



June 9, 2015

Hunter Tootoo, Chair  
Nunavut Planning Commission  
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Via email: [jsavoy@nunavut.ca](mailto:jsavoy@nunavut.ca)

**Re: Draft Nunavut Land Use Plan WRRB position**

Dear Hunter Tootoo,

The following comments are submitted on behalf of the Wek'èezhì Renewable Resources Board (WRRB), to be considered during the review of the Draft Nunavut Land Use Plan (DNLUP). The WRRB has a mandate for wildlife, plant and forest management in Wek'èezhì and adheres to the principles and practices of conservation in fulfilling its duties. The Board's comments clarify the Board's position on the DNLUP, and are focussed on concerns related to barren-ground caribou and species at risk while considering the potential transboundary implications of the DNLUP.

**Barren-ground caribou**

The WRRB believes barren-ground caribou calving and post-calving grounds should receive the highest level of protection in the DLNUP, including the possibility of creating Protected Areas. The calving grounds should not be subject to exploration or development at any time, as the calving grounds have significant importance for caribou. The protection of calving and post-calving grounds is a major concern for conservation of a number of barren-ground caribou herds, in particular the Bluenose-East and Bathurst herds.

Both the Bluenose-East and Bathurst caribou herds are considered to be in decline. For the Bluenose-East herd, the 2013 photocensus provided a population estimate of 68,295 (CI+/-18,041) indicating a decline from the 2010 photocensus population estimate of 98,600 (CI+/-7,100). For the Bathurst herd, the 2012 photocensus population estimate was 34,690 (CI+/-9,756), indicating no statistical difference from the 2009 estimate of 31,982 (CI+/-5,306), which suggests that the Bathurst herd is not increasing. Further, results from the 2014 reconnaissance surveys suggest that both the Bluenose-East and Bathurst herds continue to decline. Photo surveys were recently completed for both the Bluenose-East and Bathurst herds, and the new population estimates that will be obtained after analyses will inform management decisions.

There is a great deal of interest in obtaining up-to-date population estimates for both Bluenose-East and Bathurst herds, notably given the harvest restrictions which have been implemented due to the decreasing populations. Harvesters in the NWT have been limited in their harvest of the Bluenose-East and Bathurst caribou herds in order to allow the herds every opportunity to recover and increase in size. The Board believes that maintaining herd health and harvesting opportunities requires careful

consideration, and acknowledges that the DNLUP recognizes food security and access to country foods, such as caribou, are of the utmost importance to residents of Nunavut and neighboring jurisdictions.

The Board appreciates that the DNLUP weighs ecological, social and economic factors with regards to areas identified as sensitive wildlife habitat, and that the DNLUP also recognizes the importance of caribou habitat and the caribou calving and post-calving areas. The Board understands that under the DNLUP, core caribou calving and post-calving areas that have not been identified for high mineral potential are assigned a Protected Area Land Use Designation that prohibits incompatible uses. The Board also understands that core caribou calving and post-calving areas that have been identified for high mineral potential are assigned a Special Management Area Land Use Designation that identifies cumulative impact concerns and provides direction to regulatory authorities to mitigate impacts. Further, the Board understands that to support environmental protection and management needs, including wildlife conservation, protection and management, the establishment of Parks and Conservation Areas is an option.

Though these (and other) options are available for actions specific to calving and post-calving grounds, the Board maintains its perspective that calving and post-calving grounds should have no exploration or development on them at any time. The Board feels, despite possibility of restrictive conditions on access and activities, those areas vital to the Bluenose-East and Bathurst herds should not be subject to any disturbance under any circumstances.

### Species at Risk

The WRRB notes that, in addition to barren-ground caribou, the DNLUP will also have transboundary impacts in the Northwest Territories on several species at risk that are of particular management concern. Protecting key habitats and mitigating and monitoring potential impacts are a major concern for the conservation of species at risk.

Under the *Species at Risk Act* (SARA) (s.79), species at risk are protected from the effects of development in that potential impacts are to be identified, mitigated and monitored regardless of their level of significance. Best practices for considering wildlife at risk in environmental impact assessment suggest that Committee on the Status of Endangered Wildlife in Canada (COSEWIC) listed species be treated in a similar fashion to species listed under SARA. The species of concern are:

- Peregrine falcon, anatum/tundrius complex – Special Concern (SARA);
- Short-eared owl– Special Concern (SARA);
- Grizzly bear – Special Concern (COSEWIC); and,
- Wolverine – Special concern (COSEWIC).

The WRRB acknowledges that the DNLUP mentions areas important to species at risk in the Options and Recommendations report. The report identifies a number of key areas where peregrine falcons, short-eared owls, grizzly bears, and wolverine may be found, and recommends that a number of important areas be assigned a Protected Area Land Use Designation. However, important areas may also be assigned a Special Management Area Land Use Designation, which though prohibiting certain uses, may still allow for land use activities. The Board wants to ensure that where species at risk may be impacted by activities, the highest degree of protection is provided in all instances as well as ensuring all appropriate mitigative measures are implemented.

Concluding remarks

It is the WRRB's position that the Bluenose-East and Bathurst calving and post-calving grounds should be areas where no exploration or development occurs at any time, as those areas are of the utmost importance to the health and sustainability of both herds. Impacts to key habitats for species at risk such as peregrine falcons, short eared owls, grizzly bears, and wolverine are also of concern, and management of critical areas must offer the highest degree of protection to these species as well as ensuring all appropriate mitigative measures are implemented. The Board wants to ensure that the implementation of the DNLUP addresses the Board's barren-ground caribou and species at risk concerns, as these concerns highlight transboundary issues that impact the Northwest Territories.

If you have any questions, please feel free to contact our office at (867) 873-5740 or [jpellissey@wrrb.ca](mailto:jpellissey@wrrb.ca).

Sincerely,

A handwritten signature in blue ink that reads "J. Grant Pryznyk". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J. Grant Pryznyk  
Interim Chair

Cc Jonathan Savoy, Senior Planner, Nunavut Planning Commission  
Sharon Ehaloak, Executive Director, Nunavut Planning Commission  
Lynda Yonge, Director of Wildlife, Environment & Natural Resources, GNWT  
Sjoerd van der Wielen, Manager, Culture & Lands Protection, Tłı̨chǫ Government  
Drikus Gissing, Director of Wildlife, Government of Nunavut