

Heidi Wiebe

From: Rick Meyers [rmeyers@mining.ca]
Sent: Friday, July 24, 2009 9:27 AM
To: Heidi Wiebe
Cc: mike vaydik; pbousquet@pdac.ca; Philip Wright; James Lariviere; Scott Cairns; Overvold, Bob; Gordon Peeling
Subject: Comments on the Sahtu Land Use Plan - Draft 2
Attachments: NWT Diamonds 2008 (Final) v3.pdf

To: Ms. Heidi Wiebe, Plan Development Lead, Sahtu Land Use Planning Board Staff

Dear Heidi

Re: Sahtu Land Use Plan – Draft 2

Thank you for the opportunity to submit comments on Draft 2 of the Sahtu Land Use Plan (SLUP). The comments that follow are submitted on behalf of the Mining Association of Canada in advance of your July 31, 2009 deadline. For convenience I have used similar headings to those used in the April 30, 2009 Letter of Transmittal signed by Judith Wright-Bird, Chairperson of the Sahtu Land Use Planning Board.

1. **Zoning:** We agree that further work is needed on zoning. Although there appears to be an increase in balance between Go and No-go areas for resource development compared with earlier drafts, most areas zoned General Use are those having high potential for the discovery of oil and gas, but not for minerals. The areas having high mineral prospectivity are largely within Proposed Conservation Initiatives (PCIs) or Special Management Zones (SMZs). A large part of the Mackenzie Mountains, significant components of which has high mineral potential, are within PCI zones, or are zoned SMZ. The same can be said for the Bear geologic province (prospective mineral areas around Great Bear Lake). The results of this zoning is that the viability of mineral development in the Sahtu settlement region is unlikely since very little land remains available to mineral prospectors and developers to explore for economic mineral deposits. Areas of high mineral potential must be considered in the establishment of PCIs and SMZs. If special management is required, we propose that attainable and enabling conditions permitting mineral exploration and development activity be included that meet special management objectives, however, SMZs should not be de facto conservation zones.
2. **Mineral Potential Mapping:** The Letter of Transmittal indicates that a revised Mineral Potential Map is in development by the NWT Geoscience Office. We strongly recommend that the results of this work be considered and included in future zoning exercises. There has been no identification or recognition of significant known mineral deposits in the Sahtu LUP maps. In the development of any balanced land use plan, the delineation of known mineral occurrences is essential. In addition, we see no recognition within the plan documentation of what benefits future mineral development can bring to the people of the Sahtu. As an example of the possible benefits I have attached a recent report on the economic impacts of the development of the NWT diamond industry on the Territory's economy.
3. **Reclamation and Monitoring:** With respect to Conformity Requirements, reclamation plans and environmental monitoring plans are fundamental requirements for mineral development activity on all regions within the NWT, and project-specific conditions are determined by the Mackenzie Valley Land and Water Boards under the MVRMA. Including these requirements under the SLUP are redundant. Additionally, the conforming requirements to restore land to its pre-development condition are, by strict definition, unattainable. We suggest alternate wording based on future productivity objectives be developed for the next draft.
4. **Grandfathering of Existing Rights:** The development of the SLUP must respect pre-existing Third Party Rights. If the Board is considering some form of expropriation of (mineral) rights, then guaranteed financial compensation for any resources held under those rights must also be included in the Plan. Otherwise, we agree with previous comments from Government that such actions would render the Plan 'unapprovable'. An alternate approach would be to allow resource development activity under appropriate and enabling special management conditions, as suggested above in bullet #1.

Again, The Mining Association of Canada appreciates the opportunity to comment on this draft and we look forward to reviewing future drafts. If you wish to discuss the above comments please don't hesitate to contact me at the coordinates below.

Yours truly,

Rick Meyers

Rick Meyers
VP Diamond Affairs
The Mining Association of Canada
1105-350 Sparks Street
Ottawa, Ontario K1R 7S8
Ph 613-233-9392 ext 329
Fx 613-233-8897
RMeyers@mining.ca

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