

# Draft Land-use Plan in Lower Athabasca Weak on Land Outcomes

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White Sand Point on Lake Athabasca.

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In April 2011, the Government of Alberta released for public consultation a draft integrated regional plan for the Lower Athabasca region in northeast Alberta. This is the first of seven regions to have a draft plan developed for cumulative effects management under the Land-use Framework (LUF), so it is the first big test of how effective that Framework might be. AWA has been closely involved in the LUF process since its inception in 2006 and supports the stated goal of cumulative effects management of all developments on landscapes across Alberta. Unfortunately, it appears that this process has become largely industry driven; the draft plan falls far short of responsible cumulative effects management that would sustain the area's biodiversity. Other significant land and water cumulative effects management issues remain unresolved in the draft plan.

## No Biodiversity Framework/Land Disturbance Commitments

Perhaps the single biggest concern in this draft plan is that it does not include regional targets and management actions for protecting biodiversity, as promised in the Government of Alberta's 2009 *Responsible Actions* oil sands strategy. The claim made at Lower Athabasca public information sessions in May 2011 to explain the omission is that there are insufficient science-based targets. Yet in 2008, a multi-stakeholder subgroup of the Cumulative Environmental Management Association (CEMA) extensively modeled various oil sands and forestry development scenarios in the Regional Municipality of Wood Buffalo which covers most of the Lower Athabasca region. They concluded that, even to hold key species and biodiversity indicators at 10 percent below their range of natural variation, active bitumen mining and *in situ* extraction should be

limited to 5 to 14 percent of the land base. Protected areas where industry is excluded should be expanded to 20 to 40 percent of the area, and only ecosystem-based forestry and other natural disturbance based activities should prevail on the remaining 46 to 75 percent of that area.

Instead, this draft regional plan proposes a much weaker approach:

- it defers any bitumen extraction area limit for two more years, which creates uncertainty and will be highly susceptible to further delay pressures from industry;
- it proposes to set aside just an additional 14 percent of the land base to bring to only 20 percent the area that will eventually exclude industry once conventional oil and gas leases expire;
- it recommends 2 percent of the land base for ecosystem-based commercial forestry inside new

- Conservation Areas; and
- it proposes an indeterminate-sized zone of intensive commercial forestry, including wetland drainage, commercial thinning, fertilization and tree “improvement,” further reducing biodiversity.

AWA has recommended instead in its consultation input that, to maintain biodiversity and viable woodland caribou populations as per longstanding commitments, the provincial government should limit active bitumen extraction to a 5 percent area threshold, expand industry-free protected areas to at least 50 percent, and implement ecosystem-based commercial forestry in the remaining area. A promised wetland conservation policy is also urgently required on this landscape. Energy and forestry industries’ development plans need to be informed sooner rather than later by Alberta’s biodiversity and species at risk international commitments.

### Strengthen Conservation Areas

Another frustrating aspect of this draft plan is the approach to protected areas. Instead of representative areas protected from industry representing ecosystems across the region, the government proposes Conservation Areas (CAs) only where there are no proven oil sands reserves. This is hardly a principle for balanced oil sands development. Instead, significantly larger areas of woodland caribou ranges, such as the Algar Lakes area, urgently need protection. At a minimum, the Richardson herd range, which has little overlap with oil sands reserves, should be immediately protected. More southern representative ecosystems need protection; the Lakeland North and South CAs proposed in 2010 by the Regional Advisory Council should be re-instated as they are contiguous to relatively intact habitat on the Cold Lake Air Weapons Range and in Lakeland Provincial Park and Provincial Recreation Area.

Moreover, the proposed CAs are not protected from industry. They will exclude bitumen extraction and other mining but existing conventional oil and gas leases will proceed. This could detract significantly from conservation values for decades to come. In caribou habitat or ecologically sensitive areas, these leases should be extinguished with

compensation. The remainder should be managed with reduced footprints and accelerated, strictly defined production schedules similar to the effective multi-stakeholder arrangement in place in Hay-Zama Lakes Wildland Park. Ecosystem-based commercial forestry should be implemented as the expectation outside, but not inside, new Conservation Areas.

There should also be a strategy to protect Environmentally Significant Areas that contain unusual land forms, rare vegetation communities or important migratory bird habitat. McClelland Lake wetland complex and sinkhole lakes and other ESAs should be protected on these grounds.

### Strengthen Water Management

AWA supports the draft plan’s establishment of indicators, thresholds and trigger components to manage cumulative effects of development on water and air at a regional level. Some missing components that should be added to the surface water quality management framework are: adding more monitoring stations aside from the one at Old Fort, including on the Beaver River watershed; including aquatic ecosystem outcomes; and adding thresholds and triggers for heavy metals and polycyclic aromatic

hydrocarbons (PAHs) once long-overdue baseline estimates of natural bitumen loadings are established. For surface water quantity, the Phase II Athabasca River framework should include an ecosystem base flow cut-off level below which no industry withdrawals would be permitted.

For groundwater management, it is important that more of our groundwater resources be quantified. In addition, brackish groundwater that can still be easily treated (total dissolved solids less than 10,000 mg/l) should be monitored and managed with thresholds and targets in the Lower Athabasca and other regions. For the credibility of the surface water and groundwater objectives in this regional plan it is important for independent scientists to evaluate the indicators, and draft threshold and trigger points.

The public consultation period for this plan ended in early June and the government pledged to release the plan as early as late June 2011. We are still waiting. So far this plan does not appear to deliver on the Land-use Framework’s guiding principle to “ensure this land - and all the activities it sustains - is managed responsibly for those who come after us.”



*What will the Lower Athabasca Regional Plan mean, in the final analysis, for impressive tracts of intact boreal forest such as these?*

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