in the sub-region, for the benefit of Indigenous people, local people and all Albertans.

“How successful do you think the plan will be in supporting recreation, culture, and traditional land uses?”

A little supportive.

Our Take

Many sections of the plan commit to Indigenous-led planning for recreation and conservation, however numerous policy exemptions for the energy and other industries make us skeptical that the outcomes for these can be fully met.

“Is there any additional information you would like to provide to explain your responses to the last three questions?”

Our Take

The entire plan focuses on doubling oil and gas production but does not consider the massive water quantities needed, and the plan does not consider impacts to waterbodies and water flow/wetland health across the region.

Section 4: Incorporating the South Athabasca Sub-regional Plan into the Lower Athabasca Regional Plan

“What are your thoughts about adding the South Athabasca Sub-regional Plan and its regulatory details into the Lower Athabasca Regional Plan?”

Our Take

This pathway process makes sense, however as currently drafted the South Athabasca Regulatory Details and Plan will not effectively manage cumulative disturbance on the landscape to recover at-risk caribou. The draft plan and draft regulatory details will fail to protect or recover caribou, which will fail to meet the legal obligations of Alberta to recover species at risk.

The Lower Athabasca Regional Plan underwent a panel review in 2015 and a 10-year review in 2022, during which time many recommendations were put forward. These should be considered and incorporated when amending the Lower Athabasca Regional Plan to include the South Athabasca Sub-Regional Plan (SA SRP).

Section 5: Tell us about you.

Answer as you would like.