



Yellowknives Dene First Nation

P.O. Box 2514, Yellowknife, NT X1A 2P8

June 10th, 2010

Jody Snortland
Wek'eezhii Renewable Resources Board
Suite 102A, 4504 49th Avenue
Yellowknife, NT
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Fax: (867) 873-5743

Dear Ms. Snortland:

Re: Updated 2009 Caribou Management Proposal

The Yellowknives Dene have reviewed the updated proposal and would like to offer compliments to the Parties on the much improved document, for the first time the Parties are faced with evaluating a joint proposal. That alone will help clear much of the uncertainty and confusion as to the options and desired outcomes of the management actions. Furthermore, for the first time, we believe that the management structures proposed will result in true, collaborative co-management of the single most critical resource that lies within the territory.

YKDFN are not going to comment on the particulars of this proposal, we will leave that to the stakeholders with more direct involvement in the area. Referring to the central issues of our submission to the Board and the GNWT, we do have a few comments.

- The proposal separates the near term management actions from the long term actions, and while understandable from a practicality viewpoint, the deferring of these more difficult actions until some later date without commitments is not acceptable. Many of these issues have been identified over and over again, with little action over the years. We have all witnessed the rapid decline the Bathurst Herd since the permitting of the diamond mines, and to allow the status quo to exist for another 15 years will only serve to risk a herd which the GNWT has declared as endangered.

Recommendation: The Board should identify this section as deficient and require the GNWT and Partners to submit a plan to identify and address long term management planning. The report should be submitted for comment and approval by March 31st, 2011. Those issues identified should have tentative measures to accomplish the goals as well as anticipated timelines for results and evaluation.

- One of the management actions identified in the first edition of the proposal was to maintain the 'current level of protection in Nunavut'. In the new proposal, there little reference to these actions, other than casual mentions of the need. The document also references the draft West Kitikmeot Land Use Plan as a potential source of information, which is an empty statement as that LUP has been discarded. This is an issue which needs immediate action, as contrary to

ENR's position at the hearing, there are several mines and smaller developments already in the EA process. YKDFN strongly recommend that GNWT prioritize action on this item, not waiting for the development of the longer term management plan. The calving grounds are the one known critical habitat for the Bathurst Herd and are the one area under the highest concentration of development. In another two years there could be many more third party interests to consider, creating even more inertia to developing meaningful protections for the calving grounds.

Recommendation: GNWT should immediately engage the Government of Nunavut, Indian and Northern Affairs Canada and the Kitikmeot Inuit Association in regular and ongoing engagements aimed at developing meaningful protections in the area. A report on progress should be required every six months.

- YKDFN are pleased to see the recognition and inclusion of adaptive management measures. This is a valuable tool for linking the management actions and the monitoring data being collected.

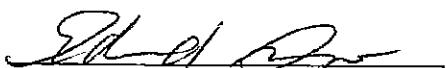
Recommendation: Table 4 is noted as 'possible approaches to adaptive management'. This is not acceptable. The adaptive management framework must be in place as part of the proposal being considered, not as some item to be finalized at a later date. Additionally, the objectives in 4.3 can should be linked to the adaptive management actions to better identify the available levers and actions

- Building on the establishment of the adaptive management framework, there should be a mechanism for reporting to the Board and other stakeholders. While clearly in the Wek'eezhii Region the Tlicho agencies should have more direct reporting, other groups also require information on the management progress and outlook.

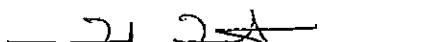
Recommendation: YKDFN suggest that the Technical Working Group should be required to produce a yearly report that considers and discusses the status of the Bathurst Herd (submission date to be determined). Included in this report should be a summary of the monitoring results from the year before along with a grading system as to the how these results fit into the adaptive monitoring framework (For instance: good, moderate, poor)

As a reminder to GNWT, the level of engagement evidenced in the principles, preparation and implementation of this plan should represent the starting point of the future, concurrent, consultation effort required by the Yellowknives Dene First Nation, with the awareness that additional capacity to facilitate that consultation is going to be required. If you have any questions or concerns, please contact YKDFN Lands and Environment at 766-3496.

Sincerely,



Chief Edward Sangris
Yellowknives Dene First Nation (Dettah)



Chief Ted Tsetta
Yellowknives Dene First Nation (Ndilo)

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