

Master Comments from Kitikmeot Inuit Association

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
KIA-01	Kitikmeot Inuit Association	4/11/2014	DNLUP	General	Land Use Designation	<p>The KIA recommends that all surface IOL parcels in the Kitikmeot be designated as “Mixed Use” under the draft and final NLUP.</p> <p>a. This designation is appropriate because it reflects the purpose of the IOL selected under Article 17 of the NLCA, a mixed use designation will enable Inuit to use the land as they see fit and to exercise their rights as landowners to act as the stewards of their own lands. Kitikmeot Inuit want sustainable economic development, and they also want the opportunity to harvest for subsistence, all in the same general area. The best way to achieve these goals is to leave the discretion about land uses with the owners. This approach empowers Inuit and leaves the responsibility for land use decisions with the communities.</p> <p>b. The KIA regularly consult with the communities. Most of the time, the KIA uses a ‘mixed use’ approach to managing multiple uses of IOL. Mixed use can range from resource development to conservation. On rare occasions a small number of IOL parcels in the Kitikmeot have been designated for only one purpose (i.e. conservation purposes), but the KIA wishes to maintain its discretion on these decisions. Because surface IOL is privately owned, the KIA wishes to maintain the right to decide how land is used, including any potential and reasonable closure to development.</p>	As per NLCA 11.4.1(a) broad planning policies, objectives and goals for the NSA set out the criteria that will be used to develop the DNLUP. The major responsibility of the NPC is to guide and direct resource use and development in the NSA (NLCA 11.4.1 (b)). NLCA 11.2.1 sets out additional principles, policies and objectives for the planning process. The planning process is further guided by NLCA 17.1.3. Some parcels of IOL have had land use designations applied to them that include Protected Areas and Special Management. We believe these decisions best represents the priorities and values of Inuit. Please review the information that was considered in the decision. This information is available in the Options and Recommendations Document.
KIA-02	Kitikmeot Inuit Association	4/11/2014	DNLUP		Land Use Designation	The KIA recommends that terrestrial access or marine access not be restricted to surface IOL in any way by the DNLUP or the final Plan, except with the written consent of the KIA.	The Commission’s Broad Planning, Policies, Objectives and Goals direct the content of the land use plan. The NLCA Article 17 guides the Commission decision making. The Plan is intended to reflect the priorities and values of Inuit which in many cases suggests that some IOL parcels do require management under the land use plan. In accordance with the NLCA 17.1.3 IOL are to the extent possible mixed use. Terrestrial and marine shipping is prohibited in specific instances only. Accessory Uses allow winter roads and open water shipping, related seasonal ports and staging, warehousing facilities in all land use designations.
KIA-03	Kitikmeot Inuit Association	4/11/2014	DNLUP		Traditional Place Names	The KIA recommends that traditional Inuit place names to be used for ALL project proposals in the Kitikmeot. We make this recommendation in order for Inuit to better understand the location where projects are proposed.	The Implementation Strategy encourages the inclusion of Inuit place names with the project proposal submission as suggested.
KIA-04	Kitikmeot Inuit Association	4/11/2014	DNLUP			<p>The KIA commends the NPC’s Kitikmeot community consultation efforts in March 2014. The NPC staff did an excellent job of documenting Inuit land uses, and knowledge of ecological rhythms and patterns. Once a Plan is in place and development is proposed, the KIA is of the understanding that the NPC will issue a project conformity determination to the proponent that will highlight Inuit land use and concerns in the project area. Likewise, the KIA understands that the NPC will pass on the local Inuit land use and knowledge to the NIRB and NWB for these organizations to consider as part of their further assessment of the project. The KIA is pleased that the NPC determination will communicate this information to both the proponent and other Institutes of Public Government (IPG) because:</p> <p>a. it informs the proponent that their project may be occurring in a multiple use area, and that the proponent may need to undertake mitigative measures if they want the project to proceed;</p> <p>b. it informs the other IPGs to be considerate of the multiple uses occurring in the project vicinity;</p> <p>c. it also informs the IPGs of the local issues and concerns, and allows the IPG to assess the adequacy of the proponents mitigation plan, or to propose alternatives if the plan is insufficient.</p>	General comment noted.
KIA-05	Kitikmeot Inuit Association	4/11/2014	DNLUP		Community Consultation	While the KIA commends the NPC for its March 2014 Kitikmeot community consultations, it must be understood that the NPC’s timelines offered the KIA, and especially other Kitikmeot groups (hamlets, HTOs, other organizations, etc.), very little time after these meetings to meaningfully participating in the NLUP process and comment on the DNLUP. The KIA understands that it may still make submissions which will be considered by the NPC at its hearing in Iqaluit in November of this year.	General comment noted. The KIA was provided the Draft Plan in September 2012. Public comment is welcome at the public hearing.
KIA-06	Kitikmeot Inuit Association	4/11/2014	DNLUP			During the NPC meetings in Cambridge Bay (September 18 and 19, 2014), the KIA requested clarification from the NPC and Parks Canada (present via teleconference) regarding the status of the proposed extension to the Tuktut Nogait National Park in Nunavut. The KIA continues to require this clarification.	General comment noted. The extension of the Park has been continued. Please review the information that was considered in the decision. This information is available in the Options and Recommendations Document.
KIA-07	Kitikmeot Inuit Association	4/11/2014	DNLUP			The KIA recommends that proponents of conservation areas provide a comprehensive and modern multi-use geological and ecological resource inventory (e.g., the Rasmussen Lowlands south of Taloyoak, and Kagloryuak River on Kiilnik-Victoria Island). Inuit should have the ability to see all the potential uses and benefits of the land, and combine it with the unique Inuit knowledge of the land before making resource management and zoning decisions. In the past, the Queen Maud Gulf Bird Sanctuary, and the Thelon Wildlife Sanctuary were established without consulting Inuit, or without providing Inuit with full information about the resources within those areas. Part of the consultation process is providing the information required in order to make a sound resource management decision. Inuit must understand the opportunity costs associated with the establishment of such areas before decisions are made.	The Plan is not legislation and as such is open for review and amendment. These would be good areas to take priority as part of a regional or sub-regional planning studies. Land use designations have been applied to this areas. These designations would form the basis for the more detailed planning study. Please review the information that was considered in the decision. This information is available in the Options and Recommendations Document.
KIA-08	Kitikmeot Inuit Association	4/11/2014	DNLUP		Conservation Areas	The KIA would also like to learn more about existing conservation areas. The KIA recommends that the Canadian Government complete a modern geological, economic, and ecological resource inventory for the Queen Maud Gulf Migratory Bird Sanctuary and that portion of the Thelon Wildlife Sanctuary within the Kitikmeot Region. Ideally, conservation areas should be located in areas where it provides most benefit to Inuit. These conservation areas were established without this consideration in mind.	General comment noted.

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KIA-09	Kitikmeot Inuit Association	4/11/2014	DNLUP		Caribou	Inuit rely on harvesting several wildlife species as part of their cultural and economic needs. Among these wildlife, there is currently a particular interest in Caribou management. Caribou are an important resource to Kitikmeot Inuit. We realize that some of these caribou populations have trans-boundary ranges and wise multiple-use management of the entire herd range will be required to conserve the population throughout their winter and summer range. We respect that many organizations share our concern for healthy wildlife populations. We hope that they will manage their lands and environment within the scope of their authority and jurisdiction. Within its authority and jurisdiction, the KIA will promote the responsible management of wildlife populations within the Kitikmeot Region, and will carefully review development proposals to ensure that the KIA maintains sustainable harvesting opportunities for Kitikmeot Inuit now and in the future.	It is the understanding that the NLUP applies to all lands in the NSA including IOL. Land use designations have been developed where appropriate. 80% of the NSA remains open to mining exploration and development. Nearly 6% of the NSA is exclusively for mineral exploration and development and some of this includes IOL. The Plan does contain15% protected area where mining is prohibited. These include core caribou calving and post calving areas, unique habitat for polar bear, walrus, whales and seals. IOL is also included in these designations which we believe fairly reflects NLCA Article 17.1.3 and feedback that we have received.
KIA-10	Kitikmeot Inuit Association	4/11/2014	DNLUP			Any NLUP proposals or restrictions on the use of oceans in the Kitikmeot Region including the Northwest Passage must require the consent of the KIA as it may affect access to IOL or Kitikmeot Inuit harvesting rights.	The Plan does identify areas where shipping is prohibited. However accessory Uses allow winter roads and open water shipping, related seasonal ports and staging, warehousing facilities in all land use designations.