



February 16, 2017

Heather Bourassa, Chair  
Sahtu Land Use Planning Board  
PO Box 235  
Fort Good Hope, NT X0E 0H0  
email: [info@sahtulanduseplan.org](mailto:info@sahtulanduseplan.org)

**Re: SLUP Amendment Process Following Establishment of Nááts'ihch'oh National Park Reserve**

Dear Chairwoman Bourassa:

Thank you for the opportunity to comment on the continuing process of amending the Sahtu Land Use Plan following establishment of Nááts'ihch'oh National Park Reserve ('NANPR').

**WCS Canada reiterates our scientific findings in prior submissions that point to the great value of the Proposed Conservation Initiative Zone 41 lands (non-NANPR lands) in the Nááts'ihch'oh area for sensitive wildlife like mountain caribou, grizzly bear, and Dall's sheep. The 2012 decision to exclude these lands from Nááts'ihch'oh -NPR undermined the intent of establishing a protected area to secure these values. Consequently, we urge that: (1) the areas excluded on the Nááts'ihch'oh Ratification Draft map (February 17, 2012) be designated as a Conservation Zone until they are added to Nááts'ihch'oh National Park Reserve, and (2) remaining lands also be designated as a Conservation Zone (rather than Special Management Zone).**

One of us - Dr. John Weaver, Senior Scientist for WCS Canada - conducted 5 years of field research on grizzly bear, Dall's sheep, and woodland caribou throughout the South Nahanni River watershed, including the Nááts'ihch'oh area. John obtained extensive, on-the-ground experience in this very remote area and his conservation reports provided much pertinent data that informed the momentous decision to expand Nahanni National Park Reserve and create Nááts'ihch'oh National Park Reserve. The maps 4-6 in the SLUPB Background Report (2015) were based upon our WCS Canada map data from Dr. Weaver's 2006 report. Dr. Justina Ray, President and Senior Scientist of WCS Canada, is co-chair of the Terrestrial Mammal Subcommittee of COSEWIC and led numerous Canadian assessments of wildlife species that occur in the Sahtu region, including grizzly bear (2013), mountain caribou (2014), and barren-ground caribou (2016). Justina has served as science advisor to Environment Canada on identification of critical habitat for boreal caribou across Canada and to the Ontario government on caribou recovery and has authored numerous publications on this subject.

The final Sahtu Land Use Plan designated the Nááts'ihch'oh area (Zone 41) as a Proposed Conservation Initiative (PCI), having the same status as Conservation Zone until the process for establishing Nááts'ihch'oh National Park Reserve was concluded. In this version, however, the Sahtu Land Use Planning Board (SLUPB) is considering re-zoning options for the remaining lands outside Nááts'ihch'oh NPR as a Special Management Zone, which will provide considerably less protection.

It is our understanding that the Sahtu Dene and Metis of Tulita and Norman Wells supported a ratification draft for Nááts'ihch'oh NPR as mapped by the Senior MERA Committee on February 17, 2012 (more similar to Option 1). That draft, however, subsequently was rejected by the Government of Canada and replaced with a much smaller area. Those areas in the ratification draft that were excluded from NANPR have outstanding value for ecosystem integrity, populations and seasonal ranges/habitat of large wildlife (e.g., caribou), and watershed protection for the headwaters of the South Nahanni River. In particular, within the Nááts'ihch'oh area west of the upper South Nahanni River:

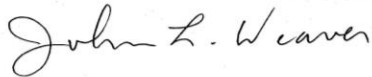
- the area along the Yukon border north of Howards Pass provides critical calving/rearing range and breeding range for the Nahanni caribou herd, which migrates from wintering areas near Virginia Falls in Nahanni National Park Reserve (see Figures 1 - 3); and
- the Little Nahanni River valley provides important calving/rearing range for the Nahanni caribou and sustains high density of grizzly bears (see Figures 2 and 4).

Therefore, WCS Canada supports adding these areas into Nááts'ihch'oh National Park Reserve, as per the 2012 ratification draft. With the understanding that this step may take time, we urge you to protect these excluded lands as a Conservation Zone in the Sahtu Land Use Plan in the interim period. The remaining areas within PCI 41 also have important birthing and breeding areas for mountain caribou, grizzly bear habitat, and a herd of Dall's sheep on Lened Ridge. Mineral development without strong and enforceable standards could impact these wildlife populations. We understand that mining leases for the Lened area have not been renewed, so this may be an opportunity to extend Park protection there (Figure 5). To better safeguard these wildlife values, WCS Canada urges that remaining lands be designated as a Conservation Zone instead of a Special Management Zone.

Lastly, the proposed conformity stipulation #20 appears useful but rather general. In light of these important wildlife values amid adjacent National Park Reserves, we encourage stronger and more explicit provisions. Any future proposals for development in the non-Park sections of the Nááts'ihch'oh area should require a thorough regional assessment of impacts, with a view toward proactive management of cumulative effects. Any approved developments should be contingent upon enforceable standards to protect the waters and wildlife – especially sensitive and wide-ranging species like caribou and grizzly bears. We offer our technical assistance if needed.

We thank you for carefully considering these comments and recommendation.

Sincerely,

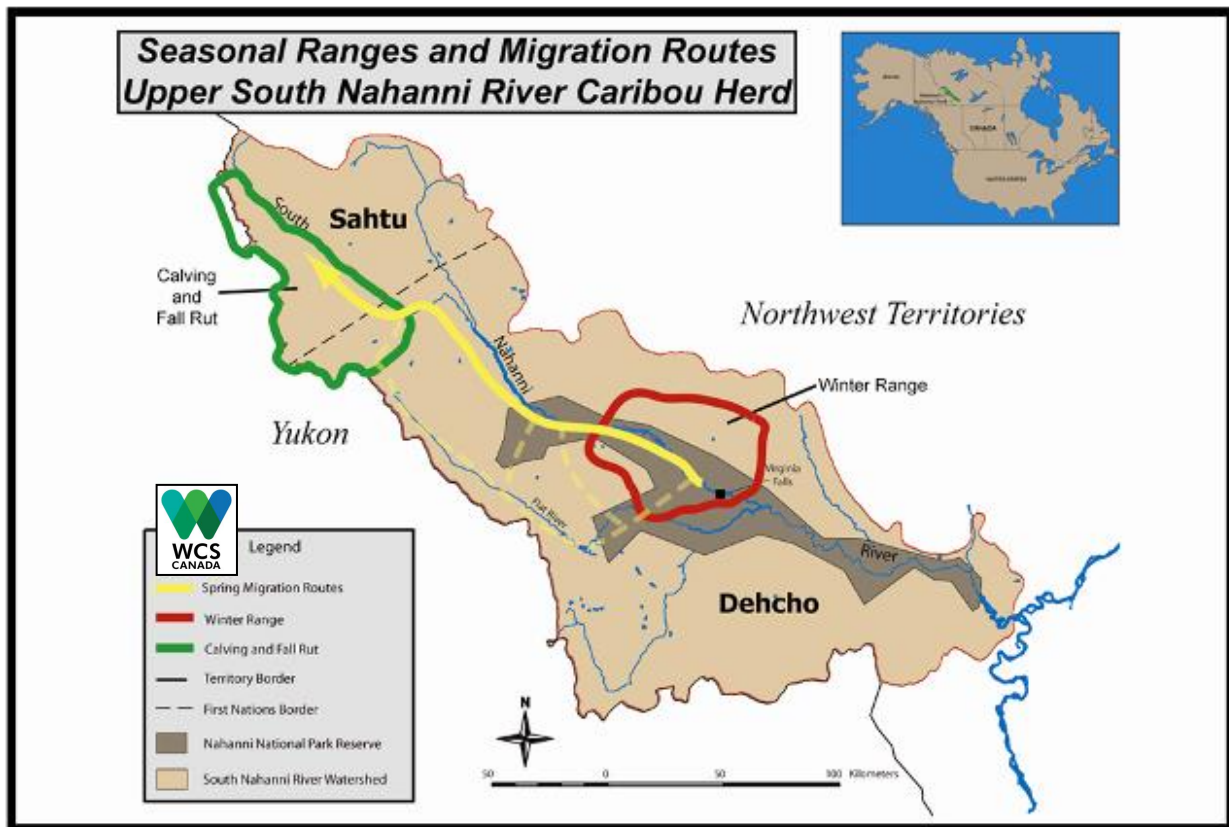


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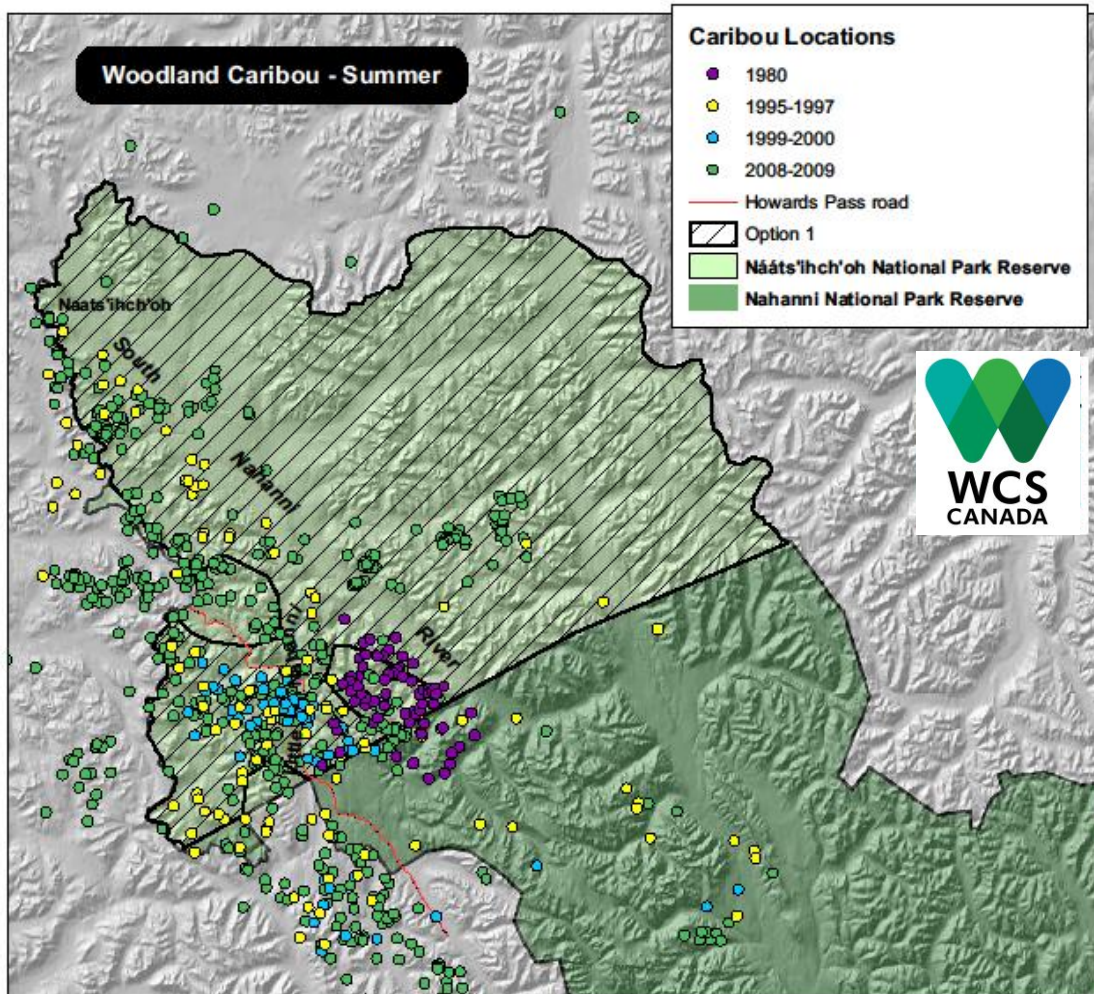


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**Figure 1.** Seasonal ranges and likely migration route of the Nahanni caribou herd that winters above Virginia Falls and migrates to the Nááts'ihch'oh area for calving and breeding (from Weaver 2006).

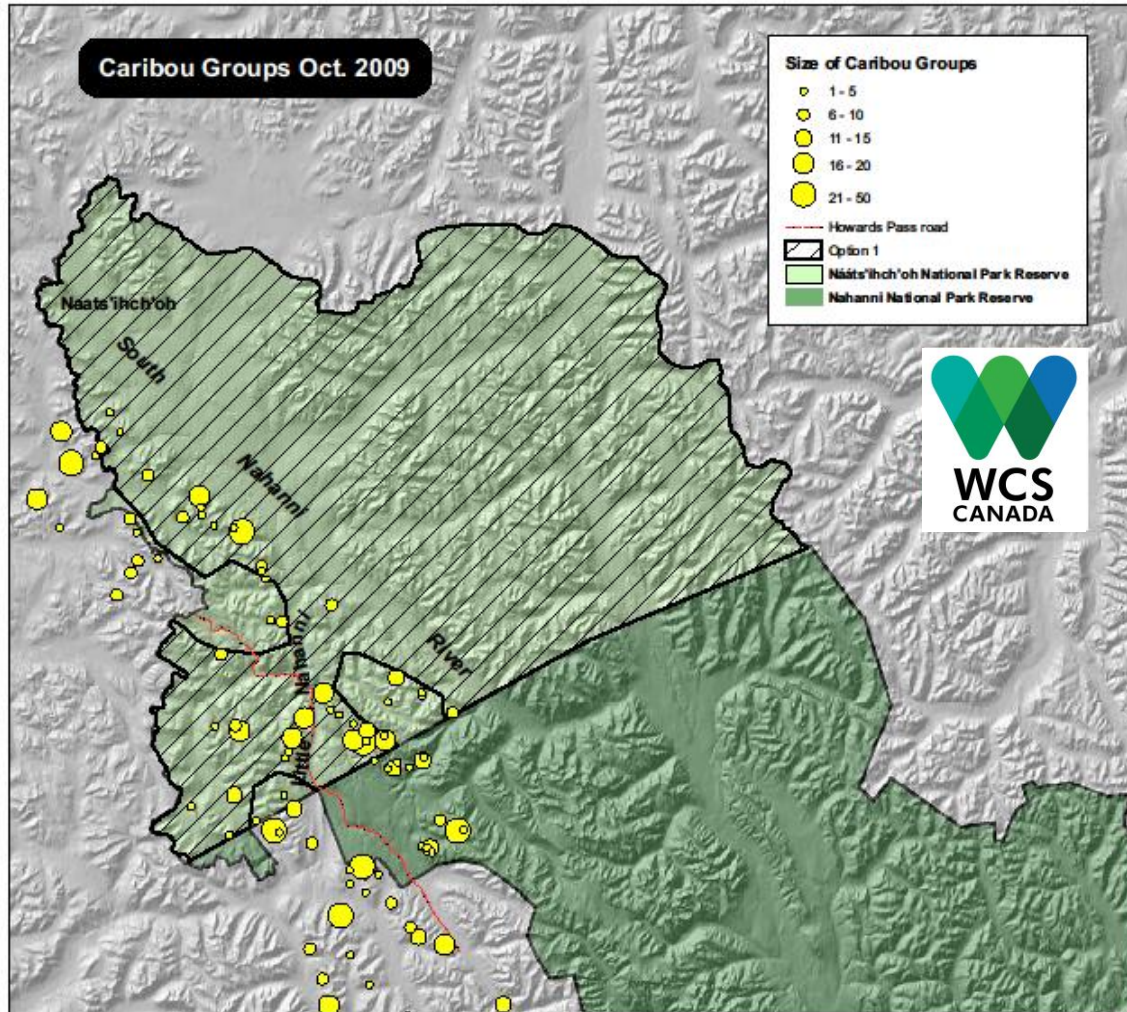


**Figure 2.** Locations of woodland caribou during summer in the Nááts'ihch'oh region 1980-2010 relative to Option 1 (from Weaver 2006).





**Figure 3.** Location and size of woodland caribou groups observed during October 7-9, 2009 in the Nááts'ihch'oh region, relative to Option 1.



**Figure 4.** Map of grizzly bear density based upon extensive sampling across the Greater Nahanni Ecosystem, relative to Option 1 (Weaver 2006).

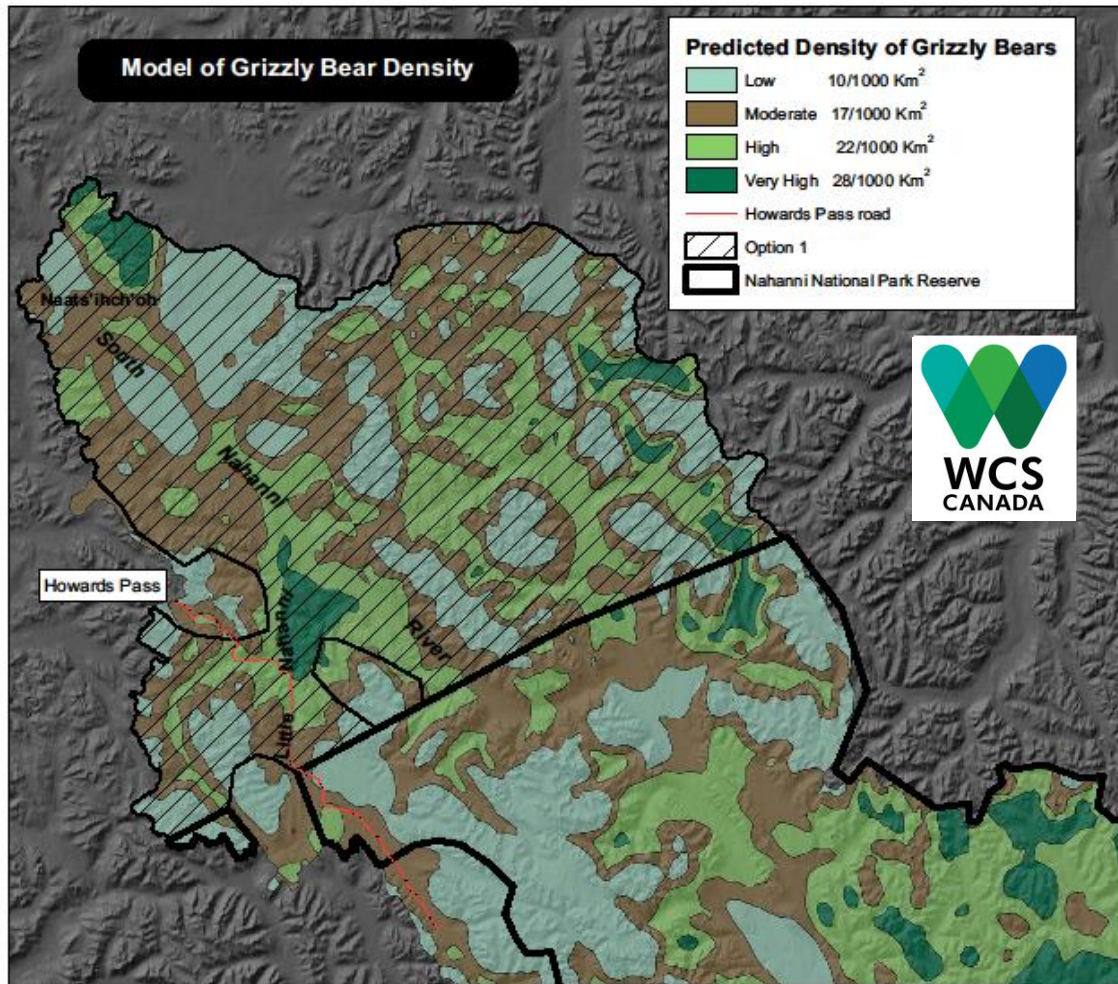




Figure 5. Occurrence of Dall's sheep in the Lened area relative to Option 1 (from Weaver 2006).

