



Celebrate, Educate, Protect!



January 26, 2006

Ms. Heidi Wiebe
Executive Director
Dehcho Land Use Planning Committee
P.O. Box 199
Fort Providence, NT
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Subject: Comments on the November 2005 plan entitled *Respect for the Land: The Dehcho Land Use Plan(DCLUP)*

Ms. Wiebe:

On behalf of Sierra Club of Canada and Nature Canada, we would like to thank you for the opportunity to participate in this latest round of consultations and to comment on the revised Dehcho Land Use Plan.

First, we applaud the tremendous efforts undertaken by the Dehcho Land Use Planning Committee and the Dehcho people. Your efforts will result in a precedent-setting example of integrated land-use planning.

Second, there are several plan elements, which, in our opinion, need to be changed, strengthened or clarified.

Watershed Protection

The upper reaches of the northwest rivers watershed in zone 18 remain unprotected. Buffer-zones currently in place will provide limited protection from land-based activities occurring on adjacent general use zones. Any contamination or compromised integrity of the upper parts of the watershed will likely impair the river systems downstream. The identified buffer zones cannot protect against this type of threat.

The only way to truly protect the entire watershed is to prohibit all industrial activity within the watershed, a solution that might not be perceived as in keeping with a balanced approach. Perhaps, a more pragmatic approach may be to designate all of the adjacent lands of conservation zone as special management zones and to make best practices mandatory within these zones.

Access

The revised DCLUP includes a number of disclaimers that indicate zoning requirements do not apply to pre-existing 3rd party rights. Where this disclaimer is used to allow access, for example through a conservation zone, the benefits of the conservation zone designation are impaired. This potential threat obliges the plan to set strict limits and conditions for the access.

Thresholds

The current plan identifies only “critical” level thresholds. The inclusion of quantitative thresholds is an important tool for assessing impairment to ecological integrity. If mitigation measures are initiated only once critical thresholds are reached, damage to the ecosystem may be beyond repair. For clarity purposes, a “cautionary” threshold should be identified for species at risk, water and air quality and other ecosystem elements as identified by technical experts.

For example, the road density thresholds established for the conservation of caribou are set at 1.8 km/km² a level that was identified as a critical threshold in the previous draft plan. We believe that a more cautionary approach should be taken, and that there should be an explicit monitoring process established to ensure that caribou populations do not decline as a result of linear disturbances.

Finally, we support the adoption of the Dehcho Land Use Plan (2005), albeit with some concerns, as it seems to achieve balance between industrial development and conservation values. With 52% of lands designated for conservation, not only is significant natural capital preserved but also preserved are the ecosystem services associated with this capital. The protection of natural capital, including ecological services such as air filtration, water purification and carbon sequestration, provided by the 110 000 km² of conserved land is integral to ensure future ecological and economic security. **In short, the conservation of these lands is in the best interest of all Canadians.**



Rachel Plotkin
Director, Forests and Biodiversity Program
Sierra Club of Canada



Mara Kerry for
Director of Conservation
Nature Canada