



October 23, 2020

Mr. Bruce A. MacDonald  
Director, Canadian Wildlife Service – Northern Region  
Environment and Climate Change Canada  
3RD FLOOR 5019 – 52 STREET  
YELLOWKNIFE, NT X1A 1T5

BY EMAIL

Dear Mr. MacDonald:

**Government of the Northwest Territories' comments for the proposal to establish the Edéhzhíe Dehcho Protected Area as a National Wildlife Area**

On behalf of the Government of the Northwest Territories (GNWT), I would like to submit our attached comments and recommendations regarding the proposal to establish the Edéhzhíe Dehcho Protected Area as a National Wildlife Area. All GNWT departments with interests related to the area reviewed the preliminary screening material. Comments and recommendations were provided by the GNWT departments of Education, Culture and Employment; Environment and Natural Resources; and Justice.

If Environment and Climate Change Canada has any questions about this submission or requires additional information, please contact Ms. Katie Rozestraten, Project Assessment Analyst, and Katie\_Rozestraten@gov.nt.ca, or me at Lorraine\_Seale@gov.nt.ca or (867) 767-9180 ext. 24020.

Sincerely,

Lorraine Seale  
Director, Securities and Project Assessment  
Department of Lands

Attachment

## Government of the Northwest Territories' comments for the proposal to establish the Edéhzhíe Dehcho Protected Area as a National Wildlife Area

Topic	Comment	Recommendation
General Comment - archaeological site protection gap	The <i>Archaeological Sites Act</i> and <i>Archaeological Sites Regulations</i> do not apply to Edéhzhíe as it is on federal land. In the absence of federal legislation that regulates archaeological research and protects archaeological sites and artifacts on federal lands outside those administered by Parks Canada, it appears that Edéhzhíe lacks a management regime for archaeological sites and artifacts.	It is recommended that ECCC clarify if adequate protection for archaeological sites and artifacts can be achieved through the management plan or regulations for the protected area or if further action is required to ensure the area has a suitable archaeological site management regime and a process to regulate archaeological research.
General Comment - ENR operations	GNWT-Environment and Natural Resources (ENR) has several operational interests that overlap with the Edéhzhíe Dehcho Protected Area. In addition, ENR has management responsibilities that occur at a regional scale. Should the implementation of the protected area move forward, ENR requires further information to understand how our work on regional wildlife management and compliance matters, and fire management may change with the proposed project. It is also important to note that a limited wood bison harvest through a quota of 40 male-only animals allocated primarily to rights holders, but also to General Hunting Licence and Resident Hunting Licence holders, will resume in winter 2020 in <i>Wildlife Act</i> management areas that include the Edéhzhíe Dehcho Protected Area. Will ECCC allow tag holders without an asserted or established Aboriginal and/or treaty right to harvest in Edéhzhíe National Wildlife Area to seek to harvest a bison therein? A consistent management approach for this species is important.	To add more clarity for the public, it is recommended that the proposal document includes: <ol style="list-style-type: none"> <li>1. If the regulations on the National Wildlife Area will preclude research and monitoring work undertaken by GNWT.</li> <li>2. A description of the permit process, permit criteria and approval time.</li> <li>3. Technical information regarding ECCC's approach to fire management in the protected area</li> <li>4. A description of how wildlife harvesting compliance issues (i.e. wastage of big game or pelts of furbearers) will be operationalized.</li> <li>5. If bison hunting is to occur in the project area - ENR recommends that the current bison 'total allowable harvest' that is implemented under the NWT <i>Wildlife Act</i> through tags, and is applied to rights holders, should be followed in the Edéhzhíe Dehcho Protected Area National Wildlife Area for continuity in the management approach for bison between federal and territorial jurisdictions.</li> </ol>
Page 3, Governance Structure	The Edéhzhíe Dehcho Protected Area will be "managed collaboratively between the Dehcho First Nations and the Government of Canada, with input from the Government of the Northwest Territories (GNWT)". The section does not speak to supporting the Territorial government with its operational program delivery, in particular, ENR programming that has a regional management responsibility for wildlife and fire.	To support GNWT input on governance, it is recommended that the proposal include a statement of future intent to support regional environmental management and programming requirements of the Territorial government.
Page 4, heading 'Prohibited and Allowable Activities without a Permit'	The section 'Prohibited and <u>Allowable</u> Activities without a Permit' only provides for activities that would be prohibited within the proposed National Wildlife Area without a permit.	For clarity, this section should be restructured to identify prohibited and allowable activities, as driven by the permit process. Identify any differences for section 35 rights holders.

Attachment

Topic	Comment	Recommendation
'Prohibited and Allowable Activities without a Permit'	Building on comment above, could permitted allowable activities include habitat restoration projects (offsets) within the Edéhzhíe National Wildlife Area?	ENR recommends that offset or habitat restoration project activities, including but not limited to boreal forest caribou, be considered as an allowable activity in the Edéhzhíe National Wildlife Area.
'Prohibited and Allowable Activities without a Permit'	Building on comment above, and recommendation 2 provided under 'governance structure' comment regarding information about the permit process and criteria: The package as presented does not explain if permit eligibility will impact or reduce hunting given the implications of how the Edéhzhíe National Wildlife Area will operate. ENR cannot determine if the permit process will impact hunters holding General Hunting Licences or Resident Hunting Licences.	It is recommended that ECCC indicate what, if any, changes non-section 35 right holders may encounter if this project proceeds. Should greater limitations on hunting be observed in the Dehcho region due to the Edéhzhíe National Wildlife Area, this is perceived to be a potential area of public concern. GNWT requests additional information is provided to help inform if fewer opportunities to hunt in the Edéhzhíe National Wildlife Area under a General Hunting Licence or Resident Hunting Licence will occur as part of this proposed project.