



February 17, 2017

Heather Bourassa, Chair  
Sahtu Land Use Planning Board  
PO Box 235  
Fort Good Hope, NT X0E 0H0  
Email: [chair@sahtulanduseplan.org](mailto:chair@sahtulanduseplan.org)

Dear Ms. Bourassa,

**Re: Amendment Application for Zone 41 in Sahtu Land Use Plan**

Thank you for the opportunity to continue to participate in the process to review the future of the Zone 41 high mineral potential lands that were excluded from the final Naats'ihch'oh National Park Reserve boundary because of their high mineral potential. The NWT & Nunavut Chamber of Mines (the Chamber) has taken an active interest in land use planning and the promotion of responsible mining in the Sahtu since the land claim was settled, and we are pleased to continue to provide our thoughts as the process advances. Our thoughts build on our contributions to the Sahtu Land Use Planning Board in regards to the Zone 41 lands over the last several years.

From a high level perspective, the NWT is challenged economically today, in no small part because non-renewable resource development is facing challenging international commodity prices and high costs and investment challenges here in the NWT. We understand the effects are being especially felt in the Sahtu region, which has relied on oil and gas development as a key economic driver.

Despite the challenges resource developers face today, it is important to understand that non-renewable resources are the NWT's natural long term economic strength. While there are opportunities for economic diversification to renewable resource activities, those opportunities available to us today will never have the same ability (economic horsepower) to generate the kinds of revenues and opportunities as do non-renewable resources. That is not meant to mean they are not important, however, rather to provide context.

Thus, from this economic perspective, amending the high mineral potential Zone 41 lands with an eye on how to create clarity and certainty to accommodate non-renewable resource investment and development is a good and logical approach. In doing so, Northerners and Sahtu residents should feel safeguarded by the stringent northern regulatory regime under the Mackenzie Valley Resource Management Act with all of its public scrutiny and oversight, and its strict requirements that development not create significant adverse environmental effects.

From an ability for the Sahtu to take advantage of mineral opportunities on these lands, we believe the Boards' proposal to amend all the high mineral potential lands of "Zone 41 Naats'ihch'oh" so as to become Special Management Zones (SMZ) is sound. This is based on our understanding that SMZ's allow all types of land use (other than bulk water removal) including mineral exploration and development.

Further, we understand that the portions of Zone 41 lands to the north and east, which are in the Redstone and Keele watersheds would be rezoned to join Zone 38 and under the Existing Conformity Requirement #14. We believe that mineral development can occur and meet the Values to be Protected, to be Respected, and to be Taken into Account as described in the Appendix to the SLUP Amendment Application. This requirement would not compromise the Sahtu region's ability to develop mineral resources on and under these lands.

The portions of Zone 41 lands in the South Nahanni watershed would be rezoned as "Zone 41 South Nahanni", and in addition to all existing Conformity Requirements #1 through #13, would fall under a new Conformity Requirement #20, which is framed so that:

- Regulators shall ensure that land use activities in SMZ "Zone 41 – South Nahanni Watershed" are designed and carried out in a manner that:
  - a) Sustains existing populations of mountain woodland caribou, grizzly bears, Dall's sheep, and moose; and
  - b) Does not substantially alter quality, quantity, or rate of flow for waters within the South Nahanni watershed.

We believe that condition b) in regards to water is manageable. However, condition a) is problematic as it would put the onus on regulators and developers for all manners of wildlife effects beyond their control. This condition should be modified to require the developers to submit plans on actions they will take to mitigate the effects their project might have on the identified wildlife species. It would be unrealistic and unachievable for a developer to have to sustain populations in the face of circumstances out of their control, such as disease, predation, climate change and natural population cycles, for example.

We note too that the Description for Zone 41 on page 35 of the Appendix to the SLUP Amendment Application is inconsistently worded. All the other Zone descriptions use a format which has clear statements on the "Values to be Protected", "Values to be Respected", and "Values to Take into Account". We recommend that Zone 41 description be amended to follow that same format, so as to more clearly describe to potential investors and land users what they should expect. More clarity provides better certainty and removes risks of the unknown, something investors need.

In conclusion, with the additional changes we recommend, the proposed amendments to the Zone 41 lands would allow them to become attractive to investment for responsible mineral development. This is particularly timely, given the significant downturn in oil and gas opportunities, and appropriate, given the significant mineral potential in the region.

As we continue to believe, the Sahtu region has the opportunity to diversify its economy with mineral exploration and mining. It is, after all, in the Sahtu where mining in the NWT began some 85 years ago. Rezoning and opening the former “Zone 41 – Naats’ihch’oh” lands to responsible mineral development will add to the Sahtu region’s ability to attract investors who can, with perseverance and support, provide new mineral development opportunities for the region. In that regard, we continue to recommend that the Sahtu develop its own Sahtu Regional Mineral Strategy that would complement and take advantage of efforts under the NWT Mineral Development Strategy for the benefit of not only the Sahtu, but all of the NWT.

We would be pleased to provide any additional information you may require.

Yours truly,

**NWT & NUNAVUT CHAMBER OF MINES**

A handwritten signature in black ink, appearing to read 'Tom Hoefler', written in a cursive style.

Tom Hoefler  
Executive Director

c.c.: Tom Jensen, Deputy Minister, GNWT – Industry, Tourism & Investment  
Willard Hagen, Deputy Minister, GNWT – Lands