

June 16, 2015

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: Wildlife Conservation Society Canada (WCS Canada) Comments regarding the SLUP Amendment Process Following the Establishment of Nááts'ihch'oh National Park Reserve**

Dear Chairwoman Bourassa:

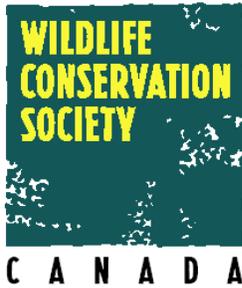
Thank you for the opportunity to comment on the *Background Report - Amending the Sahtu Land Use Plan Following the Creation of the Nááts'ihch'oh National Park Reserve*. We are submitting comments in our respective capacities as Wildlife Conservation Society (WCS) Canada scientists<sup>1</sup> specializing in wildlife ecology, conservation biology, and landscape ecology in Canada.

Based upon the scientific information (see our attached submission), it is our opinion that the non-Park Reserve lands in the Nááts'ihch'oh area should be designated as a **Conservation Zone** to best support the Sahtu vision and goals.

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 headwaters area known as *Nááts'ihch'oh*. John obtained extensive, on-the-ground experience in this very remote area and published the WCS Canada *Conservation Report Big Animals and Small Parks: Implications of Wildlife Distribution and Movements for Expansion of Nahanni National Park Reserve* (2006). This scientific report provided much pertinent data that informed the momentous decision to expand Nahanni National Park Reserve and to create Nááts'ihch'oh National Park Reserve –

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<sup>1</sup> WCS Canada ([www.wcscanada.org](http://www.wcscanada.org)) was established in May 2004 as a Canadian non-government organization with a mission to conserve wildlife and wildlands by improving our understanding of and seeking solutions to critical problems that threaten key species and large wild ecosystems throughout Canada. We implement and support comprehensive field studies that gather information on wildlife needs and then seek to resolve key conservation problems by working with First Nation communities, Government and regulatory agencies, conservation groups, and industry.



which together comprise a remarkable gift and legacy from the Dehcho, Sahtu Dene and Metis to all people of Canada and the world.

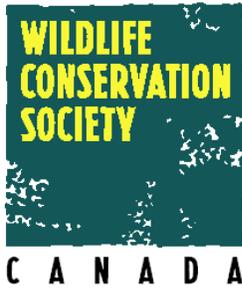
Dr. Justina Ray, Senior Scientist and Executive Director of WCS Canada, is co-chair of the Terrestrial Mammal Subcommittee of COSEWIC and led the recent assessments of grizzly bear (2013) and mountain caribou (2014) in Canada. Justina served as science advisor to Environment Canada on identification of critical habitat for boreal caribou across Canada and to the Ontario government on caribou and wolverine recovery. She is co-author (with Monte Hummel) of the book Caribou and the North: A Shared Future (2008) and other relevant publications.

The final Sahtu Land Use Plan (August 8, 2013) designated the Nááts'ihch'oh area (Zone 41) as a *Proposed Conservation Initiative* (PCI) in recognition of its 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 watershed. Unfortunately, the boundaries of Nááts'ihch'oh National Park Reserve (NANPR), announced in August 2012 and finalized in December 2014, left out several areas that are critical to the South Nahanni caribou herd and other key areas for grizzly bears and Dall's sheep. Now, the Sahtu Land Use Planning Board (SLUPB) is considering re-zoning options for the 2,702 square kilometres that were not included in the Nááts'ihch'oh National Park Reserve (NANPR) as part of your land use planning process.

The Little Nahanni River area from Howard's Pass south to the Sahtu-Dehcho border:

- provides critical calving/rearing range for the migratory South Nahanni caribou herd (Mac Creek Plateau, Lened Ridge, Howard's Pass, and Little Nahanni River valley);
- provides important breeding range for the South Nahanni caribou (east Lened Ridge/Lened Plateau, Mac Creek Plateau, and Little Nahanni River valley);
- sustains one of the few very high-density areas of grizzly bears in upper South Nahanni basin (Little Nahanni River valley and surrounding valleys);
- includes the only area in the Greater Nahanni Ecosystem that has both woodland caribou and a very high density of grizzly bears (Little Nahanni River valley and surrounding valleys);
- sustains year-round use by Dall's sheep, with some unique color patterns (Lened Ridges).

In light of the documented use of these excluded areas by vulnerable wildlife, explicit protection of these excluded areas in the Land Use Plan is critical to maintain the ecological integrity and wildlife uses of the adjacent National Park Reserves.



In addition, we are particularly concerned about the effects of proposed mining developments and the associated heavy, constant industrial traffic along the Howard's Pass road on seasonal movements and ranges of the South Nahanni caribou herd and grizzly bears. The many and substantive detrimental effects of new mines and roads – even a single development – into remote country on vulnerable wildlife and ecosystem integrity have been well documented in the scientific literature. Any future proposals for development in the non-Park sections of the Nááts'ihch'oh area should require a thorough regional assessment of impacts, including cumulative effects. This is especially critical in this area of renowned National Parks and World Heritage Site.

We have provided supporting data and rationale for this recommendation in the attached submission as part of the Sahtu Land Use Board deliberations and decision.

Thank you for carefully considering these comments and recommendation.

Sincerely,

A handwritten signature in black ink that reads "John L. Weaver".

John Weaver, Ph.D.  
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344 Bloor Street West  
Toronto, Ontario M5S 3A7

A handwritten signature in black ink that reads "Justina Ray".

Justina Ray, Ph.D.  
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