

**Additional Comments on Deh Cho Land Use Planning Committee Working
Draft Land Use Map, Terms and Policy Recommendations
From the Department of Resources, Wildlife and Economic Development,
GNWT**

The Department of Resources, Wildlife and Economic Development (RWED) has reviewed the draft Deh Cho Land Use Planning Committee's Working Draft Land Use Map, Terms and Policy Recommendations and will be pleased to make two presentations at the Deh Cho Land Use Planning Committee Regional Forum. Additional comments of a general and specific nature are provided below.

GENERAL

Compliance

The documents contain suggested conditions for specific land use zones. For some of these conditions, enforcement may be required (e.g. sport fishing restrictions, and Zone 27 hunting restrictions: Table 7. pg. 21). How is the DCLUPC envisioning that these conditions be enforced?

Critical Wildlife Habitat

On the critical wildlife maps (Map 4) there are extensive areas indicating no critical wildlife habitat. If these areas result from data gaps (e.g. caribou travel corridors south of Nahanni National Park Preserve), we suggest this be noted on the maps.

We have noted there is overlap between critical wildlife habitat (Map 4) and zones of permitted agricultural activity. Is there a mechanism to prioritize which activity will prevail?

Agriculture

Clarifying which type of agricultural practices are allowed (eg. crops only, livestock and crops, livestock only) is important in order to assess impacts on wildlife accurately.

Forest Fire History

We are aware that RWED data on fire history was utilized. GNWT's forest fire policy recognizes forest fire as a natural phenomenon, which means that changes to the landscape will occur over time. The evolving landscape needs to be considered to ensure the Land Use Plan remains up-to-date to reflect areas impacted by fire.

Forest Management

Concerns about the direction contained in the regional forum information package for forest management relate to the definition of the term forestry, its subsequent application to zoning maps and restrictions identified in Table 7 under the description column.

An adequate supply of fuel wood and community needs for other timber products should be ensured. It should also be ensured that the definitions and their application in the zoning do not result in this not being able to be achieved.

The document defines forestry as the selected harvest of sawlogs. This is not considered an acceptable definition of the term. Defining terms in a manner inconsistent with generally accepted practice may lead to confusion or be seen to support unacceptable management practices. The definition should be broadened to be more inclusive of other forest management activities.

It is important that restrictions associated with terms are appropriate to a land use plan and do not contain conditions that are more appropriately identified through a resource management planning process or through terms and conditions of authorizations. In Table 7- Description of Terms, the term "Deh Cho Wide Forest Management and associated description reflects the need for joint development of appropriate silvicultural practices. The Department supports this approach. The term, Community-Based Forest Management in Table 7, also specifies some restrictions consistent with the IMA and land use planning. Restrictions that refer however to operations are considered more appropriately determined on a project specific basis than for an entire zone. While Community-Based Forest Management is supported, identification of utilization standards, operational practices and types of markets are considered to be better determined through other types of process.

SPECIFIC

Page 10

Zone Objectives – “where high resource potential co-exists with high conservation values.”

It should be recognized that the Special Management Zones may have a distinct seasonal component (e.g. fall hunting, spring hunting). In these areas, some resource development activities could occur at other times. Map 1 does not distinguish between which special management zones have these seasonal components.

As well, resource activity may also be seasonal. For example, most resource extractions occur during the winter months where potential environmental impacts are kept to a minimum. Linear disturbance may exist within the area of co-existence, which could be utilized to ensure cumulative effects are kept to a minimum.

Zones could be given a polygon to illustrate a season, for example;

1. accessible during winter
2. traditional trapping area in the winter
3. protected during spring migration/staging areas
4. accessible during summer for vegetation work
5. fall hunting grounds

Page 12 Table 5

Sport Fishing – should also be checked off for Nahanni Greater Ecosystem and Upper Mackenzie.

Lake Tourism – should identify that Sibbeston Plains has a Naturalist Lodge at Cli Lake that isn't being utilized now, but may be in the future if tourism increases.

Page 17 Table 7

Access Planning

Has there been any consideration given to the fact that there may be an all-weather Mackenzie Highway in Zone? Any consideration for road access should be considered concurrently with development of the Mackenzie Gas Pipeline.

Page 18 Table 7

Non-consumptive Tourism

Why is Big Game Outfitting referenced in the non-consumptive tourism section of Table 7?

Page 19 Table 7

Revegetation

Achieving the need identified in the table may be better met by ensuring that revegetation is carried out using a northern Canadian seed mix developed for use in the NWT. This would ensure that seeds mixes are compatible to the region where they are planted. A seed mix native to the Canadian Boreal Forest in general, may still result in establishment of vegetation not found in the north. The highway corridors that connect the north with the south have already brought in invasive plants that are not native to the NWT, for example sweet chamomile has been found along the Yellowknife highway. The pipeline could be considered another corridor for invasive plants if the seed mix used for restoration is composed of seeds from the south and the whole pipeline utilizes the same seed mix.

Page 20 Table 7

Use of Guides

Local guides should be familiar with area of interest and be proficient on the land (incorporate somehow).

Page 21 Table 7

GHL

There are established residential hunter camps within Zone 27. Will these be grandfathered?

Sport Fishing

In our view, not allowing Catch and Release will weaken tourism in the Deh Cho. A lot of tourists come to the north for the great northern experience. Catch and release provides tourists with an opportunity to experience the north first hand, while preserving this resource for future visitors and local residents. Not having catch and release will harm the tourism industry including northern residents that come to the Deh Cho for fishing. In 2004, use of barbless hooks became mandatory throughout the NWT. Was the recent introduction of this legislation considered by the DCLUPC when developing the terms and conditions for this land use zone?

Page 24 Table 8

Habitat Availability

Our interpretation of 97% habitat disturbance as a threshold for moose implies that virtually the entire landscape can be modified without any impacts on moose. Is this interpretation correct? If yes, this statement is of considerable concern where moose habitat overlaps with woodland caribou habitat (e.g. Ebbutt Hills) as woodland caribou are more sensitive to landscape disturbance. .

Page 26 Table 9

Seasonal Restrictions

Birthing season for woodland caribou needs to be extended to be from mid-May to mid-June. This is critical to note when restricting access or development on a seasonal basis.

Page 29 Map 3

The location of well sites, pipelines and oil and gas fields south of the 60th parallel will influence the future location for oil and gas infrastructure in the NWT. This is not acknowledged throughout the entire draft land use plan. For example, Duke Energy has well sites north of Petitot River. Were these considerations incorporated into the zones that were developed for the land use plan?