

Heidi Wiebe

From: david.murray@pc.gc.ca
Sent: Friday, October 22, 2004 3:39 PM
To: Heidi Wiebe
Cc: Chuck.Blyth@pc.gc.ca; Doug.Tate@pc.gc.ca; 'Monika Templin'; Steve.Catto@pc.gc.ca
Subject: Comments from Parks Canada



Parks Canada
Comments for DCLU.

Hello Heidi,

I have attached a WordPerfect file of my comments. These are basically what we said at the meeting in Fort Providence, and I got the message there that you were working on all of our issues already!

I am working on getting the data to you that we already have available. This will include bull trout locations, caribou locations, the archaeological sites around the park, and possibly a better database of the karst features. By next year we will have a lot more, but you will have a draft plan by then!

Thank you for taking the time to hear from us,

David

(See attached file: Parks Canada comments for DCLUPC.wpd)

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| To: <Steve.Catto@pc.gc.ca>, <david.murray@pc.gc.ca>
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| cc: <Chuck.Blyth@pc.gc.ca>, <Doug.Tate@pc.gc.ca>, "'Monika Templin'"
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| Subject: Comments Deadline
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Hi All,

As a follow up to our discussion last week and the rest of our Board meeting, I wanted to let you know that the Committee will be accepting written comments on our reports, process, etc until next Friday, Oct. 22/04. With respect to data fixes/exchange, we have set a deadline of November 26th to complete all required changes to our base data layers and model. It's best if we get our GIS people working together on any required fixes from your group. Monika is off for a few days but back in the office on Monday. She is cc'd here for contact purposes and her number is (867) 699-3165. Thanks all.

Heidi Wiebe, Executive Director
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Information to the Deh Cho Land Use Planning Committee regarding the *Draft Land Use Plan Options Atlas* and the Expansion of Nahanni National Park Reserve

The Deh Cho Land Use Planning Committee's (DCLUPC) *Draft Land Use Options Atlas* is well organized and well presented. It is a useful document to get discussion started on land use decisions in the Deh Cho Region.

Parks Canada and the Dehcho First Nations have been working with many partners (DIAND, NRCAN, GNWT, Wildlife Conservation Society, etc.) on a proposal to expand Nahanni National Park Reserve. We appreciate the words regarding Land Use Planning and Protected Areas in your document on "Common Questions and Answers" such as "... we recognize park expansion as a parallel process and will work to ensure that our plans are harmonized." However, we are concerned that the maps did not recognize the proposed expansion, and that all of the "Land Use Options" would limit the scope of a national park expansion.

Our comments fall into 4 areas:

- 1) We would like to see the park expansion area of interest shown on maps. This is also known as the Greater Nahanni Ecosystem.
- 2) There are data gaps and inconsistencies: we can help you with this (new info, corrections, mines appearing as conservation values, etc.)
- 3) There are problems with the models - most important to us is that of "trade-offs" that don't necessarily exist - i.e. Tourism for Conservation. There are also issues of incompatible development - again one could see trade-offs between certain development scenarios and tourism would have be considered as incompatible to some types of industrial development.
- 4) The "Land Use Options" maps do not illustrate options - they illustrate the output from a mathematical model. None of these are actually options - they are not feasible options at any rate.

Data Gaps - new information etc.

Minor correction for most of the maps: The Yukon/NWT boundary is a solid line on a map, not the dashed line shown on the legend.

Map 4 - wildlife habitat value

There is more information on caribou that should be included in the analysis. We will have more information on caribou, grizzly bears, bull trout, sheep and goats over the next months - can we provide this for your analysis. We also have the data used by

Claude Mondor to create the map of “Areas of High Conservation Value” used to determine the land withdrawal in the South Nahanni River watershed. We have recent data from radio collars that the Yukon Government put on caribou that come into the area west and south of Nahanni National Park Reserve. We also have data on Bull Trout range in the South Nahanni basin.

Map 6 - Archeology, Cabins, Historic Sites and Rare Features

The map’s legend should be more clear - Conservation Value Rank is shown on the legend as shaded rectangles, while on the map the sites are marked with dots and bullseyes.

This map should differentiate between the different types of features since it now lists mine infrastructure at Prairie Creek and Tungsten as very high conservation value. At a minimum there should be a distinction made between contemporary infrastructure and places of historic importance.

It appears that archaeological sites in the upper Nahanni area are not on the map.

We appreciate that the data points related to the karst features are indicated, but I would suggest that some of the points be turned into polygons. As an example, there are area points for the top and bottom of Scimitar Canyon, while the whole canyon should be marked. A more appropriate treatment would be to show the entire area as a high value karst landscape, rather than a series of karst points.

Problems with the Models

The models that resulted in the 5 maps of “options” have some unfortunate assumptions built in to them. The greatest problem is that the models contrast development and conservation in a polar manner - setting out lands for one or the other. In fact, some land uses that are considered “development” do not run counter to conservation. The most obvious example is tourism. Tourism, as a land use, would generally be counter to mining and oil and gas but could easily be supportive of conservation land uses.

Some conservation areas can allow for limited logging or agricultural uses such as grazing. With modern technology, it is even possible to remove oil and gas, or even minerals, from beneath small protected areas. And, on the other hand, conservation areas can generate economic benefits. Certainly, Nahanni National Park Reserve has been a steady employer and tourism promoter for over 30 years. The expansion of Nahanni National Park reserve will have measurable economic benefits to the region.

Sustainable development does not contrast economic development and environment - it integrates them. A land use plan should look at ways of encouraging the protection of the land through economic development. Certainly, some land uses that may be destructive and inappropriate for conservation areas - but perhaps these specific uses

should be identified and not lumped in with all development, including tourism.

Land Use Options

The maps entitled “Land Use Options” should be called “scenarios” or some other title to indicate that they represent the output of a computer model, and are not options that have been developed through discussion, thorough analysis or planning.

The Way Forward

Parks Canada and the Dehcho First Nations are working together to expand Nahanni National Park Reserve. We are gathering a lot of information and we will be consulting extensively during this park expansion planning program. We do not want to see the potential park area reduced or the park expansion proposal hampered unnecessarily. On the other hand, we hope that the Deh Cho Land Use Planning Process could provide opportunities to discuss the park expansion proposal. We must work together so that the opportunity for both park expansion and a final land use plan are achievable.