



Independent Environmental Monitoring Agency

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June 26, 2018

Rob Gau
Manager, Biodiversity and Conservation
Environment and Natural Resources
Government of the Northwest Territories
Yellowknife, NT
X1A 2L9

Dear Mr. Gau,

Re: Wildlife Act and Wildlife Management and Monitoring Plan Process and Guideline Requirements

The Independent Environmental Monitoring Agency (Agency) has reviewed the Wildlife Act and Wildlife Management and Monitoring Plan (WMMP) distributed for comment by the Government of the Northwest Territories Department of Environment and Natural Resources (ENR). The Agency appreciates the opportunity to comment on the WMMP, and provides the following comments for your consideration.

General

The WMMP and associated documents are well-written documents that clearly identify the processes and content for WMMPs in the NWT. The use of a single WMMP – as opposed to the two processes proposed several years ago – is a welcome modification. The use of text boxes for suggested best practices was effective.

How to address existing WMMPs

It was not clear in the process document how existing WMMP-like documents will be handled. For example, the diamond mines have had wildlife effects management programs and related documents in place for 20 years. How will these documents fit into the currently proposed guidelines? If there is some misalignment between the current programs/documents and those outlined in the process and content guidelines, what process will be in place to align these plans and documents?

Recommendation: The process requirements should provide discussion how existing WMMP-like plans will be aligned with the currently proposed guidelines and contents.

Minor comments and suggestions

Process requirements

1. As outlined on page 1, the *Wildlife Act* presents a number of qualifiers to determine whether impacts of a development on wildlife or habitat would trigger the requirement for a WMMP (e.g., significant disturbance, serious harm). While the Agency was initially surprised to see these

qualifiers, our concerns were allayed by the extensive descriptions to clarify how these terms will be interpreted (p. 11-18).

2. Page 14 discusses “physical barriers” to wildlife movement. The Agency suggests you may wish to also use the term “semi-permeable barriers”, since a barrier implies full cessation of movement, while most linear developments potentially reduce passage or slow crossing times of some portion of a population.
3. The guideline proposes a 30 calendar day public comment period on revised draft WMMPs (e.g., pg 23). This time period may be too restrictive for some Indigenous governments and organizations to provide a meaningful response.
4. Appendix 1: WMMP Screening questionnaire (pg 30): Within the table of big game species, you may wish to separate “bear” into grizzly bear and black bear. Similarly, splitting “deer” into species may be more consistent.

Content requirements

5. Section 2.1.2 Types of monitoring (pg 3): The document provides a good description of the differences between **Mitigation monitoring** and **Wildlife effects monitoring**. However, the first sentence under mitigation monitoring states “... *or to verify the effectiveness of mitigations in place*” while the first sentence under wildlife effects monitoring states “... *or test the effectiveness of mitigation measures*”. The intent of the former is to ensure that everything is “*implemented as planned and are functioning as intended*”, while the latter tests how well the mitigation is performing. You may wish to remove or revise the word “*effectiveness*” from mitigation monitoring to avoid confusion.

Should you have any questions concerning these comments, the Agency is pleased to discuss these at your convenience.

Sincerely,



Jaida Ohokannoak
Chairperson

Cc: Dominion Diamond– April Hayward
Tłı̨chǫ Government – Jessica Hum
Yellowknives Dene First Nation – Johanne Black
Łutsel K’e Dene First Nation – Ray Griffith
North Slave Metis Alliance – Nicole Goodman
Kitikmeot Inuit Association – Geoff Clark
Government of the Northwest Territories – Laurie McGregor
Indigenous and Northern Affairs Canada – Michael Roesch