



*Votre référence - Your file*

*Notre référence - Our file*

Ms. Heather Bourassa  
Chair  
Sahtu Land Use Planning Board  
PO BOX 235  
FORT GOOD HOPE NT X0E 0H0

Dear Ms. Bourassa:

Thank you for providing Indigenous and Northern Affairs Canada the amendment application for the Sahtu land Use Plan Amendment to exclude the Nááts'ihch'oh National Park Reserve from plan applicability and rezone lands excluded from the final park boundary.

Generally, we support the proposed amendment to the Sahtu Land Use Plan Amendment. The rezoning of the remaining Proposed Conservation Initiative Zone 41 lands as special management zones is appropriate given the identified mineral potential in the area, their exclusion from the final Nááts'ihch'oh National Park Reserve and the interest in resource development potential in the area. The specific conformity requirement #20 still recognizes and protects the special concern identified for the South Nahanni watershed, mountain woodland caribou, Dall's sheep, moose, grizzly bears, and their habitat.

Specifically, we propose changes to the wording of draft conformity requirement #20 before the final draft amendment is submitted for approval. The rationale behind the proposed changes is to improve the clarity of part (a), remove the potential wildlife management component of part (a), and include a new component (c) which incorporates Parks Canada's concern for visitor experience along the Little Nahanni River.

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The wording in part (a) of the draft conformity requirement “sustain existing populations of...” leaves room for interpretation and addresses wildlife management which is beyond the mandate of the Sahtu Land Use Planning Board. Interpretation depending, part (a) of the conformity requirement could potentially impose implementation requirements on the Sahtu Land and Water Board for wildlife management which would also go beyond their mandate. Our proposed revision is modelled on conformity requirement #7 of the Sahtu Land Use Plan and removes concerns that the draft conformity requirement strays beyond the mandates of the Sahtu Land Use Planning Board and the Sahtu Land and Water Board with respect to wildlife management.

Component (c) has been added to the draft conformity requirement #20 to reduce potential impacts to recreationalists on the Little Nahanni River from future development activities in the area. The text is modelled on a condition found in the Gwich'in Land Use Plan to protect tourism value along the Dempster Highway.

*Proposed Wording:*

*Amendment 9 – Section 3.4 Special Management Conformity Requirements, page 17, SLUP Amendment Application*

*CR #20 - South Nahanni Watershed*

*Regulators shall ensure that land use activities in SMZ Zone 41 - South Nahanni Watershed are designed and carried out in a manner that:*

- (a) Will ensure that there is no reasonable prospect of impacts to mountain woodland caribou, grizzly bears, Dall's sheep, and moose, their habitat and migration patterns, and important community harvesting areas, or otherwise ensure that the proposed land use activities include measures to avoid or mitigate such impacts; and,*
- (b) Does not substantially alter quality, quantity, or rate of flow for waters within the South Nahanni watershed; and,*
- (c) Any new activities requiring permits, licenses or authorizations taking place within 1,000 meters of either side of the Little Nahanni are not visible or audible from the Little Nahanni River.*

It is recognized that further discussion may be required to agree on the final wording for Conformity Requirement #20 that all parties can accept. We propose a meeting of the three approving parties and the Board to discuss this wording in advance of the Board's final submission of the amendment for approval by the three approving parties.

Should you have any questions concerning this submission, please contact Kim Pawley, Manager, Environmental Assessment, Land Use Planning and Conservation, at (819) 994-7110 or by email at [Kim.Pawley@canada.ca](mailto:Kim.Pawley@canada.ca).

Respectfully,



Mark Hopkins  
Director General  
Natural Resources and Environment Branch

c.c.: Mr. Terry Hall  
Mr. David Little