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February 17, 2017

Dear Ms. Bourassa,

The following submission from the Canadian Parks and Wilderness Society – NWT Chapter is in regards to the application to amend the Sahtu Land Use Plan (“SLUP” or “Plan”) following SLUP boundary changes after the creation of the Nááts’ihch’oh National Park Reserve (NANPR).

Currently we do not support the amendment application as we believe that the proposal to zone the entire area as Special Management is a further reduction of the conservation outcome intended through the *February 17, 2012 Ratification Draft* which is referenced in the Background Report for this Amendment Application.<sup>1</sup> Our position on this matter is based on the information collected during the NANPR establishment process, and the compromises made to accommodate conservation and potential development within the NANPR – Proposed Conservation Initiative (PCI) study area, and Tulita District.

It has been our understanding that Nááts’ihch’oh was set aside for conservation as an opportunity to protect important ecological and cultural values, while other lands in the Tulita District were left open for economic potential. We are aware that compromises were made during the final draft of the SLUP where conservation zones were adjusted to accommodate access to areas with identified mineral and hydrocarbon potential, and the pursuit of a National Wildlife Area for the Shúhtagot’ı̨në Nënë study area was terminated. It was then also determined that Nááts’ihch’oh would continue to move forward as a conservation initiative. Respecting these decisions, we participated in the public consultation process for Nááts’ihch’oh, supporting the interest to secure protection of ecological and cultural values within a National Park. We supported a boundary for Nááts’ihch’oh that would maximize the conservation opportunity in way that would also respect the presence of third party mineral interests.

The Federal Government’s unilateral boundary decision announced in Norman Wells on August 22, 2012, excluded areas of high ecological value, diminishing conservation outcomes that would have been achieved through the *February 17, 2012 Ratification Draft*, the boundaries that were very similar to the public consultation boundary Option 1 being rejected in favour of a much smaller boundary similar to public consultation Option 3 (also referenced in the Background Report).

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<sup>1</sup> [https://sahtulanduseplan.org/sites/default/files/slupb\\_background\\_report\\_april\\_17\\_2015.pdf](https://sahtulanduseplan.org/sites/default/files/slupb_background_report_april_17_2015.pdf)

We are concerned that the proposed Special Management Zoning is a far departure from the *February 17, 2012 Ratification Draft*. It appears that areas that were intended to be in NANPR are now being negotiated further away from conservation. This is apparent in the GNWT submission March 8, 2016 which requested that the majority of the amendment area be zoned as General Use. We feel that the GNWT submission disregards the exceptional ecological values documented during the NANPR establishment process and elsewhere, and runs contrary to the *February 17, 2012 Ratification Draft* to which the GNWT had previously been party to.

Furthermore the NANPR legislation allows for the development of roads and access through the Park to allow the development of existing mineral leases. This is in addition to the grandfathered Howard's Pass Access Road which is currently undergoing Environmental Assessment for expansion into a double lane haul road. Much has already been done to accommodate industrial development within the area considered for NANPR even though the area was put forward as a priority for conservation, yet this proposed application amendment still increases the possibility of further industrial development.

The negative consequences to wildlife, particularly for broad ranging species such as grizzly bear and mountain caribou, could be substantial. Consider that of the original PCI only 43% of documented calving and post calving habitat for mountain caribou is protected in NANPR, and the headwaters of the South Nahanni Watershed are left open to potential future development. The Ecological Integrity in both Nahanni and Nááts'ihch'oh NPRs would be at risk. Sustainable economic opportunities such as tourism could be diminished and food security issues could arise.

We believe that the governments of the Northwest Territories and Canada are under the scrutiny of the public both in the NWT and across Canada to reconvene on the boundary issue and to ensure that NANPR more fully contributes to the protection of the South Nahanni Watershed. We submit that this Amendment Application should be reconsidered to allow for the conservation outcomes that were intended by the *February 17, 2012 Ratification Draft*.

We suggest that a solution to the boundary issue should be pursued before zoning is finalized. This could be done by going back to the point were the *February 17, 2012 Ratification Draft* was approved by members of the Tulita District Dene and Metis, and expanding NANPR with the support of Canada and the GNWT. Until, the current PCI designation should remain.

We appreciate the opportunity to submit on this important matter,



**Kris Brekke –Executive Director**

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