

A Framework for Boreal Caribou Range Planning

What We Heard

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Government of
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What We Heard: Summary of Engagement

In May 2018, the Government of the Northwest Territories (GNWT) released a Framework for Boreal Caribou Range Planning Discussion Document (Discussion Document). The Discussion Document presented an approach to developing and coordinating regional range plans for boreal caribou that manage human-caused land disturbance in the NWT portion of the boreal caribou range (NT1). The Discussion Document was developed over two years by the Department of Environment and Natural Resources' (ENR) Wildlife Division with guidance from a variety of GNWT departments, including Industry, Tourism, and Investment; Lands; Infrastructure; Executive and Indigenous Affairs; and Municipal and Community Affairs. It also reflected input from Renewable Resources Boards on an earlier draft range planning guidance document (circa 2014) and input received during the development of the NWT Recovery Strategy for boreal caribou.

Engagement on the Discussion Document took place from May 2018 to March 2019. Two working groups were formed to conduct focused engagement on the Framework. The Northern NWT working group consisted of representatives from Indigenous governments and organizations, Renewable Resources Boards, regulatory and land use planning boards from the Wek'èezhìi, Sahtú, Gwich'in and Inuvialuit regions, as well as federal government departments, and environmental and industry stakeholder groups. The Southern NWT working group consisted of representatives from Indigenous governments and organizations, regulatory and land use planning boards within the Dehcho and South Slave administrative regions, and federal government departments. The list of organizations invited to participate on each working group is provided in Appendix C of the revised Draft Boreal Caribou Range Planning Framework (Draft Framework).

Each of the working groups met for three 2-day meetings between July 2018 and March 2019 to review the Discussion Document in detail. There was also a public comment period from May to December 2018, with notices inviting submission of written comments posted in English and French-language newspapers (News/North and L'Aquilon), radio ads (CKLB) and posts on ENR's regional Facebook pages.

This document summarizes comments received during the engagement period and presents how they have been considered in development of the Draft Framework. General perspectives and specific comments organized by major themes are summarized and described below. In addition to discussions held during the engagement workshops with the two working groups, written submissions were received from 12 organizations representing IGOs, Renewable Resources Boards, regulatory boards, federal government, industry and non-governmental organizations.

ENR wishes to thank all of the members of the two working groups who helped to develop the Draft Framework. Your input, perspectives, commitment and expertise are greatly appreciated.

General Perspectives

There was a strong desire among members of the working group to reflect the full range of perspectives and values of Indigenous governments and organizations across the NWT. Early feedback on the Discussion Document was that it felt too “top-down” and “GNWT heavy,” and that it reflected only GNWT concerns. Many written comments reflected the desire for the development of the Discussion Document to have been a collaborative process, and also expressed hope that the development of the range plans themselves would be more collaborative moving forward. Nearly all working group members felt the tone of the document should shift toward simpler, clearer, more concrete language to help those outside government, including community members, connect to the ideas in a more direct way.

In response, the revised Draft Framework has been shortened considerably and language has been changed throughout to be less technical. A glossary has been added for technical terms that remain. In general, there has been considerable effort to make the document reflect the broad set of perspectives represented by the working groups.

Context for Range Planning

1.1 Scope of the Range Planning Framework

Several working group members in the engagement workshops wanted more clarity on which factors affecting boreal caribou populations would be considered by the Draft Framework and which factors would not (e.g. disease, predation, habitat loss, harvest). Several working group members suggested the scope of the Draft Framework should be more clearly articulated and better justified. This was particularly the case for issues related to management of boreal caribou harvest and wildfire management.

To help explain the scope and purpose of the Draft Framework, a stronger introduction to the NWT Boreal Caribou Recovery Strategy has been added that explains how the Draft Framework fits into the recovery context. The NWT Recovery Strategy identifies the various initiatives underway to recover boreal caribou, and managing human disturbance (the focus of the Draft Framework) is one of those initiatives.

1.2 Goals and objectives of the Range Planning Framework

Feedback from the working group, in both workshops and written comments, overwhelmingly supported a primary goal of caribou conservation and recovery. Participants felt strongly that the Draft Framework should be clearly tied to the NWT Recovery Strategy. Some of these working group members felt that objectives reflecting other interests (e.g. balancing caribou conservation and opportunity for economic development, providing certainty for developers or emphasizing the need to demonstrate compliance with the federal *Species at Risk Act*) should not be included in the Draft Framework, while others felt they should be included as “secondary considerations.”

Several working group members suggested including additional considerations that better capture (a) the importance of Aboriginal harvesting rights, and (b) the role of existing land claim agreements in co-management.

In response to this feedback, the Draft Framework directly references the relevant goals and objectives of the NWT Recovery Strategy to help provide better context for the goals of the Draft Framework. Other considerations previously described as “objectives” have been renamed “considerations” to clarify their role in the development of range plans and new considerations have been included based on suggestions received.

Regional Division of the Range Plans

1.3 General feedback

Most working group members and written comments supported the proposed division of the range plans by settled land claim areas and administrative regions, though many acknowledged these boundaries are not relevant to the movement of caribou groups. Several sets of comments suggested biologically-relevant boundaries based on population sub-structure should be considered based on relevant monitoring data and local and traditional knowledge. All groups agreed that attention should be given to maintaining genetic and habitat connectivity across range planning areas.

The need for scientific, local and traditional knowledge to support the development of biologically-relevant range planning areas has been included in the section on knowledge gaps.

1.4 Connectivity among regions

Several written comments and working group members noted the need to manage habitat consistently across boundary areas in order to maintain habitat connectivity and allow for caribou movement between regions. These reviewers suggested that connectivity should be referenced throughout the Draft Framework, including as an objective and in guidance for range planning.

Connectivity has been explicitly included in several new places throughout the Draft Framework, including as a consideration in determining habitat importance and in guiding the development of range plans.

1.5 Transboundary collaboration

Two sets of comments noted the need for collaboration between the GNWT, Indigenous governments, non-government organizations and other governments outside the NWT (e.g. Yukon Government) to maximize the likelihood of success for boreal caribou.

A note has been included in a new section on Range Planning Guidance to indicate that transboundary observers may be invited to participate in the range planning process as appropriate.

Tiered Management Framework

1.6 General feedback

All reviewers supported the concept of a tiered management approach where more important habitat would receive more stringent management, and regions with higher levels of human disturbance overall would use more stringent management classes. Comments on specific aspects of the tiered approach are summarized below.

1.7 Important habitat areas

In working group meetings and in written comments, there was a strong preference for local and traditional knowledge to form the foundation for identifying important habitat areas for boreal caribou and for the Draft Framework to recognize community members and knowledge holders as authorities on caribou behaviour and habitat. In a more general sense, there was broad support for a process of using local and traditional knowledge alongside scientific knowledge rather than attempting to combine these different sources of knowledge into one map.

In response to this feedback, the Draft Framework suggests using local and traditional knowledge to form the basis of the maps of important habitat areas and monitoring, with science used to compliment this knowledge where appropriate. Range planning participants would be responsible for integrating the two sources of information in a way that respects and values both sources of knowledge.

1.8 Disturbance estimates (natural and human)

There was wide acknowledgement among working group members that the estimates of both natural and human-caused disturbance may not have accurately captured the disturbance on the landscape: some known habitat disturbance does not appear on existing maps of disturbance and there are areas currently mapped as disturbed habitat that have likely recovered. All working group members agreed that correcting these errors in base maps will be an important step in the range planning process.

There was general support for the revised methods for mapping fire disturbance discussed during the working group meetings. However, there was continued concern that large lakes are mapped as “undisturbed habitat” though they are known to provide limited or no habitat value to caribou. One working group member raised this concern as an issue needing to be addressed early in the range planning process.

The new section on Range Planning Guidance notes that range boundaries and disturbance data will need to be refined early in the development of range plans, during the information gathering stage.

1.9 Disturbance thresholds

The Discussion Document proposed limits for total disturbance (human plus fire) that vary region to region, depending on the expected amount of fire disturbance and the size of the region. This approach meets the 35% disturbance limit across the NWT range (set by the national Recovery Strategy for boreal caribou), while allowing for disturbance limits greater than 35% in regions more affected by wildfire and less than 35% where wildfire is not as prevalent.

Region	Total disturbance limit (%)
Inuvialuit	15
Gwich'in	35
Sahtú	31
Wek'èezhìi	42
Southern NWT	41

Disturbance limits proposed in the Discussion Document

Most reviewers and working group members provided similar input on the total regional disturbance limits, suggesting the method used in the Discussion Document had little connection to caribou persistence or the risk associated with different levels of habitat disturbance. The consistent feedback was that total disturbance limits should be tied to risk to caribou populations; however, feedback differed among working group members in terms of what those limits should be.

Some working group members felt the approach to setting disturbance limits identified in the Discussion Document allowed too much continued disturbance in the southern NWT, where the risk to caribou is already higher. Others felt that while this option did allow more disturbance in areas of high risk to caribou, it also allowed the regional range planning process the flexibility to determine how protective to be (i.e. by not limiting development options in regions with more wildfire).

Working group members also explored two additional options for setting total disturbance thresholds:

1. Every region has a total disturbance limit of 35%.
2. No specific total disturbance limit, with the human disturbance limit based on the level of fire disturbance in each region.

On the first option, some working group members felt using 35% disturbance limits in each region was unnecessarily restrictive in areas where levels of fire disturbance are naturally higher, given that boreal caribou may have evolved to cope with high levels of fire disturbance. Similarly, some working group members noted that although the science underlying the 35% disturbance limit considers conditions in the NWT, it is primarily driven by range conditions in southern Canada, and is therefore not applicable to the NWT. These working group members felt a 35% disturbance limit was simply unachievable in two of

the five regions, and therefore should not be used as a limit in those areas. However, other working group members supported this approach, noting the best available science suggests more than 35% disturbance translates to less than a 60% chance of a self-sustaining population, which they felt was unacceptably low. From the perspective of these working group members, a 35% disturbance limit is the most ecologically defensible.

The second option, which is based on the risk-disturbance relationship presented in the national Recovery Strategy, specifies levels of human disturbance that would keep a region within a specific risk category after accounting for fire. Most working group members who supported a 35% disturbance limit also supported this approach, noting it is similarly rooted in the best available science. However, all working group members acknowledged it is complex, and like the other options, does not incorporate local and traditional knowledge. Additionally, some working group members did not support this option because it is restrictive for regional decision-making in the two regions with the highest levels of natural disturbance.

In response to this feedback, the Draft Framework lays out a set of total disturbance thresholds that attempts to reconcile these divergent interests. The revised total disturbance thresholds identify a *maximum* level of acceptable risk to the self-sustaining status of caribou in each region and a corresponding limit for total disturbance, based on the risk-disturbance relationship presented in the national Recovery Strategy. Human disturbance thresholds are derived from the total disturbance limits using a similar, though slightly more conservative, method to that described in the Discussion Document. In total, these changes have generally made the human disturbance thresholds more protective than those presented in the Discussion Document (with the exception of the Inuvialuit Settlement Region, where the thresholds are now less protective).

1.10 Management classes

The Discussion Document recommended each regional range plan present different mixes of management class areas (Basic, Enhanced and Intensive) based on the amount of human disturbance in the region and maps of relative habitat importance.

Two reviewers provided comments that the Southern NWT region should not have any Basic management class areas because of its relatively high current level of human disturbance and resulting high level of risk to caribou, given the majority of the boreal caribou population is found in this region. These reviewers felt that limiting the Basic management class was necessary to provide for more protection in that region.

All reviewers felt that pre-determined ratios of management classes (e.g. ensuring 1/3 of boreal caribou habitat is assigned to each management class in regions with high levels of human disturbance) was too prescriptive. They suggested it should be left to each regional range planning process to identify the appropriate mix of management classes, guided by best available local, traditional and scientific knowledge.

The Draft Framework was revised based on this feedback so that it does not prescribe the exact proportions of management classes required for different levels of disturbance, but instead suggests a maximum proportion for the Basic management class in Tiers 2 and 3 (maximum of 1/3 Basic). Decisions on how much of each management class to include in each range plan is left to the regional range planning processes. It was felt that only having Enhanced and Intensive management classes in the Southern NWT would be too restrictive on opportunities for economic development in that region.

Management Actions

1.11 General feedback

Working group members supported the recommendation to leave decisions about specific management actions to the regional range planning processes, given the variation in habitat and land use across the boreal caribou range. They felt this approach would provide regions with the appropriate level of discretion, and also help to ensure community involvement in choosing and implementing management actions.

Several working group members noted actions to manage sensory disturbances and timing of activities were missing entirely, and needed to be included in the Draft Framework.

Working group members also raised questions about whether the Draft Framework should consider non-habitat-related actions, such as harvest restrictions (or promoting harvest of alternate species) and predator control in some specific cases, to help ease the pressure on local boreal caribou groups.

Some written comments suggested certain areas or types of development activity should be exempt from management actions; for example, mining and areas disturbed by mining activities, and currently disturbed habitat.

The Draft Framework is focused on management of habitat disturbance as defined by Environment and Climate Change Canada (ECCC), and maintains that focus in the current version. This Draft Framework, and the range plans that will be developed under it, need to demonstrate effective management of habitat disturbance in order to maintain adequate habitat for the persistence of caribou. However, management triggers have been included that allow for non-habitat actions to be considered in the event that the management of habitat is not sufficient to maintain caribou populations.

1.12 Best management practices/minimum standards

One reviewer felt that best management practices, or the basic minimum expectations of actions to mitigate effects on caribou, should be mandatory in the Basic management class, rather than only “encouraged.”

Several working group members noted the existing guidelines to identify the minimum expectations for mitigating effects on boreal caribou are outdated and need revision based on the current understanding of caribou habitat needs and behaviour.

The GNWT has committed to reviewing industry best management practices and standards for boreal caribou from other Canadian jurisdictions, and updating current NWT guidelines for boreal caribou or creating new guidelines where needed; this update will consider actions to minimize sensory disturbance and timing windows to avoid key periods where boreal caribou are particularly sensitive to disturbance.

1.13 Restoration offsets

Many working group members expressed concerns with the Draft Framework’s reliance on restoration-based offsets for new habitat disturbance in order to achieve no net loss or a net gain in undisturbed habitat, citing there is very little evidence (and none in the NWT) of their effectiveness at restoring caribou habitat. In particular, ecological restoration treatments, which aim to return an area to its pre-disturbance state (e.g. by restoring lichen cover), are largely untested in the North. These working group members also noted the long timescale required to return areas to pre-disturbance states and the challenge of balancing immediate disturbance with future recovery of habitat. Some of these working group members felt the burden should be carried by developers to demonstrate effectiveness of restoration-based offsets before they are allowed to be used.

In consideration of this feedback, the role of offsets has been restricted slightly in the Draft Framework, which now clarifies that offsets are only appropriate following a set of other actions to avoid and minimize disturbance, and that there may be some areas of such critical importance to caribou that offsets are not acceptable. However, the decisions about where and under what conditions offsets are appropriate will be made at the range planning table.

1.14 Fire management

Many working group members in the southern regions of the NWT felt that wildfire management should be considered more strongly in the Draft Framework, particularly in areas where fire is a dominant driver of disturbance, in areas that are particularly important to caribou and in areas around communities. They expressed that initial attack and suppression of fires in areas identified as Values at Risk could be effective on a short term basis. However, there were concerns about the effectiveness and wide-scale applicability of managing fires by reducing fuel loads through prescribed burning or timber harvesting to create fuel breaks.

The NWT Boreal Caribou Recovery Strategy commits the GNWT to managing fire disturbance as a natural and necessary part of boreal caribou habitat. However, the GNWT Fire Management policy describes the use of a Values at Risk hierarchy that can include specific, size-limited areas of important caribou habitat where GNWT can action fires given the right conditions. The identification of specific areas of caribou habitat to be designated as Values at Risk has been emphasized as the primary approach to managing the impact of fires in the Draft Framework. Other fire management approaches may be tried on an experimental basis to assess their effectiveness.

Implementation Tools

Many working group members from both groups noted the Discussion Document made little mention of implementation approaches and decision processes established under land claims, and suggested this section be revised to embrace a more collaborative tone, focusing less on the GNWT's tools and more on a broader suite of options.

Several working group members noted the need for mandatory and enforceable tools, and for tools that guide decision-making early in the development process, such as through the issuance of rights to proponents before project review and permitting processes occur. Some working group members suggested land use plans are not an appropriate implementation tool given the length of time it takes to draft or amend a plan. Others suggested these plans could, given time, be an ideal tool because they identify where different types of activities can and cannot take place, and how they should be undertaken. All working group members supported the role of the regional range planning processes in choosing appropriate implementation approaches.

In response to this feedback, the section on Implementation in the main body of the Draft Framework has been shortened and re-focused to provide guidance about how to identify appropriate implementation instruments during the range planning process. Additional information on specific tools available to the GNWT and other governments has been included in the appendices of the Draft Framework.

Monitoring and Review

Several working group members felt the 10-year review cycle (with a mid-term opportunity for course correction) proposed in the Discussion Document would not allow the range plans to be responsive enough to possible declines in caribou populations. Some working group members suggested synchronizing the review cycle with the review of land use plans, which generally occurs every five years. Though there was general acknowledgement that revising range plans more frequently could be

burdensome, there were several suggestions for additional management triggers that could initiate an earlier review of a range plan based on caribou monitoring data or other factors.

Working group members also suggested a wide range of specific knowledge gaps for inclusion in the list of high-level questions in the Discussion Document. Specific questions were wide-ranging, and included:

- Gaining a better understanding of the status of natural regeneration of human disturbance (in particular, seismic lines)
- Gaining a better understanding of caribou use of fire-disturbed habitat
- More harvest monitoring

Several working group members also suggested the Draft Framework clarify that these knowledge gaps could be addressed through local and traditional knowledge as well as science. Many working group members felt the Discussion Document underemphasized the role of local and traditional knowledge in addressing these major uncertainties.

Additional management triggers have been included in the Draft Framework as suggested, allowing for earlier range plan review under a specific set of conditions. In addition, suggested knowledge gaps have been added; these are detailed in the appropriate appendices. Language changes made throughout the document attempt to place the role of local and traditional knowledge alongside that of science.