



July 31, 2009

Chairperson Judith Wright-Bird and Members  
of the Sahtu Land Use Planning Board  
c/o Heidi Wiebe, Plan Development Lead  
Email: heidi.wiebe@shaw.ca

**Re: Review of Sahtu Land Use Plan – Draft 2**

Dear Board Members:

The Canadian Boreal Initiative (CBI) congratulates the Sahtu Land Use Planning Board on your second draft of the land use plan. One of CBI's central activities is supporting First Nations centered land use planning work across Canada's Boreal region, so we respect and appreciate what a major undertaking a comprehensive plan like this is and we commend you for your hard work.

It is our pleasure to provide the Sahtu Land Use Planning Board with a review of the second draft of the Sahtu Land Use Plan, which builds on our submission on the first plan.

We first would like to reiterate that CBI is committed to the principle that Aboriginal people should control the outcomes of resource management and conservation planning decisions on their lands. As such, we strongly support the objectives that guided the development of the plan and the participation of Sahtu communities in the planning process. CBI also supports the vision expressed in the draft land use plan of balancing development and conservation. It is a vision that is consistent with the Boreal Forest Conservation Framework that guides our efforts.

CBI also believes that planning based on scientific and traditional knowledge and grounded in local perspectives and values is best path to follow to achieve the conservation of natural and cultural values. We commend the Sahtu Land Use Planning Board for gathering and applying a diversity of scientific and traditional knowledge in this second draft.

In order to further the objective of balancing development and conservation, we provide the following recommended revisions to the draft land use plan:



*Conservation Initiatives, Zones and Subsurface Protection* – we commend the long and determined work of Sahtu communities to protect lands important to them and for wildlife, and of the sites for protection included in this plan. CBI has had the good fortune to actively support some Sahtu communities in their conservation work, such as Deline, Fort Good Hope and more recently Tulita. We commend the communities and the Board for setting clear goals for conservation initiatives and zones to protect them from industrial development. Experience has shown around the world and in Canada that protected areas are best managed by keeping them free of development, and that managing low impact development fits more appropriately in special management lands. Protecting core conservation lands free from development gives sensitive species the best chance for long term survival. This you have followed in your plan.

We support and appreciate that the Board is asking for input on whether a dual designation under the Sahtu Land Use Plan and through a protected areas designation would be a good strategy. Based on CBI's experience, some of which is with communities in the NWT, we would recommend you seek permanent subsurface protection solutions for your proposed conservation initiatives – such as through regulations for new national wildlife areas supported by withdrawals under the Territorial Lands Act. Of course, communities in the Sahtu region would need to be satisfied and negotiate clear co-management terms with responsible authorities and perhaps this principle could be underscored in the land use plan – should you choose that preferred course of action. This option has already been used to protect Saoyú - ʔehdacho, and could be applied to other sites. Use of the 5-year subsurface protection mechanism under the Sahtu Land Use Plan would be, we would suggest, a great tool to apply in conservation zones.

*Managing Cumulative Effects* – we understand that given time constraints that you were not able to fully address this and that greater detail on this will come in Draft 3. Since you encouraged us to reiterate any points we'd raised relating to Draft 1 if we did not see them addressed in Draft 2, we would like to underscore the importance of setting thresholds and conditions for development to achieve your goals, particularly in special management zones, as well as securing the funds needed for effective overall research and monitoring. Increasingly, resource development companies are setting higher bars for how they manage lands and waters. Setting clear goals in your land use plan and laying out the rules for how those can be achieved helps provide operational clarity. Lastly, we recognize and support the Board's work to study how the Great Bear Lake Watershed Management Plan could be integrated within the Sahtu Land Use Plan so both can be effectively implemented and afforded legal authority.

*Linear Disturbance* – setting clear thresholds will be key. We would support a linear disturbance threshold of 1 km/km<sup>2</sup>. Available caribou research suggests that it will be sufficient to protect woodland caribou. We recommend that all linear disturbances, regardless of width, be included when applying the linear disturbance threshold. We also recommend that research be conducted in the region to determine the sensitivity of woodland



caribou to narrow linear disturbances. If research were to determine that seismic less than 3 m wide did not disturb woodland caribou, the linear disturbance threshold could then be restricted to disturbances greater than 3 m wide. We also recommend a conformity requirement be added that ground cover not be disturbed during development of seismic lines – such as through helicopter supported seismic work. Recent research released on marten in the Dehcho region shows there's a time lag before sensitive species can reuse seismic lines where vegetation is disturbed (see Northern News Service, July 31 09, Roxanna Thompson article).

*Maintaining Wildlife and Ecological Integrity* – to protect wildlife over the long term, which is one of the guiding principles of the plan, we suggest you include an analysis of how the plan will provide for functional connectivity for wildlife, particularly across the special management zones for sensitive species such as caribou and marten. In other words, on connectivity, how are you planning to ensure wildlife can move across and between protected areas across the broader landscape over time? Other land use plans have, in their own ways, looked to address this such as in the Dehcho territory and with the Innu Nation in Labrador. Both provided corridors for wildlife, which you could achieve in your plan through a combination of conservation and special management lands. The other point we would like to flag is that to offer the best security for wildlife over the long term, we would recommend you look at a higher percentage of conservation lands beyond the 20% currently in Draft 2. We commend the proposed conservation lands in the plan in many areas and see there are some gaps, particularly in the Northwest.

In closing, we would like to thank you for the opportunity to review Draft 2 of the Sahtu Land Use Plan. We appreciate what a major undertaking it is to develop this type of planning vision, and we would like to recognize the hard work of the planning team and members of the communities who made this work possible.

We are assisting with a number of land use planning exercises across the North, so if we can be helpful in any way in the work ahead, please feel free to contact us.

Sincerely,

Larry Innes  
Executive Director