Land and Water Boards of the Mackenzie Valley



October 1, 2021







Lisa Worthington Wildlife and Fish Division Department of Environment and Natural Resources Government of the Northwest Territories P.O. Box 1320 Yellowknife NT X1A 2L9

Sent via email

RE: Land and Water Board comments the draft Interim Wek'èezhìı Boreal Caribou Range Plan

Dear Lisa Worthington,

The Land and Water Boards of the Mackenzie Valley, or the Boards (Gwich'in, Mackenzie Valley, Sahtu, and Wek'èezhìi Land and Water Boards), would like to thank you for the opportunity to provide comments on the draft *Interim Wek'èezhìi Boreal Caribou Range Plan* (the draft Plan). The Boards recognize the collaborative effort that has gone into the development of the Plan and would like to take this opportunity to applaud its progress.

The Boards comments on the draft Plan are largely editorial in nature and are attached in the supplied Excel spreadsheet. Noting that implementation of the draft Plan relies largely on Section 95 of the *Wildlife Act* and the use of the Wildlife Monitoring and Management Plan (WMMP), at least until regulations under Section 93 are developed, the Boards will continue to work with Environment and Natural Resources (ENR) to facilitate your review of WMMPs through the use of the Boards' Online Review System. The Boards recommend that, whenever possible, an early determination by the Minister for the requirement of a WMMP for a project will assist in helping the Boards determine what conditions are required. The Boards further recommend that ENR ensure that the WMMP guidance for proponents is updated to reflect that a WMMP will be required by default for any project proposed in an Enhanced or Intensive management area.

The draft Plan proposes the use of the Boards' application review process to ascertain whether or not a project application adheres to the Plan's management actions and will require additional information in applications to the Boards. This may require updates to Board guidance in what is required in an application as well as determinations of an application's completeness. **The LWBs strongly encourage GNWT staff to engage with Board staff on these proposed new application requirements as soon as possible**.

The Boards look forward to further engaging in the process as the discussion progresses. Again, we would like to thank the GNWT for this opportunity to review the draft Plan. Please feel free to contact Sarah Elsasser at <u>selsasser@wlwb.ca</u> or (867) 446-5963 should you require more information.

Sincerely,

Leonard DeBastien Executive Director Gwich'in Land and Water Board L.DeBastien@glwb.com

Paul Dixon Executive Director Sahtu Land and Water Board Paul.Dixon@slwb.com

Shelagh Montgomery Executive Director Mackenzie Valley Land and Water Board smontgomery@mvlwb.com

Ryan Fequet Executive Director Wek'èezhii Land and Water Board rfequet@wlwb.ca

Comments on Wek'èezhìı Interim Boreal Caribou Range Plan

Organization (if applicable): _____

Name:

Sarah Elsasser

Section #	Section Title / Sub-title	Page #	First few words of paragraph or Table or Figure (Cut and paste from the document).	Table #	Figure #	Comment	Recommendation
Executive Summary	Why was an interim Boreal Caribou Range Plan needed?	7	Boreal caribou were listed as threatened under the federal Species at Risk Act (SARA) in 2003 and in the Northwest Territories (NWT) under the Species at Risk (NWT) Act in 2014			Second sentence in paragraph has repeated textet at end of sentence "leading to its decline."	delete repeated text
Executive Summary	Maps of Important Areas for Boreal Caribou and Management Classes	8	The T ¹ ₁ cho Government and the North Slave Métis Alliance conducted community meetings and interviews with elders and harvesters to gather IK about boreal caribou and their habitat.			This sentecne is the first time "IK" is used and should be presented in full	
Executive Summary	Implementation Tools	10	Section 93 of the Wildlife Act focuses on protection of habitat for the conservation of specified wildlife species.			spacing needs to be corrected	
Executive Summary	Implementation Tools	10	There is a very small parcel of federally-administered land in the Wek'èezhii boreal caribou range planning region where an active mineral lease exists			This sentence needs a period at the end	
Introduction	none	20	This interim range plan has been developed based on the best Traditional Knowledge1 and western science available at the time.			The second last sentence on this page " before the road opens for public use in November 2021" needs a period at the end	
Habitat Information	5.4.2	55	Because the predictive seasonal RSF maps are very fine- grained (30 m pixel resolution), Marxan software, a spatial optimization program commonly used to support conservation planning Ball et al. 2009)			the reference "Ball et al. requires a bracket at the beginning	
EXISTING LAND PROTECTIONS AND DEVELOPMENT INTERESTS	6.42	74	The plant would be located 11 km northwest of Gamètì, and would comprise of 800 m of land between the Rae and Taka Lakes			the sentence is not gramatically correct or clear	
MANAGEMENT ACTIONS	8.7.1	130	In order to identify high priority boreal caribou habitat patches to designate as VAR for consideration in fire management decisions, the late winter predictive RSF model was used (see Appendix C, Figure C-6) was used.			duplicate words at end of sentence	