

Master Comments from Department of Environment and Natural Resources

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
ENR-01	Department of Environment and Natural Resources (GNWT)	2/13/2014	DNLUP	2.1.2	Caribou	ENR has reviewed the draft plan and has comments related to the protection of caribou habitat. Many of the barren-ground caribou herds in Nunavut are shared with the NWT. Management of these herds should also be shared, particularly as some of these trans boundary herds are in decline or stable but at low numbers...Based on our understanding, this means that while proponents must consider impacts on caribou calving habitat, post calving habitat, migration routes, and sea ice crossing, these areas are not protected from human disturbance. ENR is also concerned that recommendations in the draft NLUP do not ensure adequate mitigation of individual project effects or the cumulative effects of multiple developments on caribou and caribou habitat.	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou.
ENR-02	Department of Environment and Natural Resources (GNWT)	2/13/2014	DNLUP	2.1.3	Caribou	ENR is particularly concerned that recommendation in the draft NLUP will not ensure protection of caribou when they are most vulnerable to disturbance. For example, demands on lactating cows are high during calving and post-calving periods so disturbance during this time will limit the ability of cows to feed calves...ENR encourages the NPC to reconsider its approach to caribou habitat protection in the DNLUP. One method of protection could be timing restrictions on industrial activity to exclude activity during the critical calving and post-calving periods. Another approach could be to set cumulative effects thresholds for land disturbance in these very important habitats. NPC could also consider re-instating and updating the Caribou Protection Measures that would govern industrial activity based on where the caribou are, and could give special recognition and protection to traditional water crossings.	The DNLUP has been revised to address calving and post-calving areas. At this time the NPC is not coordinating the development of thresholds. The Commission's broad planning policies, objectives and goals require the NPC to implement thresholds and indicators developed by government and other IPGs. The Plan has been revised to identify in which specific situations the NPC may refer a project for cumulative impact concerns.
ENR-03	Department of Environment and Natural Resources (GNWT)	2/13/2014	DNLUP		Caribou	ENR is facilitating the development of a range plan to guide land use decision made by NWT and Nunavut management authorities on the historic range of the Bathurst barren-ground caribou herd. The range plan will recommend approaches to monitor cumulative land disturbance and identify when action should be taken in the form of mitigation, best practices, reclamation and/or suspension of certain activities. This is a collaborative process that the GN and other organizations in Nunavut have been asked to participate in. NPC is encouraged to refer to this guidance in the plan in future revisions of the draft NLUP or as operational guidance for cumulative effects referrals in the Bathurst range.	General comment noted.