

Gwich'in Renewable Resources Board

AprDraft Page #	Comment (Gwich'in Renewable Resources Board)	Board Response	Final Draft
14	Figure 3 should state the dates of the Gwich'in Harvest Study (1995-2004).	added	p 11
20	In the Integrated Fisheries Management Plan for Dolly Varden Char, the Government of the Northwest Territories considers Dolly Varden "Sensitive", meaning that it may require special attention or protection to prevent it from becoming "At Risk." This should be stated in this section, similar to what is listed in Figure 10.	added	p 19
24	<p>The GLUP states there are no active mines in the Gwich'in Settlement Area (GSA). However there should be some mention of Eagle Plains as that company is near the active stage of exploration for minerals. A description of this exploration should also be made in any zones that are near the claim.</p> <p>The GLUP states there are 38 gravel pits in the GSA, of which 15 are being used and the rest inactive. Ensure that these are the current numbers (Figure 13 is from 1995 and may not match these numbers). As well, figures 11-12 should include dates.</p>	<p>The Plan is printed to be effective for a five year period. The Board hesitates to mention specific companies as ownership can change on leases or claims, and exploration programs can be delayed or ramped up at little notice (as has happened during the last five years of the Plan).</p> <p>Only the surficial materials data is from 1995. Provided source information for developed pits and pipeline.</p>	p 25 (fig.14)
35	There should be a review of the upcoming amendments to the MVRMA prior to approval of the GLUP.	preliminary review of amendments proposed under INAC file number NCR-N7392-12 has been done. The amendments don't appear to affect the content of the Plan.	p 35
36	There are draft management plans for the Bluenose caribou herds and the Northern Woodland caribou, in addition to a national recovery strategy for Boreal Woodland caribou and an existing Porcupine caribou management plan. These plans should also be mentioned with the plans listed in the GLUP.	added	p 40
40	This section states that low impact tourism activities are exempt from the zoning rules and these activities don't require permits. However, page 98 states that outfitting and tourism may be exempt from conservation rules and conditionally permitted. There should be a clearer definition of tourism to avoid confusion by land managers in the future.	Added a definition of 'commercial' to qualify the tourism referenced on page 98 and included an example.	pages 44, 98
43	The new map of zones in the GLUP should contain only the new zones.	The map contains the proposed zoning for the revised plan.	p 47
Chapter 4	There are a number of guidelines the GRRB recommends for aircraft minimum distances to ungulates. The Northwest Territories Guidelines for sheep recommend a minimum distance of 300 m or 1000 feet for any flight. However, Dall's sheep are very sensitive to aircraft and human presence. The Northern Richardson Mountains Dall's Sheep	It is expected that detailed conditions for caribou, sheep, and other wildlife would be provided to regulators by the GRRB and ENR during the referral process for applications or determined during an environmental assessment and would be tailored for the specific area and project activities.	

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75	Mouth of the Arctic Red River SMZ: Raptor nests should be identified prior to permit authorizations	It is the Board's understanding that CWS will let regulators know if a proposed project is near a known raptor site or request field work to determine proximity when they are consulted during the referral process on an application.	p 84
77	<p>Cardinal Lakes SMZ: The ecological report made a recommendation to increase protection of this zone as a conservation zone due to increasing development and activity surrounding the area. However, the Gwich'in Land Use Planning Board (GLUPB) believes the existing conditions and permitting process will protect the ecological integrity of the area. The GLUPB should reconsider increasing protection of this zone to a conservation zone as enforcement of permit conditions is difficult in the GSA.</p> <p>Caribou were recognized as an important resource in the area. Conditions for caribou should be made for this SMZ, similar to the sheep and waterfowl conditions for other zones. These conditions may also be drawn from existing and draft management plans.</p> <p>As well, the forest has been mentioned as an important resource in this area. Forest conditions may also be added.</p>	<p>The Board does not want to set a precedent of addressing enforcement issues in the regulatory system by using conservation zoning - would have to put 90% of the GSA into conservation zones. The issue will be identified in the RPA and will look at options within the NWT Board Forum.</p> <p>If the GRRB is proposing a CZ because it believes no development should be occurring in the area, the GLUPB is willing to facilitate stakeholder discussions and compile any new information to re-evaluate the zoning for the next Plan review. Added regional barren-ground caribou condition. Included statement for application of precautionary principle until Boreal Caribou Management Plan developed as per ENR recommendation</p> <p>The RRC's have the opportunity to raise forestry related concerns to regulators during the referral process. Need a concrete objective to develop condition(s) for forests. Can explore as an action item under the RPA.</p>	<p>p87</p> <p>p 50</p>
81	<p>Travaillant Lake SMZ: Migration times for fish species should be listed. The GRRB has reports that could assist with this.</p> <p>Water quality conditions and conditions for caribou should be included as water quality affects fish habitat.</p> <p>Forest conditions may also be added as this zone recognizes the importance of habitat and forest.</p>	<p>Condition directs developers and regulators to engage the RRC's, GRRB and DFO directly to ensure they are working with the most recent and site-specific information available.</p> <p>Added regional conditions.</p> <p>The RRC's have the opportunity to raise forestry related concerns to regulators during the referral process. Need a concrete objective to develop condition(s) for forests. Can explore as an action item under the RPA.</p>	<p>p 90</p> <p>p 49, 50</p>
88	Arctic Red River SMZ: fish migration times should be listed to assist land managers and users.	Condition directs developers and regulators to engage the RRC's, GRRB and DFO directly to ensure they are working with the most recent and site-specific information available.	p 99
93	<p>Headwaters of the Arctic Red River SMZ: A description of the Mackenzie Mountains ecoregion could be included in the zone description as the zone is being extended to the boundary of this ecoregion to protect these features.</p> <p>Specific periods should be stated for lambing season. As well, more</p>	<p>Added general description from recent ecoregion reports.</p> <p>Opted for a condition that directs developers and regulators to</p>	p 105

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	sheep conditions may be included from the draft Dall's sheep management plan (e.g. conditions may be similar to those for waterfowl). The GLUP should refer to this management plan.	engage the GRRB and ENR directly to ensure they are working with the most recent and site-specific information available.	
100	The Rat River, Husky River, Black Mountain CZ should refer to the Integrated Fisheries Management Plan for Char. This plan may also contain conditions to be included in the GLUP.	Because development is so restricted in a conservation zone, don't really need to add general conditions for char directly in the Plan. Conditional approval of outfitting or guided fishing depends approved management plan for any species to be harvested.	p 114
103	<p>James Creek/Vittrekwa River CZ: The importance of Porcupine Caribou is mentioned in this zone. The management plan for this species should be referred to for specific conditions similar to waterfowl in the GLUP.</p> <p>Expected land use should include the proposed Mackenzie Gas Pipeline as this activity will affect this zone in particular. As well, the transportation corridor should be visible on the map.</p>	<p>Couldn't find specific conditions that translate to policy relevant to the land use plan. If there are examples that you had in mind, that you feel we missed, please feel free to provide them.</p> <p>The MGP may bring increased traffic on the Dempster highway, but that will be in the Transportation SMZ that cuts through this CZ; the highway is clearly marked.</p>	p 118
139	<p>The Gwich'in Forest Management Plan (GFMP) is near final stages of completion and is ready for endorsement pending signing. The importance of the GFMP should be included in this Plan as it outlines the recommendations for many activities that occur in the GSA. Although there is little commercial forestry in the GSA currently, there has been renewed interest in commercial forest use in the GSA. A permitting system is in place to monitor commercial and personal tree harvesting on public and private lands. Recommendations from community workshops included a 2 km no-cut buffer zone around all 4 communities in the GSA as there is little timber available in the areas. Cabin owners in Tsiigetichic also suggested a ban on wood cutting off the Dempster highway near Rengleng River. There is concern over commercial harvest and timber permits granted in conservation zones. Communities also supported wildfire protection plans and use of local seed sources.</p>	<p>The Plan cannot address personal harvesting by Gwich'in as it is an entrenched right under the land claim, even if there is a permitting system. There are no enforcement options at this time so it is outside of the scope of the Plan.</p> <p>Commercial harvest is not an allowed use in Conservation Zones. ENR cannot issue permits for it within any conservation zone (it falls under the commercial renewable resource activity restriction). Will list as an example on page 96 to clarify. Will follow up to ensure ENR has policy/procedure to check conformance with plan before issuing permits for commercial activities.</p> <p>RPA actions: track development of wildfire protection plans investigate local seed source options Look at 2 km no-cut buffer concept for zoning in next revision of land use plan (can only apply to commercial operations).</p>	p 110
154	GRRB should be listed as participant for monitoring and caribou herd status actions.	ok	

Canadian Association of Petroleum Producers (CAPP)

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	Currently, there is very limited industry activity underway in the Gwich'in Settlement Area, and we have no comments to offer on the revisions proposed.		
	Wish to be kept on mailing list for RPA development	ok	

Industry, Tourism, and Investment, Government of the Northwest Territories

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	No concerns with the revisions proposed.	no action necessary	
	The proposed changes to the Campbell Hills Special Management Zone are complementary to the objectives of the Gwich'in Territorial Park.		p 75
	The rules for Outfitting and Tourism are appropriate and will support future sustainable product development.		p 110
	Tourism product development and diversity have been, and will continue to be, in the forefront of ITI's vision for the future. The Gwich'in Territorial Park and the surrounding area hold great potential for non-consumptive, environmentally friendly products, as do other Special Management Zones in the Gwich'in Settlement Area.	This comment may be appropriate for actions in the RPA concerning Campbell Hills area and tourism opportunities	

Transport Canada, Navigable Waters Protection Program (NWPP) Officials

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	NWPP has no issues with your land use plan as submitted.		

Bert Bullock

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	Proposes extension of the conservation zoning on Tree River to the entire headwaters.	Used 500 m buffer on either side of Tree River to create SMZ. Need more information to determine watershed and potential for using it to create SMZ boundaries. Will revisit for next Plan review	p 97
	<p>Reasons:</p> <ul style="list-style-type: none"> • Andre and Bullock families have used the area for the last 80 plus years. • is the only large creek in the general area – has heavy spring run off • unmistakable decline in water flow in Tree River and the Mackenzie River. • Concerned with large slope failures along the Mackenzie River • need healthy river to support wildlife/fish/birds in area 	<p>Applied conditions for heritage, traditional harvesting, and fish. Water quality and quantity covered by new regional condition.</p> <p>Will add RPA action item to establish monitoring site</p>	

Ecology North

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	Ecology North has been working with Tsiigehtchic and Fort McPherson on the development of Climate Change Adaptation Management Plans.	Will note in RPA	
	Supportive of this renewal of the Gwich'in Land Use Plan. Covers much of what was discussed in workshops with the communities.		
	Two major concerns identified from Climate change adaptation planning exercises		
	Believe that the land use plan should put more emphasis and pressure on INAC to monitor historic waste sites and sumps from oil and gas activity. Want the Plan to reinforce the idea of mapping and monitoring the sites in the next five years because melting permafrost could release contaminants into the surrounding environment.	Will add as RPA action items	
	suggest that climate change have a more central focus in the land use plan. Specific mention of fish migration and spawning periods changing rapidly in last ten years. This should be taken into account when looking at activities surrounding fish bearing streams around spawning times.	<p>Will discuss in RPA.</p> <p>Condition for Fish directs developers and regulators to engage the RRC's, GRRB and DFO directly to ensure they are working with the most recent and site-specific information available.</p>	

Environment Canada

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14 - third paragraph	The GRRB ceased collecting detailed harvest data a few years ago with findings analysed and presented in a final report.	added study dates	p11/p40
20	figure 10 – In the Species at Risk table, Short-eared owl is listed in Schedule 3 of the SARA and not legally a Special Concern species. Peregrine Falcon anatum and tundrius combined into a complex and downlisted to Special Concern.	ok (now figure 11)	p 19
21	2.3.3 Forests – Some acknowledgement should go to the Draft Forest Management Plan, recently completed by the GRRB, and which is awaiting final approval.	ok	p 20
27-28	The legislative protection for some of the listed sites need to be more clearly identified and their current status noted. Additionally, to whom has the GSCI nominated the NWT Historic sites? Where will this designation be acknowledged?	clarification added	p27-32
31	figure 14 The caption “Legislated Protected Areas” should be expanded as it implies protected areas established through law. The areas identified in the figure have not all been protected under a law, as indicated on page 28 (“nominations for the following sites...”). It appears some of them will be “Northwest Territories Historic Sites” which does not mean legislated protection.	ok - changed to the more general term, “designated areas”	p 27
44	The “Generalized Best Practices Regarding Conformity with the Land Use Plan” flow diagram is a useful addition to the GLUP.		p 48
45	The information in the last third of the page is redundant to the table on page 46. We suggest this be dropped in favour of the “Special Management Zone Conditions Summary Table”.	ok	p 56
48	conditions regarding waterfowl: condition 3, regarding aircraft disturbance, should be expanded to include ‘aircraft should avoid, by at least 1.5 km, concentrations of migratory birds’. This would bring this condition into line with the standard EC/CWS recommendation or permit condition, depending on the situation. Note: this condition is found in multiple locations in the LUP and should be modified accordingly, as per above.	ok	p 58, etc
78	Cardinal Lakes SMZ: conditions regarding waterfowl. EC/CWS strongly suggests there should be a 4 th condition related specifically to the protection of waterfowl habitat, including both the water and important shoreline vegetation. The wording in condition 1 is not specific or strong enough, and it does not cover the winter period when, although there are no birds present, industrial activity can have a negative effect on shoreline habitat as well as the actual water quality if strict operating procedures are not followed. Under the	Modified condition wording to ‘at any time of year’ Water quality and quantity now a regional condition	p 58 p 49

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	Migratory Birds Convention Act, it is a federal offence to deposit a substance that is harmful to migratory birds in waters or an area frequented by migratory birds. In other words, water bodies such as in the Cardinal Lakes area which are important for waterfowl nesting must be protected from such occurrences on a year round basis.		
81	Van Kat Khaii Luk Gwindii: conditions regarding waterfowl same comment as for Cardinal Lakes, above	as above	
91	Daazraii Van K'adh: conditions regarding waterfowl same comment as for Cardinal Lakes, above	as above	
99	4.6.3 Gwich'in Conservation Zone Descriptions – perhaps the English names for these areas could be repeated?	ok (now 4.7.3)	p 113-129
106	(headwaters: top and middle of page) the Travaillant Lake area can not be considered the true headwaters of the Anderson River, although some waters from that area do find their way into the Anderson River. The headwaters are located immediately north of Great Bear Lake.	Adjusted wording to be more accurate	p 122
106	For accuracy, “The Bluenose caribou herd...” should read, “The Bluenose West caribou herd”.	ok	p 122
128	Land Use Plan for the Future: a Regional Plan of Action This is probably the most significant change to the original plan, although it is mainly a re-packaging of section 5 of the existing LUP. The Regional Plan of Action consists of a table (section 6.3) which outlines some key actions, but is short on detail. For example, “Need baseline to develop cumulative effects thresholds”, but what baselines and how to achieve them?	Next version will be filled out with more detail. This initial draft was more focussed on presenting a concept and organization for the RPA.	p 145 RPA
136	Issues and Analysis: “Concerns about water stem...” The number of water gauging stations in the GSA (12) has remained constant over the last five years. It is not clear whether the statement is referring to rumours, but at this time there is no reason to believe that there will be a decrease in that number due to budget cuts.	ok	RPA
147-150	6.2.10 Land Use Issue 10 – Legislated Protected Areas In EC's view and experience, this section does not square up with stated Gwich'in views on legislated protected areas. The consistent message out of GTC and others has been that they are content to let the land use plan meet their land protection goals and not to engage with the NWT PAS. This section, however, appears to leave open the possibility of future PAS involvement in the GSA. Has the policy changed, or is the LUPB perhaps being optimistic? Also, this section is silent on the legislative options which, in reality, are extremely limited. The federal government through Parks Canada and EC/CWS are presently pretty much limited-out on additional protected areas initiatives given recent PAS funding to establish a limited number of	The GTC currently has no specific interest for engaging the PAS process, but there has been a good working relationship between the Board and the secretariat to build up information that will help inform if a protected area is needed or not. Will include mention of limited protected area options Will wait for full PAS comments to respond to funding issues. Just investigating options and collecting more information on important sites– will adjust wording to reflect the expectation is not to establish every site mentioned as a protected area. Need	RPA

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	federal protected areas, all of which are elsewhere in the NWT. That leaves the GNWT to meet the ambitious vision portrayed in this section, at least in terms of legislated protection. The GLUPB should decide how unrealistic an assumption that is.	more information first.	

Environment and Natural Resources, GNWT

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s 1.4	Principles In lieu of more or better information, the precautionary principle is advocated by the GNWT. Suggested application in Plan: application of precautionary principle until Boreal Caribou Management Plan (BCMP) is developed. Set general conditions in Land Use Plan to protect the species and their habitat as much as possible until a BCMP further directs human actions.	Created regional boreal caribou condition with reference to BCMP. Principles in s 1.4 left as is because they come from the Gwich'in Comprehensive Land Claim Agreement.	p 50
2.1.2	People - Update text to include 2009 population of Aklavik, Inuvik, Fort McPherson, and Tsiigehtchic.	ok	p 9
2.1.3	Economy - update figure 5 with 2008 data update figure 6 and corresponding text with 2009 data update figure 7 with 2007 income data	ok now figure 8 now figure 6	p 12 p 13 p 13
32	References - Update reference 5 to "GNWT Bureau of Statistics 2009 population estimates." Update reference 9 to "GNWT Bureau of Statistics 2009 community surveys." Update reference 10 to "GNWT Bureau of Statistics"	ok	p 33
2.1.4	"The Land" as the Environment Figure 8 is based on the 1996 NWT Classification Framework and does not reflect the new ecoregions as described in <i>Ecological Regions of the Northwest Territories - Taiga Plains</i> and <i>Ecological Regions of the Northwest Territories - Cordillera</i> . Not clear if all ecoregions in the GSA as described in the new reports have representative protection.	Now figure 9 - The Board used the old system for this version of the Plan. Will assess how to integrate new system into the Plan for the new 5-year review. Will work with PAS secretariat to further analyse representative areas for ecoregions.	p 14-15

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3.1.3	<p>Municipal Lands: Municipal lands are lands held in fee simple title by a municipality and are not managed by MACA.</p> <p>Suggested that there also be a separate definition for Commissioner's Lands as they are distinctly different from municipal lands. Clarify that Commissioner's lands may be found both inside and outside of municipal boundaries and that those found outside are subject to the Land Use Plan.</p>	Will correct wording	p 35
6.2.10	<p>Land Use Issue 10 - Legislated Protected Areas Original: The secretariat for the Northwest Territories Protected Areas Strategy describes a protected area as, "a piece of land where a specific law limits the amount and type of human activity allowed." Under the strategy, the purpose of a protected area is to recognize specific natural and cultural values or to preserve area representative of each ecoregion.</p> <p>Suggested Re-wording: The definition of protected areas used by the PAS is that of the International Union for the Conservation of Nature (IUCN): <i>An area of land or sea especially dedicated to the protection and maintenance of biological diversity, and its associated natural and cultural resources, managed through legal or other effective means.</i> Under the Strategy, the purpose of a protected area is to recognise specific natural and cultural values and to preserve areas representative of each ecoregion.</p>	Will wait for PAS comments which will take precedence over this suggestion; otherwise, ok.	RPA
6.2.10	<p>Land Use Issue 10 - Legislated Protected Areas No specific reference to Critical Wildlife Areas is made. Critical Wildlife Areas would appear to fit as an example of a legislated protected area.</p>	Cross reference to Environment Canada comment – can include list of options as found in PAS literature	RPA
6.3.2	<p>Baseline Studies and Long Term Monitoring: Issues pertaining to Cumulative Effects are not well developed. The only clear reference to cumulative effects is in section 6.3. It is not apparent how cumulative effects would be addressed in the context of land use planning for the Gwich'in region. The GNWT is prepared to discuss this matter further with the Gwich'in Land Use Planning Board, the GRRB, the GTC, and INAC in order to find a manner to address cumulative effects consistently.</p>	Next version will be filled out with more detail. This initial draft was more focussed on presenting a concept and organization for the RPA.	RPA

Gwich'in Social and Cultural Institute

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	<p>Table of Contents</p> <ul style="list-style-type: none"> 4.5.3 Teet'it gwinjik (Peel River and <u>Peel Channel</u>). Note Teet'it gwinjik is the Peel River. Not sure of the TG name for the Peel Channel? 4.5.5 ...(Frog Creek and <u>Frog Lake</u>) 4.5.7 Nichiitsii Diniilee (Campbell Hills Big Rock) 4.5.10 Special Management Zone - GSCI suggests a new name, Chii T'iet - Tsiigehnjik - Srehtadhadlajj Special Management Zone, as the area is larger than just the mouth of the Arctic Red River 4.5.12 Van Kat Khaii Luk Gwindii Gwindyee* (Lakes around Travaillant Lake) [Note, proper spelling of this word in Gwichya Gwich'in dialect.] 4.5.15 ...(Swan Lake and <u>Swan</u> Creek) [Note, please include 'Swan' Creek throughout document. 4.5.16 Tsiigehntchie Tsiigehnjik Gwit'it (Headwaters of the Arctic Red River) 4.6.3A ...(Rat <u>River</u>, Husky <u>Channel</u>, Black Mountain) [Please present place names in full through document. Rat River instead of Rat, Husky Lakes instead of Husky, etc.] 4.6.4HO2. Lenaiidlajj Lenaiidlajj (Earl's Place) 	<ul style="list-style-type: none"> Change made. Will just use Gwich'in for Peel River to reference zone. Will keep original only for the sake of keeping zone name simple. (now 4.6.10) 	p iv-v
	<p>Acknowledgments</p> <ul style="list-style-type: none"> p. 5, 2nd paragraph, first sentence should read, "...from the communities of Aklavik, Fort McPherson, Inuvik, and Tsiigehntchic...[names of communities put in alphabetic order] p. 6, 1st paragraph, 6 lines down...Agnes Mitchell, Barney Natsie, George <u>Niditchie</u>... 	ok	p viii p ix
	Maps do not have the same titles as the zones in the text.	fixed	
Page 7	Ch. 4 paragraph, 2 nd sentence should read, "This is the where the conditions..."	fixed	p 1
	Figure on page 14 is hard to read in the copy received.	was small in draft only – was intended to be larger in final plan layout	p 10
	Please add additional references to traditional medicine paragraph (Alestine Andre & Alan Fehr 2002, <u>Gwich'in Ethnobotany: Plants Used by the Gwich'in for Food, Medicine, Shelter and Tools</u> . Gwich'in Social and Cultural Institute and Aurora Research Institute. Inuvik, Northwest Territories.) and http://plants.gwichin.ca/database .	ok	p 11
Page 14	comment about the harvest study seems to indicate that the harvest study is on-going, I'm not sure if this is an issue or not.	ok - cross reference to GRRB comments	p 11
Page 14	include year for Figure 3: Annual Average Harvest Estimates	ok	p 11
Page 14	5 th paragraph, 1 st sentence should read, "...tied to the <u>proposed</u> Mackenzie Gas Pipeline..."	ok	p 11
Page 14	6 th paragraph, 1 st sentence should read, "for the first half of the <u>20th</u> century, is now..."	ok	p 11

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Page 13	consider including projection information on maps.	left off map to keep cleaner and simpler - information can be requested from office	
Page 15	consider including brief reference to social and cultural importance of traditional activities.	ok	p 12
Page 15	Suggest first sentence in 3 rd paragraph read, "The Gwich'in continue the historic pattern of engaging in both the traditional and wage economy, however are now more dependent on the wage economy than earlier this century." Or "...wage economy than they were earlier during the last century."...	modified wording	p 12
Page 15	End of 3 rd paragraph – reference needed for 2003 data.	Updated with new GNWT stats	p 12
Page 17	1 st sentence last paragraph is awkward (Oral history is a vital...). Last sentence of this paragraph, include 'legendary <u>people and locales</u> " - and consider revising this sentence based on Ingrid and Alestine's paper ¹ (p130-131): <i>Over 350 Gwich'in and English place names have been recorded for trails, areas, and topographic features. These names tell us about how people lived, where they traveled, and their in-depth knowledge of the land. They are like windows into the traditional culture, history, and values. The majority of these names describes places in terms of their physical appearance, specific resources, or the type of technology used to capture the resource. For example, many names refer to the use of fish traps; a few refer to the use of nets or jigging. Other place names are associated with particular individuals, or with both legendary and historical events. In several cases, the names are so old that they have either lost all or part of their meaning over time. The elders refer to these place names as ts'ii de'ji meaning "stone age," and indicated that these names are at least 500 years old (Andre and Kritsch 1992; Kritsch and Andre 1993, 1994; Kritsch et al. 1994; Kritsch 1994). Stories and legends accompanied many of the place names. Indeed, the names appear to serve, as Andrews (1990), Basso (1984), Cruikshank (1990), Harwood (1976), Rosaldo (1980) and others have suggested, as "mnemonic devices" or "mnemonic pegs" on which to hang traditional narratives.</i>	reworked text and included quote from paper.	p 16
Page 18	Include major water bodies on Figure 8 – at least the major rivers?	ok	p 15
Page 19	Where is the Carnworth River? Is there a common name?	added to fig. 8	p 15
Page 19	2 nd paragraph, 1 st sentence should read, "Water flows <u>north</u> from the south..."	not added - doesn't increase understanding of description	p 17
Page 19	Tributaries to the major rivers are also key for both harvesting and trail networks.	importance of water is spoken of in general terms in first paragraph	p 17

¹ Kritsch, Ingrid and Alestine Andre. 1997. "Gwich'in Traditional Knowledge and Heritage Studies in the Gwich'in Settlement Area." In: *At a Crossroads: Archaeology and First People in Canada*. Pp. 125-144. Edited by George Nicholas and Thomas Andrews. Archaeology Press, Simon Fraser University, Vancouver, B.C.

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P age 21	Might be appropriate to include mention that Dolly Varden char are currently in the pre-COSEWIC process.	Highlighted there is an issue, created a regional condition for SARA species to ensure developers get latest listings to consider.	p19/p52
Page 21	Section 2.3.3 Forest. Note: Important to include the Plan and GSA within the range of the Boreal Forest, crucial habitat to animals, plants, fish and birds and fresh waterways.	Reworked the first paragraph slightly	p 20
Page 22	Tourist surveys confirm.....and the Midway Lake Music Festival (add - in Fort McPherson).	ok	p 20
Page 22	Consider updating the sentence about the EIA of the Mackenzie Gas Project.	ok	p 21
Page 22	under Oil and Gas, 2 nd paragraph – Interior Platform? Not on Figure 11.	Changed location of reference to map so it doesn't look specific to the formations – map is just generalised potential	p 21
Page 22	edit for last sentence on page – At this time,...and then closely follow the oil...	ok	p 21
Page 24	reference to mineral potential in Richardson Mountains – nothing on map indicated for this area	will move reference to map from discussion of potential to mention of activity	p 24
Page 27	2 nd paragraph, last sentence, add, “highway links to Aklavik, <u>and</u> Tuktoyaktuk, camps and harvesting sites.”	reworked section to capture intent. Camps mentioned in first paragraph,	p 24
Page 27	sentence about snowmobile and boat traffic: major modes of ‘off-road’ travel? Non-highway travel?	reworded to: Many households have boats and/or snowmobiles for off-road travel.	p24/p26
Page 27	edit for end of fourth paragraph – They are an inexpensive way for people to stay in touch...	ok	p 26
Page 28	Add – Fort McPherson National Historic Site?	ok	p 29
Page 28	There is one Lost Patrol Memorial at the base of “Gwaatlit Hill” – the official name of the hill according to 1:50,000 map. There is a second Lost Patrol Memorial where the bodies of Constables Kinney and Taylor were found at Nji' haii chii enùugwat, which is about 1.6km north of the NWT/Yukon border.	ok	p 29
Page 28	all GSCI-proposed NWT Territorial Historic Sites have been accepted.	ok	p 30
Page 28	can you include mention of Pokiak and Vik'ooyendik in the first paragraph in this section even though they are both within municipal boundaries?	ok	p 30
Page 29	include explanation for Siglit under Nataiinlaii? – “The Siglit were an Inuit group who lived between the Mackenzie Delta and the Arctic Coast at the time of contact with Euro-Canadians. In the early 1900s, the Siglit were joined by Alaskan Inuit and today are known collectively as the Inuvialuit.”	ok	p 30
Page 29	add – “Ehdiitat Gwich'in Cultural Landscape” before Chigwaazraii, etc.	ok	p 32
page 31	Map: way side parks seem to be lost	using ‘map pin’ symbol	p 28
page 31	Map: Ehdiitat Gwich'in Cultural Landscape	Will be corrected in final version	p 28
page 31	Map: Mouth of the Peel = Nagwichoo Tshik	Will be corrected in final version	p 28
page 31	Map: add label for Gwich'in Territorial Park	Is labelled in the legend same as the Peel River Preserve. Will add labels on map for consistency in final version	p 28

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	Consider including reference to on-going Mackenzie River as a Canadian Heritage River nomination?	Will follow up in RPA	
	There are some spelling variations between the recorded place names used by the GSCI and those used in the plan – Special management zones:		
	Neeghail Zhò Njik (instead of Zhoo tshik) and Neeghail zhò vàn. As the low tone (´) is a pronunciation guide, it's presence or absence may not be important). Generally the word Tshik refers to the mouth of a creek, and the work Njik, among others, refers to the creek itself.	ok	
	The spelling in the Gwich'in Place Names data base is Gwi'eekajilchit (not Gwieekajilchit [tshik]); but the name of Campbell River (aka Gull River) is recorded as Tithegeh chi' niilajj.	Zone is the Creek not the River	
	Low tone and spelling variation of second word of Nichiitsii diniinlee.	ok	
Page 43	Pull-out Map		
Page 43	under Conservation Zones, 'space after Vittrekwa' in B (James Creek, Vittrekwa River).	ok	p 47
Page 43	under Special Management Zones, #6 Gwieekajilchit <u>tshik</u> (Campbell Creek), #7 Nichiitsii Diniilee (Campbell Creek Big Rock), #8 remove 'rounded brackets' from Mackenzie Delta, #10 Tsiigehntchie Tsiigehnjik, #12 ...Luk Gwindii-Gwindyee..., #16 Tsiigehnjik Gwit'it.	ok (SMZ#7 just Campbell Hills as it doesn't reference Big Rock - it's a HCZ)	p 47 p 47
Page 43	can't distinguish between SMZ and Deepwater Lake Watershed (same shades of green), and also can't see the blue for the Gwich'in Territorial Park.	will fix	p 47
Page 45	#7. Nichiitsii Diniinlee refers to Big Rock and not the Campbell Hills. As far as we know there is no Gwich'in name for the Campbell Hills.	ok - will remove Gwich'in name for Big Rock	p 56
Page 45	4 th paragraph, #3 ... (Peel River and Peel Channel)..., #5. ... (Frog Creek and Frog Lake)..., #7 ... (Campbell Hills Big Rock), #10 Tsiigehntshik Tsiigehnjik....	ok	p 56
Page 46	top of the page, #12...Luk Gwindii-Gwindyee..., #15 ... (Swan Lake and <u>Swan</u> Creek)...	ok	p 56
Page 46	SMZ conditions summary table:		p 56
Page 46	shouldn't the Mackenzie Delta (#8) and Headwaters of the ARR (#16) have "heritage" marked off?	Added heritage conditions to those zones	p 56
Page 46	#3 Peel River & <u>Peel</u> Channel	ok	p 56
Page 46	#5 Frog Creek & <u>Frog</u> Lake	ok	p 56
Page 46	#7 Campbell Hills Big Rock	(SMZ#7 just Campbell Hills as it doesn't reference Big Rock - it's a HCZ)	p 56
Page 46	#15 Swan Lake and <u>Swan</u> Creek	ok	p 56
Page 47	re: Conditions regarding Porcupine Caribou: 1. Activities requiring a permit, licence or authorization will not block or cause substantial diversion...	Will leave as is; the Board trusts that regulators will evaluate projects for potential impacts that could cause diversions and apply specific	p 57

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		conditions to mitigate.	
47-49	Can you add that before a pit management plan is prepared, that an archaeological assessment has to be carried out for ALL pits? This is something we've been suggesting for years and it would be much more economical to have them all assessed at the same time rather than on a case by case basis.	Made it a part of the regional condition for pit management plans that the GSCI and PWNHC must be consulted about the requirement for archaeological assessments. The condition for pit management plans is specific to pits that have not been developed yet. Applications to develop pits are often made one pit at a time and therefore the condition can only be applied on a case by case basis. Can't see any options within the context of the Plan for applying the requirement to all existing pits at once.	p 51
Page 48	Should previously established pits also have Pit Management plans? Are contents of Pit Management Plans described somewhere or are they standard?	Ideally, but these pits would be considered grandfathered. Have best practices document that was prepared for Board – presents a relatively standard format.	p 51
Page 51	6 th paragraph, 5th line down...Black Mountain (Mount Goodenough), Red Mountain (Mount Gifford),	ok	p 61
Page 51	I'm unsure of what recent studies are underway re: Vittrekwa Char. This needs to be done but as far as I know is not being done.	Report referenced in fourth paragraph	p 61
Page 51	second to last paragraph – This area is full of heritage....to Old Crow, Yukon. The GSCI have also recently identified an Edhiitat Gwich'in cultural landscape for recognition was recently recognized under the Territorial Historic Sites program.	ok	p 61
	Note that I believe the GRRB has started to use the original wording in the GCLCA of Gwich'in Renewable Resources Board.	inconsistent use through plan, will correct to Resources	
Page 53	Conditions regarding Porcupine Caribou: 1. – delete “substantial”	Will leave as is; trust that regulators will evaluate projects for potential impacts that could cause diversions and apply specific conditions to mitigate.	
Page 54	4.5.3 Teetl'it gwinjik – Peel River and *Peel Channel SMZ [*please add 'Peel' throughout document]	ok (now 4.6.3)	p 64
Page 60	4.5.5 ... Frog Creek and Frog Lake SMZ [*please add 'Frog' throughout document]	ok (now 4.6.5)	p 70
Page 54	E.g. – the plan notes that developers must be prepared to assess the impacts of their activities on <i>known</i> heritage resources. In fact, the law states that both known and undiscovered archaeological sites are protected by law. Unsure how this could best be addressed: developers should first identify known heritage resources, assess likelihood of unrecorded heritage resources, and then assess impacts? Or is the protection of previously unrecorded heritage resources covered under the second clause effectively? We propose a teleconference with the GSCI and perhaps PWNHC to address this wording issue (for all similar heritage resource wording). The GSCI requests that the GLUPB consider recommending that on-site heritage site impact	The intent of the second clause is to direct regulators to work with the GSCI and could include developing permit/license specific conditions for the protection of previously unrecorded heritage resources Nothing in the Land Use Plan takes away from the existing responsibilities under the Territorial Land Use Regulations regarding protection of	

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	assessment, followed by mitigation if necessary, be conducted as part of any development project proposal. We believe this may done in the Yukon although we would have to check.	known and suspected heritage resources.	
Page 57	wording indicates that the Nataiinlaih NWT Territorial Historic Site is still a nomination – as indicated above, these are all accepted sites now. Consider a find and replace of all 'nomination' wording.	Will be corrected in final version	p 67
Page 63	4.5.6 Campbell Creek = Tithegeh Chi' Niilajji (with low tone on "I" in Chi' AND nasals under the aii in Niilaih)	Used the name used in the Gwich'in Territorial Park master plan document for Campbell Creek	p 73
Page 63	Is there a table with local fish names (such as loche) when non-local names are used? And waterfowl names (e.g. scaups) as well?	added common names to table in figure 11	p 19
Page 65	4.5.7 Campbell Hills – has no name in Gwich'in - Nichiitsii Diniilee is Big Rock but it is the Campbell Hills 'outcrop or dolomite uplift' that is referred to in this document as the Campbell Hills Special Management Zone.	ok - dropping Nichiitsii Diniilee from the title	p 75
	Section 4.5.8 – the Gwich'in name for the delta is Ehdiitat (TG, EG) and Ehdyee tat (GG). Note: Please include both names for the Mackenzie Delta in the document.	ok	p 78
Page 68	winter fishing under the ice might also occur in the delta.	reworded to leave out seasonal reference	p 78
Page 68	shouldn't "heritage values" also be included as a primary reason for special management?	ok	p 78
Page 71	4.5.9 – fourth paragraph – One An older Gwich'in name for the Rengleng River refers to a fish trap used on the river (K'adh Gwitshik).	ok	p 81
Page 71	4.5.10 See re-naming note above. Note: It could be noted that this SMZ is an extension of 4.5.14 Tsiigehnjik – ARR SMZ. Also note designations at this site: Arctic Red River Heritage River, Nagwichoonyik (Mackenzie River) National Historic Site, Vik'ooyendik (Church Hill) Territorial Historic Site, Teetshik Goghaa Territorial Historic Site (7 miles below Tsiigehntchic).	Referenced section 2.6 for simplicity	p 81
Page 77	Lakes in Cardinal Lakes SMZ. There are also lakes with traditional Gwich'in place names in this zone; include some of the locally named lakes mentioned (i.e. Big Woman Lake = Tr'iinjoo choo k'adh van).	Included Gwich'in place name for Big Woman Lake	p 87
Page 80	4.5.12 Van Kat Khaih Luk Gwindii Gwindyee – Lakes Around Travailant Lake SMZ	correction made	p 90
Page 80	third paragraph – capitals needed for Gwich'in Renewable Resources Board and Department of Environment...	ok	p 90
Page 83	4 th paragraph, 2 nd sentence should read, "...at the start of the Mackenzie Delta was designated as the <u>Nagwichoonyik</u> National Historic Site in 1998...." In this paragraph, also note the other designations along this SMZ: Khaih Luk Tshik Territorial Historic Site, and well as the Arctic Red River Heritage River, Nagwichoonyik (Mackenzie River) National Historic Site, Vik'ooyendik (Church Hill) Territorial Historic Site, Teetshik Goghaa Territorial Historic Site (7 miles below Tsiigehntchic).	Made changes to 2 nd sentence and including reference to Khaih Luk Tshik. Other designations are more relevant to other zones.	p 93
Page 83	5 th paragraph. Please consider adding the word 'Fort McPherson' and 'any' as follows: This close connection between the Mackenzie River and the communities of Tsiigehntchic, Inuvik, 'Fort McPherson', and Aklavik supports the need to carefully consider the impacts 'any' development might have on water quality and quantity.	reworked the sentence to capture the intent of the comment	p 93

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Page 87	third paragraph – add Eric Damkjar’s 1996 & 1997 reports on excavations up the Arctic Red River?	ok	p 97
Page 87	fifth paragraph – The natural and cultural importance of the Arctic (with a “c”) Red River is recognized nationally through its designation as a Canadian Heritage River.	ok	p 97
Page 90	4.5.15 ...Swan Lake and ‘Swan’ Creek SM Area or Zone?	Corrected to zone	p 102
Page 93	4.5.16 Tsiigehtshik Tsiigehtshik Gwilt Gwilt – Headwaters of the ARR SMZ	ok	p 105
Page 93	2 nd paragraph, 3 rd sentence, insert ‘is’ ... As this is a headwaters area, it plays...	ok	p 105
Page 93	add “Conditions regarding Heritage Resources?”	ok	p 105
Page 95	5 th paragraph, A....(Rat River, Husky Lakes, Black Mountain)	Ok, except it is the Husky Channel and not Husky Lakes	p 109
Page 95	6 th paragraph, 1 st sentence could read, “In addition to the four Gwich’in Conservation Zones, there are also an additional 13 <u>small culturally significant</u> Gwich’in Heritage Conservation Zones....”	removed the word small, reference to cultural significance in next sentence	p 109
Page 95	Some spelling variations: Ddhah Zhìt Han, Chigwaazraii; Dachan choo gèhñjik.	Didn’t attempt the e with two accent marks to avoid font compatibility issues	p 109
Page 95	D. typo in Tsiigehtshik	ok	p 109
Page 96	Some spelling variation: Nichiitsii diniinlee.	ok	p 110
	Page 99, Page 103, Page 106 – odd use of hard returns in name of GCZ.	Based on formatting, will make sense by looking at original plan / final draft revised plan.	
Page 99	3 rd last paragraph, last sentence should be, “...via the Husky channel -Channel...”	ok	p 114
Page 100	The Ehditait Gwich’in Cultural Landscape has been accepted as an NWT Historic Site.	Will be corrected in final version	p 115
Page 104	Expected Land Uses within the James Creek/Vitrekwa River CZ – what about gravel deposits? Only outfitting and tourism are mentioned.	All existing pits are within the Transportation SMZ that cuts through the CZ, and new pits will not be allowed.	p 120
Page 106	3 rd paragraph under heading Location, 2 nd sentence could read, “It is east of the Dempster Highway , centered around <u>the</u> Travaillant Lake Area itself....”	Left as is	p 122
Page 107	On p. 107, 3 rd paragraph, 3 rd sentence could read, “...like Travaillant <u>Lake</u> , Andrew <u>Lake</u> , Tregnantchiez, and Deep Lakes...” [Present place names in full.]	ok	p 122
Page 107	typo of space before comma: Travaillant , Andrew...	ok	p 122
Page 107	fourth paragraph – The section of the Mackenzie River between Thunder River and Point Separation, at the start of the Mackenzie Delta , is the Nagwichoonjik National Historic Site.	Provides frame of reference left as is	p 123
Page 107	4th paragraph, last sentence, the wording “The Gwich’in Social and Cultural Institute strongly support the protection of the National Historic Site.” Could be changed or taken out totally.	ok	p 123
Page 108	1 st and 2 nd paragraph, Mackenzie River/Tree River plus “...by including Travaillant Lake and Travaillant River, as well...” [Present place names in full.]	ok	p 124
Page 109	a) water quantity, water quality...water are substantially unaltered;	Left as is since it is taken from the Land Claim text.	p 125
Page 111	D.Tsiigehtshik (Arctic Red River) Could the description for the beginning and end of this GCZ be more specific? The location in the upper section of the ARR is vague.	added detail	p 127

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	General comment: As they are presented now, the four GCZ are lost in the pages of the document. They must stand out!	formatting issue that was meant to be addressed in final draft	
Page 114	– 4.6.3_4.6.4 Gwich'in Heritage Conservation Zone Descriptions	numbering corrected (now 4.7.4)	p 130
	Please note, the thirteen Gwich'in Heritage Conservation Zones could be marked as follows: H01. Nitchiitsii diniinlee (Big Rock) H02. Lenaiidlaii (Earl's Place), etc., etc. Presented this way, they will stand out.	reformatted to stand out	p 130-132
Page 114	Use of Diniinlee without Nichiitsii. Should be Nichiitsii Diniinlee.	corrected	p 130
Page 115	check boundaries for Eltyin Choo Chihvyah K'yit and Martin Zeh.	see next section of comments	p 130-131
Page 115	At a recent GRRB review of the Rat River Char TK report, it was decided to use the English name Canoe Landing instead of Destruction City for Tr'ih Zhit Tagòhdii, as the name Destruction City only started to be used during the gold rush, whereas Canoe Landing was a well known spot from before the gold rush. The name Canoe Landing more closely relates to the pre-goldrush name and purpose of the site. Just something to consider. Reference should be to Kritsch, Jerome and Mitchell 1999 report.	Added	p 131
Page 116	Natainlaii should have the same boundaries and description as the NWT Territorial Site?	Natainlaii SMZ created to match NWT Historic Site. Conservation zoning for the NWT Historic Site may be a problem because of transportation uses in the area.	p 132
Page 116	Shildii – check boundaries (site is only on west side of the river)	see next section of comments	p 132
Page 116	Dèeddhoò gòonlii – delete “chi” in first sentence of description of site.	ok	p 132
Page 134	One paragraph starts with the GSCI mandate (documents, preserves, and promotes) which has been modified. It no longer includes “the practise of”.	ok	RPA
Page 134	Issues and Analysis – Ehdiiat Gwich'in Territorial Historic Site near Aklavik...	ok	RPA
Page 134	4 th paragraph, 4 th sentence, please delete, “...including Nagwichoonjik National Historic Site on the Mackenzie River, the designation of the Arctic Red River as a Canadian Heritage River, and the Ehdiiat...” the Canadian Heritage River work was completed by Ron Cruikshank, not GSCI.	ok	RPA
Page 142	add the need for archaeological assessments (and oral history studies?) here to build the knowledge base for the GSA?	ok	RPA
Page 145	second paragraph – add “heritage” to second sentence – “Consideration must be given to potential environmental, cultural, social, heritage and economic impacts?”	ok	RPA
Page 149	remove proposed in front of NWT territorial historic sites.	ok	RPA
Page 149	4 th paragraph, could add ‘Big Rock’ and other places to this sentence.	will look at expanding list	RPA
Page 149	Arctic Red River Canadian Heritage River designation	ok	RPA
Page 149	Wouldn't the Peel Watershed also be considered a priority area? I know it's mentioned in the transboundary part of this document, but part of the proposed Peel National Historic Site under discussion several years ago, is in the NWT (from the	will add reference to the application	RPA

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	confluence of the Peel and Mackenzie rivers to the NWT/Yukon border). See <u>Teet'it njik/Tshuu tr'adaojich'uu: At the Heart of the Teet'it Gwich'in Cultural Landscape. An Application for the Designation of a National Historic Site.</u> Prepared by Mélanie Fafard and Ingrid Kritsch, Gwich'in Social and Cultural Institute on behalf of the Teet'it Gwich'in First Nation. June 2003. 34pp.		
Page 151	Transboundary Planning – should there be mention here of the 2 nd part of the proposed Peel National Historic Site under discussion several years ago, which is in the Yukon (in the area of the Peel Canyon)? I believe it has been incorporated into the Peel Watershed Land Use Plan. For info about proposed site see, <u>Teet'it njik/Tshuu tr'adaojich'uu: At the Heart of the Teet'it Gwich'in Cultural Landscape. An Application for the Designation of a National Historic Site.</u> Prepared by Mélanie Fafard and Ingrid Kritsch, Gwich'in Social and Cultural Institute on behalf of the Teet'it Gwich'in First Nation. June 2003. 34pp.	ok	RPA
Page 166	include following under list of heritage and culture reports? <u>Teet'it njik/Tshuu tr'adaojich'uu: At the Heart of the Teet'it Gwich'in Cultural Landscape. An Application for the Designation of a National Historic Site.</u> Prepared by Mélanie Fafard and Ingrid Kritsch, Gwich'in Social and Cultural Institute on behalf of the Teet'it Gwich'in First Nation. June 2003. 34pp.	ok	RPA
Page 166	Nagwichoonjik NHS draft Commemorative Integrity Statement. April 14, 2004.	ok	RPA
	The GSCI would like to submit their current 5-year plan to the GLUPB, as requested. It is available for download from the GSCI site at http://www.gwichin.ca/AboutGSCI/documents/GSCI-5-YrPlan-2006-2010.pdf .		RPA
	<p>New Heritage Conservation Zones</p> <p>In the letter to the GSCI dated May 17, 2010; a request was made to the GSCI to “let the Board know of any new sites the GSCI would like to see recognized under conservation zoning.” Unfortunately, time and funding restraints at the GSCI will not allow for a proper analysis of potential sites to be suggested at this point, aside from the suggestions below (and in reports previous supplied to GLUPB, as indicated below). The GSCI anticipates working closely with the GLUPB over the next five years to identify sites in gap areas and by working with Gwich'in communities.</p> <p>The map of heritage conservation zones on page 117 shows some interesting gaps in HCZ locations: the lower delta near Aklavik, the headwaters of the Arctic Red River, the Travailant Lake watershed, south of the Mackenzie River away from the Arctic Red River, and the northern / eastern portion of the GSA. Additionally, major trail routes and water bodies could be ‘underserved’ by HCZ by nature of their importance historically and culturally – i.e. sites are concentrated in areas of increased use and importance.</p>	Will identify actions in RPA	RPA
	<p>Potential Aklavik Heritage Conservation Zones report</p> <p>In April 2007, the Gwich'in Social and Cultural Institute interviewed Elders and land users from Aklavik to identify possible heritage conservation zones:</p> <p><i>The Gwich'in Social & Cultural Institute was contracted by the Gwich'in Land Use Planning Board to conduct preliminary interviews about important heritage</i></p>		RPA

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	<p><i>areas for the Ehdiiat Gwich'in of Aklavik. This work is being conducted to supplement the 5 year review of the <u>Nahn' Geenjit Gwitr'it Tigwaa'in: Working for the Land – Gwich'in Land Use Plan (2003)</u>. Interviews with select Aklavik Elders and Elders originally from Aklavik were conducted and transcribed, and special places on the cultural and historical landscape were identified. Recommendations for further interviews and research were also gathered from the Elders.²</i></p> <p>The GSCI and Aklavik Elders identified eleven sites as potential Heritage Conservation Zones.</p> <ol style="list-style-type: none"> 1. Pokiak 2. Knut Lang's Place 3. Jim Firth's Place 4. Fish Hole 5. Fish Hole on Big Fish Creek 6. Fish Point 7. Big Eddy 8. Black Mountain 9. Red Mountain 10. Historic dog-team trails 11. The Delta <p>Big Eddy, Black Mountain, Fish Hole, Black Mountain and Red Mountain are within a NWT Territorial Historic Site as a cultural landscape. These are currently within a Special Management Zone in the GLUP; although both Fish Hole and Big Eddy are small and contained enough to be good candidates as HCZ. The Delta and historic dog team trails may be too large to consider for the specific HCZ requirements. The Fish Hole on Big Fish Creek is not within the GSA. Fish Point is within the ISR but is on Gwich'in-owned lands. Pokiak and Knut Lang's Place are now NWT Territorial Historic Sites, and could be considered for inclusion in the GLUP as HCZ. Additionally, Jim Firth's Place could be considered as well, as a small, important site. The report makes additional recommendations for the GLUPB (page 47).</p>	<p>Will revisit report and identify RPA Actions</p>	<p>RPA</p>
	<p>Potential HCZ: summary report of heritage values</p> <p>Additionally, the GSCI has prepared a geodatabase and report with 813 important cultural sites across the Gwich'in landscape for use by the GLUPB.³ The</p>		

² Gwich'in Social and Cultural Institute with Ehdiiat Gwich'in Elders Annie B. Gordon, Mary Kendi, Richard Ross, Alfred Semple, Catherine Semple, and Tommy Wright 2007. Ehdiiat Gwich'in Heritage Sites: Potential Heritage Conservation Zones. Unpublished manuscript, GSCI: Tsiigehtchic. Page 2.

³ Gwich'in Social and Cultural Institute. 2007. Heritage and Cultural Places in the Gwich'in Settlement Area: A list created for the Gwich'in Land Use Planning Board. Unpublished manuscript, GSCI: Tsiigehtchic.

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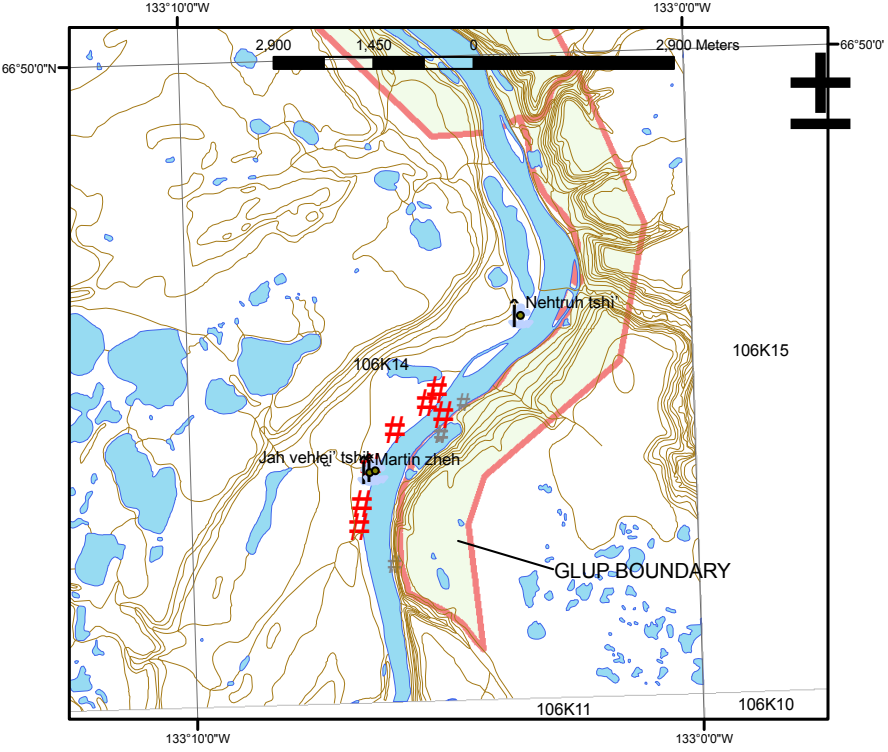
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	<p>geodatabase indicated the location of each feature and the attribute data included reasons why each site was considered important, as far as the GSCI could determine (within data and time limits). It also identifies existing protection. Since every site across the Gwich'in landscape is included, a process to identify those most appropriate for HCZ status would need further work. For example purposes only, the following is an entry in the GDB and accompanying report:</p> <hr/> <p><i>Gwich'in Place Name - Primary: Big David Lake</i> <i>Key (Database number): 623</i> <i>Name affiliation: Gwichya Gwich'in</i> <i>Present At Site: Remains of fish trap in creek, remains of camp.</i> <i>Value:</i></p> <ul style="list-style-type: none"> >Heritage (fish trap in creek, fishing for dog fish) >Fishing (whitefish for dog food) >Whitefish <p><i>Protection</i> Archaeological site Mktm-13, a campsite, is located near the shores of this lake. Archaeological sites are protected by GNWT law. Portions of this feature are located within the Special Management Zone "Lakes areas around Travaillant" and Gwich'in Conservation Zone "Travaillant Lake, Mackenzie and Tree River" in the Gwich'in Land Use Plan. <i>Existing name: Crossing Creek Lake</i></p>	<p>Will include as RPA action item</p>	<p>RPA</p>
	<p>Identification of potential heritage conservation zones The identification of other heritage conservation zones in Teet'it Gwich'in and Nihtat Gwich'in areas would need a similar project: interviewing a select number of Elders, around five or six; with a mapping and historical/oral history/ethnohistorical literature review. The geodatabase of heritage values created by the GSCI for the GLUPB could serve as a starting point. The Gwichya Gwich'in have worked with the GSCI to identify important sites for the NWT Territorial Historic Sites process and these could potentially be reviewed and presented to the GLUPB for consideration. The GSCI will be conducting interviews or workshops in all four Gwich'in communities in November and could potentially interview Inuvik residents at that point, for a similar project. This would depend upon timing and funding availability.</p>	<p>include as RPA action item</p>	<p>RPA</p>

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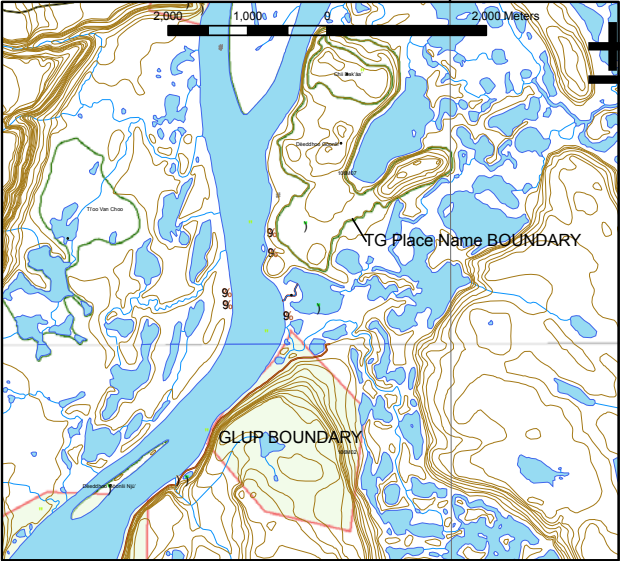
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	<p>Site-specific heritage management plans The GSCI and GLUPB have discussed the possibility of the GSCI creating site-specific heritage management plans over the last several years. The GSCI feels that they are indeed the best-situated to create these plans. However, and as discussed earlier, the GSCI would need to work with a professional conversant in the creation of management plans early in the process – perhaps someone who has years of experience working specifically with management plans in Parks Canada or another organization; and would understand the ramifications of the plan and process involved. The GSCI proposes the following methodology:</p> <ol style="list-style-type: none"> 1. GSCI and outside heritage professional experienced in the creation of management plans meet (by teleconference) and discuss particulars of project. 2. Heritage pro creates a template for management plans. The template includes general headings and indicates what type of information to include in each section. Template includes example conditions and stipulations. 3. GSCI drafts management plans for each HCZ, with participation and consultation of relevant community members and GLUPB. 4. Outside heritage professional reviews and comments on plans. 5. GSCI finalizes plans and presents documents to GLUPB. <p>The GSCI can start to work on the process as soon as funding is in place. The GSCI recognizes that GLUPB has a contact who would be suitable as the outside heritage professional</p>	<p>include as RPA action item</p>	<p>RPA</p>
	<p>Concern At present there is no legislation in place to protect palaeontological resources in the NWT. In the past 3 years, significant finds have been recovered from Tsiigehtchic (steppe bison) and most recently from the Midway Lake area. Reports and further analysis are being carried out on the steppe bison which has been dated to ca. 11,800 years old and is now in the care of the PWNHC. We are awaiting an analysis of the latter find near Midway but understand that it includes a possible Holocene horse mandible plus a caribou vertebrae and tree fragment. If it is of Holocene age, this will be a significant scientific find as most specimens from NW North America date to the Pleistocene according to Tom Andrews (pers. comm. July 14, 2010.)</p> <p>Question – is there some way of protecting these and future areas through the Land Use Plan until legislation is in place? Both finds were the result of slope failures because of warming permafrost and we can expect more finds in the coming years. There are also potentially significant fossils along the Arctic Red River which were noted in 1994-1996 but have not been officially reported on.</p>	<p>Need more information on type of protection wanted - will add action item to investigate to RPA.</p>	<p>RPA</p>

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	<p>Review of Heritage Conservation Zone boundaries As requested by the GLUPB in a letter to Sharon Snowshoe dated May 17, 2010, the Gwich'in Social and Cultural Institute has reviewed the Heritage Conservation Zone boundaries against GSCI heritage GIS layers and has the following comments. The GSCI did not review the boundaries against textual references to the places in question at this time; only digitized spatial data.</p> <p>Occasionally the GSCI found discrepancies with the boundaries and the NTS base layers used. We assume the NTS base layers are incorrect but point out the discrepancies nonetheless.</p> <p>The GSCI will be conducting verification sessions (including verifying location and extents) in November 2010. If results from these verification sessions impact the HCZ boundaries, these will be passed along to the GLUPB.</p> <p>H01 Big Rock The GSCI has no current comments on the boundary of H01 Big Rock.</p> <p>H02 Earl's Place It appears that the western boundary should follow the river; it is unclear from GSCI data that it does follow the river. This may only be due to poor NTS data.</p> <p>H03 Thunder River If the southern boundary of H03 is supposed to run along the water's edge, from current NTS data that the GSCI has it appears to be slightly away from the edge. However, this could relate to poor NTS data.</p> <div data-bbox="237 1015 762 1482"> </div> <p>H04 Old Arctic Red River The Gwichya Gwich'in Place Names boundary for <u>Teetshik Goghaa (Zheh Gwishik – Old Arctic Red site)</u> is substantially larger but somewhat slimmer than the H04 boundary. The place name boundary is the thick green line in the map below, and the HCZ boundary is the smaller shape:</p> <p>At least one archaeological site and one cabin are within the larger boundary but outside the current HCZ boundary. However, the current boundary matches the accepted NWT</p>	<p>Likely different NTS datasets</p> <p>Likely different NTS datasets</p> <p>Will keep boundary that matches NWT heritage site.</p>	<p>RPA</p>

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	<p>Historic Site boundary (which was based on the HCZ boundary). This boundary therefore has community approval through several processes.</p> <p>H05 Jackfish Creek The GSCI has no current comments on the boundary of H05 Jackfish Creek.</p> <p>H06 Martin House The boundary of this HCZ appears to be on only one side of the creek; while Martin House itself, as well as various trail heads and archaeological sites, are on the other side. The boundary should be extended to both sides.</p>  <p>H07 Bernard Creek The GSCI has no current comments on the boundary of H07 Bernard Creek.</p>	<p>H06: Extended to other side of river</p>	<p>p 133</p>

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	<p>H08 Destruction City The eastern boundary of H08 does not come to the river.</p> <p>H09 Mouth of the Peel The <i>Nagwichoo Tshik</i> boundary from the NWT Territorial Historic Site is slightly larger than the HCZ boundary – see shapefile sent earlier this year (Nagwichoo_tshik_Boundary.shp).</p> <p>H10 8-Mile The boundary of 8-Mile was reviewed during a community steering committee meeting and a finalized version was submitted as a NWT Territorial Historic Site. It varies quite a bit from the established boundary – it is much larger. See shapefile sent earlier this year (EightMile_Boundary.shp).</p> <p>H11 Shiltie Rock The GSCI has no current comments on the boundary of H11 Shiltie Rock.</p> <p>H12 Many Scrapers There is a discrepancy between the Teet'it Gwich'in place names boundary of this name and the GLUP boundary. They appear to reference different hills; and the large extent of the current Gwich'in Place Name may also need to be updated to only include the small hill at the southern tip of the current polygon. See map, below.</p> 	<p>H08: Conservation Zone A provides protection to the portion of the site that lies directly on the Rat River. Will look at adjusting boundary after additional site specific management planning work</p> <p>H09: boundaries matched</p> <p>H10: boundary adjusted to match 8 mile Historic Site boundary.</p> <p>H12: Revised boundary based on place name location provided. Can update when consultation yields community agreement on final boundary. (through amendment or review process of Plan)</p>	<p>RPA</p>

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	<p>It appears that further consultation on this HCZ is needed. As mentioned above, the GSCI will be conducting place names extents and verification workshops in November with knowledgeable Elders and may verify this hill shape at that time. Alternatively, a specific consultation with Elders from Fort McPherson may be appropriate. In the interim, activities in both areas should be assessed as appropriate.</p> <p>H13 Tl'oondih The GSCI has no current comments on the boundary of H13 Tl'oondih.</p>		

Aboriginal Affairs and Northern Development Canada

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	<p>GENERAL COMMENTS: Overall, the Draft Revised Plan is a constructive document that is easy to read and to follow. Users of the document, namely proponents and regulators, should have no difficulty understanding where proposed projects would be allowable or prohibited, and what general conditions may apply.</p> <p>The Planning Board's approach to the Zoning is clear and recognizes that any requirement for further detailed conditions would be dealt with through subsequent and integrated environmental assessment and permitting phases. In a few cases however, some conditions could be clarified. Achieving a "substantially unaltered" state for Water Quality and Quantity, for example, may be difficult to apply if it does not provide sufficient guidance to regulators. As part of this review, INAC has attempted to provide the Planning Board with constructive recommendations to further improve the Draft Revised Plan.</p>		
	<p>SPECIFIC COMMENTS:</p>		
P 2	<p>Table of Contents: - Insert the word 'Chapter' under the 'Acknowledgements' at the top of the page so it is clear that the left-most numbers are the actual Chapter numbers.</p>	Will format for clarity	p iv-v
P 3	- List of Figures [Tables, Charts, etc] and maps would be helpful.	ok	p vi
	<p>Chapter 2: Information About the Gwich'in Settlement Area and its Resources</p>		
P 12	Include a sentence describing the status of Yukon planning initiatives and a reference, given the importance of aligning adjacent initiatives.	Added brief comments	p 9

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P 12	Section 2.1.2 People - There seems to be a lack of statistics provided on population within the communities. This information, which includes population changes in the past 10 years, and the percentages of aboriginal residents could be helpful. The Board should provide further population data to help track changes within the Gwich'in Settlement Area.	The Board didn't feel that detailed demographics will make any difference to the planning or regulatory processes. Also keeps Plan from getting too big (less user friendly - focus is on chapter 4)	p 9
P 12	Include a description of Gwich'in owned lands in the ISR; note that there is no Gwich'in-owned land in the Yukon.	Mentioned Gwich'in lands in ISR and Yukon	p 9
P 13	Figure 1: Gwich'in Settlement Region - Consider adding a legend and define on the map the primary and secondary community use areas.	Primary and secondary use areas defined with labels on map already. Will format for clarity.	p 9
P 14	Figure 2: Gwich'in Seasons Calendar - Can't appreciate the seasonal cycle as it is too small. Consider using a larger diagram, otherwise delete it.	Was only small for this draft, will be formatted for clarity when final draft put together	p 10
P 14	Figure 3: Annual Average Harvest Estimates - Reference is made to the annual average of subsistence forest harvesting and traditional medicine as harvesting activities in the GSA. Why represent these activities in an annual average number, as opposed to a % to be kept consistent with other statistics presented (Figure 4, 5 and 6)?	Percent of harvest is relative and doesn't present the concept of quantity.	p 11
15 & 16	Label 'y' axes in graphs.	ok	
P 16	1st paragraph - The text indicates that there is a range in the average income in the GSA, but also states that the cost of living in the area is much higher than in other areas in Canada. It would be worthwhile to compare the average personal income of the various communities to other locations in Canada.	Added Federal isolated post living cost differential that uses Edmonton as a reference point - figure 7.	p 13
P 19	Section 2.3.1, last 2 paragraphs - Are all these rivers mapped in the Plan? If so, please refer to this map. Any geographic feature referenced in the text should be labelled on one or more map(s), e.g., Fig. 1.	added some labels for water features on ecoregions map - figure 9	p 15
P 20	Section 2.3.2 - Should include discussion of Territorial SARA in text – mentioned in Figure 10, but not discussed in text1.	Done in conjunction with direction from ENR comments - now figure 11	p 18/19
P 20	Section 2.3.2, Figure 10 - In addition to COSEWIC, federal SARA and NWT SARA, suggest adding a column describing the resources/issues considered important by the Gwich'in, particularly for sustainable harvesting. For example, Dalls Sheep, the Porcupine Caribou Herd, Woodland Caribou, Dolly Varden Char, Inconnu, and declining Scaup and Scoter populations, and other resources/species/habitats, are all referenced in the Draft Plan because they are considered important to the Gwich'in.	Mentioned in text	p 19
P 24	Section 2.4.2, paragraph 2 – Are these deposits mapped somewhere in the Plan? If so, provide reference.	Deposits are not mapped in a way to present in the Plan from the referenced documents	p 21
P 27	Section 2.6 – Consider noting that the Mackenzie River is part of the Trans-Canada Trail. The Trail is mentioned on P 146, but without reference to the River.	Added	p 29
P 27	Section 2.6 Existing Designated Areas, 1st paragraph – Heritage Rivers are not a legislated designation, suggest removing the word 'legislated' from the first sentence to reflect this.	Corrections made with consideration to additional comments from Environment Canada and PAS	p 27

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P 28	Section 2.6 – The last sentence under <i>NWT Historic Sites</i> is the 1st mention of Plan not applying to municipal lands. This should be included earlier in the document.	Added reference in last sentence of first paragraph of section 2.1.1	p 7
28 to 30	Section 2.6, <i>NWT Historic Sites</i> - For historic site overlaps, might be useful to identify the specific zone(s) with which each site overlaps.	done	p 30-32
P 31	Figure 14: Legislated Protected Areas - The title of the Figure should be changed. If the Board is intending to show all of the “conservation” type of designations, then they should ensure that this is reflected in the Figure, more specifically in the Legend and title.	Corrections made with consideration to additional comments from Environment Canada and PAS (now figure 15)	p 28
Chapter 3: Land Ownership, Regulation and Management			
P 33	Section 3.1 – Chapter 2 makes more sense after reading Section 3.1 and looking at Fig. 15. Consider moving this material into Chapter 2.	Left structure as is, included reference to 3.1 in 2 nd last paragraph, 2.1.1	p 27
P 35	<p>Section 3.2 <i>Mackenzie Valley Resource Management Act</i> – The Department suggests revising this Section, as it is not complete and seems to exclusively focus on the Gwich'in organizations, precluding any other Boards. It should be broader. There are other elements requiring clarification. For example, the <i>Act</i> should reference the establishment of a Cumulative Impacts Monitoring Program but instead refers to the need for a responsible authority to analyze data and other pertinent information for the purpose of monitoring the cumulative impacts).</p> <p>Suggest the alternative paragraphs:</p> <p>“<i>The Mackenzie Valley Resource Management Act</i> established an integrated co-management structure for public and private lands and waters throughout the Mackenzie Valley. The Act was proclaimed December 22, 1998 but Part IV which establishes the Mackenzie Valley Land and Water Board was not proclaimed until March 31, 2000. The Act was amended on March 3rd, 2006 to reflect the completion of the Tlicho Agreement.</p> <p>The Act established the public Boards such as the Gwich'in Land and Water Board to regulate the use of land and water, the Gwich'in Land Use Planning Board to prepare regional land use plans and the Mackenzie Valley Environmental Impact Review Board to guide development and to carry out environmental assessment and reviews of proposed projects in the Mackenzie Valley. The Act also contains provisions for monitoring cumulative impacts on the environment and for periodic, independent environmental audits.</p> <p>As institutions of public government, the Boards regulate all uses of land and water while considering the economic, social and cultural well-being of residents and communities in the Mackenzie Valley.”</p>	Reworked the section to include more information	p 36

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P 36	<p>Section 3.6 Gwich'in Land and Water Board – The role should be explained in the context of environmental assessment. Pursuant to s. 125 of the MVRMA, a development will be referred to EA after preliminary screening not where there are 'significant issues', but rather where in the opinion of the Land and Water Board, the 'development might have a significant adverse impact on the environment or might be a cause of public concern.' This would have the merit of providing key information to developers, that although a proposal might conform to the Land Use Plan, the proposal might have significant effects that still need to go through the EA process.</p>	<p>Added a brief reference to EA (now section 3.4)</p>	<p>p 37</p>
P 36	<p>Section 3.6 Mackenzie Valley Land and Water Board - Again, role of the Board should be better explained with respect to the MVRMA's integrated approach to planning, screening, environmental assessment, permitting and regulation.</p>	<p>as above (now section 3.5)</p>	<p>p 37</p>
P 36	<p>Section 3.6 MVEIRB (should be 3.7). It would be useful to revise this section for further clarity. For example, it could be more comprehensive and better describe land use planning and environmental assessment process. Consider avoiding terms such as "has a fairly comprehensive mandate", as it brings a subjective element to the mandate. Re the 3rd sentence, in describing whether a proposed development is referred to MVEIRB for environmental assessment, please refer specifically to legislative language. For example, rather than stating that a referral will be made when the proposed development "is of public concern", it should state that it "might be of public concern" (see s. 125 of the MVRMA). Furthermore, the description does not include other matters in which a proposed development might be referred to MVEIRB. These included situations where regardless of the public concern/significant adverse impacts if it is referred to the Board pursuant to s. 126 by government, regulatory authorities by aboriginal governments or on its own motion.</p> <p>In addition, to describe the complete process, a description of environmental impact review should be provided for those instances where the development is likely to have a significant adverse impact on the environment or likely to be a cause of significant public concern.</p>	<p>Revised</p>	<p>p 39</p>
P 36	<p>Section 3.6 MVEIRB (should be 3.7). Final sentence needs rewording, as it implies that a department or agency of the federal or territorial government can only refer a project to EA "if the development will have an impact within their boundaries," which does not make sense. In addition, the self-referral authority of MVEIRB is missing.</p> <p>The Act requires that a proposed development outside local government boundaries which might have a significant adverse impact on the environment or might be a cause of public concern be referred to the MVEIRB for environmental assessment. A proposed development wholly within the boundaries of a local government must be referred to MVEIRB for</p>	<p>Revised</p>	<p>p 39</p>

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	environmental assessment if it is likely to have a significant adverse impact on air, water or renewable resources or might be a cause of public concern. Notwithstanding the outcome of a preliminary screening, the Act also provides for a regulatory authority, a designated regulatory agency, a department or agency of the federal or territorial government, the Gwich'in First Nation (as represented by the GTC), the Sahtu First Nation (as represented by the SSI), or the Tlicho Government to refer a proposed development to MVEIRB for environmental assessment. In addition, the Act provides MVEIRB with the authority to initiate an environmental assessment of a proposed development on its own motion.		
P 37	Figure 16 – This presently-blank Figure will be an important component of Chapter 3 and a useful reference during Plan implementation. INAC will review and comment on this Figure once it is provided. Depending on the content of the Figure, it may be better placed in Chapter 5.	now figure 17	p 38
	Chapter 4: Land Use Plan For the Future, Vision and Land Zoning		
	General – Please provide a map showing the zoning in relation to land ownership.	Will have one available from office or website. It is difficult to have a detailed map with both layers on a letter sized page so hesitate to include in Plan	
	The zone maps would be easier to interpret with feature labels added.	Given the scale of maps, community location gives a point of reference. Project proponent will need to work with more detailed maps - these can be acquired from the Planning Board if necessary.	
P 40	Section 4.2.2, #1 - It would be useful to provide a list of grandfathered activities as an annex; it does not need to be included in the Plan itself.	It is hard to have accurate list of projects given long approval time, so best left out.	p 44
P 40	Section 4.2.2, #5 – Re Minor Exceptions to the Plan, they should be properly identified in the Land Use Plan.	Dropped #5 as it referenced an exception for outfitting in Rat River CZ. Dealt with by new conditional approval defined in 4.7.2 (iii)	p 44
P 40	Section 4.3, paragraph 2, last sentence – Wording is not clear.	reworked for clarity	p 45
P 41	Figure 17 – In the “No” box, bottom left, Plan should note that if none of these 3 options is workable, then the only remaining option is to not to proceed with the land use.	added	p 46
P 43	Foldout Map – Cannot find the Gwich'in Territorial Park or the Deepwater Lake Watershed (the Territorial Park is easy to find on Figure 15). The “Territorial Border” in the legend does not match the Territorial Border on the map.	Revised for clarity	p 47p 48
P 44	Generalized Best Practices chart – Should be in Chapter 5.	keeping as is - reference made in chapter 5 back to chart, keeps it in chapter 4 which is the “working” section of the Plan (bulk of information needed by regulatory authorities and proponents regarding zoning, policy, and process can be found here)	p 48

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Pgs 45 to 94	<p>Section 4.5 on the SMZs – General comments:</p> <p>(a) For the staff of the North Mackenzie District Office in Inuvik (Operations Directorate), it should be noted that areas of the Plan which focus on aspects other than land and water have been problematic in the past. For these jurisdictional areas, INAC has found it difficult to address issues with any degree of authority (i.e.: wildlife, fish, air etc.). The Land and Water Boards often do their best to try to deal appropriately with these aspects within their authorizations as well, but at times find themselves in difficult positions of trying to satisfy the Land Use Plan and their own regulatory responsibilities/limitations.</p> <p>(b) More specifically, the concern is connected to sections of the document where Conditions are recommended to mitigate effects on the wider scope of environmental aspects. Within the Special Management Zones sections, Conditions are designed to mitigate impacts on aspects of the environment that the Department has no mandate to deal with, an example being the Condition focusing on aircraft minimum altitudes. The Board uses the term "Should" and not "Shall", but not everyone involved realizes the difference in the meaning of these different terms. Accordingly, the Department recommends that the Board include in the Plan an overarching statement recognizing the limitations of the MVRMA and its regulations in this regard.</p>	<p>Inspectors will likely find their jobs easier as the Land and Water Board work on standardised, best practices for terms and conditions.</p> <p>Concerns with the Implementation of the MVRMA will be discussed in more detail in the RPA</p> <p>As part of the mandated responsibility for monitoring implementation of the Plan, the Board will look at whether regulators are comfortable and accurate when determining conformance of projects with the Plan</p>	
Pgs 45 to 94	<p>Section 4.5 on the SMZs - The following specific comments apply to the Conditions that are found in duplicative form for many of the Special Management Zones. The comments apply equally to each reference.</p> <p>(a) Conditions regarding Water Quality and Quantity: The conditions suggest that proponents be required to post security that should only be refunded where it is demonstrated that water quality and quantity and rate of flow remain substantially unaltered. Regarding the term 'substantially unaltered', does this mean no change at all? Or does it mean that after an initial dilution zone (mixing zone), that there are no changes to water quality? To avoid confusion, the term "substantially unaltered" should be clarified as it is subjective and provides no real measure for regulators. Perhaps this 2nd Condition would be better positioned as an operating principle at the beginning of the Draft Plan. Reclamation security pertains to land and water in general and should not be isolated within Water Quality and Quantity Conditions as it is here.</p> <p>Security for water related activities is governed by the <i>NWT Waters Act and Regulations</i> and specifies clearly for what uses the Minister (of INAC) may use security and also when it should be refunded. The Minister may only use security in two circumstances. First, where the Minister is required to act to account for a danger to persons, property or the environment results or may reasonable be expected to result from the adverse effects because waters are</p>	<p>reworked condition wording and created a new regional application of the condition.</p> <p>Discussed in new regional condition 4.4.1</p>	p 49

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	<p>used, waste has been deposited or there has been a failure of a work related to the use or waters of the deposit of waste on contravention of a condition of its licence or the legislation. Second, where the Minister believes on reasonable grounds that a person has closed or abandoned a work related to the use of waters of the deposit of waste and the person has either failed to comply with a condition or a licence of the legislation or there is a danger to persons, property or the environment that may result from past operations of the work or from its closing or abandonment, he is required to take reasonable measures to prevent, counteract, mitigate or remedy any resulting adverse effect on persons, property or the environment.</p> <p>If no such conditions exist, then when the undertaking is completed, the Minister is obliged to return the security. Therefore, to give effect to this condition, it would need to be written into the licence, otherwise the Minister, who holds the security, would be required to refund it.</p> <p>(b) Conditions respecting Traditional Fish Harvesting and regarding Fish: This condition states that there must be consultation with the Gwich'in Renewable Resource Council, Designated Gwich'in Organizations, the Gwich'in Renewable Resource Board and DFO. It is not clear who is required to conduct this consultation. Is it the proponent or the Gwich'in Land and Water Board? Further, regardless of who is to conduct the consultation, where will information of who constitutes a designated Gwich'in Organization for the purposes of this plan be provided?</p> <p>(c) Conditions Regarding Waterfowl: This condition requires that aircraft maintain a minimum altitude. However, several zones apply to areas located next to or include an airfield within their boundaries. Can this be reconciled, or is an exception required to airfields (and emergencies or weather/safety requirements)?</p>	<p>It could be either doing the consultation. If the proponent doesn't do it while preparing their application, the regulator usually covers it because these groups are usually part of the referral process.</p> <p>DGO's that were created from the Gwich'in claim are noted on the GTC website or contact information can be requested from the GLWB as they have updated contact lists for their consultation process.</p> <p>Condition is worded 'should' rather than 'shall'. It is not a true requirement.</p>	
P 77	Section 4.5.11, 3rd, 4th & 5th paragraphs – It seems curious that this is the first instance where the dramatic decline in Scaup and Scoter is mentioned, given that these species are referenced earlier in this report. Suggest including a similar reference in the Wildlife and Fish Section 2.3.2 on pgs 20 & 21. Same general comment for boreal and barren-ground caribou.	Noted in SARA discussion and Table	p 18/19
P 96	Section 4.6.1 - The revised rewording in the second bullet appears to be consistent with the amended wording in Section 11(1)(f) of the Northwest Territories and Nunavut Mining Regulations.	now 4.7.1	p 110
P 98	Section 4.6, 1st full paragraph - Should provide additional discussion of the proposed extension of the Dempster to Tuktoyaktuk all-weather connection. This project is now in environmental assessment. No part of this proposed extension is within the Gwich'in Settlement Area, so need to explain why this project is being mentioned in the Plan.	Clarified that no part of the extension is outside municipal boundaries in the GSA (now 4.7.2 ii)	p 112

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P 98	Section 4.6, 2nd full paragraph - Assume that this means that the DOT should try to route highways alongside other existing or proposed linear infrastructure, such as pipelines. As currently written, the meaning is unclear. The wording on P 145 is clearer and could be used here.	reworked for clarity (now 4.7.2 ii)	p 112
Chapter 5: Procedures for Implementing the Land Use Plan			
P 124	Section 5.3 – This Section provides a clear and useful explanation of responsibilities.		
P 124	The Generalized Best Practices chart should be located here in Chapter 5 rather than on the back of the foldout page (P 44). There should be some way to include it in the text on two pages rather than on the back of a foldout page. The Department would like to review the now-blank Figure 16 (P 37) completed in order to fully review the Generalized Best Practices chart.	keeping as is on p 48 - there is a reference made in chapter 5 back to chart. Chapter 4 is the “working” section of the Plan (bulk of information needed by regulatory authorities and proponents regarding zoning, policy, and process can be found here)	
Chapter 6: Land Use Plan for the Future On page 3 of the Board’s separate 3-page document entitled ‘Summary of Proposed Changes to the Gwich’in Land Use Plan – April 2010’ is the following paragraph: “The Board is still developing the structure of the Regional Plan of Action, so there are many more action items to be entered into the tables. The Board would like some stakeholder feedback on the proposed RPA before adding the larger list of actions into a draft for signatories to review.” Given the importance of the RPA to the on-going implementation of the Plan, the Department would like to accept the offer from the staff of the Board to meet in Yellowknife as part of the internal review of the Draft plan Revisions. [The Working Group Conference-Call Meeting scheduled for mid-August was identified in the May 26th WG Schedule for such a get-together.]		can meet at AANDC convenience	RPA
P 131	Section 6.2 Land Use Issues: Vision, Objectives, and Actions – Perhaps the word ‘Actions’ should be deleted, since these are now addressed in the next sub-section 6.3 Action Plan on pgs 154-156. [The same comment applies to the heading for 6.2 in the outline of the structure on page 128.] In the first paragraph of 6.2, second sentence, and at the top of the list is the term ‘topic’, a hangover from the 2003 Plan. However, this is an interesting transposition, as both of the terms ‘issue’ and ‘topic’ were used interchangeably in the 2003 Plan, although they do in fact have slightly different meanings. In this regard, perhaps the Board should actually consider going back to the previous use of the word topic, so for all of the sub-sections on pgs 132 to 153, the formatting and organization of ‘issues within issues’ can be avoided [ie, the Issues and Analysis components of the ISSUES].	will consider – need time to start adding actions and thinking through the structure again	RPA
P 130	Section 6.1.2 Endorsement/Approval – Regarding the annual updates and status reports of the RPA, given that these will vary from year to year, should this Chapter 6 be a companion document to the Plan and not necessarily contained within it?	Most likely	RPA
P 130	Section 6.1.3 Implementation - How will the cooperative process be established - will this be done through specific agreements? The outlined options are	to be determined by	RPA

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	somewhat vague and should be explored in more detail, and could be an agenda item for the mid-August joint Board-Department meeting.		
P 136	Section 6.2.4, 3rd bullet – Is this a reference to water quantity? If so, should clarify.	It would be quantity and rate of flow. Will work on clarity	RPA
P 137	Section 6.2.4, last paragraph – The Plan should more clearly identify lead roles and responsibilities for water and air quality monitoring, and the Cumulative Impact Monitoring Program. The Plan may not want to presume ongoing funding for monitoring, despite this being a priority for the Gwich'in and a requirement under the claim.	The idea is to list the desired action in the RPA and then look for ways to achieve it or identify the barriers. It is not so much a presumption as a start to an investigation for solutions.	RPA
P 137	Section 6.2.4 – The Mackenzie River Basin Board produces a State of the Aquatic Ecosystem Report once every 5 years. The first one was in 2003.	Have the report, will list it as a resource	RPA
Pgs 147 & 148	Section 6.2.10, under Issues and Analysis, the report has the following statement about PAS: The secretariat for the Northwest Territories Protected Areas Strategy describes a protected areas, "...a piece of land where a specific law limits the amount and type of human activity allowed." Under the strategy, the purpose of a protected area is to recognise specific natural and cultural values or to preserve areas representative of each ecoregion. Following is a suggested re-write: The definition of protected area used by the PAS is that of the International Union for the Conservation of Nature (IUCN): <i>An area of land or sea especially dedicated to the protection and maintenance of biological diversity, and its associated natural and cultural resources, managed through legal or other effective means.</i> Under the strategy, the purpose of a protected area is to safeguard specific natural and cultural values and to preserve areas representative of each ecoregion.	ok	RPA
P 147	Section 6.2.10, 3rd paragraph - Under Issues and Analysis – “While both may have policy...” – awkward wording, not exactly sure what is meant.	Will add more explanation of concept	RPA
P 148	Section 6.2.10, 1st paragraph - Under Ecoregion Representation – “Representative areas are selected...” Context is missing. Who selects the areas?	will explain PAS secretariat does modelling, Board would decide how it fits with land use plan zone objectives.	RPA
P 148	Section 6.2.9, last paragraph – “If they meet the criteria ... then it must be matched” The meaning is unclear; suggest changing “they” to “an area”. In next sentence, it is uncertain whether the CIMP would provide funds for protected area monitoring, given that these areas should have their own monitoring funds. Certainly the CIMP could help coordinate monitoring objectives within the broader landscape context.	changed ‘they’ to ‘an area’. If using conservation zoning in the land use plan to maintain development free status, then will need outside funding. Board is not mandated or funded for monitoring or collecting baseline information.	RPA
Pgs 154 to 156	Section 6.3 – More context is needed for this Section. In Section 6.1, the text (P 129) that traditional knowledge is a an essential element of each component, so it may be appropriate to include a discussion of whether any actions are recommended in relation to traditional knowledge and any of the framework components. Has the GLUPB looked at the NWT-wide Environmental	ok page 129 brings in discussion of ESF. Definitely looking for opportunities to collaborate	RPA

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	Stewardship Framework Blueprint? Are there opportunities for collaboration?		
P 151	Section 6.2.11 Land Use Issue 11 - Transboundary Planning: The last paragraph states that the Planning Board and other co-management and Gwich'in groups are interested in monitoring activities outside the Gwich'in Settlement Area that may affect the GSA. Note that pursuant to s. 45(2), the Gwich'in Land Use Planning Board may prepare a joint land use plan with a neighbouring settlement area, however, it would be required to submit that land use plan through the same regulatory approval. Not sure if that is what the Gwich'in are suggesting they want to do or simply whether they want to "cooperate" with other land use planning boards. Perhaps this is something that might merit some further clarification or at least something to monitor.	Will provide further detail	RPA
P 154	Regarding the table in section 6.3.1, discussions of mineral potential in the document do not mention uranium. It is recommended that "discussion on uranium mining" as an action in the table be clarified or elaborated upon.	Will provide further detail See also 4.4.6 on p 52	RPA
P 154	Section 6.3.4 Environmental Assessment - The Action states that the GLUPB meet with the Review Board to discuss the possibility of EA evaluation of cumulative effects in the absence of thresholds in the Land Use Plan. It would appear that the driver of such of an initiative would be through the CIMP, among other programs, to ensure coordination and consistency of approach within the Valley as a key partner alongside of the Review Board. The CIMP partners have been developing indicators for a number of valued components. The MVEIRB has already developed CEA guidelines.	ok	RPA
P 156	Chapter 6 – Rather than end so abruptly, it is recommended that a conclusion be added to the Draft Plan.	will add conclusion after 6.3	RPA
	Appendix B		
P 165	Stakeholder List – Recommend adding MVEIRB as number 62 and moving the NEB to number 63.	ok	p 153
	Appendix C		
Pg 169	Add a general statement that any activity subject to preliminary screening under the MVRMA is also subject to the Land Use Plan. Any licence or permit application to the Land and Water Board will be subject to preliminary screening pursuant to s. 124(1) of the MVRMA. All permits, licences and authorizations must be in conformity with the Land Use Plan (s. 61). All applications must first be deemed in compliance with the Land Use Plan; only then will a preliminary screening be considered.	ok captured in figure 17 on p 38	
P 169	Land and Water Boards – the Associated Legislation/regulation column should include a reference to the NWT Waters Act and the NWT Waters Regulations.	Will be in final version	p 160
P 169	INAC Oil and Gas Directorate – The call for nominations and call for bids are subject to the Land Use Plan. Before the call process starts, the LUP is considered and followed (e.g. CZs are excluded from the call area). Since the call results in exclusive access and not an approval to any specific action (e.g.		

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	seismic or drilling), there is no specific LUP approval associated with the call process. Drilling and seismic activities are separate approvals via NEB.		
P 169	INAC Land Administration – Add 'Licence of Occupation' under the Authorization column of this table, since the issuance of a Licence of Occupation is subject to the Land Use Plan. (ie. If a proponent applies for a Licence of Occupation for a power line, they would first have applied for a Land Use Permit for construction of the power line. Once the power line was constructed, then the application for a Licence of Occupation would be submitted. Although a Licence of Occupation does not give an interest in the land, it still allows for maintenance to whatever is constructed.	ok	p 160
P 170	NEB – The GLUPB should ask the NEB to list additional relevant authorizations. For example, NEB authorizations are required to conduct geophysical work, such as seismic programs, and to drill oil and gas wells.	ok	
	Editorial Comments: General Include specific Map numbers on all maps; page numbers where the Map occupies a full page; and North arrows on all Maps.	Will be addressed in final formatting of document. (The Plan uses the common convention that the top of the page is North)	
	All Figures should include year of data compilation and the source of the data.	ok	
	It was difficult to flip to the end of the Chapters to look at the references, particularly in Chapter 4 focusing on the zoning section. A preferable system would be to use footnotes rather than endnotes.	footnotes could begin to clutter document and break up the text too much, affecting flow.	
	The Board should keep all the headings consistent and numbered, and consider using the same colour codes for Zones being portrayed on maps (red for conservation zones, green for special management zones and violet for heritage conservation zones).	Will be addressed in final formatting of document	
	Text uses both "conformity" and "conformance." Are they the same thing? If so, should pick one and not use the other.	style preference?	
	"Board" is singular. Sentences such as: "The Gwich'in Renewable Resource Board is the main group dealing with wildlife, fish and forests in the Gwich'in Settlement Area. Their role is to conduct research and propose policies..." (P 35) should be edited accordingly.	ok	
P 22	paragraph 2, sentence 3 – "An example of events..." should be "Examples of events..."	ok	
P 46	Add a Figure number to the SMZ Conditions Summary Table.	ok (now figure 21	p 56
P 47	Section 4.5.1, 3rd sentence – Insert 'all-season' between 'northern' and 'highway'.	Defined as year round in sentence (now 4.6.1)	p 57
P 51	fourth paragraph, 1st sentence – Refer to 'Dolly Varden Char', not 'char'.	ok	p 61
P 93	Section 4.5.16, 2nd Condition re Dall's sheep – 'effected' should read 'affected'.	ok	p 106
P 102	Map # _____, Rat, Husky, Black Mountain Conservation Zone – The southern part of this Conservation Zone should be depicted with the same fill pattern as the northern section.	There seems to be confusion about James Creek Conservation Zone being part of Zone A	p 117

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P 116	Nataiinlaii (Eight Miles), reference to the 'Inuvialuit' – In the NWT Historic Sites description on P 29, they are referred to as the 'Siglit'.	will correct in final version - cross reference to GSCI comment	p 132
P 125	second last bullet in list - "request" should be "requests".	ok	p 142
P 126	last sentence before 5.6 - Missing the period.	ok	p 143
P 127	first full paragraph, 1st sentence – Add "the" before "scope".	ok	p 144
P 130	last sentence of 6.1.2 – Period missing.	ok	p 147
P 147	"complimentary" should be "complementary".	ok	RPA
P 148	1st paragraph under Ecoregion Representation - Second sentence is missing initial capital 'T'	ok	RPA

Gwich'in Tribal Council

AprDraft Page #	Comment (GTC)	Board Response	Final Draft
	The GTC would like incorporated into the plan statements to support the following:		
	<ul style="list-style-type: none"> Due to lack of legislation and policy in the Northwest Territories, the GTC does not support the exploration and/or development of coal bed methane within the Gwich'in Settlement Region (GSR), and considers coal bed methane extraction an unacceptable land use within the GSR which includes the primary and secondary use areas in the Yukon Territory. 	<p>Created regional condition 4.4.7</p> <p>Applied the qualification that this issue will be looked at under the regional Plan of Action work plan.</p>	p 53
	<ul style="list-style-type: none"> Due to lack of legislation and policy, the GTC does not support the exploration and/or development of Uranium within the GSR, and considers uranium extraction an unacceptable land use within the GSR. 	<p>Created regional condition 4.4.6</p> <p>Applied the qualification that this issue will be looked at under the regional Plan of Action work plan.</p>	p 52
	<ul style="list-style-type: none"> Pit development and management plans must be provided for all new and existing granular resources within the GSR prior to issuance of land use permits and the extraction of quarry material. 	Created regional condition 4.4.4	p 51
	<ul style="list-style-type: none"> The use of sumps for disposal of drilling waste and grey water is not an acceptable method for disposal of wastes within the GSR and new methodologies should be included within the planning stages of land use permit applications. 	Created regional condition 4.4.8	p53
	<ul style="list-style-type: none"> All reclamation plans must incorporate the use of native species of plants to the natural environment. 	Created regional condition 4.4.2	p 50
	Water is an important resource for the Gwich'in and provisions within the	Created regional condition 4.4.1	p 49

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	<p><i>Gwich'in Comprehensive Land Claim Agreement (GCLCA)</i> have been included to ensure water quality and quantity and rate of flow are not altered from land uses on Gwich'in lands and or from development in areas where water flows into and through Gwich'in Lands.</p> <p>The GCLCA states in clause: 19.1.8 Subject to legislation in respect of the use of water: (a) the Gwich'in have the right to have waters which are on or flow through or are adjacent to Gwich'in lands remain substantially unaltered as to quality, quantity, and rate of flow when such waters are on or flow through or are adjacent to Gwich'in lands; and (b) the Gwich'in shall not use water so as to substantially alter the quality, quantity, and rate of flow of waters which are on or flow through or are adjacent to Gwich'in lands.</p> <p>The GLUP has designated Special Management Zones (SMZ) that identify water as a valued resource within the SMZ, but based on the important of water quality and quantity, including the rate of flow to the Gwich'in, the GTC would like this provision to be throughout the GSA and not just within the SMZ, including the proposed Tree River SMZ and the Deepwater Lake SMZ.</p>	<p>Applied the qualification that this issue will be looked at under the regional Plan of Action work plan.</p>	
	<p>Additional comments for consideration and supported by the GTC are:</p>		
	<ul style="list-style-type: none"> The GTC would like the SMZ identified as Richardson Mtns/Foothills to also include Stoney Creek within the title. 	<p>Leaving as is only to keep titles as simple as possible.</p>	
	<ul style="list-style-type: none"> Traditional harvesting and cultural uses of land is important to the Gwich'in and the GTC support traditional harvesting as a valued component to be included within the areas designated as SMZ, including the Arctic Red River Headwaters. 	<p>Added to all SMZ</p>	
	<ul style="list-style-type: none"> Boreal caribou and musk ox to be included as big game for areas designated for traditional harvesting. 	<p>Traditional harvesting condition not specific to species. would include all species for traditional harvest as protected by the Gwich'in Claim.</p>	
	<p>At the recent 2010 Annual General Assembly, the delegation passed a resolution for the GTC to allow subsurface rights issuance for potential oil and gas exploration and development. The GTC would like the GLUPB to amend zones classified as Conservation Zones in areas where the GTC hold subsurface rights to Special Management Zones to allow for the exploration and potential development for oil and gas within the GSA.</p>	<p>Prepared letter of response. Proposed leaving zoning as is and use next 5 years to work with communities to verify rezoning - work with detailed information for each of the parcels in CZ.</p>	

Protected Areas Strategy Secretariat

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	<p>Thank you for the opportunity to provide comments on the Draft Revised Gwich'in Land Use Plan. Attached is an assessment of the ecological representation of conservation/heritage conservation zones in the Revised Draft by the Protected Areas Strategy Science Team. This follows up on our earlier analyses, which suggested ways to improve ecological representation, and thereby help maintain biodiversity and healthy landscapes.</p> <p>This is technical information on ecological representation and does not necessarily represent the views of the individual organizations that make up the PAS or other PAS partners. The respective organizations will submit or have submitted comments separately and directly to the Gwich'in Land Use Planning Board.</p> <p>The NWT PAS Science Team is encouraged to see that the Gwich'in Land Use Planning Board intends over the next five years to work with the PAS Secretariat to identify potential representative sites and long term monitoring programs in each ecoregions in the GSA (pg. 148). The Science Team looks forward to supporting the Board in this effort.</p>		
<p>section 6.2.10</p>	<p>1. Protected areas definition: The opening paragraph of the <i>Issues and Analysis</i> section (pg 147) states: "The secretariat for the Northwest Territories Protected Areas Strategy describes a protected area as, '...a piece of land where a specific law limits the amount and type of human activity allowed.' Under the strategy, the purpose of a protected area is to recognise specific natural and cultural values or to preserve areas representative of each ecoregion."</p> <p>A suggested re-write is:</p> <p>"The PAS definition of a protected area is based on the International Union for the Conservation of Nature (IUCN) definition, namely: <i>An area of land or sea especially dedicated to the protection and maintenance of biological diversity, and its associated natural and cultural resources, managed through legal or other effective means.</i> Under the strategy, the purpose of a protected area is to recognise specific natural and cultural values and to preserve areas representative of each ecoregion."</p>	<p>ok</p>	<p>RPA</p>
<p>section 6.2.10</p>	<p>2. Ecoregion representation section (pg. 148) The revised Plan states: "In theory, several 'islands' of no development should support a healthy ecoregion while responsible development occurs" Protected areas should not be considered 'islands', but rather part of a larger puzzle of overall management to ensure the protection of biodiversity.</p>	<p>ok</p>	<p>RPA</p>

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	A suggested rewording is: "In theory several ecologically representative areas in which no development is allowed, surrounded by areas of well-managed, responsible development that allows for continued large-scale ecological processes and movement between protected areas should be able to maintain healthy habitats and species."		
	<p>3. Time to establish protected areas (Pg 148, first para): We suggest that a comment be included regarding the length of time to establish legislated protected areas. A suggestion is to change the sentence "They would be incorporated into the Plan document during the next scheduled comprehensive review" to: "As establishing a legislated protected area can take several years, changes would be incorporated into the Plan document during the next scheduled comprehensive review".</p>	ok	RPA
section 2.6	<p>1. Figure 14 (pg. 31) The title of the figure should be "Existing Designated Areas" (not "Legislated Protected Areas") to match the title of Section 2.6 (pg. 27). That section correctly describes that most areas that are mapped in Figure 14 (except for Territorial Parks) have designations that on their own provide no legal means for protection.</p>	Corrected (now figure 15)	p 28
	<p>The draft revised conservation zones contribute to ecological representation. However, additional areas with no development are needed within the Gwich'in Settlement Area to get full ecological representation in all Gwich'in ecoregions.</p> <p>The PAS Science Team will complete further analyses by request. Further analyses and changes to protection in the portions of ecoregions outside the GSA may change the potential representative areas presented in this report. We would be interested in discussing adding appropriate actions to your Action Plan (Section 6.3) to incorporate these analyses.</p>	Will add an item to the RPA that the Board will evaluate the areas of high importance in figure 5. Will work with PAS and the communities to include community knowledge and traditional use in analysis. (note this work is transboundary)	RPA
	<p><i>Suggestions for the 2010 Draft Revisions of Gwich'in Land Use Plan</i> The PAS Science Team recommends that the following conditions for special features be placed on any development in the Special Management Zone and the General Use Zones. If any development does take place in Conservation Zones through an exception to the LUP, these Conditions should also apply:</p> <ol style="list-style-type: none"> 1. Before any activity requiring a permit, licence or authorization takes place the (local) Gwich'in Renewable Resource Council(s), (local) Designated Gwich'in Organization(s), Gwich'in Renewable Resource Board, and Environment and Natural Resources shall be consulted on most current information on rare and may-be at risk plants and mineral licks and to identify any issues and appropriate mitigation measures for the proposed land use activities. 2. Developers within the area of glacial refugia are required to conduct a 	<p>Created a regional condition for SARA that discusses/addresses most of these points (4.4.5)</p> <p>- include research priority in RPA for wood frog (not at risk but would be one of first species to show</p>	p 52

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	<p>rare plant survey within their local study area</p> <ol style="list-style-type: none"> 3. Developers are required to report sightings of rare and may-be at risk plants and sightings of amphibians to nwtsoer@gov.nt.ca. 4. Developers demonstrate that the proposed land use activities will not have a significant adverse impact on rare and may-be at risk plants. 5. Developers must monitor their land use activities to ensure they do not disturb any rare and may-be at risk plants. 	<p>stress if ecosystem is in danger.</p> <ul style="list-style-type: none"> - Information on special features and SARA species is generally lacking. Start identifying specific research needed in RPA. 	
	<p>Next Steps The coarse filter ecological representation analyses and the fine filter analyses presented in this report give us a good starting point for finding terrestrial areas for ecological representation. The PAS Science Team is working to provide information about several additional factors that conservation scientists consider important to ensure maintenance of biodiversity, including:</p> <ol style="list-style-type: none"> 1. Freshwater: The PAS Science Team is working on science-based freshwater information along with recommendations for including representative freshwater habitats in protected areas. A draft coarse level freshwater classification, has been completed and is expected to be finalized by early 2011. For more information see the PAS website under the Science/Freshwater tab. 2. How climate change may impact the NWT: Partners of the PAS Science Team are working on how habitats might move due to climate change. This information will be included in protected areas planning so that areas continue to be representative of all habitats. This work is expected to be completed by 2011. Initial information can be found on the PAS website under the Science/Climate Change tab. 3. Size and monitoring of protected areas: This work continues as the PAS enters into a new Establishment Action Plan, which includes objectives on management and monitoring. The Establishment Action Plan 2010-2015: Fulfilling the Promise of the Northwest Territories' Protected Areas Strategy, is posted on the PAS website under Publications/Foundation Documents tab. <p>This information will also help to identify areas to protect for ecological representation and will help ensure that ecosystems will remain healthy over time and that natural processes can continue. We would be interested in discussing adding appropriate actions to your Action Plan (Section 6.3) to incorporate this work.</p>	<p>Will note in RPA</p>	<p>RPA</p>
	<p>other recommendations</p> <ul style="list-style-type: none"> - 1000 m setback from mineral licks for any type of tourism infrastructure in CZ - Condition requiring developers to report sightings of mineral licks (to PAS) 	<p>Will make note in RPA to investigate further by discussing with ENR and GRRB</p>	

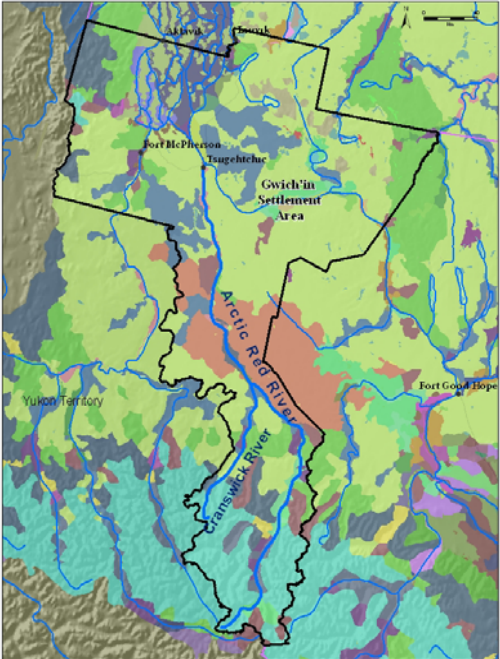
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The Nature Conservancy

“The Nature Conservancy (TNC) is an international non-profit organization that has been supporting the NWT Protected Areas Strategy (PAS) since 2005 and opened an office in Yellowknife in 2007. We focus on providing conservation science support to conservation projects. Our main focus in the NWT has been on mapping and freshwater resources.”

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	<p>“...would like to commend the planning board for providing a Special Management Zone consideration in the plan for the Mackenzie Delta.... This is very important as it provides some protection to the plants, animals and people that use resources in and around the Mackenzie Delta.”</p>		p 78
	<p>We have noticed additional areas of the plan that could use further consideration, especially in regards to water. In a document of 170 pages we found half a page relating to an overview of water resources (section 2.3.1, page 19) and a lack of focus on water quality and quantity, any thorough analysis of water in the GSA or any attempt to identify unique water features in the GSA. Also, while the water in the Mackenzie Basin originates outside of the GSA, there are sources of water within the GSA that fall fully within the jurisdiction of the GLUPB and deserve the Board's attention.</p>	<p>Created a regional condition for water quantity, quality, and rate of flow. Will be a large focus in the RPA on Water initiatives (both needed and active)</p>	p 49
	<p>We recommend an effort to map all the watersheds in the GSA to understand where the rest of the water comes from, where it goes, and how the GLUPB can help protect freshwater resources.</p>	RPA action	RPA
	<p>Using the Arctic Red River as an example, the conservation zone is a thin corridor along the river providing no protection to the headwater areas within the GSA that feed the river. It is also concerning that the GLUP states “adjacent zoning that allows for oil and gas development” (pg 112) is present to this conservation zone.</p>	<p>Added New regional scope to the condition for water so that it applies to whole of the GSA, including General Use Zones.</p>	p 49
	<p>The plan does address water quality and quantity issues for a number of conservation zones using language such as “water quantity, water quality and the rate of flow of water are substantially unaltered.” (pg. 109) These conditions need to be better defined, and backed up by science where possible, as the word “substantially” can take on very different meaning to different people and organizations.</p>	<p>Discussion included in the water condition section 4.4.1</p>	p 49
	<p>Ecoregion representation is mentioned in the plan (pg 148) with plans to set up reference sites and monitoring protocols. This is a great way to capture terrestrial processes but the plan lacks any comprehensive strategies to address water in the GSA- how many different types of water are in the GSA? Where is it moving? What is impacting water quality and quantity? Are there unique water features that should be protected? Where are communities getting their drinking water? Currently, TNC and the Protected Areas Strategy is doing work on a coarse level freshwater classification to define the freshwater ecosystem types in the NWT and collecting mapped information on special freshwater features.</p>	<p>Will discuss in RPA</p>	RPA

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	 <p>Each colour in the map represents a different ecosystem type, based on amount of water flow, surficial geology (soils), permafrost and amount of lakes. Some freshwater ecosystem types are very common, others are not, and both deserve attention. TNC is continuing to help analyze this information and provide it as supporting information to the PAS. We can provide that information as it becomes available to help guide the Gwich'in land use plan, if there is in interest from the board.</p>		
	<p>Also, the PAS has currently mapped more detailed information to help supplement the coarse freshwater classification. Some features mapped include:</p> <ul style="list-style-type: none"> Deltas Beaches/beach ridges Waterfalls Rapids Disappearing streams Estuaries <p>We suggest these unique freshwater features be added to the plan as “other notable freshwater features” on page 19.</p>	<p>Will put in RPA to evaluate for next review.</p>	