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Submission to the Nunavut Planning Commission for the Draft Nunavut Land Use Plan

on the *Options & Recommendations* document and *Draft Nunavut Land Use Plan*

General Comments

Comment: Parnautit, the GN Mineral Exploration and Mining Strategy; Ingirrasiliqta, the GN Transportation Strategy; and Tunngasaiji, the GN's Tourism Strategy, and Working Together for Caribou, the GN's Caribou Strategy, do not appear to be considered as policy direction in the Plan. NTI has provided direction via the O&R that development activity should not be restricted on IOL. The Plan and O&R documents have considered this direction in developing their recommended options throughout. In the same way, these GN strategies provide direction and policy that should be considered in management options and recommendations.

Recommendation: *Ensure that the direction and policy included in Parnautit, Ingirrasiliqta, and Tunngasaiji and Working together for Caribou is considered when making land use planning decisions. Make specific reference to these documents as part of the considered information in determining management direction and recommended options.*

Comment: Options are not consistent throughout the document. In Chapter 2, designations are roughly as follows: Option 1 allows all activity, Option 2 allows some activity and prohibits all others, Option 3 allows some activity and Option 4 allows additional activity. For Chapter 3, designations are: Option 1 allows some activity and prohibits others, Option 2 allows all activity and Option 3 allows some activity.

Recommendation: *Be consistent on Option definitions throughout the document, as is appropriate. Where sections have similar options available, list them in the same order.*

Comment: Marine Transportation is not included in the options presented throughout the Options and Recommendations document.

Recommendation: *Include Marine Transportation and shipping as an allowable activity in relevant options throughout the document.*

Comment: Mineral exploration activity is not represented and is not considered in determining various options throughout the document.

Recommendation: *Include exploration activity and consider known mineral potential as represented by this activity wherever it overlaps with other interests.*

Land Use Designation:

Protecting and Sustaining the Environment

Comments in this section deal with the following categories:

- Key Bird Habitat Sites
- Caribou Habitat
 - o Calving and Post-calving Grounds
 - o Rutting Areas
 - o Migration Corridors
 - o Sea Ice Crossings
 - o Seasonal Ranges
- Atlantic Cod Lakes

Key Bird Habitat Sites (KBHS)

Comment:

Some highly risk intolerant Key Bird Habitat Sites are recommended as Option 2 (Permits tourism, recreation and research and prohibits all other uses), while other highly risk intolerant sites which contain IOL are recommended as Option 3 (doesn't prohibit activity) to incorporate direction provided by NTI. The GN also has policy direction that aims to reduce land access restrictions (The GN Mineral Exploration and Mining Strategy states that the GN requires a review and assessment to determine whether a proposed land access restriction is warranted – Parnautit, Policy Statement 1-2). Options other than Option 2 do not specifically prohibit activity.

Recommendation: *Do not prohibit activity. Consider GN policy direction in the Commission's consideration of recommended options. In the absence of a review and assessment to determine that a site must be restricted, assign a designation for those highly risk intolerant sites that would consider a project through a plan amendment or to the plan or an impact review. In this way, the sensitivity of the site is reflected, but activities that may co-exist now or in the future can be assessed on their own merit to determine if they are potentially adverse and therefore prohibited.*

Comment: Several Key Bird Habitat Sites have been designated as Option 2 (development prohibited). However, it does not appear that oil and gas potential or other economic activity was considered in determining this designation.

Recommendation: *Reassess the Key Bird Habitat Sites to consider oil and gas potential or other economic activities that may benefit from having access to the areas if and where adverse impact can be minimized.*

Chapter 2, pg. 6 – East Axel Heiberg Island (Map 1)

The considered information does not include any oil and gas potential

Chapter 2, pg. 6 – Fosheim Peninsula (Map 2)

The considered information does not include any oil and gas potential

Chapter 2, pg. 11 – Foxe Basin Islands (Map 29)

The considered information does not include oil and gas potential.

Chapter 2, pg. 9-10; DNLUP Table 1, pg. 38 – Cape Graham Moore (Map 19)

The current recommended option is Option 2, which permits Tourism, Recreation, Research and prohibits all other uses. However, in Table 1 of the Plan, the designation is PSE-3, which permits several uses and does not prohibit use. Furthermore, the considered information does not include commercial fisheries or oil and gas potential.

Recommendation: Confirm the designation.

Recommendation: Consider all potential for economic activity in the area.

Comment: There are sites that contain active mineral claims, yet the designation only permits tourism, recreation, and research (Option 3).

Recommendation: Clarify how mineral activity will proceed on existing mineral claims.

Chapter 2, pg. 10 – Northwestern Brodeur Peninsula (Map 20)

Clarify how mineral activity will be allowed to occur on these already existing mineral claims.

Chapter 2, pg. 15 – Kagloryuak River (Map 45)

Clarify how mineral activity will be allowed to occur on these already existing mineral claims and leases.

Caribou Habitat

Calving Areas and Key Access Corridors - Mainland Migratory Herds

Recommendation: Industrial development and activity is not permitted. Prohibited activities: Mineral exploration and production, construction of roads, pipelines and transportation related infrastructure, equipment operation and permanent infrastructure relating to projects and project proposals as defined by the Nunavut Land Claims Agreement (NLCA) and the federal Nunavut Planning and Project Assessment Act (NUPPAA), which would be reviewed by the NPC for conformity. Seasonal restrictions on research not directly related to caribou biology and tourism would be imposed - these activities are not permitted when and where caribou are present, but would be permitted once caribou had left the area.

Calving grounds are widely recognized as being of critical importance for maintaining healthy caribou populations. Caribou are especially vulnerable to disturbance during calving and the effects of development cannot be mitigated in these areas. Key Access Corridors are regularly used pathways that

lead on and off the calving grounds. These corridors are essential for providing access to calving grounds. Development and/or disturbance along these routes could lead to caribou shifting or abandoning their calving grounds. The core calving areas and key access corridors have been combined for management purposes and appear as one file in GN supplied data.

Post-calving areas

Recommendation: *Seasonal restrictions (June 15 – July 15) on development activity when and where caribou are present. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances. All season roads are not permitted in these areas to prevent inappropriate access to these herds during vulnerable periods. Winter access roads would be allowed.*

Post-calving areas are used by caribou for nursing and nutrition uptake. Interrupting nursing and access to good forage can both negatively impact caribou body condition and productivity. Disturbance within post-calving areas can demographically impact caribou populations through higher calf mortality resulting from a reduction in nursing time. Adults can also be affected by displacement from areas with high quality forage required to maintain milk production.

Rutting Areas - Mainland Migratory Herds

Recommendation: *Seasonal restrictions (Oct. 10 – Nov. 10) on development activity when and where caribou are present. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances.*

Rutting areas are acknowledged as areas where caribou are particularly vulnerable to disturbance of the breeding process, which results in lower pregnancy rates. This is also an important time for breeding and pregnant cows to gain added nutrition before the winter. The GN proposes seasonal restrictions in which operators would be required to shut down and cease aircraft and vehicle use while caribou are near operations established within designated rutting areas. Development would continue to be permitted within these areas. Only seasonal restrictions apply. Minimizing disturbances in rutting areas allows for higher reproductive rates.

Migration Corridors - Mainland Migratory Herds

Recommendation: *Seasonal restrictions on development activity when and where caribou are present. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances.*

Migration corridors are critical for movement between important areas of caribou ranges. Disturbance and obstacles along the migration route can displace herds and alter access to critical habitat and forage. Migration routes to and from calving and post-calving range and to and from rutting range are essential. Disrupting these migratory routes can lead to a loss of migratory behaviour over time. Caribou populations rely on migration to maximize their access to forage and habitats free of disturbance and thus maximize productivity. If disturbance caused caribou to stop their traditional

migratory behaviour, this would substantially lower productivity and abundance, as well as fundamentally change caribou distribution across the landscape, which would dramatically impact subsistence harvesters.

Development would continue to be permitted within these areas with seasonal restrictions applying. Minimizing disturbances along the migration route will remove factors that can cause caribou to shift or abandon their migration routes.

Sea Ice Crossings - Mainland Migratory Herds

Recommendation: *Seasonal restrictions on icebreaking during crossing periods and restrictions on development activity when and where caribou are staging (preparing to cross). Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances.*

Some caribou herds migrate across sea ice to reach their calving areas. These herds are vulnerable to changing sea ice conditions, and injury and increased mortality by drowning resulting from ice breaking activities.

Development would only be restricted from a small area. Shipping in the open water season is not affected. There is no icebreaking activity currently in these areas.

Seasonal Ranges - Mainland Migratory Herds

Recommendation: *No restriction on development, but proposed projects should consider impacts on caribou and reduce disturbance as much as possible. In order to reach conformity, the project proposal must demonstrate consideration for caribou seasonal ranges in recognizing potential impacts identifying proposed mitigation measures.*

These vast areas of Nunavut are important for the survival and success of caribou herds. It is unrealistic to restrict mineral exploration projects in these areas, however, proposed projects should include particular elements aimed at reducing disturbance to caribou wherever possible. The GN proposes that a recommendation be made to regulators and proponents to consider potential impacts that may impede the ability of caribou to effectively access summer and winter range and ensure feeding behavior is not significantly disrupted. The NPC would consider cumulative effects.

Land Use Designation:

Encouraging Conservation Planning

Comments in this section deal with the following categories:

- Territorial Parks
 - o Territorial Parks Awaiting Full Establishment
 - o Proposed Territorial Parks
- Proposed National Marine Conservation Areas
- Historic Sites
- Heritage Rivers

Territorial Parks

Territorial Parks Awaiting Full Establishment

Recommendation: Designation which would allow tourism, research and recreation (ECP-2). Recommend all other uses are considered through a Plan amendment and that proponents must adhere and respect the purposes for which the park was created as well as the obligations and processes as outlined under the NLCA/ IIBA for Territorial Parks*.

Territorial Parks Awaiting Full Establishment are approved parks that have existed and been treated as Territorial Parks for years and are listed under Schedule 2.1 of the *Umbrella Inuit Impact and Benefit Agreement for Territorial Parks* (signed in 2002), but for various reasons have not yet been legally designated under the *Territorial Parks Act*.

They are two reasons for this:

1. Land Tenure – Awaiting transfer of Federal Crown Lands to the Commissioner, completing Legal Surveys, Commissioners Land transfers of Administration and Control between departments, etc...
2. Conformance with new processes outlined in the NLCA/IIBA – Amendments to exclude/include Inuit Owned Lands, Co-management, Park-Specific Appendices, etc...

* The Umbrella IIBA for Territorial Parks provides for a two-tier co-management committee structure to provide advice to the GN on all policy matters and significant decisions related to planning, establishment, operations and management of Territorial Parks. The co-management regime is made up of appointed representatives from the GN, NTI, RIAs' and affected community/ies. Among other responsibilities, its activities include: compiling inventories of the areas geological and mineral resources, wildlife populations, archaeological sites and specimens, toponymy, etc...

The Territorial Parks awaiting full establishments are:

Baffin Region

Katannilik Territorial Park (Kimmirut/Iqaluit)

Mallikjuaq Territorial Park (Cape Dorset)

Sylvia Grinnell Territorial Park (Iqaluit)

Pisuktinu Territorial Park Campground (Pangnirtung)

Tamaarvik Territorial Park Campground (Pond Inlet)

Taqaiqsirvik Territorial Park Campground (Kimmirut)

Tupirvik Territorial Park Campground (Resolute Bay)

Kitikmeot Region

Kugluk (Bloody Falls) Territorial Park (Kugluktuk)

Ovayok Territorial Park (Cambridge Bay)

Northwest Passage Territorial Park (Gjoa Haven)

Kivalliq Region

Iqalugaarjuup Nunanga Territorial Park (Rankin Inlet)

Inuujaarvik Territorial Park Campground (Baker Lake)

Of these, the only Territorial Parks awaiting full establishment that are outside of municipal boundaries are parts of Katannilik Territorial Park and parts of Sylvia Grinnell Territorial Park.

Proposed Territorial Parks

Recommendation *The creation of new ECP-R2 category. Designation which would allow tourism, research and recreation. Proponents must be made aware that a territorial park is under consideration, and therefore must adhere and respect the obligations and processes as outlined under the NLCA/ IIBA for Territorial Parks.*

Proposed territorial parks are areas that have undergone considerable background and feasibility study, have community and RIA support and have been approved by the Government of Nunavut to proceed in accordance to the legal obligations and planning processes as outlined under the *Nunavut Land Claims Agreement (NLCA)* and approved *Umbrella Inuit Impact and Benefit Agreement for Territorial Parks in the Nunavut Settlement Area (IIBA)*.

*The Umbrella IIBA for Territorial Parks provides for a two-tier co-management committee structure to provide advice to the GN on all policy matters and significant decisions related to planning, establishment, operations and management of Territorial Parks. The co-management regime is made up of appointed representatives from the GN, NTI, RIAs' and affected community/ies. Among other responsibilities, its activities include: compiling inventories of the areas geological and mineral resources, wildlife populations, archaeological sites and specimens, toponomy, etc.

Proposed territorial parks are under consideration for establishment under the *Territorial Parks Act* but final Government approval has yet to be received.

The only current Proposed Territorial park is:

Aggutinni Proposed Territorial Park (Clyde River)

Proposed National Marine Conservation Areas

Comment: In the Draft LUP (S. 3.1.1.3 pg. 21 and Table 1 pg. 39), Lancaster Sound is designated as ECP-1, which permits Tourism, Recreation, and Research and prohibits all other uses. However, it is unclear what this means for shipping through Lancaster Sound.

Recommendation: *Create a designation similar to PSE-3, and that permits marine transportation.*

The current recommended option is Option 1 (O&R, Ch. 3, pg. 25-26), which permits Tourism, Recreation and Research and prohibits all other uses. The considered information does not include marine transportation use.

Recommendation: *Create an option permits marine transportation.*

Historic Sites

Comment: It is the opinion of the GN that NPC has no jurisdiction to designate historic sites that are within municipal boundaries because municipal lands are under the administration and control of the municipalities themselves, as per Article 14 of the Nunavut Land Claims Agreement (NLCA). Moreover, Article 11.7.4 of the NLCA states that: "The NPC and municipal planning authorities shall cooperate to ensure that regional and municipal land use plans are compatible." Given the two above-mentioned NLCA references, we believe that designation of historic sites within municipal boundaries ought to rest with municipal planning authorities. We are concerned that if these sites are permitted to be included within the Nunavut Land Use Plan without further clarification of designated authority, would imply to readers that it is NPC, not municipal planning authorities, have the authority to designate historic sites.

Recommendation: *A new option should be created that makes specific reference to municipal authority to designate historic sites within municipal lands and that such sites not be included in the final Nunavut Land Use Plan (the Plan). If NPC still thinks it best to have such sites as part of the Plan, the GN proposes to create a new option which states that designation of historic sites within municipal boundaries must be consistent with municipal plans, as per Article 11.7.4 and similar to NPC's approach "Community Drinking Water Supplies". In this way, a municipality would first designate a proposed historic site, via municipal planning processes, and this designation would only later be included in the Plan, for the purpose of remaining consistent with the municipal plan. When referring to Historic Sites we are specifically referring to those contained within Municipal Boundaries and that are not current or future National Historic Sites (NHS). We are not proposing a change to the chosen "Option 2" for historic sites outside of Municipal Boundaries, which we believe to be within NPC's mandate. Moreover, we*

acknowledge that all parties are subject to federal and territorial legislation (e.g. federal NHS designation), regardless of whether or not such sites are located within municipal boundaries.

Heritage Rivers

Comment: The GN supports the NPC's recommendation of assigning a designation that permits all uses in these areas, and that proponents should refer to the management plan for each river system.

Recommendation: *Strengthen the ECP-R1 designation by making the recommendation a conformity requirement. Project proposals must demonstrate consideration for the management plan for the Heritage River in question to reach conformity. This would apply to both existing and nominated Heritage Rivers.*

Land Use Designation:

Building Healthier Communities

Comments in this section deal with the following categories:

- Transportation Infrastructure
- Alternative Energy Sources
- Community Drinking Water Supplies
- Aerodromes

Transportation Infrastructure

Comment: The transportation section in the draft LUP (S. 4.2.1 pg. 25 and Table 1 pg. 40) and O&R document (Ch. 4 pg. 32-33) acknowledges proposed routes and existing routes in a general fashion, but provides specific examples in their Maps of proposed (Nunavut-Manitoba) and existing (Meadowbank, Milne Tote) roads. It should be clear if all proposed transportation routes are being considered in the Plan. Examples include, but are not limited to, BIPR and the Steensby Inlet rail line. It should be clear that any existing transportation routes are considered in the Plan. Examples include the Nanisivik Road and the YK-Contwoyto winter road.

Comment: Other transportation infrastructure is not discussed, such as the proposed port at Steensby, the proposed port associated with BIPR, or existing docks/ harbours or trails.

Recommendation: *In the draft LUP, trails, docks, and harbours should be included activity in BHC-1 and BCH-2. Options 1 through 6 in the O&R document should include trails, docks and harbours in addition to roads, railways and utilities.*

Recommendation: *Clarify whether proposed infrastructure, in addition to roads, will include all those currently being proposed.*

Comment: Marine Transportation is not included in the proposed designations in the draft LUP or in the options presented in the O&R document. Marine Corridors (shipping routes) should be included in both the draft LUP and the O&R document in the same way that terrestrial transportation corridors (roads) are.

Recommendation: *In the draft LUP, include 'marine transportation' as an acceptable activity in PSE-3 in Table 1. Include designations that incorporate Marine Transportation within relevant options in the O&R document. . Include any current Marine Transportation Corridors and shipping routes.*

Alternative Energy Sources

Comment: As presented in the O&R, NPC recommends establishing a 100m setback around infrastructure to restrict development within this area. The GN has three concerns with this proposed setback:

1. If “infrastructure” includes transmission lines a 100m setback might be excessive for transmission lines;
2. Any setback from transmission lines, if implemented, would be impossible to achieve within municipal boundaries given existing and proposed land development; and,
3. Given Article 11.7, municipalities ought to have some say into what can occur within the setbacks, given that these areas might have important community use (e.g. transportation, recreation, hunting), even when outside of municipal boundaries. We are not proposing that high-impact activities be permitted in these areas, but activities that would be considered “manifestly insignificant” under the definition of “project” in the *Nunavut Planning and Project Assessment Act*.

Recommendation: *To remedy our concerns, we suggest: that a reduction of the setback for transmission lines might be appropriate; to clarify in the Plan that setbacks do not apply within municipal boundaries; and, to ensure that communities be given some authority to regulate “manifestly insignificant” activities within setbacks, even if outside of municipal boundaries.*

Comment: This section should have a brief overview on hydro potential within the territory and not be specific, including set back requirements. These are desktop studies.

“The Qulliq Energy Corporation (QEC) completed a study “Iqaluit Hydro-electric Generation Sites: Identification and Ranking” (2006) which identified Jaynes Inlet (Qikigijavik) as having high potential for hydro-electrical generation.”

These are only some of the potential developments. Armslow South is not listed.

Recommendation: *Option 1 should be the preferred option as these are potential sites only. Any hydro project will have to go through the NIRB process as they will fall outside of the municipal boundary.*

Option 1 instead of Option 2 is best for the Jaynes Inlet (Qikigijavik) site and the Quoich River as it best reflects the intent of Building Healthy Communities and:

Option 1 is recommended instead of Option 3 for the Thelon River site. Again the regulatory process would address the issues while taking into account the various stakeholders in the regulatory process.

Community Drinking Water Supplies

Recommendation: *The GN would like to express its strong support for the decision of NPC to review each of Nunavut’s Community Plans and assign a separate option for each community based on compliance with the Community Plan. Given Article 11.7.4, we feel that this is an entirely appropriate method for decision-making for the protection of community drinking water supplies.*

Aerodromes

Recommendation: *The GN would like to express its strong support for the decision of NPC to choose “Option 1: Assign a designation that permits all uses” for areas within aerodromes (as defined by Airport Zoning Regulations under the Aeronautics Act). We believe that choosing any other option, which would restrict land use within aerodromes in some manner, would be entirely inappropriate since most community sites are located within aerodromes and include a variety of land uses therein.*

Land Use Designation:

Encouraging Sustainable Economic Development

Comments in this section deal with the following categories:

- Mineral Exploration and Production
- Oil and Gas Exploration
- Commercial Fisheries

Comment: Mineral Exploration and Production, Oil and Gas Exploration and Production, and Commercial Fisheries are included in both the draft LUP (Ch. 5, pg. 30) and the O&R document (Ch. 5, pg. 44). However, tourism, commercial harvests, and cottage industries such as arts and crafts, sports hunting and fishing are other economic development industries and are not incorporated. Tourism has been permitted in various land use designations and options in Chapters 2, 3, and 4. Carving stone locations are being inventoried and identified, and this industry is relevant to local economies.

Recommendation: *Include Tourism and Commercial Harvest, and a discussion on other local industries in the draft LUP and the O&R document. The GN can provide locations of Carving Stone sites to be incorporated into the Plan.*

Recommendation: *Similar to the other industries discussed, include text to introduce the Tourism industry in the Plan. Include a definition of tourism.*

Introduction:

Nunavut seeks to achieve consistent, sustainable growth in the tourism industry that provides benefits for Inuit and all Nunavummiut. The Nunavut Economic Development Strategy recognizes tourism development as a key component in the economic development of our communities and businesses. Tourism will be a dynamic, sustainable industry that showcases our outstanding and unique natural, cultural and recreational resources, and contributes to a high quality of life for Nunavummiut. In Nunavut, the tourism sector is comprised of licensed tourism operators and establishments that include outfitters and hotels and restaurants, as well as airlines, cruise ships, and community-based businesses such as arts and crafts businesses and taxis.

Definition:

Tourism: the activities of persons traveling to and staying in places outside their usual environment for not more than one consecutive year for leisure, business and other purposes.

Mineral Exploration and Production

Comment: Consideration of Mineral Exploration and Production in both the draft LUP (S. 5.1.1, pg. 31 and Table 1 pg. 43) and O&R document (Ch. 5 pg. 44) is deficient. While mineral exploration and production is considered “one of the most attractive and viable economic activities in the NSA” and the NPC “recognizes the importance of this industry to Nunavut’s economy”, exploration activity is entirely

absent and several projects in more advanced stages are not included while others are. There is no information on known areas of mineral potential, and no consideration of mineral exploration has been included in previous chapters.

Recommendation: *Include mineral exploration activity to indicate where known mineral potential exists. This exploration activity should be considered and incorporated throughout previous chapters where relevant in determining recommended options for management.*

Recommendation: *Include other advanced projects, such as (but not limited to) Back River, Chidliak, Roche Bay*

Comment: It should be acknowledged that despite having some understanding of known mineral potential, that all of Nunavut is considered to have mineral potential. In the GN Mineral Exploration and Mining Strategy, the GN states that “a strong and sustainable mining industry will have operating mines throughout the territory providing employment and business opportunities. This will require a high level of exploration activity resulting in new mineral discoveries and developments...” Furthermore, the Mining Strategy states that the GN requires a review and assessment to determine whether a proposed land access restriction is warranted...endeavoring to ensure the goals of the proposed land access restriction are achieved while minimizing the impact on undiscovered mineral resources. (Parnautit, Policy Statement 1-2). Therefore, flexibility in a land use plan that allows access to lands for exploration where activities can co-exist is a necessary step toward ensuring a strong minerals industry in Nunavut.

Recommendation: *Recognize and acknowledge in both the Plan and Options and Recommendations documents that all of Nunavut may have mineral potential. As such, prohibiting access must be minimized. Plan amendments or an impact review of any activity will consider whether a proposed activity can co-exist or is potentially adverse and therefore prohibited.*

Recommendation: *In this chapter of the Options and Recommendations document, make reference to Parnautit, the GN’s Mineral Exploration and Mining Strategy, as policy direction by the GN. In this chapter, make reference to any management direction provided in previous chapters based on existing exploration activity and on Parnautit Policy Statement 1-2.*

Oil and Gas Exploration

Comment: Sverdrup and Baffin Bay oil and gas potential is noted here. However, other areas of oil and gas potential are not. It should be acknowledged that there is very little information about oil and gas potential across Nunavut; geoscience and exploration will advance our knowledge of any potential. Therefore, flexibility in a land use plan that allows access for geosciences and exploration is necessary.

Recommendation: *In both the draft LUP and O&R document, include all areas of known oil and gas potential, including locations of previous activity and wells. The GN can provide some information on this. This activity should be considered and incorporated throughout previous chapters in determining recommended options for management.*

Recommendation: Acknowledge that information is lacking and emphasize that continued geoscience and exploration is needed to better understand potential. As such, prohibiting access should be minimized.

Commercial Fisheries

Recommendation: Option 1 provides the room for Encouraging Sustainable Economic Development of existing fisheries and also allows for the possibility that other commercial fisheries may develop.

Land Use Designation:

Areas of Opportunity/Mixed Use

Comments in this section deals with the following category:

- Areas of Opportunity

Comment: Areas of Opportunity in the Options and Recommendations document and Mixed Use in the draft Plan appear to be the same thing.

Recommendation: *Clarify which term will be used and be consistent between the Plan and the Options and Recommendations document.*