

Engagement Guide

for the draft Berland, Caribou Mountains and Red Earth Sub-regional Plans Surveys

Created by CPAWS Northern Alberta, Alberta Wilderness Association, and Nature Alberta.

Photo Credit: C. Hunter

CPAWS
CANADIAN PARKS AND WILDERNESS SOCIETY
NORTHERN ALBERTA CHAPTER

AWA
Alberta Wilderness Association

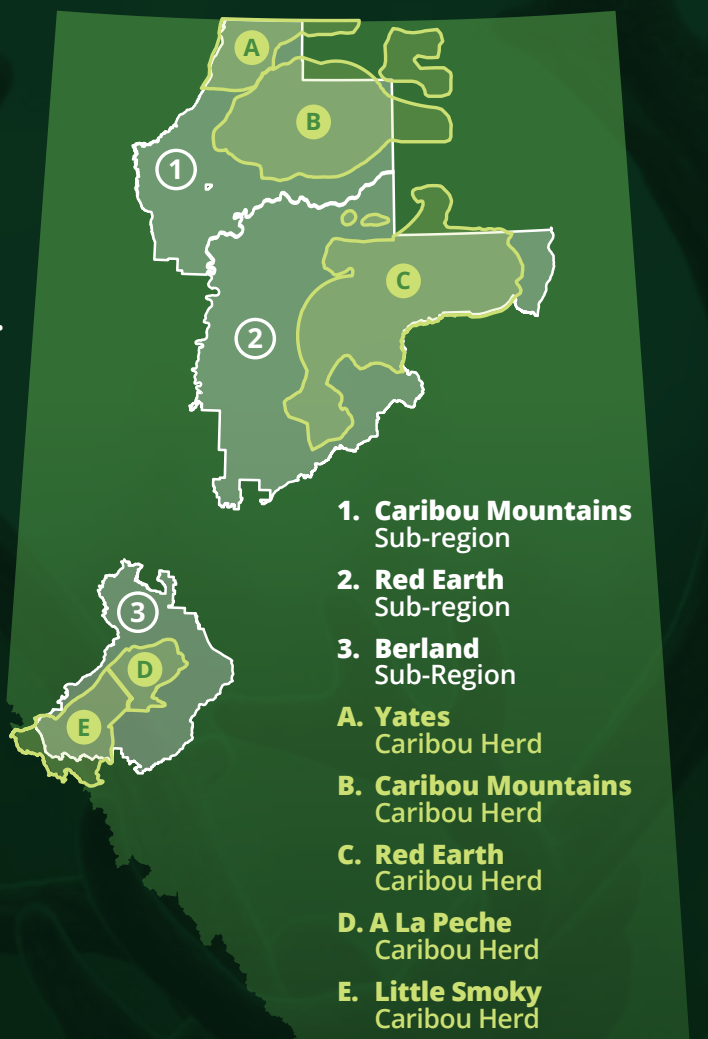
NATURE ALBERTA

3 Draft Plans

The Government of Alberta is asking for feedback on three draft sub-regional plans.

These plans will shape how land and natural resources are managed, including forestry, oil and gas, roads, recreation and conservation.

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 Section 11 of the Species at Risk Act. This agreement expired in October of 2025. It is expected that the remaining overdue sub-regional plans will be released by April of 2027.



Why We're Concerned

Caribou habitat is already under heavy pressure.

The draft plans neglect environmental objectives and put five threatened caribou subpopulations at further risk by allowing high levels of industrial disturbance and caribou habitat loss to continue for decades.

The plans don't show a path to enough undisturbed habitat.

The draft plans do not demonstrate any potential to achieve the commitment of restoring or maintaining caribou habitat to the minimum 65% undisturbed threshold specified under Canada's Recovery Strategies for both boreal and southern mountain caribou as being required for caribou recovery.

None of the caribou ranges within these sub-regions currently meet the 65% undisturbed threshold. The situation is particularly dire in the Little Smoky range, which has almost no undisturbed habitat remaining (0.7%).

Mature and old forests could continue to be lost.

The draft plans will result in further loss of mature and old forests that caribou need for their survival and recovery, further contributing to already significantly disturbed ranges.

Wood bison habitat also lacks sufficient safeguards.

The Caribou Mountains and Red Earth sub-regions also overlap with six wood bison ranges, yet the plans do not provide sufficient safeguards to prevent further bison habitat degradation or recovery impediments from industrial activities.

Oil and gas expansion is paired with uncertain future restoration.

The draft plans commit numerous times to doubling oil and gas production across Alberta, prioritizing expanding oil and gas development, while relying on vague references to long-term restoration of human footprint, which are uncertain and unenforceable.

You don't need to be an expert to participate!

Choose the survey for the region you want to comment on, then use this guide to work through the questions.



Caribou Mountains

ENGAGEMENT PERIOD CLOSES:

~~October 26, 2026~~ (EXTENSION GRANTED)

February 1, 2027

VIEW THIS DRAFT SUB-REGIONAL PLAN

This sub-region's elevated plateaus, Caribou mountains, wetlands and interconnected watersheds support a diverse group of habitats and a range of ecological functions and contribute to the quality of life and culture of local people. Caribou Mountains is home to the Yates and Caribou Mountains caribou herds, and it also overlaps partially or completely with the Wentzel, Etthithun and Hay Zama wood bison ranges.

Complete the Caribou Mountains Engagement Survey



Red Earth

ENGAGEMENT PERIOD CLOSES:

~~October 26, 2026~~ (EXTENSION GRANTED)

February 1, 2027

VIEW THIS DRAFT SUB-REGIONAL PLAN

This sub-region covers 61,306 119933km^2 of northern Alberta, and encompasses boreal forests, wetlands, river systems and agricultural land. Red Earth is home to the Red Earth caribou herd and it overlaps completely or partially with the Wabasca, Ronald Lake and Garden River wood bison ranges.

Complete the Red Earth Engagement Survey



Berland

ENGAGEMENT PERIOD CLOSES:

~~November 12, 2026~~ (EXTENSION GRANTED)

February 1, 2027

VIEW THIS DRAFT SUB-REGIONAL PLAN

This sub-region covers 19,526 km^2 in west-central Alberta. Its northern boundary largely consists of the Simonette River, while the southern boundary is predominantly the border between Willmore Wilderness Area and Jasper National Park. The sub-region's landscape is dominated by upper and lower foothills. It contains many lakes and wetlands and is crisscrossed by several rivers. Berland is home to the A La Peche and Little Smoky caribou herds.

Complete the Berland Engagement Survey



TOPIC 1 OF 6:

Landscape Restoration

RELEVANT FOR ALL 3 SUB-REGIONAL SURVEYS

✓ Caribou Mountains ✓ Red Earth ✓ Berland

SURVEY QUESTION:

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

OUR POSITION:

Unsupportive	Somewhat Unsupportive	Neutral	Somewhat Supportive	Supportive
○	○	○	◉	○

OUR TAKE AT A GLANCE (SIMPLIFIED SUMMARY):

Proposed restoration timelines are too long.

Caribou habitat disturbed by industrial activities can take decades to meet caribou needs. Restoration targets and timelines should reflect this reality.

Restoration cannot replace existing habitat.

Protect current undisturbed and critical habitat while restoration is underway. Destroying functioning habitat now and restoring different habitat later is not an equivalent trade-off.

Proposed restoration rules are inadequate.

Restoration should repair damaged land, not make room for more industrial development. The plans should work toward at least 65% undisturbed habitat in each caribou range and prevent an overall loss of wetlands. Restoration commitments need measurable targets, timelines, monitoring, and accountability.

OUR TAKE (IN FULL): **Click here for a more detailed explanation.**

INVITATION FOR WRITTEN FEEDBACK:

How would these proposed restoration requirements affect you or your activities?

EXAMPLE RESPONSE:

I support restoring disturbed caribou habitat and wetlands, but restoration should not be used to justify more industrial disturbance. Habitat can take decades to recover, so existing undisturbed and critical habitat needs protection now while damaged areas are restored. I want the plan to work toward at least 65% undisturbed habitat in each caribou range, with clear targets, shorter timelines, monitoring and consequences when requirements are not met. I'm also concerned that the Level 2 and Level 3 guidelines could result in a net loss of wetlands.

You may **copy**, **paste** and **edit** this response if it helps you express your personal position.

TOPIC 2 OF 6 (CARIBOU MOUNTAINS & BERLAND):

Well-Based Energy and Minerals



THIS TOPIC IS A BIT DIFFERENT IN THE RED EARTH SURVEY
CLICK HERE FOR THE RED EARTH VERSION OF THIS SUBJECT.

✓ Caribou Mountains X Red Earth ✓ Berland

SURVEY QUESTION:

How supportive are you of managing the energy industry in this way?

OUR POSITION:

- (●) Unsupportive
- ( ) Somewhat Unsupportive
- ( ) Neutral
- ( ) Somewhat Supportive
- ( ) Supportive

OUR TAKE AT A GLANCE (SIMPLIFIED SUMMARY):

Oil and gas expansion puts more pressure on already damaged landscapes.

Limit further habitat loss and reduce the additional pressure that energy development places on water, wildlife and the climate.

Proposed limits still allow development within caribou habitat.

Strengthen restrictions on energy development in caribou ranges to prevent further habitat loss and fragmentation.

The proposed Go-Zone does not adequately address environmental impacts.

Account for the combined effects of existing and future industrial development, rather than looking at each project by itself.

OUR TAKE (IN FULL): **Click here for a more detailed explanation.**

INVITATION FOR WRITTEN FEEDBACK:

How would the proposed changes in managing the energy industry affect you?

EXAMPLE RESPONSE:

I'm concerned that these plans support expanding oil and gas production in landscapes that are already heavily disturbed. Limiting some new surface disturbance in caribou ranges is a positive step, but development is still allowed and can add more fragmentation and cumulative impacts. I want stronger limits on disturbance, including in the Go-Zone, and a clear explanation of how energy development can proceed without undermining caribou recovery or adding further pressure on water, wildlife and the climate.

You may **copy**, **paste** and **edit** this response if it helps you express your personal position.

TOPIC 2 OF 6 (RED EARTH):

Energy



THIS PAGE ONLY APPLIES TO THE ENERGY SECTION OF THE **RED EARTH** SURVEY.

X Caribou Mountains ✓ Red Earth X Berland

SURVEY QUESTION:

How supportive are you of managing the energy industry in this way?

OUR POSITION:

- (●) Unsupportive
- ( ) Somewhat Unsupportive
- ( ) Neutral
- ( ) Somewhat Supportive
- ( ) Supportive

OUR TAKE AT A GLANCE (SIMPLIFIED SUMMARY):

Proposed oil and gas expansion will increase environmental damage.

The Red Earth plan allows more energy development in an already disturbed landscape. Stronger limits are needed to reduce the combined impacts on land, water, wildlife and the climate.

Proposed limits still allow development within caribou habitat.

Strengthen restrictions on energy development in caribou ranges to prevent further habitat loss and fragmentation.

In-situ oil sands development adds pressure on water and the climate.

In-situ projects use significant amounts of water, produce greenhouse gas emissions and fragment habitat. The plan needs stronger safeguards that account for these impacts alongside other industrial activity.

OUR TAKE (IN FULL): **Click here for a more detailed explanation.**

INVITATION FOR WRITTEN FEEDBACK:

How would the proposed changes in managing the energy industry affect you?

EXAMPLE RESPONSE:

I don't think the Red Earth plan goes far enough to protect an already disturbed landscape from additional energy development. Development is still allowed within caribou habitat, where it can add more fragmentation. I'm also concerned about in-situ oil sands development because it uses significant amounts of water, has high greenhouse gas emissions and further fragments habitat. I want the plan to look at all of these impacts together and set stronger limits that support caribou recovery.

You may **copy**, **paste** and **edit** this response if it helps you express your personal position.



TOPIC 3 OF 6 (BERLAND ONLY):

Coal

THIS PAGE IS ONLY RELEVANT TO THE **BERLAND** SURVEY.

X Caribou Mountains X Red Earth ✓ Berland

SURVEY QUESTION:

How supportive are you of managing coal development in this way?

OUR POSITION:

- (●) Unsupportive
- ( ) Somewhat Unsupportive
- ( ) Neutral
- ( ) Somewhat Supportive
- ( ) Supportive

OUR TAKE AT A GLANCE (SIMPLIFIED SUMMARY):

Coal mining can damage habitat far beyond the mine itself.

Protect wildlife habitat from the additional roads, infrastructure and land disturbance associated with coal development.

Coal pollution can spread into surrounding rivers, forests and air.

Prevent selenium and other contaminants from entering waterways and address coal dust that can travel beyond mining operations.

The plan relies on a coal policy that is still being developed.

Because the final policy is not yet available, our ability to assess how it will manage coal development and its impacts on caribou is limited. We are also concerned that it is being developed alongside industry.

OUR TAKE (IN FULL): **Click here for a more detailed explanation.**

INVITATION FOR WRITTEN FEEDBACK:

How would the proposed approach for managing coal development affect you?

EXAMPLE RESPONSE:

I'm concerned that the Berland plan relies on coal policy that is still being developed through the Coal Industry Modernization Initiative (CIMI). Without the final policy, it is difficult for me to understand how future coal development would be managed or what its impacts could be on caribou habitat, water and other environmental values. I'm also concerned that CIMI is being developed alongside industry. I want the final plan to clearly explain what protections will apply before new coal development proceeds.

You may **copy**, **paste** and **edit** this response if it helps you express your personal position.

TOPIC 4 OF 6:

Forestry

RELEVANT FOR ALL 3 SUB-REGIONAL SURVEYS

✓ Caribou Mountains ✓ Red Earth ✓ Berland

SURVEY QUESTION:

How supportive are you of managing forestry in this way?

OUR POSITION:

- (●) Unsupportive
- ( ) Somewhat Unsupportive
- ( ) Neutral
- ( ) Somewhat Supportive
- ( ) Supportive

OUR TAKE AT A GLANCE (SIMPLIFIED SUMMARY):

Proposed logging plans could further damage caribou habitat.

The plans don't show whether enough habitat will recover.

Proposed forestry restrictions still leave sensitive habitat exposed.

Make sure where and when forests are logged supports habitat recovery instead of adding more disturbance to already damaged areas.

Provide clear forecasts showing how logging and other industries will affect forests over time and whether caribou ranges can reach at least 65% undisturbed habitat.

Strengthen protections for caribou ranges and other sensitive areas, including places where logging can continue under existing agreements.

Specific to Red Earth: The plan does not adequately address the conservation needs of the Wabasca wood bison population. Stronger protections are needed to prevent logging and other disturbance within their range.

Specific to Berland: The Berland plan allows new forestry tenure within caribou range and raises additional concerns about A La Peche access to winter habitat.

OUR TAKE (IN FULL): **Click here for a more detailed explanation.**

INVITATION FOR WRITTEN FEEDBACK: **How would these changes to forestry affect you?**

EXAMPLE RESPONSE (C. MOUNTAIN):

I'm concerned that the proposed forestry approach will add more disturbance to caribou habitat without showing when enough habitat will recover. I support not issuing new long-term forestry tenure in caribou ranges, but existing quota tenures can still allow logging. I want clear modelling that shows how forestry and other industrial activity will affect undisturbed habitat over time, and whether the Yates and Caribou Mountains ranges can move toward the 65% undisturbed-habitat target needed for recovery.

EXAMPLE RESPONSE (RED EARTH):

I'm concerned that the proposed forestry approach will increase disturbance without showing whether enough caribou habitat will recover over time. Existing quota tenures can still allow logging even where new long-term tenure is restricted. I'm also concerned about the vulnerable Wabasca wood bison population. I want the plan to prohibit logging and other disturbances within their range and provide clear modelling showing how forestry and other industrial activity will affect caribou habitat over time.

EXAMPLE RESPONSE (BERLAND):

The Berland forestry proposal is especially concerning because very little undisturbed caribou habitat remains: 12.5% in the A La Peche winter range and 0.7% in the Little Smoky range. The proposed harvest plans would also cut off A La Peche caribou from their winter range. I want the plan to protect remaining critical habitat, maintain access to winter habitat, restrict new forestry tenure in caribou range, and show how forestry decisions will support recovery instead of adding more disturbance.

You may **copy**, **paste** and **edit** one of these responses if it helps you express your personal position.



TOPIC 5 OF 6:

Road Access

RELEVANT FOR ALL 3 SUB-REGIONAL SURVEYS

✓ Caribou Mountains ✓ Red Earth ✓ Berland

SURVEY QUESTION:

How supportive are you of the proposed access management approach?

OUR POSITION:

- (●) Unsupportive
- ( ) Somewhat Unsupportive
- ( ) Neutral
- ( ) Somewhat Supportive
- ( ) Supportive

OUR TAKE AT A GLANCE (SIMPLIFIED SUMMARY):

Proposed road limits don't clearly address wildlife needs.

Set road-density limits based on evidence of what caribou and other wildlife need to survive and recover.

Too many roads are exempt from the proposed rules.

Strengthen the rules so forestry roads and other exemptions don't undermine efforts to reduce habitat disturbance.

The proposed road approach may not reduce habitat fragmentation enough.

Road planning should reduce overall fragmentation and protect connections between areas of caribou habitat, rather than focusing mainly on accommodating existing road needs.

OUR TAKE (IN FULL): **Click here for a more detailed explanation.**

INVITATION FOR WRITTEN FEEDBACK:

How would these changes to road access and management affect you?

EXAMPLE RESPONSE:

I'm concerned that the proposed road-density limits are not clearly tied to what caribou and other wildlife need to recover, and that exemptions could leave habitat fragmented. Many forestry roads are not formal dispositions and may fall outside these rules. Integrating roads and avoiding new permanent roads in caribou ranges are positive steps, but I want the plan to reduce overall road disturbance, protect connections between areas of habitat, use clear ecological evidence for its road-density targets, and limit exemptions across industries.

You may **copy**, **paste** and **edit** this response if it helps you express your personal position.

TOPIC 6 OF 6:

Recreation and Tourism



RELEVANT FOR ALL 3 SUB-REGIONAL SURVEYS

✓ Caribou Mountains ✓ Red Earth ✓ Berland

SURVEY QUESTION:

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

OUR POSITION:

Unsupportive	Somewhat Unsupportive	Neutral	Somewhat Supportive	Supportive
○	◉	○	○	○

OUR TAKE AT A GLANCE (SIMPLIFIED SUMMARY):

New recreation trails could further disturb caribou habitat.

Set clear limits on where new trails can be built and keep sensitive wildlife habitats protected.

Recreation depends on healthy natural areas.

Manage where, when and how much recreation takes place so wildlife, water and healthy landscapes remain protected while respecting Treaty Rights.

More recreation could add to existing pressure on the land.

If recreation and tourism grow, reduce other industrial disturbance so more access does not come at the expense of wildlife, water and long-term environmental health.

Specific to Berland: All-Season Resort development could add more pressure to sensitive landscapes. Resort planning should account for ecological values, cumulative impacts and caribou recovery. Parks and protected areas should not be redesignated to accommodate resort development.

OUR TAKE (IN FULL): **Click here for a more detailed explanation.**

INVITATION FOR WRITTEN FEEDBACK:

How would these approaches to recreation and tourism affect you?

You may **copy**, **paste** and **edit** one of these responses if it helps you express your personal position.

EXAMPLE RESPONSE:

I value opportunities to enjoy Alberta's natural areas, but new recreation trails in caribou ranges could add more disturbance to already stressed habitat. I want recreation planning to protect wildlife, water and intact landscapes while respecting Treaty Rights. If recreation and tourism expand, other extractive industrial disturbance should be reduced where needed so increased access does not come at the expense of the healthy natural areas that recreation and tourism depend on.

EXAMPLE RESPONSE (BERLAND):

I value recreation and tourism that depend on healthy natural landscapes, but I'm concerned that new trails and All-Season Resort development could add more pressure to the Berland sub-region. Resort planning should account for caribou recovery, ecological values, cumulative impacts and Treaty Rights. I do not support redesignating parks or protected areas to accommodate resort development, or treating offsets elsewhere as a replacement for protecting those lands.

One Last Question

RELEVANT FOR ALL 3 SUB-REGIONAL SURVEYS

✓ Caribou Mountains ✓ Red Earth ✓ Berland

OUR TAKE:

Use this space for what matters most to you.

You might:

1. **Name your biggest concern. Caribou habitat? Wood bison? Water? Forestry? Coal? Recreation?**
2. **Say why it matters to you.**
3. **Say what you want the final plan to do differently.**

INVITATION FOR WRITTEN FEEDBACK:

Do you have anything else that you'd like to share about the sub-regional plan, and its regulatory details?

Thank you for making a difference.

Your feedback matters.

If you've only completed one survey, there are two more opportunities to have your say on Alberta's draft sub-regional plans.

Complete the Caribou Mountains Engagement Survey

Complete the Red Earth Engagement Survey

Complete the Berland Engagement Survey



Our Take

The earlier pages summarize the main concerns raised by CPAWS Northern Alberta, Alberta Wilderness Association and Nature Alberta.

This section includes our full-length explanations for each survey topic.

Landscape Restoration

Restoration is one of the more important tools in these sub-regional plans because these landscapes are too disturbed to support caribou survival and recovery. However, restoration should be used to recover ecological function and caribou habitat—not to justify or enable more industrial disturbance.

- We support requirements to restore disturbed habitat, particularly requirements to restore caribou biophysical habitat and wetlands to conditions capable of supporting the same ecological functions in the future. However, restoration requirements need to recognize that caribou habitat disturbed by industrial activities can take decades to regain the characteristics caribou need. Restoration targets and timelines should reflect this reality.
- Restoration should not be treated as a replacement for protecting existing habitat. Destroying functioning habitat today and promising to restore different habitat sometime in the future is not an equivalent trade-off.
- Restoration should improve the overall ecological condition of the landscape rather than simply create opportunities for future industrial development.
- The primary goal of restoration within caribou ranges should be to increase habitat intactness and support caribou recovery, including working toward the federal recovery strategy's target of at least 65% undisturbed habitat (all the caribou ranges within these sub-regions are significantly below this target).
- We are concerned that 'Level 2' and 'Level 3' restoration guidelines will result in a net loss of wetlands across the sub-regions.
- Restoration timelines should be significantly shorter to better meet caribou recovery objectives. Plans that take decades to restore habitat while allowing disturbances to continue do not provide a credible path to recovery.
- There should be greater consequences for failing to meet the restoration requirements. Restoration commitments need measurable targets, timelines, monitoring, and accountability.

Energy Development

These plans will contribute to the province's goal of doubling oil and gas production, increasing industrial land disturbance, greenhouse gas emissions, and pressure on water and wildlife. Expanding fossil fuel production within these sub-regions will add to cumulative environmental impacts across already heavily disturbed landscapes, while further contributing to climate change, which is already affecting ecosystem health, wildlife, communities and people far beyond these sub-regions.

- Limiting new surface disturbance within caribou ranges is a positive step. However, the plan ultimately still permits surface and sub-surface development within caribou ranges, allowing further fragmentation and cumulative disturbance.
- The Go-Zone misses a significant opportunity to manage cumulative effects within the sub-region and reduce negative impacts on the regional environment.
- The proposed approach is insufficient to support the survival and recovery of caribou.

SPECIFIC TO RED EARTH SURVEY

The draft Red Earth Sub-regional Plan allows in-situ oil sands development as part of the proposed expansion of oil and gas production. In-situ oil sands operations have high greenhouse gas emissions and thus contribute substantially to climate change. These projects also require significant amounts of water, adding further pressure to water resources and ecosystems, while further fragmenting the landscape.

Coal Development

SPECIFIC TO BERLAND SURVEY

The impacts of coal development are not limited to the area directly disturbed by a mine. Both underground and surface mining operations remove vegetation and wildlife habitat, fragment landscapes through roads and infrastructure, degrade downstream water quality and aquatic ecosystems, and release coal dust into the atmosphere, reducing air quality.

Coal mining also results in selenium and other contaminants from disturbed rock being released into the surrounding environment. Research in Alberta has documented elevated selenium, which is highly toxic to fish and other vertebrates in elevated concentrations and other mining-related contaminants downstream of coal mines, including impacts that can persist long after mines have closed or been reclaimed. There is no proven method to remove selenium from waterways once released. Recent research has also documented fugitive coal dust depositing into watersheds far from its source mines, meaning that the area impacted by future development is much larger than previously understood.

- Delegation of coal policy in the sub-region to the Coal Industry Modernization Initiative (CIMI), which has yet to be released, limits our ability to credibly comment on its ability to manage coal development and its impact on caribou in the sub-region.
- As acknowledged on the Government of Alberta's web page, the CIMI policy is being developed alongside industry partners, raising concerns about the meaningful incorporation of environmental and public interests in the policy.

Forestry

The plans show that proposed forest harvest management and forest harvest sequencing will increase disturbance of caribou habitat. The plans do not include analysis of how undisturbed habitat will change over time and no evidence that 65% undisturbed habitat could be met even 100 years from now with the proposed forestry plans.

- Not issuing any new long-term tenure within Nature-first zones and caribou ranges in the Red Earth and Caribou Mountains is a positive step. However, existing quota tenures will continue and thus increase forestry disturbance within Nature-first zones and caribou ranges.
- The subregional plans are relying on aggregate harvesting as the means to ensure that caribou habitat is established in the long term. However, since modeling of undisturbed habitat over time is not provided, it is not possible to assess whether these changes will increase undisturbed habitat or if disturbances from other industries will cancel out any benefits of this approach.

SPECIFIC TO RED EARTH SURVEY: WABASCA WOOD BISON

The plan does not adequately address the conservation needs of wood bison, another species at risk that relies on intact boreal habitat. The Wabasca wood bison population is particularly vulnerable, and the plan should prohibit logging and other disturbances within their range.

SPECIFIC TO BERLAND SURVEY: FORESTRY AND WINTER HABITAT

- Unlike the Red Earth and Caribou Mountain plans, the Berland plan does not prohibit new forestry tenure within caribou range leading to further habitat disturbance and impeding caribou recovery. This is extremely concerning as the caribou herds in the Berland sub-region currently have very little undisturbed habitat left (A La Peche winter range 12.5%; Little Smoky range 0.7%)[1].
- The proposed harvest plans for the Berland sub-region would cut off the A La Peche population's access to their winter range, restricting them to mountainous areas on a year-round basis. These areas are not optimal winter habitat, and this increasingly restricted distribution contributes to elevated rates of mortality. Yet, the draft Berland Sub-regional Plan will allow for the continued loss of critical habitat, that will result in profound and escalating threats to the persistence and recovery of the two caribou populations in the sub-region.

1 *Report on the implementation of the section 11 agreement for the conservation and recovery of the woodland caribou in Alberta, 2023.*

Access Management

It is unclear how the access management approach of the plan meets environmental goals. The rationale for road density thresholds is not provided in the plans and does not demonstrate how these thresholds work to meet caribou recovery goals. 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-regions is good in principle. However, the access management approaches in the plans appear designed to accommodate the road-related needs of industry, rather than meaningfully reducing overall landscape fragmentation.
- There appear to be many potential exemptions to the access management provisions of the plans.
- Many forestry roads are not formal dispositions and are therefore not subject to the access management approaches. These exemptions significantly limit the plans' abilities to reduce cumulative impacts in areas with already high levels of disturbance.
- We are supportive of preventing new highways or permanent roads to be built within caribou ranges
- We are concerned that the access management plans will not enable caribou recovery and will further degrade the natural environment.

Recreation and Tourism

While the plans mention managing recreation in ways that support caribou recovery and biodiversity, they also allow 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.

- It is important to us that recreational activities are managed in a way that does not contribute to environmental degradation or harm local ecosystems.
- Recreation and tourism often relies on healthy ecosystems but planning of where, when, and at what intensity it occurs requires careful consideration of compatibility with Treaty Rights and ecological values, including wildlife habitat, water protection, and intact landscapes.
- If increased recreation and tourism development are a priority, there should be reductions in extractive industrial disturbance to accommodate these uses to ensure that increased access does not come at the expense of wildlife, water, and long-term ecological health.

SPECIFIC TO BERLAND SURVEY: ALL-SEASON RESORTS

- Large scale tourism infrastructure in the form of an All-Season Resort raises concerns about its compatibility with ecological values and caribou recovery objectives. Ecological values and cumulative impacts must be considered when identifying areas for All-Season Resort designation.
- The redesignation of parks and/or protected areas for the creation of All-Season Resort areas is unacceptable; no public land should be redesignated, and offsetting should not be considered an acceptable option.