

May 31 2007

Mr. John T'Seleie
Executive Director
Sahtu Land Use Planning Board

Re: Review of Sahtu Land Use Plan – Draft 1

Dear Mr. John T'Seleie:

The Canadian Boreal Initiative (CBI) congratulates the Sahtu Land Use Planning Board for developing a proactive land use plan to conserve the ecological, cultural and economic values of such an important Boreal region. It is our pleasure to provide the Sahtu Land Use Planning Board with a review of the first draft of the Sahtu Land Use Plan.

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 our best opportunity 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 to establish land use zones that will guide future development and conservation in the region.

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

1. Commercial renewable resource harvesting is listed as acceptable in conservation zones (A7, page 14). Provided that the primary goal of conservation zones on page 12: "...to ensure that traditional, cultural, heritage, and bio-physical values are maintained" is upheld, we agree that commercial renewable resource harvest can be permitted, subject to the priority rights of participants' to engage in hunting, fishing, trapping and gathering rights in conservation zones. In situations where conservation limits are required, we recommend a precautionary approach whereby any commercial harvesting allocations would be made only after participants subsistence needs are met.

2. A number of fish habitat developer conditions are listed on page 20-21. We recommend the addition of a developer condition that stipulates that employees of the developer are not permitted to fish. Fish populations in northern rivers, streams, and lakes are very sensitive to fishing. For example, the maximum sustainable yield for lake trout in a northern Ontario lake was exceeded just 3 weeks after development of a single access road allowed angler access to the lake. In contrast, 9 years of experimental disturbance to lake trout habitat in the area had little impact¹.
3. A linear disturbance density threshold of 1 km/km² is established as a special management zone developer condition (T5, page 23). We support this threshold because available caribou research suggests that it will be sufficient to protect woodland caribou. However, the condition states that only linear disturbances greater than 3 m wide are included. We are not aware of evidence that indicates that linear disturbances less than 3 m wide will not have an adverse effect on woodland caribou. The 3 m criterion would permit a high density of linear disturbances that are less than 3 m wide, and this could be detrimental to 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.
4. Restoring ungulate habitat to a quality similar to pre-disturbance conditions is established as a special management zone developer condition (T7, page 23). We support this condition, but feel that more detail should be provided to define when restoration is satisfactory and the maximum time available to the developer to achieve restoration. Research conducted in the Gwich'in Settlement Area found that restoration of seismic lines in that region is slow². Restoration was particularly slow in fen habitats when the ground cover was disturbed. We therefore suggest that a developer condition be added stipulating that ground cover not be disturbed during development of seismic lines.
5. The Sahtu Land and Water Board Conditions (page 28) state that parties active in Special Management Zones must establish a site-specific research and monitoring program. We agree that research and monitoring is needed to evaluate the effectiveness of conservation strategies and to develop new knowledge to improve conservation strategies. However, we feel that site-specific research and monitoring is unlikely to achieve sufficient spatial and temporal scale to provide meaningful information. To make research and monitoring more effective, we recommend that site-specific research and monitoring be replaced by a single research and monitoring program that is run at the scale of the planning region. The research and monitoring

¹ John M. Gunn and Rod Sein. 2000. Effects of forestry roads on reproductive habitat and exploitation of lake trout (*Salvelinus namaycush*) in three experimental lakes. *Canadian Journal of Fishery and Aquatic Sciences* 57(Suppl. 2): 97-104.

² Pippa Seccombe-Hett and Jeffifer Walker-Larsen. 2004. Forest Growth after Fire and Clearing for Seismic Lines in the Upland Habitats of the Gwich'in Settlement Area. Gwich'in Renewable Resource Board. Available online: <http://www.grrb.nt.ca/pdf/seismiclines/Seismic2004.pdf> (accessed April 2, 2007).

program could be managed by the Sahtu Land Use Planning Board or another appropriate Sahtu entity, and should be designed to monitor ecological indicators in the region and research key uncertainties that limit conservation strategies (e.g. the response of woodland caribou to narrow seismic lines). Funding the regional monitoring and research program could be recovered through permitting fees from developers active in the region.

6. At present, it is difficult to assess the capacity of the plan to maintain ecological integrity because limited information on this topic is provided. Page 12 of the Appendix states that connectivity and size of areas were considered when establishing conservation zones. It will be helpful if more information is provided explaining how connectivity and size of areas were considered. In addition, the level of representation achieved by the Conservation Zones should be described in detail. Finally, the capacity of the Sahtu Land Use Plan to maintain viable populations of sensitive species such as woodland caribou and grizzly bear should be evaluated.

In closing, we would like to thank you for the opportunity to review Draft 1 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 Canada so if we can be helpful in any way in the work ahead, please feel free to contact us.

Sincerely,



Larry Innes,
Executive Director