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Sahtú Land Use Planning Board
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ATTN: Heather Bourassa, Chairperson

Delivered via email

July 27, 2018

RE: Comments on *The First 5 Years: A Look Back to Move Forward*

Dear Heather,

Thank you for the opportunity to submit comments on the Sahtú Land Use Planning Board's (SLUPB) document, "*The First 5 Years: A Look Back to Move Forward*". The ʔehdzo Got'Inę Gots'ę Nákedı (Sahtú Renewable Resources Board or SRRB) appreciates the opportunity to provide input to the SLUPB and approving parties (Sahtú Secretariat Incorporated, Government of the Northwest Territories and Government of Canada) on the scope of plan amendments to be undertaken for the five-year review of the Sahtú Land Use Plan (SLUP).

In 2017, the SRRB conducted a review of our mandate under the SDMCLCA, and updated our strategic plan to reflect the Board's evolving approach. The mandate review focused on a reinterpretation of our role under Chapters 13 and 14 in relation to Section 1 objectives and our analysis of the current Sahtú context. The strategic plan formally adopts a community conservation planning approach to fulfilling the SRRB's mandate. We understand that such a shift in strategic approach has implications for our role in the regional integrated resource management system. The SLUPB's five-year review offers an ideal opportunity to consider our responsibilities with respect to both the review and plan implementation, and the comments herein are in part an outcome of this self-reflection.

Over the past five years the SRRB has been actively involved in several intersecting community-driven programs that may be relevant to the SLUPB's five-year review:

- The Ne Ƙ'ə Dene Ts'ıı (Living on the Land) Forum (established in 2013 under the name Sahtú Environmental Research and Monitoring Forum) to address evolving regional needs for advice and coordination support for the traditional economy, on the land, research and monitoring initiatives of Sahtú community members and leadership organizations;
- Development of two caribou-focused community conservation plans: the Déłıne Got'Inę Government's *Belare Wıle Gots'ę ʔekwé – Caribou for All Time* plan addressing conservation needs for Bluenose East ʔekwé (now approved by the SRRB and the NWT Minister of Environment and Natural Resources; and the *Nıo Ne P'ęne Ɓegháré Shúhta Go Ɓepé Narehǎ –*

Trails of the Mountain Caribou plan in partnership with the Tulít'a and Norman Wells ʔehdzo Got'jné (Renewable Resources Councils) and Tu Łidlini (Ross River) Dena Council.

- A number of youth-centred initiatives to build present and future environmental leadership, including Cross-Cultural Research Camps, Dene Ts'ı̨ı̨ School, and the Sahtú Youth Network.
- More recently, Sahtú community leadership initiatives to establish three Indigenous Protected Areas and advance their land protection goals and initiatives. These represent a new model for conservation and reflect a community-based approach that is core to the mandates of both the SRRB and the SLUPB. Plan amendments will need to reflect this emerging conservation model and support this important work; and
- The Sahtú Dene Council's "Sahtú Nę K'édiká – Keepers of the Land" Guardian initiative linked to the three proposed Indigenous Protected Areas that will include traditional knowledge and collaborative scientific research, monitoring, and education at on the land camps.

The SRRB's intent is to bring these initiatives to the SLUPB's attention and identify potential implications for SLUP Amendment so that the topics can be included within the scope of amendments. The SRRB does not have specific amendment recommendations in all cases as these are evolving initiatives and community-driven. The SRRB would like to emphasize that much of the direction for amendments will need to come from the Sahtú communities and the SRRB strongly encourages the SLUPB to work closely with the communities throughout the plan amendment process.

The SRRB comments were compiled by Heidi R. Wiebe Consulting Ltd., and are organized in the following order:

- Broad comments on plan amendment, including descriptions of the above programs and their implications for plan amendment;
- Specific comments relating to the establishment of three Indigenous Protected Areas, and their implications for SLUP amendment;
- SRRB comments on the specific questions, assessment and recommendations identified by the SLUPB in its "First 5 Years" document.

The SRRB is submitting these comments as an initial response to assist the SLUPB and the approving parties to set the scope of amendments. As a regional co-management board within the Sahtú region, the SRRB expects to be engaged in defining the specific amendments to be made, and will provide more detailed proposals to support its recommendations as the amendment process progresses. Given the time it will take to carry out some of the work proposed, it would be beneficial to see a timeline for the amendment process, with opportunities for input clearly defined, as soon as possible.

We look forward to working with the SLUPB on its plan amendment process.

Máhsı cho,



Deborah Simmons
Executive Director

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Broad Comments

1. **BROAD SCOPE:** The SLUPB and the approving parties should scope this amendment process to make whatever changes are necessary for the plan to provide clear direction for land use that reflects the values and needs of the residents and communities of the Sahtú, while having regard to the interests of all Canadians. Known amendments should not be left out due to resource constraints for the simple reason that this next plan may last well beyond its intended five-years. The next five-year review may determine that a plan amendment is not required, meaning the current version could last 10 years or more. Further, both the Nááts'ihch'oh amendment process and the Gwich'in Land Use Planning Board's five-year plan review (now in year 15) point to the difficulties in completing and approving amendments within a timely manner. The plan amendment should therefore be scoped to include the full list of known and desired revisions to the plan, Implementation Guide and Background Report (update research, emerging issues). Beyond submitted comments, the SLUPB is in the best position to identify what should be included on the list of amendments.
2. **COMMUNITY-BASED APPROACH:** We recommend that the SLUPB scope and determine the amendments in close collaboration with the Sahtú communities. Regional planning has often been described as community-based planning. However, we do not see a community-based approach reflected in "The First 5 Years". The document speaks to a closer collaboration with the approving parties than the communities, despite the fact that community interests must be central to any planning process. This will take much more than one round of community engagement to be effective.
3. **PROPERLY RESOURCED:** The SLUPB, the approving parties, and Sahtú communities will all need to be properly resourced to carry out an effective amendment process.
4. **NEĀ K'Ā DENE TS'ĪĪ (LIVING ON THE LAND) FORUM:** The SRRB established the NeĀ K'ā Dene Ts'īī (Living on the Land) Forum in 2013 (formerly known as the Sahtú Environmental Research and Monitoring Forum). This Forum addresses many of the topics listed as potential actions for the Sahtú Land Use Working Group (Action #1 under the SLUP) to address, including development of a five-year research and monitoring strategy and five-year traditional economy and on the land strategy; updates on activities in progress; discussion of research licences under review; discussion of traditional knowledge processes; identification of regional priorities and gaps; collaboration on research, communications, and information sharing, etc. The SLUPB is more than welcome to consider using this Forum to address plan-related topics. The Forum has expressed an interest in making changes in membership and scoping to make this an effective regional forum that can address diverse purposes in environmental decision-making, and to reduce the challenges in scheduling, workload and funding that would result from running separate working groups for the two boards. The SRRB has established multiple sources of funding to support the Forum's costs, giving it the necessary stability to be a long-term mechanism for regional discussions.

Should the SLUPB decide to establish its own Working Group as currently proposed in Action #1, then the SRRB requests that it be a formal member of the Working Group.

Implications for SLUP Amendment

If the SLUPB accepts the SRRB's invitation, then Action #1 would need to be revised accordingly. If Action #1 is maintained as written, the SRRB would like to be formalized as a member of that group.

5. **NE K'ÁDIKÁ – KEEPERS OF THE LAND PILOT GUARDIAN PROGRAM:** The SRRB has recently been supporting a Sahtú Dene Council initiative to establish a Sahtú regional *Ne K'ádiká – Keepers of the Land* Pilot Guardian Program. The program is focused on supporting the three proposed Indigenous Protected Areas described under Item 6 below. Activities will include Guardian fieldwork, traditional knowledge and collaborative research and education with knowledge holder and youth focus groups in the community and at on the land camps, monthly Interagency Working Group meetings, and participation in regional, territorial and national Guardian networking activities.

Implications for SLUP Amendments

- a. Building community knowledge and capacity for land use monitoring and research will contribute to the successful implementation of Action #2 (Inspection and Enforcement Priorities) and R#3 (Community Land Use Monitors), and the initiative should be referenced and supported through these Actions and Recommendations.
 - b. Action #2 could be restructured to link the Sahtú Dene Guardian initiative with government inspection and enforcement responsibilities. This should be discussed with the Sahtú Dene Council.
 - c. The initiative will increase local knowledge of ecological and cultural values that can be included in zone descriptions, an updated background report, and generally lead to better informed land use decisions.
6. **ESTABLISHMENT OF INDIGENOUS PROTECTED AREAS:** The SRRB is supporting the Sahtú communities in their efforts to establish three Indigenous Protected Areas within the Sahtú. These processes are in progress and may result in further zone changes and other amendments over the next few years. A brief background on Indigenous Protected Areas and each of the initiatives follows, including an assessment of implications for SLUP amendments. The SLUPB will need to work closely with the SRRB, the Sahtú communities and their partners to align the SLUP with these initiatives. The three proposed Indigenous Protected Areas are:
 - a. the Ts'uude Nl̄l̄ne and Tuᓇeyeta (Ramparts River and Wetlands)
 - b. Nío Ne P'ęnė -Trails of the Mountain Caribou (K'á Tė/Willow Flats, Tu łidlini/Ross River, and areas bordering Nááts'Jhch'oh National Park)
 - c. Tsá Túé (the UNESCO-recognized International Biosphere Reserve encompassing the Great Bear Lake watershed).

Specific Comments Related to Proposed Indigenous Protected Areas

A brief description is provided of IPAs broadly, and the specific context for each initiative, followed by the potential implications for SLUP amendment.

Indigenous Protected Areas

In February 2018, Canada released its 2018 budget with \$1.3 Billion in funding to establish new conservation areas, including Indigenous Protected Areas to achieve Canada's Aichi Target of 17% conservation by 2020.¹ There is a two-year window of opportunity to establish new areas. While most Indigenous Protected Areas have no legal protection status on their own, they are an important vehicle for reconciliation, and provide a framework for Indigenous led conservation, that when paired with other legal designations, will achieve Canada's conservation targets and Indigenous peoples' goals for stewardship and protection of the land. IPAs are an evolving concept; even their manner and process of establishment is not yet clearly defined. The SLUPB will need to monitor these initiatives in the Sahtú and work with the communities and their partners to determine how the plan can best reflect the outcomes of these processes and support the communities' interests.

Implications for SLUP Amendments

- The SLUP Amendments will need to reflect the final status of the three areas being established.
- The definitions of Proposed Conservation Initiatives (PCIs), Established Protected Areas (EPAs) and how the plan addresses dual designations (S. 2.2. of the Plan) may need to be revised (in collaboration with relevant parties) to include IPAs and reflect their evolving, and potentially non-legal status (the SLUP could also reference the UNESCO Biosphere Reserve status as another non-legal designation).

The inclusion of non-legal "protected area" mechanisms creates challenges given the current definitions and policies in the plan. The PCI designation is a "placeholder" designation that provides interim protection while other processes are underway, with the intent that following establishment, the Plan would no longer apply to the established protected area

The 2013 Plan's Dual Designation policy (S. 2.2) states:

Once a proposed protected area is established, it too will be designated as an Established Protected Area. 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.²

¹ "We Rise Together: Achieving Pathway to Canada Target 1 through the creation of Indigenous Protected and Conserved Areas in the spirit and practice of reconciliation". The Indigenous Circle of Experts' Report and Recommendations. March 2018. Available at: https://static1.squarespace.com/static/57e007452e69cf9a7af0a033/t/5ab94aca6d2a7338ecb1d05e/1522092766605/PA234-ICE_Report_2018_Mar_22_web.pdf

² SLUP (2013), S. 2.2 with similar language under S. 3.2, Established Protected Areas.

If IPAs are paired in every Sahtú case with another legal mechanism, then there is no problem. If however, an area is established solely as an IPA, with the intent of relying on the Plan’s authority for protection, then it will lose that protection once established under the Plan’s current rules. This potential situation will need to be addressed. The SRRB does not have clear recommendations to resolve this at the moment, but wishes to flag the issue. As the situations are evolving differently for the three proposed IPAs in the Sahtú, the SRRB recommends that the SLUPB engage closely with the communities and their partners to find appropriate solutions within the plan.

Ts'ude Nijlne and Tuɔeyeta (Ramparts River and Wetlands)

Ts'ude Nijlne and Tuɔeyeta (Figure 1) has long been identified as an important area to protect. It is an important place for the K’áhsho Got’Inę for trapping, hunting, fishing and camping. It contains critical wetlands and important migratory bird terrestrial habitat, and is home to six species at risk. In 2012, the Working Group released its recommendation report, with a recommended boundary of approximately 10,100 km² and proposed designation as a National Wildlife Area under the authority of the National Wildlife Act.

When Devolution occurred in 2014, all work on candidate protected areas was put on hold. In 2016 the K’áhsho Got’Inę leadership requested a dual designation as a joint territorial and federal protected area. In July 2017 the GNWT responded that it preferred a “territorial legislation only” designation.

Figure 1. Ts'ude Nijlne and Tuɔeyeta



With the announcement of funding for new conservation areas, including IPAs, the K’áhsho Got’Inę Leadership met again in April 2018 to discuss its options. The discussions indicated a community preference for a joint designation of Canada National Wildlife Area – GNWT Territorial Protected Area – K’áhsho Got’Inę Indigenous Protected Area, though no formal decisions were made. The K’áhsho Got’Inę leadership will approach the GNWT and ECCC to determine their interest in such an arrangement and determine next steps.

Implications for SLUP Amendments

- Assuming the recommended boundary from 2012 is maintained, at some point the SLUPB will need to work with the community and the parties to determine zoning for the areas left out (within the current PCI). Given the timing of plan amendments, there is an opportunity to determine that zoning with the parties who have been involved in this initiative for inclusion in the plan amendments.
- The Plan will need to reflect (all) the final designations in its zone descriptions and other relevant places
- It seems likely at this point that at least one other legal protected area designation will be sought for this area, so this area does not require any changes to the dual designation /EPA clauses, but the situation should be monitored.

Nío Nę P'ęńę -Trails of the Mountain Caribou (K'á Tǎ/Willow, Tu łidlini/Ross River, and areas bordering Nááts'įhch'oh National Park)

The Shúhtaot'įnę (Mountain Dene) and Métis people of Tulít'a and Norman Wells, and Tu łidlini Dena Council (Ross River, Yukon) are preparing a draft Joint Mountain Caribou Plan entitled “Nío Nę P'ęńę Begháré Shúhta Goǎepé Narehǎá – Trails of the Mountain Caribou Management Plan”.³ The plan arose from discussions held between these communities in 2014, 2016 and 2017 over concerns about the impacts of human activities on the dwindling herds of northern mountain caribou and their habitat. The draft management plan was presented to the communities earlier this spring but is not yet complete, approved or ready for distribution.

The plan covers a large area spanning both sides of the Yukon/NWT border and encompassing the Mackenzie Mountain barrens – an expansive, high alpine, tundra plateau near the headwaters of the Keele, Caribou Cry, Hess, Twitya, and MacMillan Rivers. It provides rare summer/fall habitat for the mountain caribou that come from many different places. Four or five groups of caribou use this area. Nío Nę P'ęńę refers to a series of ridges and peaks that stretches from the Twitya River down towards the headwaters of the Redstone River and Nááts'įhch'oh Mountain. Nío Nę P'ęńę is like a backbone that holds everything together. It is the headwaters for much of the Yukon and NWT – all the fresh water comes from there. When it rains it flushes and cleans everything out through both sides of the border.

Nío Nę P'ęńę Begháré Shúhta Goǎepé Narehǎá (Trails of the Mountain Caribou Management Plan) proposes establishment of an Indigenous Protected Area centered on K'á Tǎ – an area of willow flats that is an important traditional use area for Shúhtaot'įnę, Métis and Tu łidlini Dena. This part of the Mackenzie Mountains is also very important to mountain caribou, and many other types of birds, fish and animals. Its unique importance was recognized by the United Nations, who designated it as an International Biological Program Site in 1975, but there is no current protection for this important place.

³ Current rolling draft dated June 26, 2018

The draft Nío Nę P'ęńę plan identifies the need for protection for areas including the K'á Tá traditional area and several areas that were previously identified by Shúhtaot'įneę, yet excluded from the boundaries of Nááts'įhch'oh National Park Reserve (NNPR). However, the plan does not yet clearly identify the mechanism to achieve it. It references the SLUP amendment as a key opportunity. The communities may also consider alternative mechanisms such as a Territorial Protected Area under the GNWT legislation currently under development. The SRRB and communities will work with the SLUPB and approving parties over the course of plan amendments to complete mapping of the area, and determine the most appropriate zoning to achieve the intent of the Nío Nę P'ęńę plan.

The SRRB wishes highlight that the Board previously submitted comments regarding the necessary amendment to the Land Use Plan respecting the areas excluded from NNPR on February 17, 2017, and June 29, 2015. The SRRB remains of the view that these areas remain ecologically important and in need of protection, as they include critical habitat such as caribou calving grounds. Zone 41 should be designated as a Conservation Zone, not a Special Management Zone as proposed. Special management zoning of Zone 41 lands would not adequately protect the wildlife conservation and cultural values documented through the extensive compilation of scientific and traditional knowledge and consultation undertaken in the establishment of Nááts'įhch'oh. There has been no new evidence presented to support changing the original PCI designation (or equivalent Conservation Zoning) of the areas in question. Moreover, Tulít'a and Norman Wells leaders have discussed protection of these areas as part of their review of the Nío Nę P'ęńę plan, and have agreed to discuss conservation objectives for Zone 41 at a joint leadership meeting as part of the plan approval process in the fall of 2018. Figures 2 and 3 show the proposed land management within Nío Nę P'ęńę Beghárę Shúhta Goęepę Narehą generally, and a standalone graphic of the Proposed IPA for clarity.

Additionally, the Caribou Management Plan proposes the establishment of Indigenous Resource Laws that could be applied to resource development. The SLUP is identified as a means of implementing these through the development or revision of Conformity Requirements (CRs). The SRRB therefore suggests that the SLUPB and approving parties consider the possibility of new or amended CRs within the scope of its amendments. If agreed, the SRRB will work with its partners to submit proposals for CRs within the SLUPB's timelines for the plan amendment process.

Implications for SLUP Amendments

- Revised zoning to protect the proposed Indigenous Protected Area within the Nío Nę P'ęńę Planning Area, including Zone 41 lands (either Conservation Zone or Proposed Conservation Initiative depending on the mechanism used for the K'á Tá portion)
- Potential addition or amendment of CRs to reflect Indigenous Resource Laws

Figure 2. Proposed Land Management within Nío Nę P'ęńę Beghárę Shúhta Goęepę Narehą

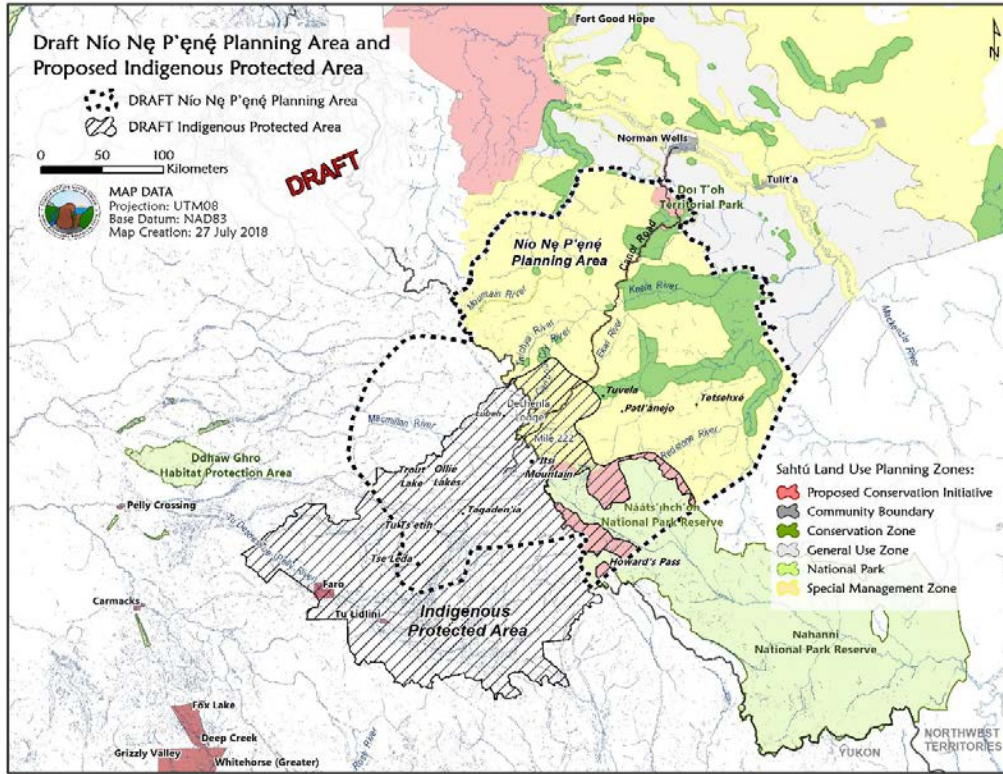
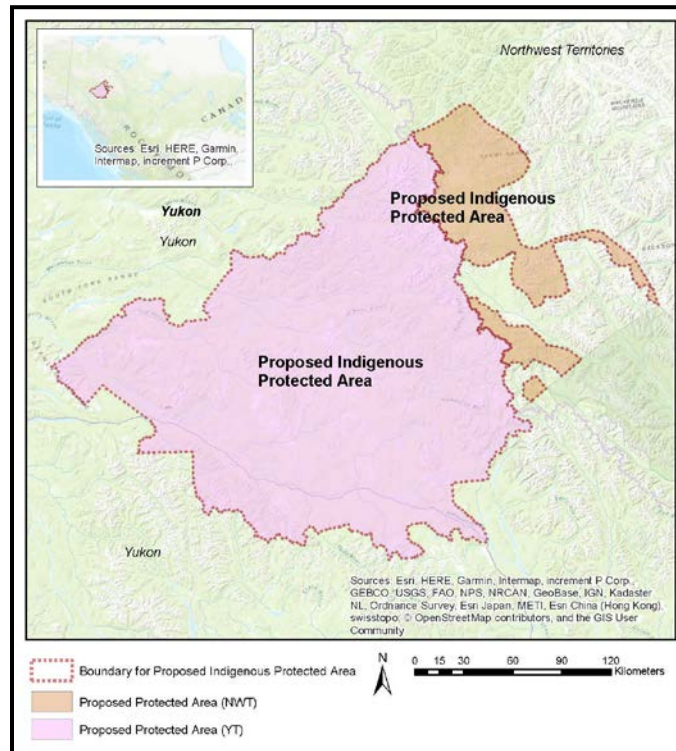


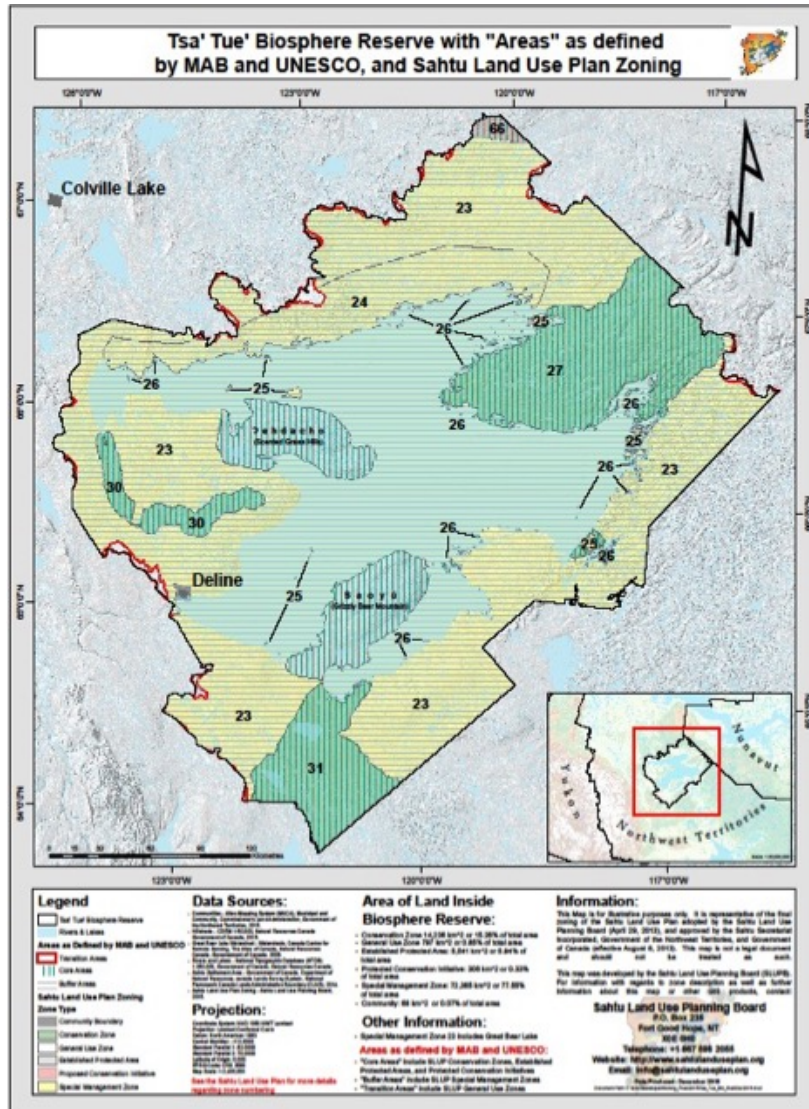
Figure 3. Proposed Indigenous Protected Area within Nío Nę P'ęńę Beghárę Shúhta Goęepę Narehą



Tsá Túé Biosphere Reserve and Proposed Indigenous Protected Area

In 2016, UNESCO (United Nations Educational, Scientific and Cultural Organization) designated the portions of the Great Bear Lake watershed lying within the Délı̨nę District as the Tsá Túé Biosphere Reserve. The Biosphere Reserve is shown in Figure 4 in relation to current SLUP zoning. Further, the Délı̨nę Got'ı̨nę Government (“DGG”) intends to work with Canada and the GNWT to manage and maintain the ecological integrity of Great Bear Lake and its watershed as an Indigenous Protected Area. Neither the UNESCO Biosphere Reserve status, nor the Proposed IPA provide any legal protection to the area. The SLUP provides the only mechanism for legal protection and land management within the area (with the exception of Saoyú ʔehdacho National Historic Site). The SLUPB will need to work with the DGG to identify any zone changes required to achieve the level of protection expected under these two new designations.

Figure 4. Tsá Túé Biosphere Reserve and SLUP Zoning



Implications for SLUP Amendments

- Update the plan to recognize the UNESCO designation of Tsá Tué Biosphere Reserve and the intent to designate the area as an IPA
- Alignment of zone boundaries with the area designated as a UNESCO Biosphere Reserve
- Zone changes as determined by DGG to achieve the desired level of protection through the SLUP

Comments on the SLUPB’s “The First 5 Years” Document

Table 1 follows the order of questions posed in “The First 5 Years” document, highlighting the SLUPB’s assessment and recommendations to each question, and providing the SRRB’s comments. This format allows the SRRB to link its broad comments and initiatives to specific questions and recommendations identified in the SLUPB’s document.

Table 1. SRRB Responses to SLUPB Recommendations for Plan Amendment

Question	SLUPB Assessment	SLUPB Recommendation	SRRB Comments
Do the vision and goals still reflect the values of the region?	Vision and goals are too broad, and it is too early to determine.	<ul style="list-style-type: none"> • Revise the goals as statements that can be measured and benchmarked to the implementation of other SLUP Sections, primarily conformity determinations, actions and recommendations. • At least one round of community consultations held in the 5 Sahtú communities and Yellowknife should be conducted to seek input on the SLUPB Vision and Goals. • That input should be brought to the SLUPB to consider any amendments needed to Section 1.5. 	<ul style="list-style-type: none"> • No specific comments • These questions are fundamental to the direction of the plan and must come from the Sahtú communities. The SLUPB will need to fully engage Sahtú communities in these revisions.
Is the Plan achieving the vision and goals of the region and of individual zones?	Vision and goals lack measurability; lack information to measure their effectiveness	<ul style="list-style-type: none"> • Support for a round of community consultations conducted to seek input on the SLUPB Vision and Goals. • Consideration should be given to revising the Goals as statements that can 	

Question	SLUPB Assessment	SLUPB Recommendation	SRRB Comments
		<p>adequate incremental funding.</p> <ul style="list-style-type: none"> All Approving Parties and Planning Partners should have dedicated resources (i.e. staff/consultants/legal and travel) to fulfill their obligations (meeting participation, document reviews) of the approved scope. All Approving Parties and Planning Partners will adhere to a timeline that will keep the process advancing at a reasonable pace to achieve the objectives of the approved scope. 	
<p>Is there new information available that needs to be considered in land use decisions?</p>	<p>The SLUPB has monitored and collected releases of new information and refined zones at 1:50,000 scale.</p>	<ul style="list-style-type: none"> Decisions should be made regarding the incorporation of new information. One option is for the SLUPB to conduct a comprehensive revision of the Background Report. The alternative would be to scope potential amendments and then selectively review only the relevant new information that would target the decisions to be made. There should be an opportunity for review and public comment on proposed 1:50,000 scale zoning maps. This should include focused work at the community level with Planning Partners that have knowledge of specific zones. 	<ul style="list-style-type: none"> The Background Report is 10 years old. If SLUPB has been tracking new info then they are in the best position to determine the scope of revisions needed to the report to bring it up to date. Recent status changes in species at risk (Boreal caribou now threatened, barren-ground caribou may soon be listed as threatened) should be reflected as those will trigger range planning work with implications for the plan. The Sahtú communities and ʔehdzo Got'Inę (Renewable Resource Councils) should be engaged in reviewing the zone descriptions for accuracy. The SRRB has initiated considerable research through CIMP since 2013 that could be referenced, including projects related to water features, the impacts of slumping on water, caribou population diversity, etc. We can provide relevant

Question	SLUPB Assessment	SLUPB Recommendation	SRRB Comments
<p>Have there been changes in Proposed Conservation Initiatives that need to be updated in the Plan?</p>	<p>There have been no changes in 3/4 PCIs. Nááts'įhch'oh is now established.</p>	<ul style="list-style-type: none"> Amendments proposed by the SLUPB regarding Zone 41 should be brought forward and incorporated into the scope of amendments that may come from the five-year Review. The SLUPB shall continue to monitor and seek input from the various parties engaged in seeking permanent protection for PCI Zones 39, 65, and 66 to determine if there are any potential amendments to consider. 	<p>details to SLUPB if included in the scope of amendments.</p> <ul style="list-style-type: none"> The SRRB is proposing alternative zoning for Zone 41 and parts of Zone 38 (K'á Tá) resulting from Níó Nę P'ęnę Begháré Shúhta Gooęepé Narehǎá (Trails of the Mountain Caribou Management Plan) and is prepared to submit more detailed comments in support of its proposal during plan amendments. SRRB is supporting community efforts to establish Indigenous Protected Areas in Zones 65, the zones within the Great Bear Lake Watershed, Zone 41 and parts of Zone 38 (K'á Tá). See descriptions provided under Item 6 of Broad comments. The SLUPB should work with all parties involved in these initiatives to determine the appropriate zoning and plan revisions to reflect the intent of these designations and community interests.
<p>Are there new land uses, issues, or major projects on the horizon that need to be addressed?</p>	<ul style="list-style-type: none"> A number of Draft 3 Actions and Recommendations were set aside that could be revisited. The Sahtú has significant potential for O&G, minerals and interest in a MV infrastructure corridor that could be forecast. Climate change and its impacts on the landscape are important topics. 	<ul style="list-style-type: none"> Consider revisiting topics (Actions and Recommendations) raised during SLUP development that were not included in the approved SLUP. Review Oil and Gas and Mineral exploration interests to determine if the SLUP is consistent with current regional, territorial, and federal objectives. In addition consider industry needs for future development, as well as potential impacts to traditional land users, 	<ul style="list-style-type: none"> Most of the Draft 3 Actions were merged into Action #1 – Sahtú Working Group. The direction for Actions and Recommendations came from the communities. Communities should be meaningfully involved in their future place in the plan. The Sahtú communities are divided over oil and gas and mineral exploration. The SRRB started the “Best of Both Worlds” project to assess the mixed economy in the Sahtú including the role of the traditional economy per objectives outlined in the SDMCLCA. This work could be incorporated into plan amendments.

Question	SLUPB Assessment	SLUPB Recommendation	SRRB Comments
		<p>local communities, and environment.</p> <ul style="list-style-type: none"> • Seek to bring clarity by identifying a preferred Mackenzie Valley Infrastructure Corridor in the SSA. • Revisit the linkage between land use planning and climate change. Does the SLUP adequately consider the attitudes expressed in the region to inform future land use activities? 	<ul style="list-style-type: none"> • Communities will need to be core participants in any consideration of the future of oil and gas, minerals and infrastructure development in the region. • The SRRB’s mandate includes forest management planning which will address some of the key changes from climate change (fire, shrubification). This will inform the SLUP when done. • Boreal Caribou are listed as threatened under the federal <i>Species at Risk Act</i>. The GNWT has a legal obligation to protect critical habitat on non-federal lands. The NWT is developing a range plan for the NWT population. It’s possible range plans for other species (e.g. Barren-Ground Caribou) will be needed in the future. The SLUP is viewed as a key mechanism to legally implement range plans. Individual land use zones may need to be re-assessed with the protection of critical habitat in mind.
<p>Have there been any challenges related to the implementation of CRs that need to be addressed?</p>	<p>Planning partners are generally positive about implementation but the Plan hasn’t really been tested. Assessment Report identified CRs 2 and 3 as most challenging, then 7, 12 and 14. The SLUPB’s 2 conformity determination processes followed the SLUPB’s Rules of Procedure, not the Best Practices laid out in the Plan’s Implementation Guide.</p>	<ul style="list-style-type: none"> • Through consultation with regulators, or as part of the Action #1, the SLUPB may request additional input on how conformity determinations are being incorporated into decision making processes. • It would be the SLUPB’s opinion that no amendments regarding conformity determinations are needed at this time. What would be more appropriate is to review and update the 	<ul style="list-style-type: none"> • Agreed. • The SRRB further recommends that any challenges with CRs be discussed through the Nę K’ə Dene Ts’ı̀ı (Living on the Land) Forum or the Sahtú Land Use Working Group if established.

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		<p>Guide to incorporate legislative changes since 2013.</p> <ul style="list-style-type: none"> Review implementation practices as they pertain to SLUP Section 5.1-<i>Shared Responsibility for Implementation</i> and consider potential amendments. This should be done in consultation with the governments, co-management regulators and other appropriate parties, or as part of a SLUP Action #1- Working Group. It may be more appropriate to address these issues as part of an Implementation Guide review. 	
<p>What progress has been made on Actions?</p>	<p>Lack of interest and funding to establish Working Group. Other Actions hard to assess progress for as they are open-ended but also no work being driven by them.</p>	<p>In consultation with the three Approving Parties, the SLUPB seeks to review the Actions to determine a path forward. The fundamental question being: is there value in having non-binding actions directed to non-SLUPB actors in the hopes that they will recognize and advance the Action as presented in the SLUP, or should the Actions be re-written to include implementable indicators with reasonable timeframes for completion?</p>	<ul style="list-style-type: none"> Action #1 could be revised to use the Nę K’ə Dene Ts’ı̄l̄j̄ (Living on the Land) Forum to discuss plan-related items. If Action #1 is maintained as written, the SRRB would like to be formalized as a member of that group. Decisions regarding the future of Actions in the Plan, and any revisions being considered should be made with full participation from communities, and those parties listed in the Actions.
<p>How effective are the current Recommendations?</p>	<p>Assessment found no evidence of any significant implementation</p>	<p>In consultation with the three Approving Parties, the SLUPB seeks to review the Recommendations to determine a course of action. The fundamental question being: is there value in having non-</p>	<ul style="list-style-type: none"> R#3: The SRRB is supporting a pilot program of the Sahtú Dene Council called “Sahtú Nę K’əd̄iké – Keepers of the Land” that will include guardian fieldwork, traditional knowledge and collaborative research and

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		binding recommendations, or should the recommendation be revisited in terms of conformity requirements?	<p>education at on the land camps. Once successfully launched, this program will increase the number of trained monitors within each community, with whom applicants can work to fulfill this recommendation.</p> <ul style="list-style-type: none"> • Decisions regarding the future of Recommendations in the Plan, and any revisions being considered should be made with full participation from communities.