

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

3 November 2006

Dwayne Rinholt
Land Use Planner
Saskatchewan Environment
Box 3003
Prince Albert SK S6V 6G1

Dear Mr. Rinholt:

Athabasca Stage 1 Draft Land Use Plan

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on the Athabasca Stage 1 Draft Land Use Plan (the draft plan). The BQCMB has followed the progress of this land use planning process with interest over the years, and welcomes the opportunity to participate in this formal review.

The role of the BQCMB is to work cooperatively to promote the wise use of Beverly and Qamanirjuaq caribou to prevent population declines and safeguard the needs of traditional hunters. The Board's main interests in the draft land use plan concern provisions for protecting barren-ground caribou, caribou range and traditional use of caribou. The BQCMB is willing to cooperate and assist with implementation of recommended actions related to these interests as outlined in the draft plan.

The partners and all participants in the Athabasca land use planning process should be commended for achieving the consensus required to produce a plan endorsed by such a diverse group. It is clear that many compromises were needed to obtain this consensus, however.

Comments are provided below as follows:

- on the issues identified and recommendations made in the draft plan related to BQCMB areas of interest
- on the broader land use planning for the Athabasca region
- on other major issues identified during the consultation process for the draft plan

Comments on Recommendations in the Draft Plan

Cumulative impacts (4.2.3)

- The BQCMB supports recommendations to develop a monitoring system and guidelines and a predictive tool to assess impact levels. This would be valuable for assessing the effect of roads and trails on barren-ground caribou, for instance.
- The BQCMB has recommended that "Cumulative effects assessment/modeling through the environmental assessment process should be implemented to minimize destruction of all habitats used by Beverly and Qamanirjuaq caribou outside of traditional calving grounds and post-calving areas." This is one of five recommendations made to

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governments by the BQCMB in a position paper¹ that also recommends long-term legislated protection for traditional calving grounds and post-calving areas. Cumulative effects assessment would not be necessary within these protected areas.

Barren-ground caribou protection (4.3.2)

Identification of issues.

Barren-ground caribou is a keystone species of the ecosystems included in the planning area. The BQCMB advises that any and all planning strategies must incorporate measures to conserve and, where necessary, legally protect caribou habitat. This will be the most effective way to apply an ecosystem-based approach to land use planning in the region.

Contribution of resources by the Saskatchewan government for surveys and monitoring programs is essential to effective conservation of the herd, the well-being of Athabasca region residents and management of human activities on the caribou winter range.

The following issues should be identified and explained in the draft plan and during consultations:

- Beverly and Qamanirjuaq caribou provide many benefits to communities across four jurisdictions (Nunavut, the Northwest Territories, Saskatchewan, and Manitoba), and the herds and their migrations are essential elements of Aboriginal cultures. These barren-ground caribou herds are an extremely valuable resource for these communities and governments. The BQCMB has estimated that the minimum gross economic value of Beverly and Qamanirjuaq caribou harvested in a single year is about \$17 million.
- Communities from the Athabasca region harvest more Beverly caribou than the three other jurisdictions combined, and most of the Beverly winter range is included within their First Nation traditional lands.
- It is likely that the Beverly herd is declining, given the declines demonstrated for five barren-ground caribou herds that use range to the west of the Beverly range (i.e., Porcupine, Cape Bathurst, Bluenose West, Bluenose East) or whose range overlaps with the Beverly range (i.e., Bathurst).
- A population survey for the Beverly herd is needed as soon as possible. The BQCMB's position is that this survey must be conducted in 2007.
- Caribou and habitat monitoring should be occurring across the ranges, and a range-wide system of conservation planning should be developed. This is also a recommendation made by the BQCMB to governments in its position paper (BQCMB 2004).

¹ BQCMB 2004. Protecting calving grounds, post-calving areas and other important habitats for Beverly and Qamanirjuaq caribou: a position paper by the Beverly and Qamanirjuaq Caribou Management Board. 26pp. Available at: www.arctic-caribou.com/PDF/Position_Paper.pdf.

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The BQCMB is glad to see that the issues of increasing hunting pressure and potential over-hunting (through influx of hunters from the south) have been identified as major concerns. These issues are also of great concern to BQCMB members from communities across the caribou ranges. Any increase in the Saskatchewan portion of the harvest will be significant, and perhaps detrimental, to the herd.

Recommendations in the draft plan:

The BQCMB supports the recommended management policies and actions for protecting caribou and caribou habitat. However, a land use plan for the entire Athabasca planning region is required to effectively implement these policies and actions.

Recommended action #3

- Actions to be taken if the herd moves close to the seasonal road must be developed and agreed to by all parties prior to implementation of the early warning system. An agreement must be in place to provide for required actions to occur.
- If helicopters are used to monitor caribou movement, the aircraft must not operate at low levels.
- If snow machines are used for monitoring, they should not approach caribou closely.

Recommended action #5 – The Porcupine Caribou Management Board should be consulted about suitable protection options, as they have experience with measures for regulating caribou hunting along the Dempster Highway in the Yukon and NWT.

Wildfire impact on caribou (4.3.5) - The BQCMB supports the recommended management policies and actions for protecting barren-ground caribou winter range in Saskatchewan. However, a land use plan for the entire Athabasca planning region is required to effectively implement these policies and actions.

Road and trail construction (4.6.6) - The BQCMB generally supports the recommended management policies and actions for protecting caribou and caribou habitat, subject to the following observations:

- It is clear that better regulation of road and trail development in the Athabasca region is required, including regulating development off the Athabasca seasonal road.
- The issue of cumulative effects of road development in relation to caribou (and other wildlife) needs to be addressed more fully at the policy and regulatory levels.
- Recommended policy #1 – The BQCMB agrees that road access to Athabasca communities should be limited to one main road.
- Recommended policy #2 - Proposed upgrading of the Athabasca seasonal road to an all-weather road would substantially increase the impacts of the road on barren-ground caribou and caribou habitat. This point should be highlighted and explained in the draft plan and during consultations.
- Recommended policy #3 - If further road development to the north-west is proposed, it is highly unlikely that the following will be achievable: “use of the route should result in minimal or no increased hunting pressure on the barren-ground caribou herds”. Methods proposed to ensure this condition is realistic should be explained in the draft plan.
- Recommended policy #4 – “occupied caribou range” needs to be defined more clearly. Minimum standards for limiting hunter access on roads and trails on caribou range

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should be developed. It is not clear how summer and winter public use of roads will be prevented; this should be explained in the draft plan.

Land use zones (5.0) – The BQCMB supports the general land use principles (p. 88).

Conservation land use zone (5.2.1)

- The BQCMB supports traditional land use as a priority for this zone, and agrees that the disposition freeze should be maintained until long-term legislated protection is established.
- Although proposed development will be subject to extensive environmental review, few activities are absolutely prohibited from this zone (i.e., lodges, waste disposal, hydro development). Many types of development activities are permitted either as exceptions (sand and gravel extraction and roads and trails) or with special conditions (mineral exploration and extraction). Therefore many development activities can potentially be approved in this zone, with decisions based on a case-by-case assessment of “the level of potential impact to natural and cultural systems” (p. 98). The options for long-term legislated protection for areas in this zone are not described, and it is unclear how they will achieve conservation results given the currently limited prohibitions planned for this zone.
- It appears this land use zone will provide very little, if any, protection for barren-ground caribou and habitat.

Special management areas (5.2.2) – The BQCMB supports the option of putting conditions on development, including seasonal restrictions to protect caribou.

Community infrastructure areas (5.2.3)

- The BQCMB supports the condition proposed for avoiding critical habitat and not creating barriers to the movement of wildlife for the Athabasca road corridor (p. 102).
- This zone should also allow for seasonal restrictions to protect caribou.

Next steps (7.6)

- The BQCMB supports developing protected area recommendations for the entire Athabasca region that include consideration of values such as barren ground caribou habitat, including migration routes.
- Research priorities should include identifying areas with high value as barren-ground caribou habitat, including migration routes and key water and ice crossings.

Comments on Land Use Planning for the Athabasca Region

- The BQCMB urges the government of Saskatchewan to provide adequate funding for land use planning for the remainder of the Athabasca planning region (stages II and III), including completion and implementation of a land use plan for this area. This must occur before development of the Wollaston Lake road.
- The interim measures provisions of the Athabasca planning agreement should be extended to the rest of the Athabasca planning region (stages II and III). This should include a development freeze and withdrawal of Crown minerals until a land use plan for the Stage II and III areas is completed.
- Development of new roads in the Athabasca region should not occur until completion of the Stage II/III land use plan. This includes the Wollaston Lake road, which should be

Secretariat Address: P.O. Box 629 Stonewall MB ROC 2Z0

Tel: (204) 467-2438 e-mail: rossthompson@mts.net

website: www.arctic-caribou.com

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subject to environmental assessment prior to approval, with completion of the Stage II/III land use plan as a condition of approval.

Comments on Other Major Issues

There are some major issues that were identified during the consultations for development of this Stage I draft land use plan that have not yet been addressed, but are crucial to achieving protection for barren-ground caribou and caribou habitat. These issues should be addressed during development of a land use plan for the broader Athabasca region.

- One objective identified for the planning process was “to develop clear land use guidelines that . . . will specify . . . development limits” (p. 34). It is not clear if and how these limits on development have been developed. Identifying these limits should involve assessing cumulative impacts of development activities on barren-ground caribou and caribou range.
- In the ranking of issues (p. 36), the environmental impacts of mineral exploration activities was identified as the highest priority issue (rank=7). This issue should be addressed in a regional land use plan for the Athabasca region.

Thank you for the opportunity to participate in the review of this land use plan. Please let me know if you have any questions about these comments from the BQCMB.

Sincerely,

Leslie Wakelyn
BQCMB Biologist

cc. Jerome Denechezhe, BQCMB Chair
Tim Trottier, BQCMB member for Gov. Sask.
Diane McDonald, PAGC