



Heather Bourassa,
Chair Sahtu Land Use Planning Board
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April 9, 2021

Dear, Ms. Bourassa

The following submission from the Canadian Parks and Wilderness Society – NWT Chapter is in regards to the Sahtú Land Use Plan Draft Amendment Application: Ts'udé Nlǫ́né Tuyeta (AM2020-01) .

Thank-you for the opportunity to comment.

CPAWS-NWT submits that Special Management (SMZ) would be the most practical and effective designation for all areas not included in the Ts'udé Nlǫ́né Tuyeta Protected Area. This approach would be more compatible with supporting the management objectives of the protected area and would function as a buffer and transition to areas of General Use while still allowing for development interests to proceed.

In recommending SMZ for all the applicable areas we have considered the following:

- A Blanket SMZ approach could enhance certainty for all land users by creating one land use regime for the areas adjacent to the Ts'udé Nlǫ́né Tuyeta Protected Area. Rather the proposed amendment application looks to be a patchwork of zoning and conformities which may require an unintended degree of investment by prospective land-users as they navigate a variety of rules and compliance within a relatively small geography. The proposed zoning approach may also require a greater degree of oversight by the SLUPB, regulatory authorities and the Ts'udé Nlǫ́né Tuyeta Management Board.
- Creating a SMZ buffer is more consistent with best practice in protected areas design. General Use if development proceeds to a high intensity could isolate Ts'udé Nlǫ́né Tuyeta as an “island” where ecological integrity and traditional activity is compromised by adjacent land use pressures. SMZ could provide greater attention to protecting values such as water quality and caribou as future development occurs.

- The proposed CR #21 would provide the Ts'udé Nlǫ́né Tuyeta Management Board the opportunity to engage with land users within 5km of the protected area, however the Management Board would not have an authority above providing recommendations. A more certain approach to creating an effective buffer would be to include CR #21 as a condition of an SMZ designation and also include water quality and caribou as values to be protected in the SMZ.
- There is a significant area of the Ramparts watershed and headwaters that is proposed for General Use. We strongly recommend that this area be designated as Special Management using a delineation along the periphery of the drainage within the Sahtu region. (Map of the Ramparts Watershed is Attached) Headwaters of a watershed should always merit protection through at minimum a SMZ designation, the fact that these waters flow into a protected area strengthen the rationale for inclusion in an SMZ. As an extension of Zone 65 is a suggested fix.

We appreciate the opportunity to submit on this important matter,



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5Km SMZ
including
Conformity #2

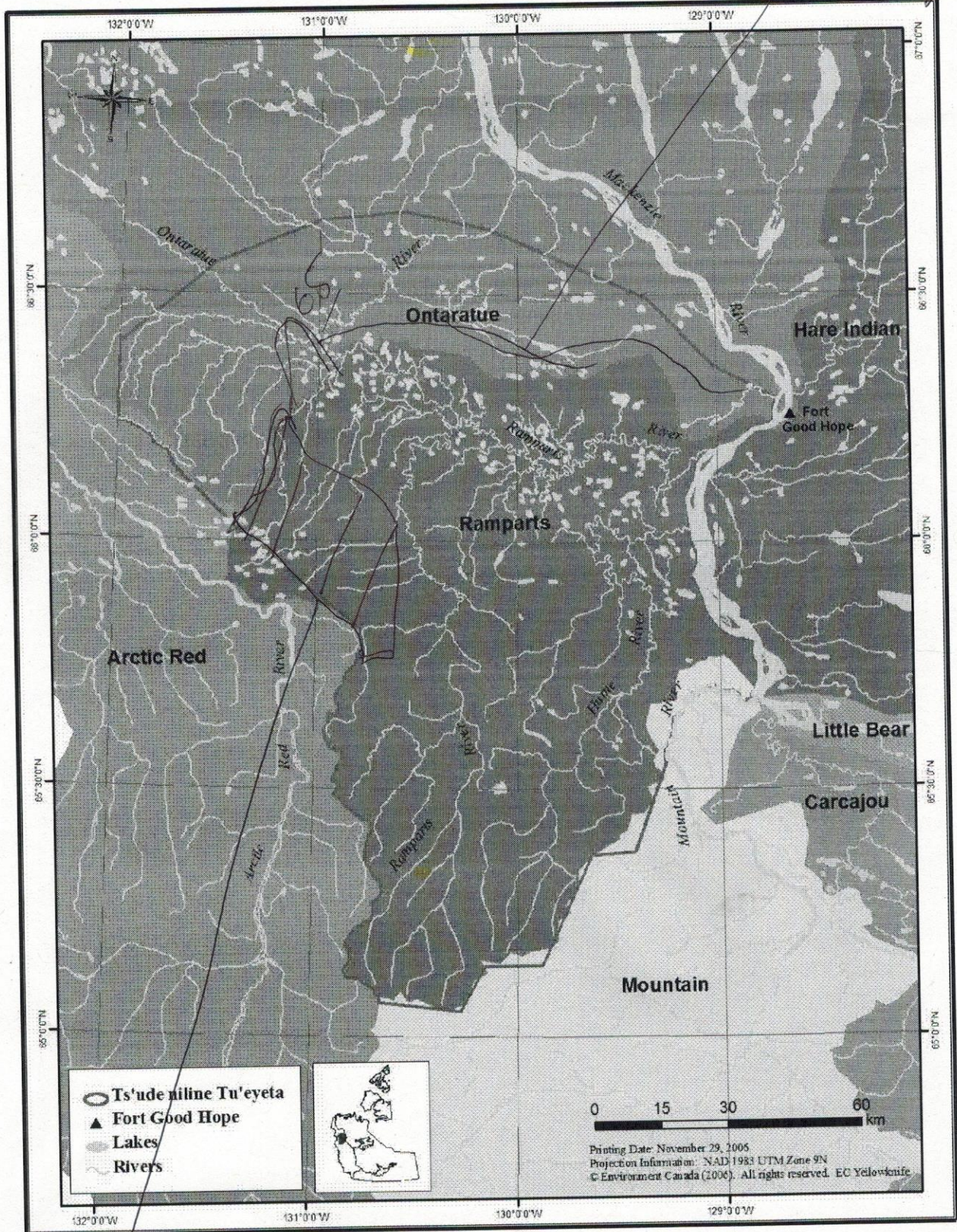


Figure 5: Watersheds within the Ts'ude niline Tu'eyeta candidate protected area.

Extension of SMZ 65 To capture the Ramparts watershed including headwaters.