

# SLUPB Understanding and Response to Tri-Party Comments on the February 5<sup>th</sup>, 2013 Draft SLUP

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*Completed  
April 29, 2013*



*Sahtu Land Use Planning Board*

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## Overview

On February 5, 2013 the Sahtu Land Use Planning Board (SLUPB) submitted a draft Sahtu Land Use Plan (SLUP) to the three approving parties: Sahtu Secretariat Incorporated (SSI), Government of the Northwest Territories (GNWT), and Aboriginal Affairs and Northern Development Canada (AANDC). As stated in the accompanying cover letter, the review period would last 30-days and comments limited to identification of major issues that could be considered obstacles for approval.

The GNWT submitted its comments on the Draft SLUP on March 21, 2013. They identified no outstanding issues that are likely to cause problems in the approval process. However there were identified areas where clarity could be improved and the GNWT provided recommendations. The SLUPB recognizes that the GNWT's Executive Council will make the final decision on GNWT approval once a final plan has been submitted.

AANDC submitted the Government of Canada comments on April 16, 2013. Twelve government departments and agencies evaluated the draft SLUP based on criteria identified by federal departments during recent reviews, and from results summarized from the September 2011 *Federal Workshop on Northern Land Use Planning Review and Approvals*. The 5 criteria are Legal and Policy consistency and accuracy; Effective, Efficient, and Credible Planning Process; Clarity; Governance and Implementation; and Regulatory Improvement & Efficiency. The draft SLUP was received positively in all 5 areas. The federal government identified and provided recommendations on 3 separate Tri-Party Discussion items as well as provided specific comments and departmental recommendations for the SLUPB to consider.

SSI submitted comments on April 23, 2013. The three primary listed concerns were the same as those provided by AANDC. SSI expressed optimism that once the Board had heard from all approving authorities the SLUPB would be able to finalize the plan for approval in the near future. In a separate request voiced at their April 18<sup>th</sup> meeting, SSI also ask that the SLUPB review Dene Zone Names.

## SLUPB Response

While the draft review period ran considerably longer than anticipated, the SLUPB is please to know that all parties have rigorously reviewed the Draft's contents and are generally satisfied with the progress to date. It is the Board's understanding that the three parties have convened independent meetings to discuss and coordinate their responses on the Draft. As expressed in their written responses, there is general agreement that the February 5<sup>th</sup> Draft with some revisions will have a high success for Tri-Party approval.

The SLUPB has considered all comments to date. Based on the Board's understanding of the final positions of each party, the SLUPB has prepared this document as the final response on issues regarding Plan development. While not all editorial suggestions were incorporated into the Final plan, the board has agreed to revise the plan were there is agreement.

Recognizing that after 15 years of work, approving the SLUP will be a major milestone for achieving aims set in the SDMCLCA and MVRMA. As a living document, the land use planning process will enter a new phase in the Sahtu Settlement Area. Through monitoring, implementation, establishment of a Sahtu

Working Group, refinement of supporting documents, SLUP exception, amendment and 5-year review processes; improvements to the Plan will be made over time. In this light, party comments and suggestions not reflected in the final plan will have an opportunity to be further discussed post approval.

## Primary Party Issues

AANDC and SSI submitted 3 substantive and identical recommendations to the Plan: CR 15 previously named Ecological Integrity, CR 12- Financial Securities, and Section 2.2- Application of the Plan to Protected Areas. The GNWT 2 substantive recommendations: Section 1.1 and 1.3 regarding the context of the Sahtu Land Use Plan in an Integrated System, CR #2- Implementation Guidance. In its comments SSI agreed with the GNWT on CR#2, and in a separate request asked that the SLUPB review Dene Zone Names.

The SLUPB has incorporated these comments into the final draft as follows.

### **Conformity Requirement (CR) #15- The Great Bear Lake Watershed**

The SLUPB received new identical language provided by AANDC and SSI. The GNWT provided no recommendations. As a result, the CR has been renamed as The Great Bear Lake Watershed, and using the SSI and AAANDC agreed upon text shall read:

*Regulators shall ensure that:*

- (a) Applicants proposing land use activities in the Great Bear Lake Watershed engage Deline Community organizations in order to understand the cultural and environmental values set out in the Water Heart- the Great Bear Lake Watershed Plan;*
- (b) Any land use activities permitted in the watershed are consistent with the maintenance of the area as a self-sustaining ecosystems; and*
- (c) Any land use activity requiring a land use permit or water licence includes a site specific monitoring program consistent with CR # 11.*

To eliminate confusion, CR #11 was modified, deleting:

~~*2) In the Great Bear Lake Watershed, the monitoring program will be sufficient to monitor indicators of ecological integrity of the watershed based on the values described in the zone descriptions for Zones 23-27, 30, and 31.*~~

No implementation guidance was provided by the parties. The SLUPB therefore inserted its own language in the Implementation Guide. As this language is not legally bound to the SLUP, it can be modified with additional input from the parties. If needed this can be accomplished along a parallel track, and should not be an obstacle for the Plan's approval.

## **Conformity Requirement (CR) #12- Financial Securities**

The SLUPB accepted the agreed upon text from SSI and AAANDC. The GNWT provided no comments. The CR will read as follows:

*When Required by a land use permit or water licence issued by the Land and Water Board, financial security must be posted and maintained with the Minister of Aboriginal Affairs and Northern Development. The Land and Water Board will ensure that closure and reclamation plans are in accordance with legislation and regulation.*

## **Section 2.2- Application of the Plan to Protected Areas**

The SLUPB accepted the agreed upon text from SSI and AAANDC. The GNWT provided no suggestions. To improve clarity the following two sentences have been added to the final paragraph of the section:

*For clarity, upon the establishment of a park or protected area which encompasses some but not all of a PCI, the SLUPB will engage the approving parties with regard to alternate zoning for all portions of the PCI. Information documented on the values of the PCI during the park or protected area establishment process should be used to set out special management conditions for the portion of the PCI excluded from the park or protected area.*

## **Section 1.1- Context for the Sahtu Land Use Plan in and Integrated System**

The board understands the GNWT seeks additional clarity regarding the SLUPB's role in the Sahtu Co-Management System, and "that without prominent information related to the Plan's relationship to other SDMCLCA and MVRMA instruments in the Introduction Section of the SLUP, roles could be misconstrued." The GNWT provided edited text with specific references to the SDMCLCA to clarify the SLUPB role in the broader co-management system. As the GNWT's revised sections come straight from the SDMCLCA and MVRMA, the SLUPB has amended the introduction. As a result, the February 5<sup>th</sup> Section 1.1 Mandate for Land Use Planning in the Sahtu has been edited into two sections. They are Section 1.1 Land Use Planning in an Integrated System of Land and Water Management and 1.2 Mandate for Land Use Planning in the Sahtu.

## **Section 1.3- Wildlife and Wildlife Management**

Additionally the GNWT raises caution to references to Wildlife and Wildlife Management objectives in Draft SLUP Section 1.3. The GNWT identifies that Wildlife Management authority, responsibility and accountability rests with the Government and Sahtu Renewable Resources Board (SRRB) as per SDMCLCA Chapter 13. Therefore Wildlife and Wildlife Management in the GNWT view is not a matter for the Plan or Planning Board. The GNWT appears to suggest that any references in the SLUP to the SCMCLCA be limited to Chapter 25.

Throughout the land use planning process there has been well established links between land use and wildlife habitat. Wildlife habitat and sensitive ecological features played an import role in defining zones

and in developing other conformity requirements. In this context when referencing the SCMCLA the intent is not to imply an active or ongoing role for the SLUPB in Wildlife or Wildlife Management issues. Rather it is to identify how land use relates to other SCMCLCA objectives. As the GNWT and SRRB have participated in the spirit of co-management throughout the land use planning process, the SLUPB does not see a conflict. As a living document an approved SLUP should support the GNWT and SRRB as they exercise their respective authority, responsibility and accountability in meeting wildlife and wildlife management objectives in the Sahtu Settlement Area.

### **Conformity Requirement (CR) #2- Implementation Guidance**

The GNWT raised concerns with Implementation Guidelines regarding this CR, and suggested that “the Interpretation Guideline for CR #2 explicitly state that the CR is a requirement for fair process of engagement not a specific outcome and that the conformity requirement is not intended to give communities a veto over projects.” SSI agreed with the GNWT about the language set out in CR #2. AANDC and the National Energy Board also requested clarification on CR #2 evaluation and its relationship to community benefits.

As expressed by the GNWT, the purpose of the CR is to highlight the importance communities place on community engagement and incorporation of traditional knowledge in decision making. The SLUPB is aware of regulatory guidance documents identified in the GNWT’s and NEB submissions, including the recently approved MVLWB Guidelines. It is not the intent of the SLUPB, or through a future working group, to duplicate ongoing efforts that advance mutually shared objectives. The “Criteria for Conformity Determination” was included in the SLUPB Implementation Guide, and not the legally binding SLUP, for the expressed reason of providing the SLUPB flexibility to assess and support improved Criteria for Conformity Determination as alternative regulatory guidance come on-line. To address the concern of an implied community veto by presenting a specific outcome, the SLUPB has modified the guidance language and is open to further incorporating the new MVLWB Guidelines into the Implementation Guide.

### **Zone Descriptions- Dene Zone Names**

The origins of SLUP zone names come from the communities during initial mapping exercises, workshops, and as used in public processes (i.e. Protected Area Strategy) and previously published documents. The SLUPB recognized throughout the planning process there are multiple Dene font options and alternative spellings for geographical features listed in the SLUP. The Sahtu Land Use Planning Board has done its best to increase the usage of written Dene names in each progressive draft version of SLUP. Through ongoing efforts the SLUPB will continue to clarify its understanding and use the most appropriate locally accepted zone name.

The board acknowledges SSI’s request for convening a small group or hosting a workshop to further refine the SLUP’s Dene Names, and further proposes that this could be expanded to a future mapping and GIS improvement project. However, at this time the level of effort to revisit the proposed zone names (in some cases used for over 10 years) would require a level of effort that would delay the approval of the Plan indefinitely. Therefore the Board has chosen to edit the Appendix introduction to allow for the recognition of alternative Dene names, and commits to working with SSI and Sahtu

communities to advance this issues by including this as an item in its Action Plan, with the goal of producing an revised Dene Place Name map, that can be incorporated into the SLUP 5-year review, or more optimistically as a Zone Description amendment.

## Definitions

The board treated suggested changes to definitions as new items that would not be considered this late in the process. The terms requesting modification from the parties included: *zone, action, conformity requirement, disposition, and land owner*. In addition, issues were raised with the SLUP's use and lack of definition for the terms "*resources*" and "*community*" throughout the plan.

The Board recognizes that the suggested definition improvements were intended to bring clarity. However even small changes to definitions would invite additional comment on topics that have previously been discussed and could unravel the progress made to date. The board feels that definition refinement, would be a topics better suited for a Sahtu Working Group or during the 5-year review process once the plan has time to be implemented and monitored for effectiveness. Clarification of terms can also be addressed through flexibility mechanisms built into the Plan (amendment and exception processes), and Implementation Guide updates.

### "Resource"

Both the governments of the NWT and Canada have raised issues with the SLUPB's use of the term "*resources*" throughout the plan. The GNWT acknowledges that the purpose of a land use plan is as stated in the *MVRMA s 41(2)* "*shall provides for the conservation, development and use of land, waters and other resources in a settlement area.*" It also is of the position that under the *MVRMA s 46 (1)*, under compliance with Plans there is a more restrictive definition "*...relating to the use of land or water or the deposit of waste.*" The National Energy Board also seeks clarity on the use of "*resource*" and "*resource manager.*" They also reference *MVRMA s 46 (1)* in addition to referring to more limited resource definition to "*land and water*" per section 25.2.9 of the *SDMCLA*.

The SLUPB has carefully considered its use of the term resource throughout the land use planning process. As a planning body that has developed the plan with a broad stakeholder audience for a period of over 15 years. It recognizes the term "*resource*" has been used repeatedly to describe a spectrum of land use attributes with cultural, social, environmental, and economic values that can be construed as "*resources.*" It is the SLUPB's perspective that the guiding principles in the legislation provide the Board a mandate to consider a wider range of "*other resources*" for guiding the development of the Plan. Therefore the SLUPB has relied on definition of "*resources*" as presented in *SDMCLA s 25.2.4* and *MVRMA s 41(2)*. Furthermore, the SLUPB understands *SDMCLA s. 25.2.9* and *MVRMA s 46 (1)* to pertain to compliance with the Plan, and directed towards First nations, Governments and licensing bodies. Once the plan is approved, it will be regulatory bodies having authority under any federal or territorial law to issue licences, permits or other authorizations that will be required to carry out their powers in accordance with the land use plan as it relates to the use of land or waters or the deposit of waste.

**“Community”** The SLUPB has done its best to identify specific “community organizations” when appropriate in the SLUP. Implementation Guidance can be refined to clarify as needed to avoid applicant confusion. In a practical sense (due to the small population of the Sahtu), future proponents reaching out to the public (via Land Corp, RRC, Band, etc.) will put the SLUP user in contact with the “community.”

## Chapter 1

### Accepted Changes

Section 1.5.2, Page 15, Paragraph 3 (AANDC): Typing error corrected to read: *It is like our words are being wasted.*

Section 1.5.3 (AANDC): Special characters in names *Nááts’ihch’oh* and *Shúhtagot’ine Néné* corrected.

### No Changes

Section 1.4.2- Goal 1 (AANDC): SLUPB recognizes that over the life of the plan development various programs have changed focus. While CIMP may no longer have a socioeconomic or cultural focus, the SLUP planning goals do. These were goals established early and guided the planning process, and in principle should not be changed in final edits.

Section 1.4.2- Goal 4a (Department of Fisheries and Oceans): Commented that “Sustainable development vs. non-renewable resource development is contradictory.” As goals were established early in the planning process, the SLUPB will not consider changes during the finalization of the plan.

Section 1.5 (AANDC, Parks Canada): The sections are titled for specific regional planning activities and/or histories. For example the Great Bear Lake Watershed Management Plan was driven by the Deline Land Corporation, Deline First Nation and Deline Renewable Resources Council. To identifying the planning process as a Deline District initiative would not be accurate. The Board is aware of developments of the Naats’ihch’oh Park Reserve Boundaries. While Tulita District resolutions may have been passed, they have not officially been submitted to the SLUPB for consideration as was the case following the Tulita Elder’s Zoning Workshop.

Table 2 and 3 (AANDC): Area calculations were done by GIS analysis in square meters (see zone description in Appendix Table 5), and rounded to square kilometers.

## Chapter 2

### Accepted Changes

Section 2.2 Application of Plan to Protected Areas (Parks Canada): The board considered proposed changes and edited the section to recognize the existing management agreement for Saoyo-?ehdacho. The final 2 sentences in paragraph 4 now read: *All Established Protected Areas will be managed according to their sponsoring legislation management plans and/or management agreements as determined during the establishment process. The Plan will provide no further direction within these*

areas. As the Doi T'oh Territorial Park and Canol Heritage Trail is included in the SDMCLCA, the Board chose to recognize this distinction and did not accept the suggested Parks Canada deletion.

Section 2.5 Plan Exemptions (AANDC/SSI/GNWT): Coal Permits added to list of legacy land uses at AANDC request. SSI comments noted, and land use should be interpreted to include water and deposit of waste. As suggested by the GNWT for clarity the addition of a colon and bullets A) and B) was accepted Under *Part D.3- Exemption of Legacy Land Uses from Certain CRs*.

Section 2.7 Effect of Plan (GNWT, SSI): Section number reference corrected in first sentence, ~~2.5~~ deleted and replaced with 2.4.

### **No Changes**

Section 2.3 (SSI): Raised the possibility of alternative private land ownership that may occur in the future. The board considered this as a new issue without a clear recommendation. This type of issue could be addressed through plan amendment, exceptions to the plan, or 5 year review as needed.

## **Chapter 3**

### **Accepted Changes**

Section 3.1- Spatial Application of Conformity Requirements (Department of Fisheries and Oceans): Zoning acronyms added to paragraph above Table 1 for clarity.

Table 3 (Parks Canada): The board edited the table to recognize the existing management agreement for Saoyo-?ehdacho National Historic Site. Text now reads: *"The Plan does not apply in these areas to either the settlement lands or Crown (Parks Canada) lands within the site."*

CR#1- Bulk Water Removal (AANDC): AANDC requested additional clarification to place bulk water removal in the correct context in relationship to the 2003 AANDC policy. Bulk Water removal was revised to read:

*Protection of water is one of the most important issues for communities and residents. Canada is the largest single owner of fresh water resources in the world. Many Canadians are concerned about the bulk removal of water from major drainage basins, such as the Great Bear Lake and the Mackenzie River. Canada's Federal Water Policy (1987) states that Canada will "take all possible measures within the limits of its constitutional authority to prohibit the export of Canadian water by interbasin diversions, and strengthen federal legislation to the extent necessary to fully implement this policy." In 2003, AANDC developed a policy prohibiting the permanent out-of basin transfer of bulk water from major drainage basins in the NWT, such as the Mackenzie River. CR#1 supports, and is consistent with this policy. For clarity, the Plan's prohibition on bulk water removal does not prohibit the use of water for other uses, including consumption, travel, road building, oil and gas or mineral exploration and development activities, or hydro-electricity generation.*

CR #3 Community Benefits (AANDC, National Energy Board): Under Interpretation, second paragraph, first bullet. For clarity regarding COGOA the board accepted recommended edits to examples of economic benefits. It now reads:

*Economic benefits (Examples of economic benefits instruments include Benefits Plans required for oil and gas operations submitted to the Minister of AANDC pursuant to the Canada Oil and Gas Operation Act (COGOA), Access Agreements for access to Sahtu Settlement Lands; privately negotiated Access and Benefits Agreements, and impact Benefits Agreements negotiated between mining applicants and affected communities for major projects as a best practice);*

CR #7 Wildlife (Department of Fisheries and Oceans): Title changed to add “Fish.” New title is *Fish and Wildlife*.

CR #14- Protection of Special Values (AANDC): Zone Descriptions were edited for consistency with the CR. For each Zone Description ~~Values to be Considered~~ was replaced with *Values to Take into account*.

### **No Changes**

CR# 4- Archaeological Sites and Burial Sites (National Energy Board): Community members voiced throughout the planning process that these sites should be avoided. In rare instances, development of mitigation measures should be coordinated with the Prince of Wales Northern Heritage Centre and affected communities and families. This CR could not be met by mitigation without a demonstrated level of engagement and satisfaction expressed by the PWNHC and/or affected communities/families.

CR #9-Sensitive Species and Features (Department of Fisheries and Oceans): New Item. *General Status Ranks of Wild Species in the NWT* was not significantly referenced in the planning process, but could be incorporated into future land use planning activities.

CR #19- Water Withdrawal (Department of Fisheries and Oceans): This CR originates from residents of Colville Lake and the lakes’ values are listed in the zone descriptions. This issue of industrial use has been raised and considered multiple times, and the SLUPB considers the matter resolved since prior to the Tri-Partite meeting.

## **Chapter 4**

### **Accepted Changes**

Section 4.1 Introduction (AANDC): The board added the following suggested sentence at the end of the section: *Where appropriate, new information or new protocols should be shared with Sahtu Organizations, departments and agencies of the federal and territorial Governments, and co-management boards, to advance planning issues or fill data gaps need to move the plan forward during future review cycles.*

Section 4.2 Actions, Action #3- Access to Wildlife Information (AANDC): Text accepted to clarify beneficiaries of information sharing. The last two sentences under context and rationale now reads: *The responsibility for identifying important wildlife areas and seasons rests with wildlife managers. Having*

*this information updated and accessible for land users, Sahtu Organizations, departments and agencies for the federal and territorial governments, and co-management boards, will improve regulatory efficiency.*

Section 4.2 Actions, Action #4- Water Withdrawal (Department of Fisheries and Oceans): Action changed to reflect updated protocol in 2010 withdrawal limits. Deleted 5% and replaced with 10%.

Section 4.3- Recommendation #1: Air Quality (National Energy Board): Revised wording for Footnote accepted. Footnote now reads: *The NEB regulates oil and gas operations that contribute to the air emission waste stream.*

### **No Changes**

Section 4.2 Actions, Action #1- Sahtu Working Group (AANDC): The SLUPB's mandate comes from the SDMCLCA and the MVRMA, and it is clear to the SLUPB that all decision making regarding Land Use Planning ultimately lies in members nominated by the parties and appointed by the Minister of AANDC. The proposed Working Group is intended to improved coordination, communication, and efficiencies in the Sahtu with regards to on-going land use planning issues as a **collaborative forum**.

Throughout the development of the Plan the Board has benefitted from the input and recommendations of other organizations that have shared mutual interests and bring to the process information, expertise, and other resources that advance Land Use Planning Goals in the Sahtu. The Action lists 7 issues that were deemed important by stakeholders in the process, but would require additional focus outside of the Land Use Plan development stage. As presented in SLUP section 4.1, approving parties will make reasonable efforts to complete the Actions in an approved plan. The SLUPB shares the concern of AANDC expresses, and has no intent of creating, or seeking funding, for an additional layer of bureaucracy. The expectation is that a Working Group would be convened only as long as the SLUPB and invited participates benefited from the coordinated effort.

Section 4.2 Actions, Action #1- Community Land Use Monitoring Program and Section 4.3 Recommendations, Recommendation #3- Community Land Use Monitoring (AANDC): The AANDC suggestion for Recommendation #3 requests that the SLUP outline "standards" regarding monitors and training. As there are none currently identified for the Sahtu, the intent of the Working Group to have a regional discussion first on Community Land Use Monitoring. It would be premature to include "standards" in Recommendation #3 until they have first been defined. Furthermore by definition, Recommendation #3 is not a requirement. It was written to recognize the high importance that communities place on having Land Use Monitors.

## **Chapter 5**

### **Accepted Changes**

Section 5.1 (AANDC): ~~INAC~~ deleted and replaced with AANDC

Section 5.1 Shared Responsibility for Implementation (AANDC): Page 54 final paragraph and Page 55 first paragraph. Edited to read, *The Recommendations included in the Plan are regulatory in nature, and*

while not mandatory, applicants and regulators are encouraged to consider these recommendations in carrying out their responsibilities.

Section 5.2 (SSI): Page 55 last paragraph and first paragraph page 56. Revised for clarity to read:

*The bodies that have authority for issuing authorizations to implement the Plan, as identified in s. 46(1), are responsible for ensuring that land uses comply with applicable CRs. Duplication of regulatory requirements may be avoided by identifying one or more lead authorizations as needed, to ensure conformity with the applicable CRs by each land use that is subject to the Plan. Land use permits and water licences may be the appropriate lead authorizations for many land uses. In some cases, other authorizations may be needed to complement the requirements that can be addressed through land use permits and water licences to ensure conformity with CRs when they apply to land uses that do not require a land use permit or water licence.*

*Where one or more lead authorizations are used to ensure conformity with the applicable CRs for a land use, regulators can meet their obligation to “carry out their powers in accordance with the land use plan” by ensuring that any other authorizations are consistent with the lead authorization on matters related to conformity with the Plan. This approach could avoid the need for all of the authorizations that apply to a land use to include requirements addressing all applicable CRs, thereby promoting the efficient use of authorizations to link CRs with land uses. As long as no authorization is issued in contravention of applicable CRs, S. 46(1) requirements will be met.*

Section 5.5 Enforcement (SSI): The first sentence of the section was removed.

Section 5.8 Five Year Review (AANDC): Page 59. Final Bullet deleted ~~To what extent are Recommendations being implemented?~~ and replaced with, *How effective are the current regulations?*

## Zone Descriptions

Naats’ihch’oh Proposed Conservation Initiative Zone (Parks Canada): The Zone Description was edited for clarity and accuracy, and renamed to differentiate the boundaries between the PCI as zoned (current land withdrawal) and future boundaries (once the park reserve is established and SLUP amended). All zone descriptions are organized by values per CR#14, and the suggestion to amalgamate the headings was not accepted. The “95% low” figure comes from the Draft 3 Sahtu Land Use Plan Background Report. GIS analysis for all zones was based on:

Gal, L.P. and Udell, A. J., 2005. Compiled Hydrocarbon Play Polygons for mainland Northwest Territories, ArcView .shp format files: Sahtu Settlement Area, Gwich’in Settlement Area, mainland Inuvialuit Settlement Region, Dehcho territory; Northwest Territories, Canada; Northwest Territories Geoscience Office NWT Open Report 2005-004

Tuktut Nogait National Park (Parks Canada): Zone Description was edited for clarity and accuracy.

## Maps

Map #2 Land Use Zones (GNWT): The GNWT noted that Conservation Zone 39 is not contiguous. This has been true since Draft 3. Segments of the Canol Heritage Trail located on Sahtu Settlement Lands are in Special Management Zone 38 (See Map 10). The GNWT also noted that 14 KM of the Canol Road near the Yukon boarder and 2 mining access roads are not included on maps. These roads will be added to the Plan as existing infrastructure in the narratives of the appropriate Zone Descriptions. The SLUPB will work with the GNWT and other GIS data providers as needed to update future mapping products for improved accuracy.

## Other SLUP Items

### Accepted Changes

Consistency with SDMCLCA (AANDC): Accent removed from “Metis,” and “Designated Sahtu Organization” capitalized throughout SLUP.

### No Changes

Acronym Additions (Department of National Defense/Canadian Forces): Neither Department of National Defense (DND) or Canadian Forces (CF) are referenced in the Plan.

## Implementation Guide

### Accepted Changes

Page 7, Item 8 (AANDC): “and water licenses” removed.

Page 17-18 (AANDC, National Energy Board): Under Criteria for conformity determination, first bullet. For clarity regarding COGOA the board accepted recommended edits.

Page 32, CR #13- Closure and Reclamation (AANDC): “INAC” deleted and replaced with “AANDC.”

Appendix 1- pg. 46 Implementation Guide (GNWT): “license or permit authorizing discharge” removed from list of authorizations.

Appendix 2- Pag48-49, Table of Authorizations and Dispositions (National Energy Board, Transport Canada): Comments noted. Users of the Implementation Guide are advised that material presented is subject to periodic legislation changes and other updates.

Appendix 3- pg. 50 Implementation Guide: Comments noted. Users of the Implementation Guide are advised that material presented is subject to periodic legislation changes and other updates.

### No Changes

Page 5, Section 2.4- Application of Land Use Activities and Applicants (Department of National Defense/Canadian Forces): Comments noted. Activities that do not require an authorization or disposition are not subject to the Plan. The Board sees no ambiguity, and has included examples of re-

occurring common activities that occur in the Sahtu Settlement Area. The board sees no reason to begin an exhaustive list of potential infrequent activities.