



SAHTU RENEWABLE RESOURCES BOARD

P. O. Box 134
Tulita, NT, X0E 0K0
TEL: (867) 588-4040
FAX: (867) 588-3324
Website: www.srrb.nt.ca

August 5, 2009

Judith Wright-Bird, Chair
Sahtu Land Use Planning Board
P.O. Box 255
Fort Good Hope, NT X0E 0H0

Re: Draft #2 Sahtu Land Use Plan – SRRB Comments

Judith:

On behalf of the Sahtu Renewable Resources Board, I would like to take this opportunity to congratulate the Sahtu Land Use Planning Board for its *Sahtu Land Use Plan – Draft 2*. This is a significant step in the process to seek formal approval of a final land use plan for the Sahtu Settlement Area.

As requested, the Board has reviewed both the draft document and accompanying map. Please find attached our comments/suggestions for improving the plan. If you have any questions, please contact our office at (867) 588-4040 or director@srrb.nt.ca. Thank you for the opportunity to comment.

Sincerely,

Jody Snortland
Executive Director

Cc Paul Latour, I/Chair
SRRB Members/Alternates

Abbreviations & Definitions (pg. vii, viii & ix)

- ADD consultation, Commissioner’s lands, Crown lands, designated Sahtu organization, development activity, habitat, traditional knowledge (SLCA 2.1.1)
- For consistency, Applicant should be used in place of Developer
- For consistency, Métis should be used (accented)
- Abbreviation for designated Sahtu organization (DSO) is not required as not used throughout the text

1.1 Introduction (pg. 1)

- Paragraph 3: “... and reflect their values, their goals, and their culture” would read better if worded as “... and reflect their values, goals and culture”

Map 1 – Sahtu Plan Area (pg. 8)

- To ensure clear separation from other settlement areas and borders, bold the SSA boundary line

Map 2 – Existing Uses (pg. 11)

- Within legend, instead of acronym use full name for EL, PL, PPL, and SDL

2.4.6 Wildlife (pg. 43)

- REMOVE acronym BCRP as not used again in document

Map 11 & Tables 6 & 7 – Important Wildlife Areas in the Sahtu Settlement Area

- Wolverine, muskrat, goat, lynx (not linx), and bear are shown on the map but not listed in either table
- Barren-ground Core Calving and Postcalving Area in legend but not on map as the areas are farther north than shown on map; therefore, not needed in the legend
- Boreal woodland caribou are listed in both tables but not shown on the map

2.5.6 Mining (pg. 57)

- Paragraph 2: “INAC has identifies ...” should read “INAC has identified ...”

Map 14 – Draft Mineral Potential of the Sahtu Settlement Area (pg. 59)

- Legend is unreadable

2.6.2 Co-management Boards (pg. 62)

- REPLACE current text for the Sahtu Renewable Resources Board with the following: “The Sahtu Renewable Resources Board is the ‘main instrument of wildlife and forest management’ in the Sahtu Settlement Area. The SRRB works with the Sahtu Renewable Resource Councils to manage wildlife and forests. Their main responsibilities include wildlife management, wildlife research, conservation-education and consultations. The SRRB proposes and establishes policies to protect wildlife and wildlife habitat, develops wildlife management plans, reviews and approves proposed developments, oversees wildlife research in the SSA, provides students with opportunities to develop

scientific learning and traditional skills, and regularly consults with communities.”

- Renewable Resource Councils are referred to throughout the document and, therefore, should have their mandate noted. This following text should be ADDED either on its own or following the SRRB text: “Renewable Resource Councils (SLCA S.13.9) “Each community in the Sahtu Settlement Area has its own Renewable Resource Council, which is responsible for conservation, research and wildlife management on behalf of their community members as well as providing harvester assistance. The RRCs provide grassroots knowledge for their local area and have an advisory relationship with the Sahtu Renewable Resources Board.”

2.6.5 Government of Canada – Indian & Northern Affairs Canada (pg. 65)

- Paragraph 2, bullet 4: “Develop mineral and oil and gas” perhaps should read “Develop mineral and oil and gas potential”

3.1 Vision – 100-Year Vision (pg. 77)

- Paragraph 1: ADD gathering to second sentence “...for hunting, trapping, fishing, *gathering*, cultural renewal and healing”

3.2 Land Use Issues and Goal (pg. 78)

- Goal #3: Not entirely convinced that the people in the Sahtu would agree that muskox populations should be maintained or increased; perhaps switch out muskox with Dall’s sheep
- Goal #10: long-term training opportunities should also include renewable resource industries (e.g. eco-tourism) (or include in Goal #7) and in renewable resources (encourage education in sciences)

3.3.2 Land Use Zoning – Great Bear Lake Watershed Management Plan (pg. 80 & 81)

- As per request, a review of the GBLW Management Plan was conducted. It appears that many of the terms, conditions and prohibitions are reflected within the land use plan (of primary concern to the SRRB, Conditions (Section 4.5.3) and Prohibitions (Section 4.5.4) related to wildlife and wildlife habitat). However, we do have some comments:
 - Who will determine what natural background levels are?
 - Ecological and cultural integrity are defined in the GBLW Management Plan but who is responsible for determining if the integrity is maintained? How is this enforceable?
 - Does the GBLW Management Plan have the authority to instruct the Mining Recorder’s Office and the National Energy Board to consult on prospecting permits and other approvals further than what is already done? GBLW Management Plan Section 4.5.3. i (pg. 54)
 - How will the GBLW Management Plan affect other communities in the Sahtu Settlement Area as they were not consulted when the plan was drafted?

3.3.3 Terms – General Use Terms – Research (pg. 88)

- Wildlife and archaeology research is not licenced by the Aurora Research Institute

3.3.3 Terms – General Use Terms – Cumulative Effects (pg. 90)

- SRRB will need to review prior to final approval

3.3.3 Terms – General Use Terms – Community Consultations (pg. 92)

- Consultation protocols must be expanded beyond the definition provided in the SLCA 2.1.1; SLUPB's definition of consultation should be consistent with the protocols developed

3.3.3 Terms – General Use Terms – Traditional Knowledge (pg. 93)

- Traditional knowledge protocols and guidelines must be clear and consistent for all types of activities in the SSA; SLUPB's definition and use of traditional knowledge should be consistent with the protocols developed

3.3.3 Terms – General Use Terms – Monitoring (pg. 93 & 94)

- The SRRB should be directly involved in the development of a Monitoring program within the SSA. Ensuring adequate funding and personnel resources for a Sahtu Environmental Monitoring Program may prove to be difficult. Sahtu organizations may want to consider involvement in the established CIMP.

3.3.3 Terms – General Use Terms – Economic Benefits (pg. 95)

- The SRRB recommends that SSI encourage the inclusion of RRCs in Benefits & Access Agreement negotiations to ensure that harvesting compensation, trained environmental monitors and resources for Back-to-the-Land programs are adequately addressed by designated Sahtu organizations and applicants
- The SRRB recommends that SSI support the RRCs to develop a regional approach to harvesting compensation agreements and encourage the involvement of all RRCs in this process
- SLCA 13.7.6 provides for the right of first refusal to purchase a commercial guiding or outfitting business at fair market value and Schedule II to Chapter 13 sets out the procedures for the exercise of the right of first refusal; with limited resources and personnel, RRCs find it difficult to put together a suitable business plan within the time period allotted (120 days); the SRRB recommends that SSI, with the aid of RRCs and land corporations, design a template that identifies a clear process for potential outfitting camp buyers. If designed in advance, a business plan may be developed within the time period allotted that will be acceptable to buyer, seller, and lending agencies.

3.3.3 Terms – Special Management Terms – Wildlife (pg. 97)

- CR #15: ADD Dall's sheep

- CR #16: ADD boreal & mountain woodland caribou, barren-ground caribou and wolverine sensitive life cycle stages (mountain & boreal woodland caribou and wolverine are all listed as NWT Species at Risk)

Chapter 4 – Zone Descriptions

- For quicker reference, suggest to list each proposed management zone under zone descriptions alphabetically
- Will the Fort Good Hope Trapping Area be incorporated into the SLUP?

4.3.2 General Use Zones – Zone Descriptions (pg. 113)

- SRRB will need to review prior to final approval

4.4.2 Special Management Zones – Zone Descriptions

- Great Bear River – no mention has been made about potential hydro dam development
- Dehcho (Mackenzie River) – Boreal woodland caribou should be identified under the ecological features of this zone
- Fort Good Hope to Colville Lake Trail – no longer exists in Draft #2; removed by community?

4.6.2 Conservation Zones – Zone Descriptions (pg.155)

- Paragraph 2: “There is moos habitat ...” should read “There is moose habitat ...”