



**CANADIAN PARKS AND  
WILDERNESS SOCIETY  
NWT CHAPTER**

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Heidi Wiebe  
Executive Director  
Deh Cho Land Use Planning Committee  
Box 199, Fort Providence, NT X0E 0L0  
By Fax: 867.699.3166

**Re: CPAWS-NWT's Comments on the Deh Cho Draft Land Use Options Atlas**

Dear Ms. Wiebe,

We congratulate the Deh Cho Land Use Planning Committee (DCLUPC) and Staff for the hard work that was required to bring the draft Land Use Options together. The work completed to date is an excellent first step toward a draft land use plan. In the work ahead to further develop the draft plan, please accept this letter as comments of the Northwest Territories Chapter of the Canadian Parks and Wilderness Society (CPAWS-NWT). Below is a brief description of CPAWS-NWT and the 'whole land' concept, followed by our answers to questions in the questionnaire provided at the Yellowknife ENGO consultation meeting on August 12, 2004.

**CPAWS-NWT Background**

CPAWS-NWT is part of a national non-profit conservation organization, dedicated to protecting Canada's wilderness. CPAWS-NWT is working toward preserving the vitality of the NWT's bioregions<sup>1</sup>. We are working actively to achieve this primarily by partnering with local communities to identify and establish new protected areas throughout the NWT. Particularly important to CPAWS-NWT is the establishment of an interconnected network of culturally significant and scientifically defensible core protected and special management areas that will aid in protecting the overall ecological health of the NWT. This would include representative landscapes, critical habitats and landscape connectivity for fish, waterfowl and wildlife, culturally significant areas, and will meet the vision of the local people. CPAWS-NWT strongly supports the development and implementation of land use plans in the NWT that integrate these conservation values. Together, the development and implementation of land use plans and establishment and management of protected areas can help maintain the clean air, clean water, and healthy landscapes we currently enjoy in the NWT.

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<sup>1</sup> A bioregion is often referred to as a 'whole-life place.' Unlike the other 'eco' terms which tend to focus strictly on biological and scientific features, the concept of a bioregion, while not neglecting the scientific characteristics, also includes humans and the corresponding history, cultures and spirituality that are linked to a place.

## **‘Whole Land’ Concept and CPAWS-NWT**

CPAWS-NWT believes that healthy ecosystems are the ‘highest and best use’ of the land. Maintaining healthy bioregions across the landscape is CPAWS-NWT’s first priority, and only small amounts of land should be allocated to (well-managed and sustainable) industrial development activities. The ‘whole land’ concept, also called the ‘reverse matrix’, envisions a land management regime where the defacto management of the land is for protection of cultural and ecological values, with carefully planned areas of industrial development. This is counter to accepted practices where small amounts of land are allocated for "protection from development" and industrial uses are considered as the "highest and best use" for land.

CPAWS-NWT staff and Board, including Northern Conservation Specialist Alison Woodley, from the CPAWS National Office, helped compile the following answers to the DCLUPC questionnaire:

### **1. Have we captured your interests in the Deh Cho?**

Through the evaluation of wildlife habitat values, traditional land use and occupancy, archeology, rare features, historic sites and cabins, and other values, several of CPAWS’ main interests have been captured. CPAWS-NWT works mainly on establishing new protected areas. For example, we have been involved in the proposed Pehdzeh Ki Deh candidate protected area and Edézhzié through the Northwest Territories Protected Area Strategy process as well as in initiatives to expand Nahanni National Park Reserve to protect the South Nahanni Watershed, including the Nahanni karstlands. Through this work we have a concern that the proposed expansion of Nahanni National Park Reserve has not been fully captured in the analysis. Specific issues, such as this, are described in detail in answers #4 and #7.

### **2. What is your vision for the Deh Cho?**

CPAWS-NWT congratulates and supports the Deh Cho people on their leadership and vision in land protection. Recently, The Deh Cho Interim Land Withdrawals reflected a vision of the land that is shared by CPAWS-NWT—an interconnected network of protected areas with the aim of protecting the culture and land of the Deh Cho people. CPAWS-NWT’s vision for the Deh Cho land use plan would also reflect this vision and the ‘whole land’ concept as described above.

### **3. Have we represented the resource potential and conservation values of the region appropriately?**

As briefly mentioned at the August consulting meeting, we have concerns with the consideration of all economic development values equally and in opposition to conservation values. Specifically, we question the lumping of potential sustainable development activities like tourism with other extractive industries in the analysis.

Appropriate tourism development can be compatible with conservation. Nahanni National Park Reserve is the most visited national park in the NWT,<sup>2</sup> and this results in economic benefits locally and regionally. A report on the “Economic Impacts of Parks Canada”, prepared by the Outspan Group in 2001, analyzed the economic impact of Parks Canada’s programs across Canada. In the NWT, the impact from Parks Canada and Visitor Spending includes a \$7.1 million contribution to GDP, \$5.5 million contribution to Labour Income, and 185.8 full time equivalents of employment. Thus it is clear that there is a significant economic contribution from Nahanni National Park Reserve to the local and regional economy, both directly and indirectly. These economic impacts would be useful to incorporate into the land use planning analyses as a model that is potentially compatible with, not in opposition, to conservation.

In addition, an analysis of the long-term economic benefits of conservation, both in terms of direct economic benefits, and in terms of ecological services such as clean water would further inform land use decisions. Again specific issues, are described more detail in answer #4 below.

#### **4. Which of the options best reflects your vision for the region? How should it change in future revisions?**

Land Use Options 4 and 5 best reflect CPAWS-NWT’s values and interest in the ‘whole land’ concept. Below are comments on specific areas of interest related to the Land Use Options.

##### Pehdzeh Ki Deh

As you are aware, the Pehdzeh Ki First Nation has been pursuing the protection of Pehdzeh Ki Deh through the NWT Protected Area Strategy (NWT PAS) since 2000. For the past two years, the community, with the assistance from the Dehcho First Nations (DFN), has been involved in overlap issues with the Sahtu communities of Tulita and Deline. Over the next two years, there are plans and funding in place to continue to resolve the overlap issues and to move forward to the next steps in the NWT PAS. CPAWS-NWT supports the ‘conservation’ land use designation of Pehdzeh Ki Deh through the land use planning process *until* permanent protection can be achieved through the NWT PAS. However, land use option #1 does not appear to protect all of the critical culturally and ecologically significant features of Pehdzeh Ki Deh. Options 2-5 offer increasingly better and more representative protection of these features.

##### Nahanni

*The South Nahanni Watershed as a candidate protected area:* As mentioned above, CPAWS-NWT, as well as our national organization, have been working closely with DFN and Parks Canada to expand Nahanni National Park Reserve to protect the entire South Nahanni Watershed, including the Nahanni karstlands. Given the longstanding interest by the federal government and the DFN in expanding the national park reserve, and the identification of the Greater Nahanni Ecosystem (which is equivalent to the South Nahanni Watershed including the Nahanni karst) as the area of interest for expansion in the Memorandum of Understanding between Parks Canada and the Deh Cho, we feel that the Watershed, including the Nahanni karstlands should be identified as a proposed protected area in the land use plan. Similar sites under discussion for protection, such as Edézhíe and Pehdzeh Ki Deh are identified as such.

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<sup>2</sup> Parks Canada. 2004. Nahanni National Park Reserve of Canada Management Plan.

Our work to date on protecting the South Nahanni Watershed has included: being involved in the assessment and regulatory stages of proposed and existing developments within the Watershed; supporting and communicating grizzly bear research; promoting protection opportunities to government agencies and officials, the media, conservation supporters, the Yellowstone to Yukon Conservation Initiative, and the general public at the local, regional and national levels. CPAWS-NWT and our national organization strongly support protection of the entire South Nahanni Watershed, including the karstlands, in an expanded national park. CPAWS feels this is the strongest and best way to protect and maintain the long-term ecological integrity of the Nahanni region.

*Nahanni Local Voices:* There are a number of documents that formally identify the South Nahanni Watershed, or Greater Nahanni Ecosystem, as a proposed protected area:

- The DFN passed several Resolutions stating support for protecting the entire South Nahanni Watershed.<sup>3</sup>
- The Aug. 20<sup>th</sup>, 2003 Memorandum of Understanding between the Deh Cho and Parks Canada identifies the Greater Nahanni Ecosystem (an equivalent area to our definition of the South Nahanni Watershed including the Nahanni karstlands) as the area of interest for a national park expansion.
- In a letter to Prime Minister Paul Martin, sent, March 23, 2004, Grand Chief Herb Norwegian supported the expansion of Nahanni National Park Reserve to protect the entire South Nahanni Watershed. Chief Peter Marsellais of Nahanni Butte also sent a letter to Senator Consiglio Di Nino in March, 2003, signaling support for park expansion to protect the watershed.
- The federal government's Five Year Action Plan for Parks Canada (announced in October 2002) includes a stated intent to expand Nahanni National Park Reserve.
- The Park Management Plan, developed by the Nah?a Dehé Consensus Team, and approved by the Parliament of Canada, identifies the establishment of an ecologically-based park as an objective, and identifies working cooperatively to protect the entire watershed as a key action to achieve this.
- The Nah?a Dehé Consensus Team also developed an ecological vision for the Nahanni which states in part that "Nah?a Dehé will protect a wilderness watershed in the Mackenzie Mountains where natural processes such as fires and floods will remain the dominant forces shaping the park's ecosystem..."

Given the clear policy direction from both the Deh Cho and the federal government that the South Nahanni Watershed including the karstlands is an area of interest for protection, we would like to see the future draft land use plan clearly identify the area as a proposed protected area. We believe that this is a key stepping-stone to achieving long-term protection for the Nahanni. As the Deh Cho people know very well, the Nahanni is a very special region of the planet, and is cherished by many people beyond the Deh Cho, from all parts of the world. Our shared objectives of protecting the land have made it a pleasure to work together on this initiative, and we look forward to continuing our work towards this shared goal.

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<sup>3</sup> Resolution #06, passed at the Leadership Meeting in Fort Providence, Oct.29-31, 2002  
Resolution #04, passed at Leadership Meeting, Wrigley, NT, Feb17-21, 2003

There is also support for protection of the South Nahanni Watershed in the Sahtu region. The Nahanni Headwaters, the northern portion of the watershed located in the Sahtu, has been identified as a Conservation Area in the Preliminary Draft Sahtu Land Use Plan to allow for expansion of the Nahanni National Park Reserve. CPAWS-NWT has been working with the community of Tulita to support protection efforts. Recently, Tulita has requested that Parks Canada sponsor an interim land withdrawal of the Nahanni Headwaters through the NWT PAS process.

*Nahanni Mineral Potential:* While CPAWS-NWT realizes that majority of the areas of highest mineral potential in the Deh Cho are within the Mackenzie Mountains, we believe it is desirable to prohibit mineral exploration and development within the South Nahanni Watershed, in order to maintain the conservation values. If the entire watershed is not protected, increased mineral development and other industrial activity along the borders of an expanded Park have the potential to degrade the watershed and Park over time, and increase park management costs in order to monitor and mitigate negative impacts from the development.

*Economic Analysis and Mineral Viability:* In the land use options, mineral potential is identified based on known and suspected geological information. We feel it is important to consider the economic viability of accessing and developing these mineral deposits in the analysis. CPAWS would suggest that economic viability of mineral potential is key to assessing its true potential as an economic development option. In addition, an analysis of the long-term economic benefits of land protection, both in terms of direct economic benefits, and in terms of ecological services such as clean water would further inform land use decisions.

*Nahanni Ecological and Natural Feature Information:* It is well known that there are information gaps in ecological and wildlife habitat information within the South Nahanni Watershed. More evidence is being gathered as part of the feasibility study for national park expansion that will help to fill some of these gaps. As the land use planning process proceeds, it would be beneficial to integrate the data collected by the Parks Canada Agency, Nahanni Expansion Working Group, and other agencies into the analysis. For example, there are currently studies underway or planned on grizzly bear, woodland caribou, bull trout, Dall's sheep, mountain goat, as well as vegetation mapping using satellite data. CPAWS-NWT feels that limiting the protection of the Watershed to areas where there was previously known ecological information would be an oversight. For example, John Weaver's Trans-boundary Survey of Grizzly Bears (2003)<sup>4</sup>, found high abundances of grizzly bears in the Prairie Creek area and that including this area as part of an expanded Nahanni National Park Reserve would "contribute importantly toward a viable population of grizzly bears." This area does not appear to be reflected in the Wildlife Habitat Value map or in the various land use options.

In another example, there is initial evidence from radio-collared woodland caribou being studied in the Yukon Territory, that some of the caribou wintering in the Park Reserve are moving southwest, through an area that is not under interim protection, to calve and rut in the Yukon. This information suggests the importance of this area of the watershed to the Northern Mountain Population of Caribou, which are listed under the Species at Risk Act as "Special Concern". A

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<sup>4</sup> Weaver, John L. 2003. Trans-boundary Survey of Grizzly Bears, Nahanni National Park Reserve. 2003 Annual Report. Wildlife Conservation Society.

CPAWS report, released October 4, 2004<sup>5</sup>, identifies the vulnerability of woodland caribou nation-wide, and highlights the need to protect boreal forest habitat in order to conserve this species.

Also, Dr. Derek Ford's karstland research in the 1970s and 1980s was used to identify very high conservation values mapped on Figure 2 (page 10), but were not identified as very high or high values in the Wildlife Habitat Value Map. CPAWS-NWT would like to see the greater karstland area maintain the original 'very high' conservation values in the Wildlife Habitat Value Map and in the options maps.

**5. The DCLUPC would like to implement cumulative effects management in the Deh Cho through the land use plan. Are you interested in reviewing research and participating in discussion with the committee on this topic?**

While CPAWS-NWT supports and is interested in supporting the implementation of cumulative effects management initiatives, we currently do not have the staff or volunteer capacity to be involved at a detailed level. However, we would appreciate receiving information such as reports, guidelines, policies etc. as they are developed.

**6. Do you have any thoughts or comments on our process?**

The collection, organization, and communication of the information was excellent. The consultation session was very informative, useful, and well presented. We appreciate both the community focus and the solicitation of input from organizations such as CPAWS-NWT.

**7. Specific Comments/Questions/Other**

Pehdzeh Ki Deh, Edézhíe, Nahanni, Sambaa K'e, and Mackenzie Bison Wildlife Sanctuary Connections

On Page 17, Map 7: Summary of Conservation Values, there are 2 areas of very high conservation value on the southeastern side of the Pehdzeh Ki Deh Candidate Protected Area and north of Bulmer Lake, in the Edézhíe Candidate Protected Area. Another area between Edézhíe and Pehdzeh Ki Deh on the east side of the Mackenzie River and highway also has significant conservation values. Given that these areas are not part of either the Pehdzeh Ki Deh or Edézhíe Candidate Protected Areas, these two areas combined would provide good landscape connectivity between the candidate protected areas and CPAWS-NWT supports having them included as conservation areas in the future draft land use plan.

Various other conservation areas have been identified in some of the Land Use Options, mostly Options 3-5. CPAWS-NWT sees the land use planning process playing a critical role in maintaining connectivity between core protected areas, especially in areas of high conservation value. Therefore, CPAWS-NWT supports the designation of conservation areas to maintain

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<sup>5</sup> Canadian Parks and Wilderness Society. 2004. Grey ghosts: the decline of woodland caribou in Canada's boreal forest. <http://www.cpaws.org/news/cariboureport.pdf>

landscape connectivity between adjacent proposed and existing main protected areas including Pehdzeh Ki Deh, Edézhzié, Nahanni, Samba K'e, and the Mackenzie Bison Wildlife Sanctuary/Falaise Lake.

#### Ecoregion Representation

In the development of the draft land use plan, a map of the ecoregions within the Deh Cho region overlaid with conservation area designations, along with a gap analysis of ecoregion representation should be included.

#### Fort Liard, Hay River and other Deh Cho Communities

Recently both Fort Liard and Hay River have approached the NWT PAS Secretariat to find out about the NWT PAS process. CPAWS-NWT encourages regular communication between the DCLUPC and the NWT PAS Secretariat to keep up to date on various conservation initiatives as they arise, and to provide information to communities about protection options and opportunities and to ensure both approaches/processes are complimentary.

#### Great Bear Lake Watershed Management Plan Initiative

CPAWS-NWT has also been an active participant in the Great Bear Lake (GBL) watershed management plan initiative. The vision is to “Keep Great Bear Lake clean and bountiful for all time.” One of the future goals of the Working Group is to involve neighbouring regions that have lands within the GBL watershed, in the management initiative. Currently, the Working Group is drafting terms and conditions for development activities and land uses within the Sahtu portion of the GBL watershed. It would be good to consider this process during the future development of the land use plan. Approximately 4% (or 6,401 km<sup>2</sup>) of the GBL watershed is located in the Deh Cho region and both Keller Lake and Tseepantee Lake, which are part of the Pehdzeh Ki Deh Candidate Protected Area, are a part of the GBL watershed.

CPAWS-NWT looks forward to continuing to participate in the land use planning process with the DCLUPC. Please do not hesitate to contact us at 867.873.9893 if you would like to discuss our comments further, or if you feel we can be of further assistance.

Sincerely,

Gordon Ringius, PhD  
Executive Director  
CPAWS-NWT

cc. Timothy Faher, National Executive Director, CPAWS-National Office  
Alison Woodley, Northern Conservation Specialist, CPAWS-National Office