



NC/10-0093-20

October 1, 2010

Ms. Judith Wright-Bird, Chairperson
Sahtu Land Use Planning Board
Box 235
Fort Good Hope NT
X0E 0H0

Subject: Comments re Draft 3 of the Sahtu Land Use Plan

Dear Ms. Wright-Bird,

Nature Canada applauds the progress made to date by the Sahtu Land Use Planning Board (SLUPB) and I ask you to accept our enclosed comments on Draft 3 of the Sahtu Land Use Plan (the Plan). Nature Canada is one of Canada's oldest national non-profit conservation organizations with a mission to protect and conserve wildlife and habitats in Canada by engaging people and advocating on behalf of nature. Our network includes 40,000 supporters and more than 350 naturalist organizations across Canada. Nature Canada is also BirdLife International's Canadian co-partner alongside Bird Studies Canada.

We are pleased to see that the Plan has taken into consideration the wealth of cultural history, ecological value and diverse knowledge present in the Sahtu Settlement Area (SSA). Nature Canada appreciates the Plan's aim to reflect the views of local communities in the SSA as well as interested stakeholders throughout the NWT and across Canada. Our comments are a general response to the Plan and are therefore not an exhaustive list of all aspects of the Plan related to our mandate.

We would be happy to discuss any of our comments with the SLUPB, and we welcome any feedback. Once again, thank you for accepting our comments on Draft 3 of the Sahtu Land Use Plan. Nature Canada looks forward to the outcome of this important multi-stakeholder process.

Kind regards,

A handwritten signature in blue ink that reads "Mara Kerry".

Mara Kerry
Director of Conservation, Nature Canada



DETAILED COMMENTS

The Protection of Edaííla

Edaííla, also known as Caribou Point, is a very important area for the Déline people, and the NWT as a whole. It is to our understanding that the Canadian Wildlife Service has rejected a proposal by the Déline to endorse Edaííla as a National Wildlife Area (NWA). Given that this ecologically unique area will not receive formal legislated protection by the federal government, we strongly recommend that Edaííla, in its entirety, be listed as a Conservation Zone (CZ). Given the substantial community interest in permanently protecting both the surface and subsurface areas of Edaííla, Nature Canada further recommends that the SLUPB ask the Sahtu Secretariat Incorporated to endorse its protection by the Government of the NWT. We understand that this can be achieved through a recommendation to the NWT Protected Areas Strategy (NWTPAS). Formal legal protection will safeguard the ecological and cultural richness of Edaííla for future generations, while ensuring that proposals to amend the Plan over time will not jeopardize the area.

We encourage the SLUPB to extend the spirit of this recommendation to all Proposed Conservation Initiative (PCI) zones that do not receive legal protection under federal legislation. This is particularly prudent given the onerous costs involved in restoring the cultural and ecological value of natural areas after they have been developed or otherwise modified. Moreover, adequate restoration is not always possible.

Important Bird Areas (IBA)

Nature Canada, alongside Bird Studies Canada, oversees BirdLife International's Important Bird Area (IBA) program in Canada. The IBA program aims to identify, monitor, and conserve a worldwide network of sites that provide essential habitat for significant and vulnerable bird populations. Nature Canada is jointly responsible for overseeing 597 IBAs across Canada, nearly 300 of which are recognized as globally significant areas for birds. We invite you to review the Canadian IBA database, which is publicly accessible at www.ibacanada.ca.

The NWT contains a total of 17 IBAs, three of which are located in the SSA. All three IBAs are designated as Special Management Zones (SMZ). Nature Canada strongly recommends that these three IBAs be designated as CZs given that two of them are globally significant¹, while the third is considered continentally significant², according to the Canadian Important Bird Area Criteria established by Bird Studies Canada³. In addition to this, the Canadian Wildlife Service has identified all three IBAs as key migratory bird terrestrial habitat sites in the NWT⁴. These IBAs represent important breeding habitat for globally and continentally significant concentrations of several species and should not be left vulnerable to disturbance under SMZ or

¹ The site is known or thought to hold 1% or more of the global or North American population of a species.

² The site is known or thought to hold 1% or more of a continental biogeographical population of a species; that is 1% or more of the population of a flyway or a subspecies or a recognized separate regional population.

³ Chaundy, R and Wilcox, S 2001. Canadian Important Bird Area Criteria. Bird Studies Canada

⁴ Latour, P.B., *et al.* 2006. Key migratory bird terrestrial habitat sites in the Northwest Territories and Nunavut. Canadian Wildlife Service



General Use Zone (GUZ) activity constraints. Table 1 lists the name, geographic location, significance and size of the three IBAs in question.

Table 1- IBAs Information for the Sahtu Settlement Area

Name	Geographic Location (UTM)	Significance	Size (km ²)
Lower Mackenzie River Islands	67° N 130.17° W (Fort Good Hope, Northwest Territories)	Globally significant	829
Middle Mackenzie River Islands	64.88° N 125.58° W (Tulita, Northwest Territories)	Globally significant	1,088
Brackett Lake	65.25° N 125.17° W (Tulita, Northwest Territories)	Continentially significant	1,343

As co-partners in Canada’s IBA program, Nature Canada and Bird Studies Canada have substantial data for each IBA that illustrate the importance of these sites for birds and other wildlife. The Lower Mackenzie River Islands IBA, a globally significant site, is a major stopover along the Western Central Flyway, hosting as many as 112,800 waterfowl and most of the Western Central Flyway population of Snow Geese (estimated to be half a million) in spring. Another globally significant IBA, the Middle Mackenzie River Islands, is visited by birds such as the Greater White-fronted Goose, Canada Goose, Tundra Swans as well as many duck species during annual spring migrations. Between two and six percent of the global population of Snow Goose congregate in the Middle Mackenzie River Islands IBA. The third site, the continentally significant Brackett Lake IBA, provides excellent breeding habitat for ducks and is used by approximately two percent of the Canadian White-fronted Goose population.

Again, Nature Canada strongly recommends upgrading the three IBAs listed in Table 1 from SMZs to CZs, given their continental and global significance for waterfowl species.

Colville Lake and Ecological Representation

While Nature Canada applauds the SLUPB’s interest in ecological representation, we note that in the Colville Hills ecoregion the proposed CZs are limited to buffers around lakes. While fully respecting the views and opinions of the local community to minimize CZs in this area, we believe that additional CZs in this area are in the interest of all Canadians. The Colville Hills ecoregion’s combination of features is not found anywhere else in Canada. Increasing CZs in the Colville Hills area would improve the level of ecological representation captured by the Plan, and would facilitate conservation measures for a unique example of Canada’s natural heritage for the benefit of all Canadians.

Nature Canada reiterates a recommendation submitted to the SLUPB on Draft 2 of the Plan by Ducks Unlimited in 2009 that a CZ be designated in the Colville Hills region given that it offers



breeding habitat for a significant number of ducks – which are considered a good indicator for ecosystem health.

We encourage the SLUPB to re-evaluate its assessment of ecological representation in the SSA before finalizing the Plan. It is Nature Canada’s understanding that the Board may have inadvertently overlooked the role of existing PCI’s and CZ’s when addressing ecological representation recommendations provided by the NWTPAS Science Team in the Plan. We urge the SLUPB to commit to a Plan that provides full ecological representation.

Again, Nature Canada recommends expanding the coverage of CZs in the Colville Hills area to improve the level of ecological representation captured by the Plan.

Ecological Monitoring Thresholds and Conservation Targets for Special Management and General Use Zones

We fully support the SLUPB’s plans to develop a Sahtu Environmental Monitoring Program and suggest that no new projects be approved until the monitoring program has been fully established. We believe it is important that the monitoring program be implemented on a regional scale rather than a case-by-case basis, as this will give a better reflection on the condition of key ecological components, take cumulative effects into consideration, and allow for the evaluation of progress made and effectiveness in managing these zones in their entirety. We also believe that it is important to define ecological thresholds, based on the most current scientific evidence, that serve as effective early warning signals for significant ecological impacts (positive or negative) resulting from development in these zones. We strongly encourage the SLUPB to establish defensible ecological baselines and set measurable conservation targets to ensure that development within the proposed zones is sustainable and that the overall biological diversity in the SSA is conserved.

General Comment

In Nature Canada’s interpretation, the Plan inherently focuses on meeting targets for the proportional area of each land use category in the Sahtu Settlement Area. While we recognize the importance of using targets to guide land use planning decisions, we caution that this practice should not be one-sided, i.e., targets for the maximum area of a given land use category should be matched with minimum area targets. The United Nations Convention on Biological Diversity captures this point well in the wording of its 2010 Biodiversity target⁵ to protect the components of biodiversity: to effectively conserve “at least 10% of each of the world’s ecological regions”.

⁵ CBD, 2004. “CoP 7 Decision VII/30. Strategic Plan: future evaluation of progress. Goal 1 – Promote the conservation of the biological diversity of ecosystems, habitats and biomes; Target 1.1”; available at <http://www.cbd.int/decision/cop/?id=7767>, accessed 29 September 2010.