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**NND Response to the Peel Watershed Planning Commission's
Recommended Plan**

Introduction:

As you know, although most of our site specific selections are in the Hart, Wind, Snake and Bonnet Plume watersheds, the NND traditional territory covers all of the Peel watershed. We are in full support of complete protection from industrial development within the Peel Watershed planning region to ensure the sustainability and future of our culture and traditional economy based on a healthy environment and our people's connection with the land.

We have long utilized the water, wildlife, fish and plant resources of the Peel watershed from pre-contact to modern day, and intend to utilize the Peel Watershed planning region far into the future for generations to come. ALL First Nation sites and areas identified are connected to hunting, fishing and used for subsistence, traditional, or cultural purposes.

Areas of Agreement with Recommended Plan:

Thank you for your hard work on the Peel watershed land Use Plan, and thank you for responding to many of the issues that we raised in response to the Draft Land Use Plan.

We agree with the recommended plan that there should be no road access in most of the watershed. NND does not support any new or otherwise all season access roads or railways, other than the current Dempster Highway all season road.

The Peel Watershed region is an important area tied to culture and community well being for all First Nations within the planning region. We demand complete protection of the Peel Watershed from extractive industry and roads particularly for these reasons. As it becomes more challenging to practice subsistence lifestyle, in the face of potential future hard times, the Peel Watershed region is our "bread basket" and in a conserved state the land would provide sustainability to our people to sustain themselves through those hard times.

NNDFN is currently in the process of renewing family connections across the entire region of our Traditional Territory (on both sides of the Yukon/NWT border) which includes: Tr'ondëk Hwëch'in, Tetlit Gwich'in, and the K'asho Got'ine (Sahtu). With this renewal, research is continually being conducted within the area and new knowledge and historical details are becoming more evident in regards to cultural connections between First Nations, traditional/historical travel routes and meeting places, and family connections.

It is NNDFN's full intention that with this renewal there is the potential for renewal of travel routes and meeting places, including required infrastructure at meeting places and along travel routes.

Many of our ancestors have been buried all over the Traditional Territory. NNDFN plans to continue to work with neighbouring First Nations to identify additional places of importance for cultural, traditional and subsistence purposes as they unfold.

For the above reasons, we agree with SMA status for LMU's A to P, for the cultural, ecological and renewable resources reasons outlined by the Peel Planning Commission in the Recommended Plan. In addition we have specific comments below.

LMU's D and E: Wind, Bonnet Plume and Snake Rivers

We fully support protection of the entire Wind, Bonnet Plume and Snake watersheds. We have many site specific selections, harvesting areas, cabins, camps and trails in these watersheds, as well as extensive general use of the area. We have an R Block near McClusky Lake. All of these cultural uses and settlement lands depend on the surrounding land, water, wildlife and vegetation remaining healthy and clean.

Industrial uses like roads and mines near our cultural use areas, including settlement lands, would completely destroy the values that make them important to us. Already over-flights, air strips, mining exploration, garbage and contamination from mining exploration (e.g. at the Crest iron ore leases), is impacting wildlife and our way of life. We do not support any further industrial exploitation of the areas on or near our settlement lands and cultural use areas.

The Wind River Trail is a winter access road only and we do not support its use for industrial purposes.

We agree with the Peel Planning Commission's information about the importance of these LMU's for wildlife, including the Bonnet Plume and Porcupine Caribou herds, high value sheep habitat, peregrine falcon, rich water bird habitat, and regionally important minerals licks. Maintenance of these important wildlife habitats and populations would not be possible if roads and industrial development are allowed in the area.

These watersheds also have high tourism appeal; NND hopes in the future to benefit from the wilderness tourism industry, which is sustainable and consistent with maintaining cultural and environmental values.

In addition, in the Peel region, water is very limited - with very little known in regards to fish over-wintering and spawning areas, additional water withdrawals/use could be devastating to local wild fish stocks and their habitats.

Snake River Watershed

The following are additional reasons why the Snake River watershed must be protected.

In the lower reaches of the Snake River there are extensive wetland and high water bird habitat areas which are critical ecosystem filters which require protection. Although there are identified concentrated pockets of caribou, these caribou migrate over large areas around their entire range. Footprint disturbance and linear features could cut off migration areas - fragmenting critical caribou habitats within their range. (This has been the experience in the 1002 lands- oil and gas linear features caused caribou to avoid those areas for many years before they were comfortable enough to return to the area).

This LMU straddles the Snake River which drains into the Peel River. Clean waters downstream are of utmost importance, not only to NNDFN but all communities downstream and across the transboundary region that rely on the watershed to supply their communities with fresh water for drinking and other uses. We need to protect the water in its entirety from the headwaters all the way down the course of the watershed drainage. There are many people, fish, and wildlife that depend on this life source.

In the part of the Snake watershed near the Crest deposit there are critical wetlands and high water bird habitat. There is also critical sheep habitat - these are critical areas such as licks and lambing areas which are extremely sensitive to human disturbance. NND site specific S-188 is in this area, and is extremely important to NNDFN as this area is a very unique area with high subsistence and cultural significance.

Canadian Heritage River Status designation of the Bonnet Plume River-

NNDFN feels that because it is not easy to become a heritage river with its rigorous and lengthy process, it is essential to protect the natural values, cultural/historical importance and recreational potential that have been identified and demonstrated to be of utmost importance not only by NND, but the public. Increasing economic and recreational activities interests within the area could potentially effect nomination values and provide a threat to the Canadian Heritage River Status designation of the Bonnet Plume River. Because of this, we feel that within the Peel River Watershed Land Use Plan, there is the requirement for a recommendation to conduct a full review and re-examination of the Bonnet Plume Heritage River Management Plan to update the plan up to current standards, and re-evaluate the immediate requirement for full protection

status. It is areas like this that require the utmost protection and could potentially be recommended for park status.

LMU C: Hart River

We agree with SMA status for all of the Hart River watershed. We have a site selection at Eliot Lake, and traditional trails and cabins in the watershed. The same comments as above for LMU's D and E apply to our settlement land and cultural use areas in the Hart River watershed: industrial uses near or in these areas are not consistent with maintaining the wildlife and cultural uses that depend on healthy land, water and wildlife.

Areas of Disagreement with Recommended Plan:

LMU 1: Lower Ogilvie River

This LMU should be an SMA for the following reasons:

This LMU contains sensitive areas such as extensive high use areas for Tr'ondëk Hwëch'in and Tetlit Gwich'in First Nations.

There are extensive areas critical to Dall's sheep and their habitats including breeding, lambing and wintering areas. There is potential for cutting up caribou migration routes.

In the southern part of LMU 1 there are winter concentrated use areas and moderate use areas for the Porcupine Caribou Herd.

It does not make sense to squeeze the Ogilvie River riparian area, which is used by the PCH between two IMA's.

LMU 2: Dempster Highway

It is good that the Planning Commission responded to the THFN's recommendation of a sub-regional plan for the Dempster Highway. However, zoning LMU 2 as an IMA pre-supposes the outcome for a sub-regional planning process.

This is winter habitat for the PCH and Hart River herd, and important sheep habitat. There are peregrine falcon nesting sites, high value water bird habitat, several mineral licks, and rare plants that are only found in this area.

There are several THFN cabins and site selections, and culturally important areas in the north and south of the LMU.

With such high cultural and wildlife values, this LMU needs to be an SMA.

New all season or winter access in the Dempster Highway LMU 2 is not consistent with NND's goal of protecting the entire Peel watershed from industrial development.

LMU 3: Blackstone River

This zone contains extremely sensitive areas. This is a high use area for the Tr'ondëk Hwëch'in.

LMU 3 is zoned as IMA in the Recommended Plan. This is not acceptable as it has the potential of cutting off caribou migration and/or movements and habitat within the Hart River and Porcupine caribou ranges. This LMU also has peregrine falcon nesting sites. We agree that no winter or all season road access should be allowed, but we do not agree with industrial development here. LMU 3 should be zoned SMA.

There are critical fish spawning and overwintering areas throughout the entire Blackstone River. There are extensive areas identified for general harvesting. Because of the current levels of development already permitted in this area, there is requirement for protection and long-term monitoring to ensure that the area is not affected by increasing activities that may have cumulative effects.

LMU 5b in the Draft Peel Plan was in the middle of what is LMU 3 in the Recommended Plan. 5b was recommended for the highest protection, yet it is now recommended to be part of an IMA. There is a TH First Nation R-Block here, and high value winter habitat for the Hart River herd, a THFN cabin, and high value water bird habitat. Obviously, this area and the surrounding LMU 3 need to be an SMA.

LMU 4: Dalglish Creek

It appears that the main reason that the Planning Commission is recommending this LMU as an IMA is because it has high oil and gas potential. However, the Eagle Plains area that has oil and gas potential is relatively large and this LMU is a relatively small part of it. This LMU is important for the Porcupine Caribou Herd as strategic habitat used in the fall, and for migration to wintering grounds in the south and east Peel watershed region. The importance to the PCH of this area may increase as more development occurs to the north. There are already impacts to the PCH from proximity to the Dempster Highway.

Tributary waters run into the Peel River which supplies water, a life source, to communities downstream. It is critical that these waters remain clean and free from any kind of contaminants that may have detrimental effects to the watershed on a whole.

There are traditional travel routes for both the Tr'ondëk Hwëch'in and Tetlit Gwich'in, and many Vuntut Gwich'in and Tr'ondëk Hwëch'in archaeological sites. Travel routes were also used for hunting/general use areas and may contain important cultural areas that have not yet been identified such as additional grave sites.

In the Recommended Plan the entire north shore of the Peel River is unprotected in this LMU. It makes no sense that the riparian area of a river of such ecological and cultural importance would not be protected.

LMU 4 should be an SMA.

LMU 5: Peel Plateau

This LMU is comprised two areas, divided by LMUs M, O, P and J. The eastern portion of this LMU is snuggled beside a recommended SMA. This is a high use area for Tetlit Gwich'in including community trap lines and trap line trails. Although trap lines are identified as dotted lines on maps, for a sustainable successful trap line, there must be space required for wildlife habitat areas.

The western portion of this LMU is highly used for cultural importance and community trap lines area. There are extensive wetlands and high water bird habitat with completely no protection. The area is extensively used for travel, archaeology and culturally important areas for Tetlit Gwich'in, Tr'ondëk Hwëch'in and Vuntut Gwich'in First Nations.

LMU O and P are extremely well-used and culturally important – they are almost all Tetlit Gwich'in R-Blocks, and include many site specifics. LMU M, which is the Turner Wetlands, is critically important for water fowl.

On the west side, LMU 5 is bordered by the Richardson Mountains, which are extensively used by the PCH and recommended to be an SMA in the Recommended Plan.

Ft. McPherson and NNDFN 'overland trail'

We have used this trail for many, many years. Every year both NNDFN and Ft McPherson plan the overland journey and will continue in hopes that the upcoming winters will permit this traditional meeting. This is an important cultural route for us. It appears that LMU 5 either overlaps this trail or is very close to it.

For all of the above reasons, LMU 5 needs to be an SMA.



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