



October 1, 2010

Chairperson Judith Wright-Bird
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

Dear Board Members:

The Canadian Boreal Initiative (CBI) congratulates the Sahtu Land Use Planning Board and Sahtu communities on your final draft of the land use plan. One of CBI's lead priorities is supporting First Nations land use planning work across Canada's Boreal region, so we appreciate the dedication and determination it takes to produce 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 our comments on the final draft of the Sahtu Land Use Plan. We look forward to the day the Plan is approved and is operating on the ground. As this is the final draft, we hope some of our comments can be helpful in plan approval and implementation.

Overall, CBI strongly supports the vision and goals that have guided the development of the Plan and the participation of Sahtu communities in the planning process. In that light, and in order to further the objective of balancing development with ecological and cultural values, we provide the following comments on the final draft land use plan:

Conservation Initiatives, Zones and Subsurface Protection – CBI commends Sahtu communities working to protecting lands important to them and for wildlife, and we have had the good fortune to support some communities in the Sahtu region in their efforts in this regard. We support the approach that communities and the Board are taking in the Plan in designating conservation zones and identifying initiatives for protecting key areas from new resource development.

We strongly support subsurface protection for all conservation zones. Experience elsewhere shows that protected areas are best managed by keeping them free of industrial and other development, as this ensures that sensitive species have the best chance for long term survival. We believe that the more intensive requirements for management of development activities fits more appropriately in special management and general use zones, where revenues from such activities can support the more intensive management efforts that are required.

Managing Cumulative Effects – CBI appreciates the commitment by the Board to managing cumulative effects in the Plan. We understand and support that developing a cumulative effects



action plan needs to be a consultative process with communities, and that time must be given to allow for such consultation to occur. We appreciate that the Board was not able to advance a detailed implementation plan to manage cumulative effects at this time, as the gaps in the information base are still too thin to accurately identify and effectively implement targets and thresholds. However, this remains a gap that must be filled, and we support the Plan's approach to set up a broadly-based Sahtu Working Group to tackle this task. We suggest that one of the first tasks for such a group should be consideration of landscape thresholds (perhaps on a regional pilot basis) as a mechanism to fill this critical gap. We believe that there would be support for such work from the conservation community. Cumulative effects work elsewhere in Canada may also be used as guidance.

As you know, adaptive management is a vitally important support system to help inform decision making. The Plan mentions how the Sahtu Working Group can help advance adaptive management in the SSA, however, this could be elaborated. We suggest a greater focus be put in the Plan on how an adaptive management framework could be developed and implemented – particularly how research, monitoring and building in flexibility to make changes over time can work together.

Protecting Water Values – We recognize that water issues were some of the most important to Sahtu communities in developing this Plan. We are pleased to see the many conformity requirements relating to protecting water quality and quantity in the Plan. We heard at the public consultations that the vast majority of the goals and substance of the Great Bear Lake Watershed Management Plan were captured by the final Plan, and we hope that the Community of Deline is satisfied with the result. We consider the GBLWMP to be an impressive body of work, and would like to see it implemented through this Plan.

Ecological Representation – We congratulate the Board for bringing together a wealth of information in support of the Plan's goal to maintain ecological integrity. There remain, however, some ecological representation gaps which could impair the objective of maintaining ecological integrity in the Sahtu region as a whole over the long term.

In particular, we note that map 17 in the Background Report contains areas identified as being important for contributing to the NWT Protected Areas Strategy's goal of protecting representative areas within each of the territory's 42 ecoregions. The map indicates that many areas identified as being important for representation are not within the conservation zones or initiatives. Protecting representative areas is an accepted approach for protecting a full range of ecosystem types, including those that are necessary to conserve wildlife populations. Any failure to adequately protect a full range of ecosystem types creates a risk that some species' habitat requirements will not be conserved.

We understand there are reasons why there are gaps in the representation of ecoregions within the Plan, however, we wish to point out that the representations gaps are greatest in the north-central and south-central portion of the SSA. If development pressures remain low within these parts of the SSA, such gaps may not be significant from a conservation perspective. If such gaps



persist, however, in the face of expanding development within those regions, conservation values could be significantly impaired.

Sustaining Wildlife – One of the Plan’s goals that was identified as being of vital importance to the Sahtu Dene people is to “maintain or increase the populations of wildlife on which people depend”¹. We commend the Sahtu Land Use Planning Board for its commitment to both science and traditional knowledge in advancing this goal.

However, there does not appear to have been an assessment of the capacity of the Plan to maintain wildlife populations in balance with development over the longer term. While the Plan’s zoning appears to have considered the location of areas that exhibit high wildlife concentrations such as special harvesting areas (map 19, page 72 of the Background Report), key migratory bird terrestrial habitat sites, important wildlife areas (map 25, page 84 of the Background Report), and the potential for changes to alter the abundance or distribution of wildlife within the SSA has not been explored. Such an assessment could be accomplished through scenario analyses that explore future landscape transformations, the effects on associated wildlife habitat and population trajectories that are plausible under land-use plan options. We recommend that such an analysis be considered for the implementation and management phase of the Plan.

We also commend the Board and communities for advancing a number of large protected areas in areas of great importance for wildlife and cultural values. The ability of protected areas to provide secure habitat for wildlife generally increases the larger the protected area. Many valued species such as caribou, as you well know, move across home ranges that encompass thousands of square kilometers. In those regions of the Plan, however, where relatively small areas have been identified for conservation, we anticipate that the challenges of protecting wildlife for the future will be greater.

a) *Woodland Caribou* - The SSA includes the ranges of the Boreal and Northern Mountain populations of woodland caribou. While a substantial portion of the mountain caribou range occurs within the conservation zone network identified within the Plan, much of the Boreal woodland caribou range does not.

Unless steps are taken to address this gap, we believe it is likely that the industrial footprint within the region may expand to affect the majority of boreal woodland caribou habitat in the SSA. Such an increase in the industrial footprint would threaten the long-term viability of the boreal population of woodland caribou within the SSA because the species requires large (thousands of km²) and relatively intact landscapes for persistence². We recommend that future versions of the Plan address this gap by increasing the area included within conservation zones in the central and eastern portion of the SSA.

¹ Quoted from page 32 of the Plan.

² Environment Canada. 2008. Scientific Review for the Identification of Critical Habitat for Woodland Caribou, Boreal Population, in Canada.



Under the existing Plan, boreal woodland caribou conservation will depend on limiting impacts from development in general use and special management zones. We recommend that the targets proposed by the Sahtu Target Implementation Project be implemented on a temporary basis until the Sahtu Cumulative Effects Management Plan of Action is complete, as a precautionary approach to ensure that ongoing development is consistent with the goal of maintaining the SSA's ecological integrity. Woodland caribou are well suited as a species upon which to base cumulative effects thresholds because of the availability of woodland caribou research that quantifies the species' sensitivity to an industrial footprint.

b) Barren-ground Caribou – We appreciate that one of the priority reasons for establishing many of the conservation zones in the north-central portion of the SSA is to protect barren-ground caribou habitat.

However, we are concerned that these areas are small relative to the portion of the Bluenose West Barren-Ground Caribou herd's range that overlaps with the SSA. Due to the mobility of barren-ground caribou, such small areas may not be an effective conservation strategy for the herd. As recognized by CR 7³, a conservation strategy is needed that extends across the herd's range within the SSA.

Our preferred recommendation is to expand the conservation zones to include a greater portion of the barren-ground range. We appreciate that this creates potential constraints on developing the high hydrocarbon potential of the region. As a possible alternative to full protection, we suggest creating a special management zone, spanning across the unprotected portion of the herd's range within the SSA, that identifies barren-ground caribou as a key ecological and socio-cultural value and establishes thresholds and other criteria to ensure that development occurs within ecologically and socially acceptable limits.

In closing, we would like to thank you for the opportunity to review the final draft of the Sahtu Land Use Plan.

If we can be helpful in any way in the work ahead, please let us know.

Sincerely,

Larry Innes
Executive Director
Canadian Boreal Initiative

³ CR 7 states, in part, that: Regulators shall ensure that appropriate measures are in place to prevent and/or mitigate long-term adverse impacts from the land use activity to barren-ground and boreal woodland caribou and their habitat, within the area shown in Map 7 from October 8th to March 31st.