

Honourable Grant Hunter  
Minister of Environment and Protected Areas  
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By e-mail: epa.minister@gov.ab.ca

Environment and Protected Area South Athabasca Sub-regional Plan engagement:

Email: epa.southathabascasrp@gov.ab.ca

**April 9, 2026**

Re: Feedback on the Draft South Athabasca Sub-regional Plan

Dear Minister Hunter,

Canadian Parks and Wilderness Society Northern Alberta, Alberta Wilderness Association, Nature Alberta, and the Alberta Chapter of The Wildlife Society are writing to provide feedback on the draft South Athabasca Sub-regional Plan (SASRP). Our organizations have been engaged in woodland caribou conservation in Alberta for decades. Representatives from our groups participated in the multi-stakeholder task forces that informed the development of the Cold Lake Sub-regional Plan and would have informed the Wandering River Sub-regional Plan. While we appreciate the opportunity to provide feedback, we are deeply concerned that the draft SASRP prioritizes industrial expansion without a clear or credible pathway to meet environmental obligations, particularly with respect to woodland caribou conservation and recovery.

The sub-regional planning process was initiated to meet legal obligations to recover woodland caribou to self-sustaining levels across Alberta, as outlined in the 2020 Canada-Alberta Conservation Agreement under Section 11 of the *Species at Risk Act*. While the agreement expired in October of 2025, its intent remains fundamental. The draft SASRP represents a clear departure from these commitments. It focuses almost exclusively on providing extensive allowances for industrial growth and intensification, while failing to outline concrete, measurable actions to achieve caribou conservation and recovery or show consideration for the planning region's ecological integrity. In particular, the draft plan does not present a commitment or pathway to meet minimum habitat requirements for species at risk.

While the draft SASRP acknowledges the need to reduce cumulative industrial disturbance and address its impacts, many of the policy statements that could safeguard

environmental conditions are accompanied by inadequate targets, together with many exemptions and workarounds for industry. The plan cannot achieve its stated environmental goals, rather it will enable continued habitat loss and further degradation of already at-risk ecosystems, including the ranges of the threatened East Side Athabasca and Cold Lake caribou populations occurring in the planning area.

The draft SASRP places the threatened boreal caribou populations at further risk by allowing high levels of industrial disturbance and associated caribou habitat loss to continue for decades. At the same time, the plan lacks environmental objectives or measurable outcomes necessary to support caribou conservation and recovery.

Our main concerns are that the draft SASRP:

- Allows for industrial disturbance that will make it impossible to reach the minimum 65% undisturbed caribou critical habitat threshold identified as necessary for boreal woodland caribou survival and recovery will not be possible during the time period projected in the plan.
- Will prevent restoring or maintaining the mature and old forests that make up the biophysical critical habitat that boreal woodland caribou need to survive and recover.
- Enables expanded oil and gas development, including in-situ projects at the expense of the environment while relying on vague references to long-term restoration and water management, which are uncertain and unenforceable.
- Fails to manage cumulative effects, one of the main purposes of land-use planning, resulting in increased disturbance footprint rather than reducing it.
- Does not limit access or disturbance in the areas of highest industrial activity, further threatening wildlife and intact landscapes.
- Lacks meaningful constraints or management provisions for developing in-situ oilsands leases.
- Lacks clear and enforceable habitat and landscape targets.
- The described rate for restoration and densities for new developments is not associated with ecological rationale nor meaningful landscape targets. The plan requires clear and enforceable habitat and landscape targets, including meaningful management of new disturbance and restoration timelines.
- Ultimately, the SASRP will further impede caribou recovery and degrade the environmental condition of the region.

The following sections provide detailed feedback on specific components of the draft SASRP, along with recommendations to improve alignment with woodland caribou conservation and recovery objectives.

We are profoundly disappointed with the upending of decades of collaborative work completed to improve the environmental conditions of the region. As drafted, both the plan and its regulatory details will further degrade habitat and prevent the recovery of woodland caribou. This represents a failure to meet Alberta's legal and policy obligations to recover and protect species at risk. We hope to see these concerns addressed in a revised version of the plan, demonstrating the Ministry's commitment to environmental stewardship and the recovery of species at risk. We would welcome the opportunity to clarify any aspect of our feedback and are available to discuss these comments further. We look forward to reviewing a revised plan that meaningfully incorporates these recommendations and achieves caribou recovery objectives.

Sincerely,



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Canadian Parks and Wilderness Society Northern Alberta Chapter



Pamela Narváez-Torres, Conservation Specialist  
Alberta Wilderness Association



Cheryl Bozart Soll, President

Nature Alberta



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## Detailed feedback on the draft South Athabasca Sub-regional Plan

Sub-regional planning in Alberta was initiated to fulfill legal and policy obligations to recover woodland caribou to naturally self-sustaining populations.<sup>1</sup> This includes achieving stable or increasing populations over time without reliance on ongoing intensive management, such as wolf control. An important part of this objective was the development of range plans that outline how land-use decisions would protect and recover critical habitat, including achieving and maintaining a minimum of 65% undisturbed habitat within each caribou range. Sub-regional plans were intended to do this by integrating land-use planning, cumulative effects management, and habitat recovery actions over space and time.

Although the Section 11 Agreement has expired, its purpose remains fundamental to woodland caribou conservation in Alberta and nearly all of Alberta's commitments in the Agreement remain outstanding. The draft South Athabasca Sub-regional Plan (SASRP) does not achieve the outcomes Alberta committed to in the Agreement. The draft SASRP contains no analysis of how proposed land-use decisions will affect caribou populations, no projections of future habitat conditions, and no indication that the plan will achieve—or even attempt to approach—the 65% undisturbed critical habitat threshold required for caribou recovery. If caribou recovery is not an intention of the plan, this should be clearly stated.

With no clear objectives for achieving caribou habitat conservation and recovery, including no commitment to 65% undisturbed habitat, the plan further undermines the ability to improve conditions for species at risk.

Additionally, the draft plan does not present baseline information on caribou habitat conditions, cumulative disturbance or broader indicators of ecological health. Without this context, it is not credible that the plan will achieve its stated Outcome 2: “consolidate and manage development over time to support landscape intactness and naturally self-sustaining plant and wildlife populations with a focus on species at risk.”

**The final SASRP and all future draft sub-regional plans must describe clear baseline conditions, projected outcomes, and analyses of impacts on species at risk. This content should have been provided in the draft SASRP prior to the public engagement period.**

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<sup>1</sup> Agreement for the Conservation and Recovery of the Woodland Caribou in Alberta (2020)

Both the caribou ranges located in the planning area are already well beyond disturbance levels compatible with caribou recovery. As of 2023, undisturbed habitat in these ranges remained substantially below the minimum threshold of 65%, identified as providing a 60% chance of self-sustaining caribou populations, with even smaller portions of undisturbed biophysical habitat (see Table 1).<sup>2</sup> In this context, additional disturbance, particularly without enforceable restoration amounts and timelines and limits on new development, will further reduce the likelihood of caribou recovery.

Table 1. Area (ha) and proportion (%) of caribou ranges covered by undisturbed critical habitat, biophysical critical habitat, and undisturbed biophysical critical habitat in 2023.<sup>3</sup>

<b>Range</b>	<b>Undisturbed Habitat (ha) (%)</b>	<b>Biophysical Habitat (ha) (%)</b>	<b>Undisturbed Biophysical Habitat (ha) (%)</b>
Cold Lake	83,635 (12.4%)	332,694 (49.5%)	35,155 (5.2%)
East Side of the Athabasca River	128,695 (9.8%)	639,371 (48.7%)	84,874 (6.5%)

The draft SASRP acknowledges that the sub-region requires reductions in cumulative industrial disturbance and improved management of existing impacts. However, for nearly every policy statement intended to improve environmental conditions, the plan lacks meaningful targets and introduces exemptions, discretionary provisions, and/or flexibility for industry. While our organizations recognize some positive elements within the draft SASRP, including commitments to Indigenous-led conservation areas in the Cold Lake Air Weapons Range, restoration planned for the Bohn region, and timber harvest deferrals in portions of caribou ranges, these measures are very limited in scope and are outweighed by the plan enabling continued industrial expansion and intensification. The SASRP 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.

## Landscape Restoration

The landscape within the South Athabasca sub-region is already at a level of disturbance that, without extensive restoration and protection, will prevent the survival and recovery of woodland caribou (Figure 1). In this context, the plan’s emphasis on restoration is

<sup>2</sup> Report on the implementation of the Section 11 agreement for the conservation and recovery of the woodland caribou in Alberta: 2022-2023

<sup>3</sup> Report on the implementation of the Section 11 agreement for the conservation and recovery of the woodland caribou in Alberta: 2022-2023

appropriate and could be beneficial if it meaningfully enabled recovery of a more intact landscape. Restoring ecological integrity at a landscape scale would, in turn, support caribou recovery. We are supportive of the plan's focus on restoration, particularly the requirement to restore caribou biophysical habitat and wetlands to conditions capable of producing similar habitat characteristics over time. However, without strict requirements to make this happen, other aspects of the plan will cancel out any progress made by restoration.

The projected changes in disturbances and linear feature densities across the draft plan zones are inadequate and not rationalized within the draft plan. These targets should be revised to reflect environmental and ecological thresholds necessary for ecological function and recovery of species at risk.

Restoration appears framed primarily to enable future industrial disturbance, rather than to restore ecological integrity and achieve the minimum habitat conditions required for species recovery. Within caribou ranges, restoration objectives should prioritize achieving at least 65% undisturbed critical habitat within 60 years, restoring biophysical critical habitat, and supporting ecological function. Restoration should not be structured in a way that facilitates additional disturbance before habitat recovery has occurred. Solely relying on restoring legacy seismic lines will not be sufficient to reach caribou habitat recovery needs (Figure 2).

The draft plan should include clear deadlines and targets for restoring inactive or unproductive well-based footprints, along with commitments to publicly report on restoration progress. This transparency would allow assessment of whether restoration commitments are being met and would support accountability of companies responsible for disturbance. Definitions for "economically unproductive" wells and other infrastructure should also be provided to clarify which developments are expected to be restored.

Restoration requirements should be strengthened by tying approvals for new disturbances to demonstrated successful restoration progress. Timelines for completion of restoration treatments should be shortened to better align with caribou recovery objectives. The plan should also include consequences for failing to meet restoration requirements. The restoration requirements and timelines proposed for forestry activities would be strengthened by explicitly linking them to caribou habitat recovery targets.

Overall, the draft plan lacks clear incentives and consequences related to restoration objectives and does not define which types of 'unproductive' developments must be restored. This creates uncertainty regarding how the restoration timelines and scale envisioned in the draft plan will be achieved. Stronger restoration requirements, clearer

definitions, and enforceable accountability mechanisms are necessary to ensure the restoration contributes meaningfully to caribou recovery and ecological integrity.

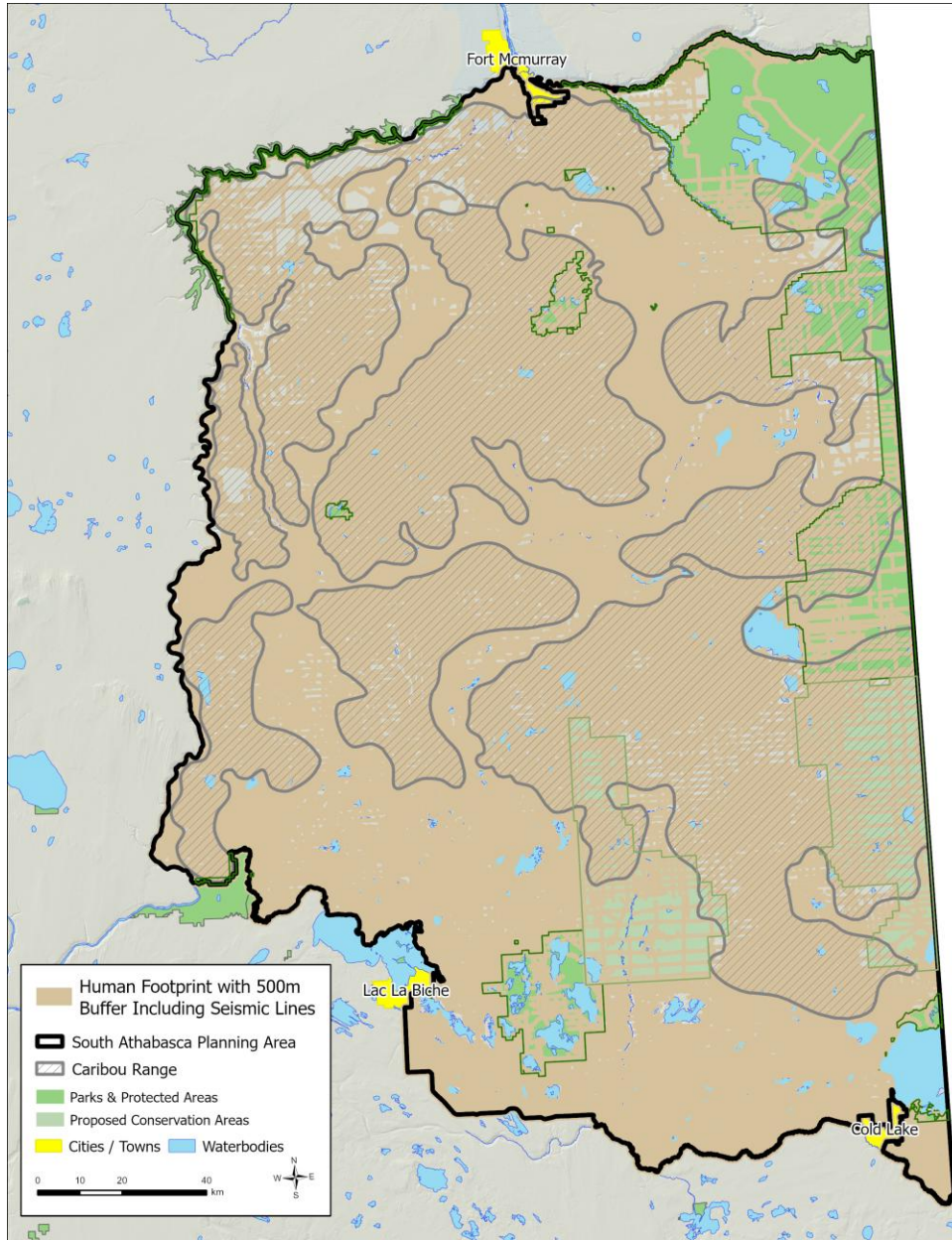


Figure 1. Human caused landscape disturbance (with 500m buffer) within the South Athabasca sub-region based on the ABMI human footprint layer 2023.

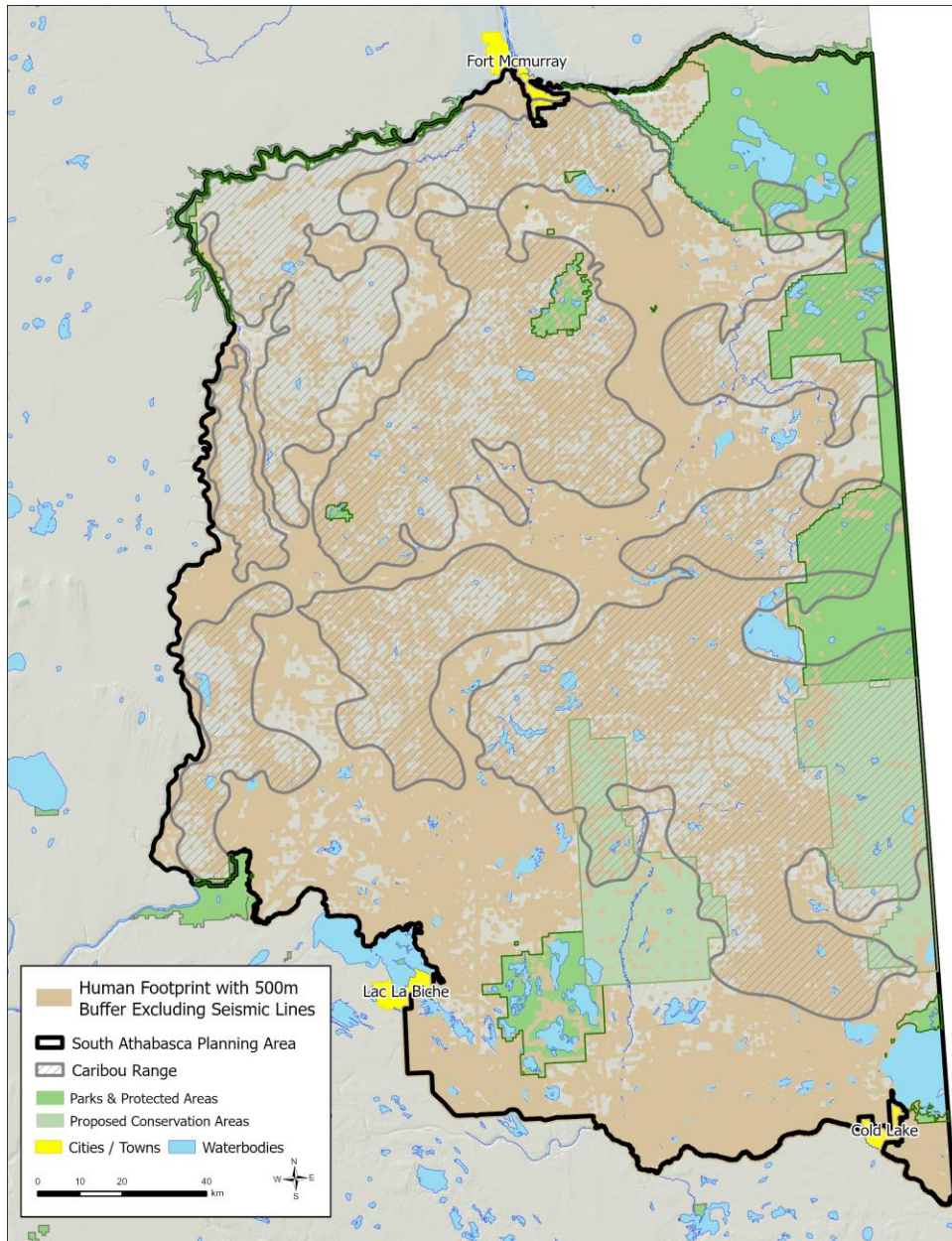


Figure 2. Human caused landscape disturbance (with 500m buffer) excluding seismic within the South Athabasca sub-region based on the ABMI human footprint layer 2023.

## The Energy Industry

The focus of the SASRP on doubling oil and gas production in the region is deeply concerning, particularly given the potential impacts of in-situ oilsands development, which is the dominant form of extraction in this sub-region. In-situ extraction is associated with significant environmental risks, including extensive habitat fragmentation across the

boreal forest, high greenhouse gas emissions from steam generation, and the expansion of supporting infrastructure such as roads, pipelines, and well pads<sup>4</sup>. When considered cumulatively, including the additional natural gas production required to extract bitumen, these operations could result in a larger overall land footprint than surface mining.<sup>5</sup> The Alberta Oil Sands Region has already experienced decades of impacts on land, water, wildlife, and downstream communities. In the context of in-situ development, risks include pipeline leaks, contamination of groundwater, and “flow-to-surface” incidents, where bitumen escapes uncontrollably to the surface, affecting soils and waterbodies.<sup>6</sup> Documented cases in the Cold Lake region have resulted in extended releases of bitumen and the contamination of local environments, requiring extensive remediation efforts. Research in the Cold Lake sub-region has also shown that in-situ operations can contribute to the accumulation of contaminants associated with bitumen extraction in nearby lake sediments.<sup>7</sup>

At the same time, water quality and availability are increasingly under pressure. Industrial activities have contributed to contamination concerns, and several downstream communities have raised alarms about water safety. As Alberta faces more frequent drought conditions, the demand for freshwater from in-situ operations, combined with broader cumulative effects, raises serious questions about long-term water security. Expanding oil and gas production under these conditions will further intensify pressures on ecosystems, biodiversity, and climate without clear evidence that these impacts can be effectively mitigated.

These cumulative impacts are, in part, the result of insufficient regulatory oversight. In this context, the draft SASRP’s intention to create greater regulatory flexibility for energy-related development raises concerns over the standards to which they will be held. If this plan aims to support any environmental outcomes, and development occurs in the best way possible, it must establish clear and enforceable standards for industry, along with mechanisms to ensure compliance. As currently written, the in-situ development portion of the plan will further degrade ecological health of the sub-region. In-situ project areas,

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<sup>4</sup> Schneider, R., Dyer, S., 2006. Death by a Thousand Cuts: Impacts of in situ Oil Sands Development on Alberta's Boreal Forest. Pembina Institute, Edmonton, AB. <http://www.pembina.org/reports/1000-cuts.pdf>.

<sup>5</sup> Pembina Institute. Mining vs. In Situ. What is the highest environmental impact oil? <https://www.pembina.org/pub/mining-vs-situ>

<sup>6</sup> Alberta Energy Regulator, 2014. Independent Panel Review of the Canadian Natural Primrose Flow to Surface Causation Report. Calgary, AB. <https://static.aer.ca/prd/documents/reports/CNRL-CausationReport-20140627.pdf>

<sup>7</sup> Korosi, J. B., Cooke, C. A., Eickmeyer, D. C., Kimpe, L. E., & Blais, J. M. (2016). In-situ bitumen extraction associated with increased petrogenic polycyclic aromatic compounds in lake sediments from the Cold Lake heavy oil fields (Alberta, Canada). *Environmental Pollution*, 218, 915-922.

which cover significant portions of each caribou population range, are exempt from any development restrictions and other management provisions. In-situ project areas should be fully included in the zonation approach and subject to meaningful requirements, including limits on disturbance, protection of sensitive features (such as riparian areas), and obligations to minimize new footprints. These areas should be required to meet meaningful cumulative disturbance density targets and minimize new footprint development within caribou ranges.

The cumulative disturbance parameters outlined in the draft plan seem inadequate to address the need to improve landscape conditions. They lack timelines, appropriate targets, and ecological relevance. The proposed targets are not linked to species requirements, including for woodland caribou, nor are they supported by a rationale explaining how they will achieve desired environmental outcomes. Additionally, restoration requirements are limited to “economically unproductive” footprint in certain zones, missing opportunities to reduce disturbance across the whole landscape, particularly within the “Go Zone”. This represents a significant gap in the plan’s ability to manage cumulative effects and improve environmental conditions.

The plan lacks accountability mechanisms. While the plan references the Liability Management Framework (LMF) as a tool to support restoration, the LMF has been widely criticized for its limitations, particularly in addressing the scale and pace of restoration required, and mechanisms to initiate restoration. Additional or strengthened measures will need to be necessary to ensure that cumulative disturbance is addressed.

The proposal to reduce or exempt setbacks around riparian areas for energy development is inappropriate. Existing setbacks already represent minimum standards required to maintain aquatic health and ecosystem integrity. Weakening these protections risks further degradation of sensitive habitats and water systems.

While the plan includes some measures related to roadway development, it does not comprehensively address other forms of surface disturbance, nor does it apply consistently across all development types, including in-situ operations. Critically, the plan does not commit to reducing cumulative disturbance to levels that would support caribou recovery. Cumulative disturbance targets should be explicitly aligned with ecological thresholds, including maintaining disturbance below 35% in consideration of all disturbance types within caribou ranges.

In-situ development areas should not be exempt from contributing to improved habitat conditions, particularly given the overlap with caribou range (Figure 3). These developments must be required to minimize new disturbances and actively participate in

restoration efforts. Measures that limit new or amended surface dispositions within caribou ranges would represent a positive step towards conserving critical habitat and supporting recovery, but these must be applied consistently across all industries to be effective.

Additionally, there is no incentive for the achievement of the parameters set out in Table 3 and no consequence for not achieving them.

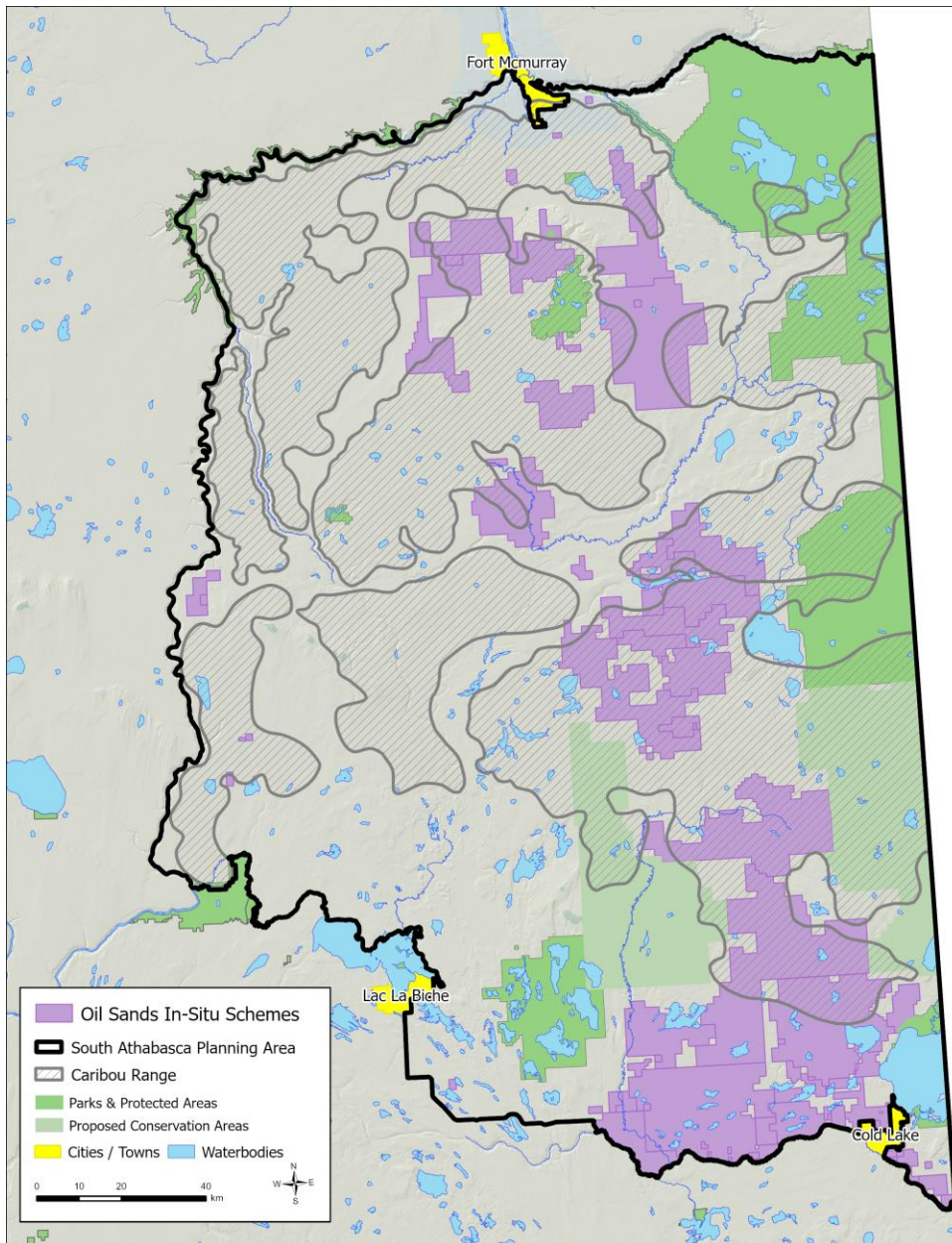


Figure 3. Oil sands in-situ project areas and caribou ranges within the South Athabasca sub-region.

## Forest Industry

As with other parts of the draft SASRP, no supporting analysis was provided to demonstrate how the proposed forest harvest management and sequencing will affect caribou critical habitat conservation or recovery. This absence of information makes it difficult to assess whether the proposed approach is compatible with caribou recovery objectives that are necessary under Canada's *Species at Risk Act*.

There is no evidence provided within the plan that the proposed harvest timing sequence would achieve the minimum 65% undisturbed critical caribou habitat threshold. Our own analysis demonstrates that forest harvest alone would exceed disturbance thresholds in the caribou ranges within the first 50 years, which will prevent the achievement of the minimum amounts of critical undisturbed and biophysical caribou habitat for survival and recovery of East Side Athabasca Range and Cold Lake Range caribou populations (Figure 4 and Figure 5). Without demonstration of how harvest levels and sequencing align with ecological limits, the proposed approach risks further degrading already highly disturbed ranges.

We are supportive of the proposed “conservation areas” identified within the forest harvest timing series. Avoiding harvesting in these areas is a positive step; however, these benefits will be compromised if other disturbances are not prevented within the areas, and if surrounding areas continue to experience high levels of disturbance and biophysical habitat loss, including from forest harvesting.

The draft SASRP presents forest harvest timing series only within caribou ranges. No information is provided in the draft plan for forest harvest timing series outside of caribou range. Without understanding the forest harvest timing series across the entire sub-region, it is not possible to fully assess the ecological and landscape impacts of forestry operations – this is a consequential deficiency in the draft SASRP. Forest harvesting plans should be displayed for the full sub-region.

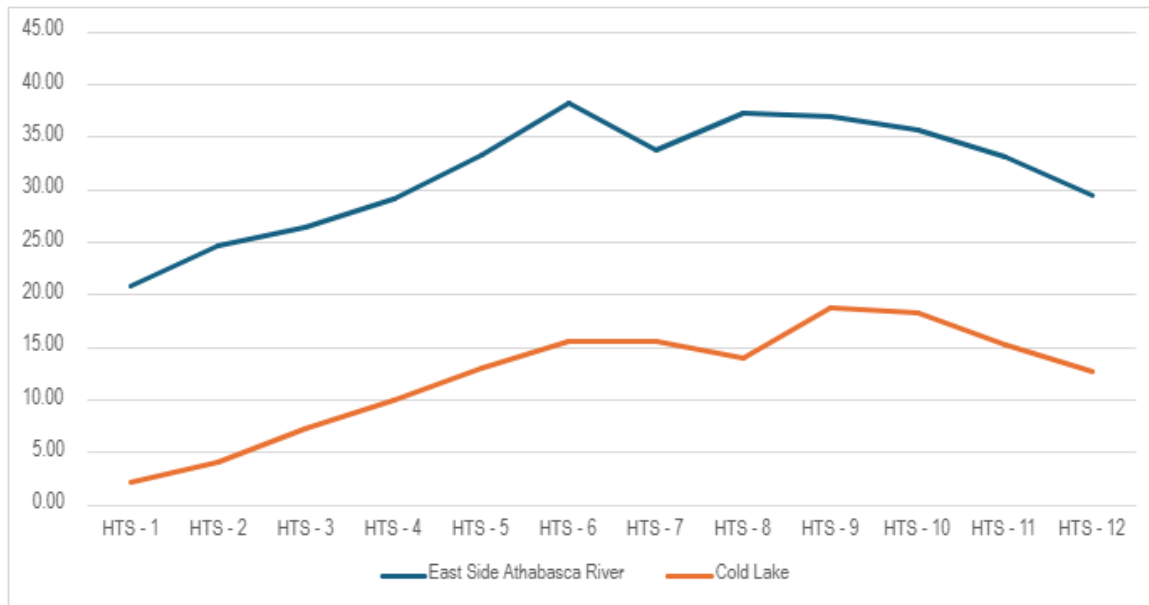


Figure 4. Percent of disturbed habitat from proposed SASRP forest harvest timing series by decade. Projection assumes that habitat is no longer disturbed after 50 years per the Boreal Woodland Caribou Recovery Strategy.<sup>8</sup>

<sup>8</sup> Environment and Climate Change Canada. (2020). Table H-4: Disturbance management thresholds. In *Amended recovery strategy for the boreal population of woodland caribou (Rangifer tarandus caribou) in Canada (2020 amendment)*. Government of Canada. <https://species-registry.canada.ca/index-en.html#/documents/3583>

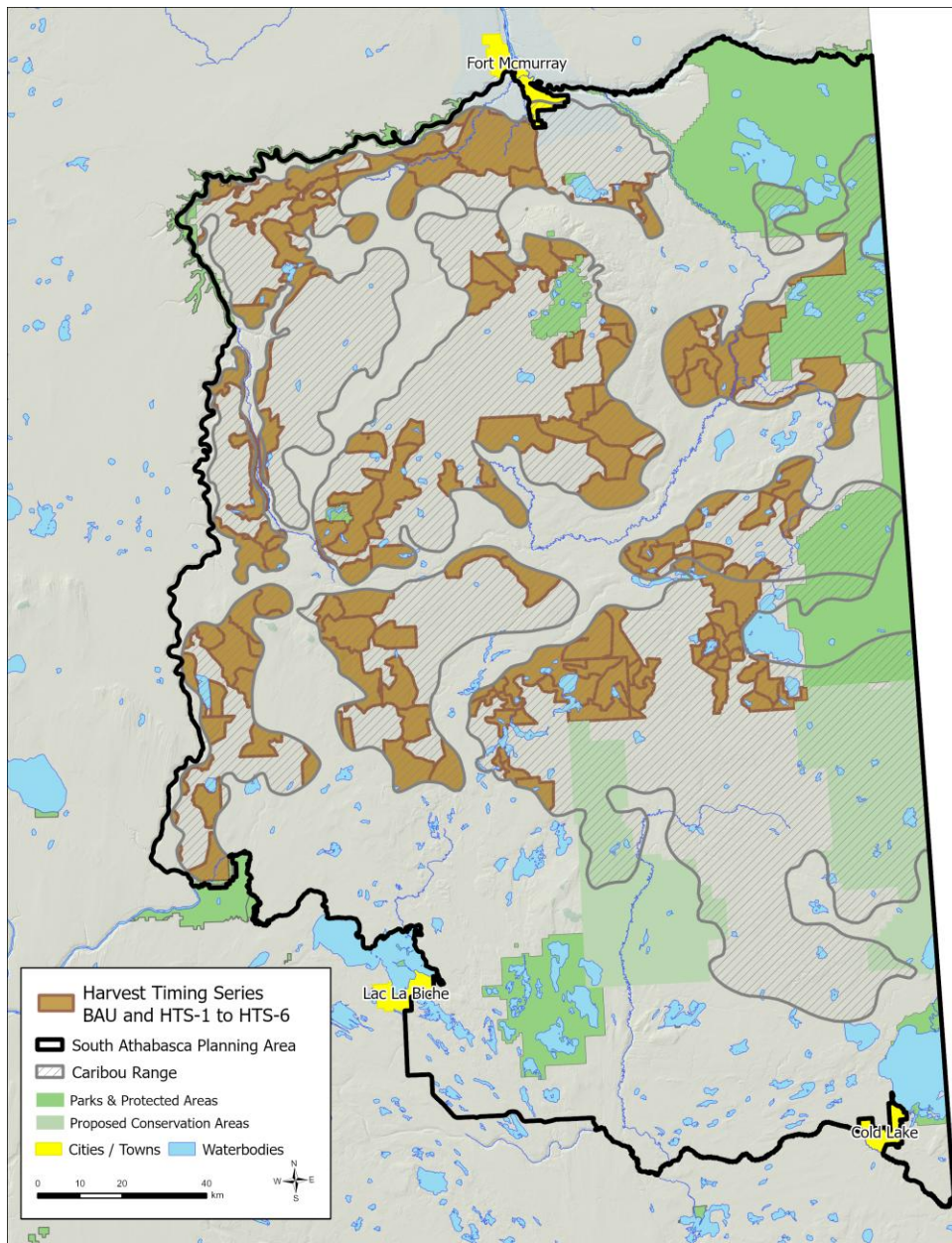


Figure 5. Forest harvest timing series proposed in the SASRP in the next 60 years.

Exclusively examining planned in-situ project areas and forest harvest timing sequences in the next 60 years, it is evident that the two activity types alone will result in disturbance levels incompatible with boreal woodland caribou survival and recovery (Figure 6 and Figure 7). Critical undisturbed habitat objectives will be impossible to meet for caribou survival and recovery.

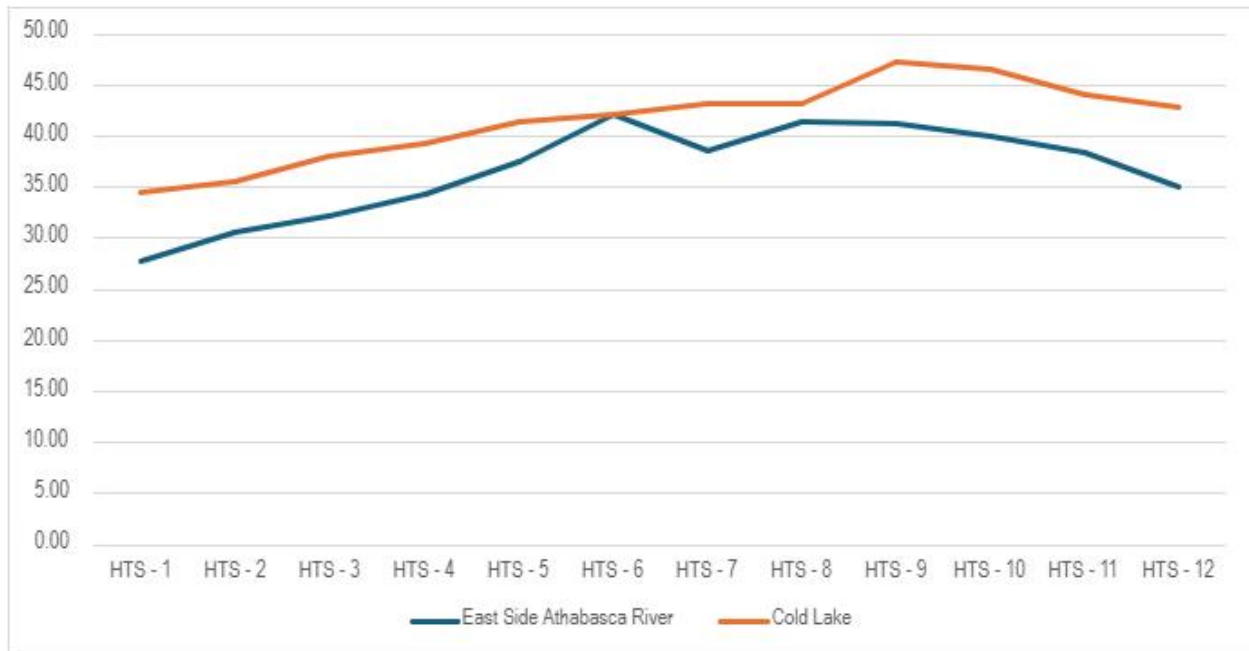


Figure 6. Percent of disturbed habitat from proposed SASRP forest harvest timing series and in-situ project areas by decade. Projection assumes that in-situ project areas and business-as-usual harvest timing series are 100% disturbed for the entire period. Forest harvest areas within the harvest timing series are no longer considered disturbed after 50 years per the Boreal Woodland Caribou Recovery Strategy.<sup>9</sup>

<sup>9</sup> Environment and Climate Change Canada. (2020). Table H-4: Disturbance management thresholds. In *Amended recovery strategy for the boreal population of woodland caribou (Rangifer tarandus caribou) in Canada (2020 amendment)*. Government of Canada. <https://species-registry.canada.ca/index-en.html#/documents/3583>

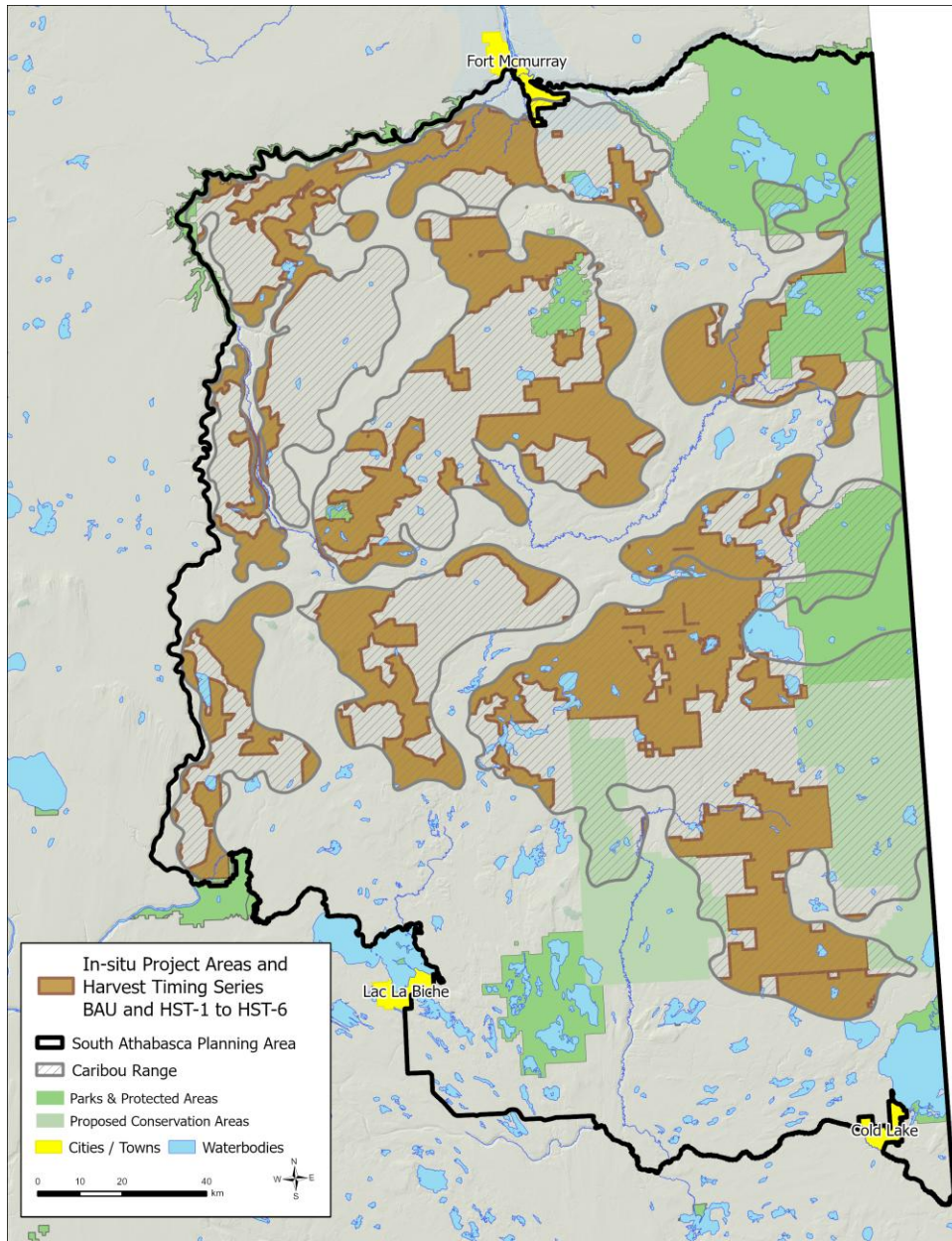


Figure 7. In-situ project areas and forest harvest timing series proposed in the SASRP in the next 60 years.

### Access Management

At best, the proposed access management approach will only maintain the status quo. The draft SASRP does not establish ecosystem-based targets for road densities, and many prevalent access types are exempt from access management considerations. As a result, the target road densities for each zone do not appear to be related to ecological thresholds or meaningful landscape management considerations.

The concept of integrating primary access roads to reduce road duplication across the sub-region is good in principle. However, as currently written, the approach is designed to accommodate the road-related needs of forestry and oil and gas development, rather than meaningfully reducing overall landscape fragmentation and impacts. In practice, the draft plan appears to permit any road to become a primary road if it meets the loose criteria outlined in Sections 2.1 to 2.6, even if it occurs within caribou range. This contradicts provisions laid out in Alberta's Master Schedule of Standards and Conditions aimed at improving caribou conservation outcomes.<sup>10</sup>

There are multiple exemptions that significantly weaken the effectiveness of the access management section. Key access management requirements do not apply to 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 and road densities in areas containing the highest levels of disturbance.

Additional concerns are related to the treatment of sensitive habitats. Allowing roads to cross riparian areas along the most direct and practical routes increases risks to water quality and undermines the integrity of these ecologically important areas. While the draft SASRP requires restoration when road density thresholds are exceeded, these requirements do not apply to in-situ projects, further limiting the likelihood of meaningful reductions in road density or improvements in ecological integrity.

We are supportive of preventing new highways or permanent roads being built within caribou range. However, this measure alone is insufficient to offset the weaknesses in the access management approach listed in the draft SASRP. We are concerned that the access management approach will not enable caribou conservation and recovery and will further degrade the natural environment. There is no clear link to indicators such as interior habitat, connectivity, or other measures of ecosystem health. As currently written, the access management plan is unlikely to reduce fragmentation or support recovery of species at risk and will instead contribute to continued environmental degradation.

## Recreation and Tourism

It is important that recreational activities are managed in a way that does not contribute to environmental degradation or cause harm to local ecosystems. We support the draft

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<sup>10</sup> Government of Alberta. (2021). *Master schedule of standards and conditions* (Condition 1901-AS: Caribou range—Access / major corridor). <https://open.alberta.ca/publications/master-schedule-of-standards-and-conditions>

SASRP'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. While the plan mentions managing recreation in ways that are compatible with caribou recovery and biodiversity, it also allows new recreational trails within caribou ranges, which risks increasing disturbance in an already compromised habitat.

Without clear thresholds, limits, and exclusions, recreational development could further undermine conservation efforts, particularly for caribou and sensitive riparian ecosystems. Timing restrictions for OHV access should apply across all caribou ranges, not solely the White Muskeg area. Stronger and more explicit limits on recreation and tourism development are necessary to ensure that increased access does not come at the expense of wildlife, water, and long-term ecological health.

## Conservation Areas

The establishment of new conservation areas can be a critical tool for safeguarding biodiversity and supporting the survival and recovery of species at risk, including woodland caribou. For these areas to be effective, they must be explicitly managed to achieve conservation outcomes. We strongly support Indigenous-led management of the conservation areas as a meaningful approach to advancing caribou recovery while upholding Treaty rights and enabling Indigenous stewardship.

Conservation areas should be managed to achieve full recovery and conservation of critical habitat for caribou. However, the current proposal undermines these objectives. The draft SASRP allows for continued energy development within proposed conservation areas, including honouring existing oil and gas surface and subsurface tenures and the consideration of new activities. Thus, these areas would not function differently from adjacent "Go zones" in terms of environmental impacts. Conservation areas should not permit ongoing and new permanent disturbances to the critical habitat of species at risk.

To be credible, these areas should be designated under appropriate legislation that ensures long-term biodiversity protection and supports Indigenous-led governance.

## Implementation of Lower Athabasca Regional Plan Commitments

### Multi-use corridor

The proposed multi-corridor through the Clearwater River PLUZ raises concerns regarding its environmental impacts. While the corridor 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.

### Regulatory Details Input

The proposed regulatory details do not provide enforceable mechanisms to guarantee that environmental objectives are achieved. There are no clear tools to limit or deny industrial approvals based on cumulative disturbance thresholds, road density, or habitat conditions.

While the concept of a regulatory pathway to manage development is appropriate, the current approach lacks the strength and specificity required to effectively manage cumulative effects. As drafted, both the plan and its regulatory details will not prevent further habitat degradation or support the recovery of woodland caribou. This represents a failure to meet Alberta's legal and policy obligations to recover and protect 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 recommendations should be considered and incorporated when amending the Lower Athabasca Plan to include the SASRP.

## Conclusion

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. Short-term gains from intensified industrial development must not come at the cost of ecological collapse and further damage to irreplaceable ecosystems. The draft SASRP is a plan to enable industrial expansion without due consideration to conservation and recovery of ecological values. This is incompatible with protecting the value that Albertans place on their environment and the wildlife that should be able to thrive in it.

The draft SASRP does not identify and commit to meaningful environmental objectives and does not provide enforceable mechanisms to guarantee that environmental objectives are achieved. There are no clear tools to limit or deny industrial approvals based on cumulative disturbance thresholds, road density, or habitat conditions. The draft plan does not demonstrate how its proposed policies will maintain or improve environmental conditions across the sub-region. Environmental health is not prioritized in the provisions listed in the draft plan, nor is it recognized in the many exemptions to the listed statements and policies for restoration or industrial development

While many sections of the draft plan commit to Indigenous-led planning and stewardship, these commitments are undermined by extensive allowances for industrial development. This raises serious concerns about whether the plan can meaningfully support Indigenous priorities, uphold Treaty rights, or achieve meaningful conservation outcomes.

The draft plan also fails to account for the water quantities needed to support expanded in-situ oil sands development. There is no clear consideration of how increased water withdrawals will affect rivers, wetlands, and overall watershed health. This omission represents an important gap in the draft plan's assessment of cumulative effects.

The draft SASRP clearly departs from the original intention of sub-regional planning and fails to align with scientific evidence, provincial policy, and federal commitments to species at risk recovery. If implemented as written, it will further allow landscape degradation and accelerate the loss of already threatened caribou populations.

We strongly urge the Government of Alberta to reconsider the direction of this draft plan and include meaningful and enforceable measures that prioritize habitat protection and restoration and species recovery. Without meaningful changes from the draft version, the plan will not meet its stated objectives and will undermine public confidence in the Government's ability to responsibly manage Alberta's public land.