



Parks Canada Preliminary Screening under the *Mackenzie Valley Resource Management Act* (MVRMA)

Parks Canada has conducted this preliminary screening pursuant to sections 124(2) and 125(1) of the *Mackenzie Valley Resource Management Act* (MVRMA) and has determined that it **is not** referring the proposal to establish Thaidene Nene national park reserve to the Mackenzie Valley Review Board for environmental assessment. Decision reasons are provided in Section 8 of this document and further supplemented by the material provided in Appendix 2.

- Sections 4-7 (Development description, Potential outcomes of establishment and assessment of potential impacts, Mitigation measures, Consultation) provide relevant background concerning the development's scope and context.

TYPE OF DEVELOPMENT:

- ✓ New
- ✓ Does not require permit, licence or authorization and is proposed by Parks Canada (MVRMA s. 124(2))

1. DEVELOPMENT TITLE & LOCATION

Title: A Proposal to Establish Thaidene Nene National Park Reserve of Canada

Location: East Arm, Great Slave Lake, Northwest Territories (Figure 1)

2. PROPONENT INFORMATION

Protected Areas Establishment Branch

Protected Areas Establishment and Conservation Directorate

Parks Canada Agency / Government of Canada

pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca

3. FILE #

TNNPR-001

4. DEVELOPMENT DESCRIPTION (as posted on the preliminary screening section of the Mackenzie Valley Review Board's public registry)

Establishment Process

The proposed Thaidene Nene National Park Reserve of Canada (hereafter Thaidene Nene) is situated in the East Arm of Great Slave Lake of the Northwest Territories and is comprised of approximately 14,000 km². The proposed national park reserve is north east of the community of Lutsel K'e and within the territory under land and resources negotiations of the Akaitcho First Nations and the Northwest Territory Métis Nation. The Mowhi Gogha Dè Nùtleè of the settled



land claim of the Tlicho Government overlaps the proposed Thaidene Nene. The proposed national park reserve is also claimed by the North Slave Métis Alliance. Parks Canada is in the process of completing an Establishment Agreement with Lutsel K'e Dene First Nation and an Impact and Benefit Agreement with the Northwest Territory Métis Nation. Parks Canada is also consulting and engaged with the Deninu K'ue First Nation, the Yellowknives Dene First Nation, the North Slave Métis Alliance and the Tlicho Government.

To legally establish Thaidene Nene, agreement must be reached with the Government of the Northwest Territories to transfer the administration and control of the lands to Parks Canada. This will be achieved with the completion of the Memorandum of Agreement for Thaidene Nene National Park Reserve under negotiation between Parks Canada and Government of the Northwest Territories.

At the discretion of Parliament, a bill to establish Thaidene Nene would be passed and the national park reserve subsequently listed under Schedule 2 of the *Canada National Parks Act* (CNPA). It will remain under Schedule 2 as a national park reserve until all claims with respect to aboriginal rights that have been accepted for negotiation by the Government of Canada are settled. This designation recognizes that Indigenous land title has not been resolved and land claim rights are yet to be finalized. Once all the claims are settled, Thaidene Nene may be listed under Schedule 1 of the Canada National Parks Act and would become Thaidene Nene National Park of Canada.

Thaidene Nene will represent the Northwestern Boreal Uplands Natural Region, heretofore unrepresented in the National Parks System Plan.

Supporting Research

As part of the feasibility assessment for Thaidene Nene, studies were conducted on topics including:

- Thaidene Nene State of Knowledge Report
- Preliminary Area of Interest for a National Park in the East Arm of Great Slave Lake
- Ecological Values of the Proposed Thaidene Nene National Park Reserve
- Migratory Tundra Caribou Seasonal and Annual Distribution
- Assessment of Landscape Values (Our Landscape Values) Study - Proposed Thaidene Nene National Park Reserve
- Mineral and Energy Resource Assessment (MERA) - Proposed Thaidene Nene National Park Reserve.

The mineral and energy resource assessment was completed under the direction of scientists from the Geological Survey of Canada. This assessment informed the decision making on the boundary with areas with the highest mineral potential left out of the proposed protected area. The results are available to the public as open files at the following website:
<https://geoscan.nrcan.gc.ca/starweb/geoscan/servlet.starweb?path=geoscan/shorte.web&search1=R=292448:292476>.



Land Withdrawal

The Northwest Territories Lands Act allows for land withdrawals to ensure that no new dispositions on Crown Land are registered. The Northwest Territories legislature enacted a land withdrawal of 33,690 km² that will be in effect until April 1, 2019 for the purpose of establishing Thaidene Nene. All of the proposed area for the national park reserve is withdrawn for both the surface and subsurface estates. However, existing third party leases in the area will be respected. A renewal of the land withdrawal for the proposed area was put into place by the Government of the Northwest Territories (GNWT) on April 1, 2019 with a separate order for the national park reserve lands.

Public Consultations

Consultations with the Canadian public and residents, special interest groups and stakeholders of the Northwest Territories regarding the proposed Thaidene Nene national park reserve spanned from January 2015 to January 2017. This information was compiled in a consultation report produced by an independent consultant entitled “Proposed Thaidene Nene National Park Reserve Consultation and Engagement Report”. The report is available on the Parks Canada website at <https://www.pc.gc.ca/en/pn-np/cnnp-cnnp/thaidene-nene/apprendre-learn/consultations>. The results of the consultations have informed the negotiation of the Memorandum of Agreement for Thaidene Nene (Land Transfer Agreement) with the Government of the Northwest Territories.

Description of Proposal

Parks Canada is working to establish a national park reserve of 14,000 square kilometres. The proposed national park reserve is located in the very picturesque East Arm of Great Slave Lake and highlights the transition from boreal forest to tundra. It is very rich in water features including not only parts of Great Slave Lake, but also, numerous rivers (Lockhart and Snowdrift), lakes (Whitefish, Eileen) and numerous bays (Christie, Maufelly, McLeod and Wildbread). The Lady of the Falls (Tyrell Falls) is not only spectacular but also of great spiritual importance to the Lutsel K'e Dene First Nation. The variety of habitats within Thaidene Nene supports diverse species of mammals, birds, fish and amphibians. Wildlife species projected to occur in the proposed Thaidene Nene national park reserve study area include 42 mammals, 171 birds, 28 fish and 1 amphibian.

Mammal species of particular note include: barren ground caribou, moose, muskox, grey wolf, black and grizzly bear, red and Arctic fox, lynx, wolverine, otter, beaver, muskrat, and snowshoe and Arctic hare. The proposed Thaidene Nene national park reserve would protect parts of the annual ranges of all three barren-ground caribou herds in the area, one herd of which may soon be listed as “endangered”. Ten species of hawks and falcons, two eagle species, osprey and six owl species also occur in the Thaidene Nene study area. Islands and cliffs in the area are known to be important nesting habitat for breeding birds and many rocky islands host colonies of gulls and terns.



Importance of the Thaidene Nene National Park Reserve

- The proposed Thaidene Nene national park reserve has provided sustenance and been travelled by Indigenous peoples since time immemorial and includes numerous areas of spiritual and cultural importance to Akaitcho First Nations and the Northwest Territory Métis Nation.
- The Thaidene Nene area was also part of the early fur trade and exploration activities. Fort Reliance, built for an 1833 British military expedition across the Arctic led by George Back, is now recognised as a National Historic Site. An RCMP detachment and a weather station were also located at Reliance, within Thaidene Nene.
- Despite human use and development pressures, the proposed Thaidene Nene national park reserve has remained a large, relatively intact wilderness area.
- The proposed Thaidene Nene national park reserve will be part of a matrix of land designations supporting conservation and ecological integrity. The matrix includes approximately 12,000 km² of adjoining lands and waters within several territorial protected areas and a wildlife management zone. The 55,000 km² of the Thelon Wildlife Sanctuary are also within close proximity.

4(a). JULY 2, 2019: ADDITIONAL INFORMATION RELEVANT TO DEVELOPMENT DESCRIPTION

Amendments to the CNPA pertaining to the establishment and management of Thaidene Nene were tabled in Parliament on April 8, 2019 and given Royal Assent on June 21, 2019, after Parliamentary review in the House of Commons and the Senate of Canada. However, they will not come into force until the relevant agreements have been signed and executed, the land transferred from the GNWT to Parks Canada, and an Order in Council accepting transfer of the land from the GNWT and bringing the amendments into force is passed.

5. POTENTIAL OUTCOMES OF ESTABLISHMENT AND ASSESSMENT OF POTENTIAL IMPACTS

(posted as part of the Development Description on the preliminary screening section of the Mackenzie Valley Review Board's public registry)

Potential outcomes of the establishment of Thaidene Nene National Park Reserve of Canada include: natural and cultural resource protection; improved ecosystem monitoring; co-operative management with Indigenous partners; visitor access; and facilities and Parks Canada expenditures. The area protected will contribute 0.14 percent towards the Canada Target 1 goal of protecting 17 percent of Canada lands and freshwater by 2020.

Natural and Cultural Resource Protection

The proposed Thaidene Nene National Park Reserve of Canada will be managed under the CNPA. The CNPA protects natural and cultural resources while prohibiting forestry, hydro-electric development and mineral and oil and gas activity.

Hunting and traditional activities

Curtailling non-Indigenous hunting will lead to positive effects on wildlife populations in the national park reserve area. The Government of the Northwest Territories manages hunting



across the territory to ensure that, if hunters move their activities to other areas of the NWT, populations remain sustainable. The significant decline of the barren ground caribou herd populations led to the closure of all guided big-game hunting in the area in 2009 so the establishment of the national park reserve will have no new impacts on this business sector. Similarly, there will be no impact on commercial fishing, which has been prohibited for years.

Within the proposed park reserve First Nations and Métis people will continue their traditional use of the area. Hunting and other traditional activities carried out by Indigenous people will be managed cooperatively to minimize the possibility of conflicts between visitors and traditional users and to ensure the sustainability of harvesting. Any environmental interactions resulting from Indigenous camps, or resource harvesting would occur irrespective of the establishment of the park.

Mineral and oil and gas exploration and development

The establishment of Thaidene Nene will also lead to a prohibition of mineral and oil and gas exploration and development in the area. There is no known hydrocarbon potential in the proposed park nor are there any existing mining operations. Therefore, there will be no impacts on any existing extraction industry.

The final boundary of Thaidene Nene excluded all areas of high mineral values and most of the areas of medium to high mineral values. There have been concerns raised by the mining industry that the Mineral and Energy Resources Assessment (MERA) was insufficient for determining the full potential of the area. Parks Canada has responded that the MERA, completed in 2013, entailed two years of new field work and incorporated those results with work done in the 1980's and an extensive review of known occurrences, deposits and other sources of geological information. It was also peer reviewed.

The other issue that has arisen from the mining industry is a request for a process for a potential corridor through the national park reserve. Parks Canada has responded that, with the reduction in size from a 33,690 km² land withdrawal to 14,000 km², there is both more urgency for Thaidene Nene to remain intact and more options outside the park for any potential corridor. A corridor for industrial use is not permitted under the *Canada National Parks Act*. In addition, with the smaller configuration, the north shore of Great Slave Lake has been removed from the national park reserve to facilitate access to existing and potential mineral areas north of the park. Industrial corridors bisecting critical habitat for caribou, such as the habitat of the severely diminished Bathurst herd, is inconsistent with the purpose of a national park. Thaidene Nene promises to protect an important northern landscape while offering unique visitor experiences and ensuring Indigenous peoples are integral to its management. Investments to promote that vision would be continually at risk if the prospect of industrial corridors were an on-going possibility,

Facilities

In keeping with the wilderness character of the proposed park, outside the Reliance area, there are no current plans for infrastructure within the national park reserve. In the future and



subject to management planning activities, structures of modest facilities such as primitive campgrounds, patrol cabins or mooring buoys may be considered.

Any facilities have the potential to cause minor disruption or loss of wildlife habitat, minor disruption of movements, minor changes to drainage patterns and damage of vegetation in small areas around operational facilities, and increased risk of wildlife-human interactions. Environmental assessments of physical works will be conducted before any facilities are built in the park and these would provide direction in mitigation measures.

A number of existing facilities will continue to be located at Reliance. Among these facilities is Trophy Lodge, an operating fishing and tourism camp, and two leasehold residential properties. A fee simple property at Reliance will remain outside of the national park reserve unless this property is acquired on a willing seller – willing buyer basis. There is also a fuel cache accessed by aircraft and boat traffic. The establishment of the national park reserve will not increase the existing environmental impacts of existing facilities and in the case of the fuel cache, Parks Canada will bring this facility up to environmentally sound standards.

The former Fort Reliance weather station site is located approximately 270 km east of Yellowknife on the eastern end of Great Slave Lake, within the proposed Thaidene Nene. Since 1993, the site has been vacant except for a small automated weather station operated by Environment and Climate Change Canada (ECCC). The site contains abandoned buildings and infrastructure which are remnants from the Department of National Defence's (DND) occupation between the 1940s and early 1970s and from Atmospheric Environment Service's (AES) occupation starting in the late 1950s and ending in the early 1990s. In 2019, ECCC has launched the Fort Reliance Remediation Project to clean up the site.

Most of the buildings on-site are in poor condition and are no longer suitable for future beneficial use. Foundations of the historically significant DND buildings will be left in place for future acknowledgement, potentially through the erection of plaques on-site. ECCC is currently working with the Federal Heritage Buildings Review Office (FHBRO) to confirm a plan to record the legacy associated with those buildings that have a designated heritage status. It is anticipated that the successful contractor will mobilize equipment to the site by barge as early as open water conditions will allow during the spring of 2019 and remediation activities should be complete by the end of the summer, 2019, at which time all equipment and waste material will be removed from site by barge.

Visitor Access

From a 2013 study, it was estimated that the visitor pattern is approximately 500 visitors to the Thaidene Nene area each year.

It is expected that these numbers may increase following park establishment. Increases in park visitation numbers should be expected as a result of new types of service offers from tourism outfitters and the increased profile of Thaidene Nene. Visitor registration will allow for collection of visitation statistics.



As in many remote northern national parks aircraft access will be available in all water bodies. Currently in the East Arm of Great Slave Lake, apart from boat access, air is the only method of access to the area. For visitation, Parks Canada recognizes that maintaining this access is essential. During consultations, aircraft pilots, both recreational and commercial, confirmed that the vast majority of them accessed the area either on skis or floats and therefore water access will accommodate them. An alternative process will be available for any planes on tires. However, increased tourism and Park management activities may increase air traffic which could have a negative impact on wildlife due to noise or visitor-wildlife encounters. The impacts are not expected to be substantially different from the current use and if too many aircraft landing in one location becomes an issue for wildlife or visitor enjoyment, mitigation measures will be considered by the cooperative management body, and implemented.

Visitor Activities

Visitors to the national park reserve will be able to participate in a variety of activities including sailing, kayaking, canoeing and motor-boating, backcountry and front-country hiking, snowmobiling, berry picking, dog-sledding and cross-country skiing. If visitation is increased with the national park reserve, these activities may lead to increased, but minor, disruption of wildlife habitat and movements and minor damage to vegetation in commonly used areas and increased risk of wildlife-human interactions. Visitation will be managed according to the Canada National Parks Act, impacts are therefore not expected to be substantially different from current levels. If adverse impacts from visitation are foreseen mitigation measures will be considered by the cooperative management body, and implemented.

Increased opportunities for tourism may lead to an increase in employment and contracting opportunities in the regional tourism sector.

Parks Canada Expenditures

Parks Canada has agreed that the administration and visitor reception center will be constructed in Lutsel K'e leading to new jobs in the community related to the establishment and operation of Thaidene Nene. Employees of Parks Canada will have increased training and career development, and the potential for stable, long term employment. Also, direct requirements for Parks Canada operations will increase expenditures on services in the community of Lutsel K'e and have a positive effect on the local economy.

In addition to the direct economic benefits from Parks Canada operations in the community of Lutsel K'e, Parks Canada is also making financial contributions for operations carried out by Lutsel K'e in Thaidene Nene. Parks Canada is also engaged in discussions with other Indigenous governments and the Northwest Territory Métis which could support gateway services. This investment in the communities around Great Slave Lake will have local as well as regional benefits from the economic stimulation and promotion of employment opportunities. Also, the anticipated increase in tourism will benefit the local and regional economies, not only in Lutsel K'e, but in order for tourists to travel to the proposed Thaidene Nene, they will also make use of accommodation and transportation services in the gateway communities of



Yellowknife and Deninu K'ue. Spin off effects in all these communities will aid Indigenous residents in building a sustainable conservation economy.

6. MITIGATION MEASURES (posted as part of the Development Description on the preliminary screening section of the Mackenzie Valley Review Board's public registry)

Potential negative effects on the natural environment from facilities, visitor activities and visitor access will be primarily mitigated through the park management plan and environmental assessments for individual developments.

A park management plan is required by the CNPA to be completed within five years of formal establishment under the CNPA. It is expected that the management plan will direct that the park be managed with special emphasis on the protection of wilderness values. Cultural resources will also be managed to ensure a high level of protection and in a manner consistent with the Indigenous agreements, CNPA, and the Parks Canada Cultural Resource Management Policy. To the extent possible, no new development will take place before completion of the park management plan. In that way, the ability to make informed planning decisions will not be compromised. The park management plan can also address broader issues such as cooperation with First Nations and Métis in management of traditional uses of the park and air access. Once completed, the park management plan will be assessed for adverse environmental effects as required by Parks Canada policy and the *Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals*.

Any particular development will be subject to a preliminary screening under the *Mackenzie Valley Resource Management Act* (MVRMA). The required mitigation, surveillance and follow-up will be developed while the proposals progress from the conceptual phase to the design and implementation phase.

7. CONSULTATION

- *Formal public consultation (2015 to 2017) related to park establishment:* please see "Public Consultations" section on page 3 of this document.
- While it continues to change in scope, consultation and negotiations with Indigenous governments has been ongoing, beginning in the early 2000's.
- *Public review related to preliminary screening:* An announcement commencing public review of the Development Description was circulated on April 5, 2019 and, on June 20, 2019, a second public review period was announced ([Appendix 1](#): Distribution List). All documents are posted to the preliminary screening section of Mackenzie Valley Review Board's public registry (<http://reviewboard.ca/registry/preliminary-screenings>) and are accessed by selecting "Thaidene Nene Park Establishment" from the Development drop-down menu. Documents include:
 1. Development Description (posted April 5, 2019)
 2. Comments Received in Response to the Development Description: April 5-May 6, 2019 (posted May 17, 2019)



3. Parks Canada Response to Comments (posted June 20, 2019)
4. Comments Received During Second Public Review Period (posted July 3, 2019)

8. DECISION

Parks Canada has conducted this preliminary screening of the "Proposal to Establish Thaidene Nene National Park Reserve of Canada" (the proposed development) pursuant to the *Mackenzie Valley Resource Management Act* (ss. 124(2)) and 125(1)), and has concluded that it **is not** referring the proposal to establish Thaidene Nene national park reserve to the Mackenzie Valley Review Board for environmental assessment.

Reasons for Preliminary Screening Decision

A summary of all comments received and Parks Canada's response, can be found in [Appendix 2](#). The Appendix forms part of this preliminary screening decision.

There is no reasonable likelihood that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment (natural environment, social cultural resources, or heritage resources). Establishment of the national park reserve in legislation will preclude industrial development and, as such, may result in positive long-term environmental outcomes. For example, the proposed park reserve would protect parts of the annual ranges for barren-ground caribou herds in the area, one herd of which may soon be listed as "endangered". Additionally, the *Canada National Parks Act* (CNPA) requires the maintenance or restoration of ecological integrity to be the first priority when considering the management of national parks and national park reserves. Should developments (e.g.: modest facilities such as primitive campgrounds, patrol cabins or mooring buoys) be proposed within the park reserve, their scope and intent will be dependent upon direction provided in the park reserve's management plan, which will be developed cooperatively with First Nations and Métis and in consultation with the public and stakeholders; they will also be subject to screening to meet MVRMA requirements and Parks Canada's environmental assessment policies.

Existing Aboriginal and treaty rights in the area will continue to be exercised within Thaidene Nene. Rights holders will continue to travel on the land and engage in traditional resource harvesting activities. These activities will remain unchanged and will not be negatively impacted by the establishment and management of the national park reserve. The permanent protection and cooperative management of the reserve will help protect the Dene and Métis living cultural heritage. The creation of the national park reserve will also increase opportunities for educating others about that heritage.

As per the following information, Parks Canada has determined that there is no reasonable likelihood that establishment of Thaidene Nene national park reserve might be a cause of public concern. Compilation and analysis of results by an independent consultant of the 2015 to 2017 formal public consultations on establishment of Thaidene Nene concluded that there was 90% support for the proposed national park reserve. Comments from an additional 24 individuals/organizations (representing multiple individuals) from the Mackenzie Valley were



received during the two public review periods for this screening. Many of these comments were supportive of the proposed park reserve; citing the area's value to protecting the natural and cultural environment, promoting diversification of the economy, providing benefits for future generations, and enhancing Indigenous-Crown collaboration. However, issues were also raised. These include:

- i. the potential for lost economic opportunity;
- ii. matters related to access, use, and boundary configuration of the park; and
- iii. procedural matters related to the preliminary screening process.

These issues have been further described and addressed in Appendix 2 (Summary of Comments Received during Public Review, and Parks Canada Response), which forms part of this preliminary screening decision. Parks Canada finds that, given the responses provided in Appendix 2, the issues raised have been thoroughly mitigated so that there is no reasonable likelihood that the proposed development might be a cause of public concern. Highlights of these mitigations include:

- Description of numerous activities allowed in the proposed park reserve that are not typically allowed in national parks, in direct response to concerns raised by residents of the Northwest Territories.
- Acknowledgement that in-camera meetings with the East Arm Properties Owners Association were instrumental in the decisions about what would continue to be permitted in the area around Reliance.
- Description of how Indigenous Governments have been involved in engagement, consultation, and negotiations regarding the proposed park reserve.
- Description of funds invested and to be expended by Parks Canada, and opportunities related to economic diversification.
- Results from the Mineral and Energy Resource Assessment resulting in a proposed park reserve boundary that excludes all high, and most medium-high, areas of mineral potential.
- Description of Parks Canada's role as a preliminary screener pursuant to section 124 (2) of the MVRMA

The proposed Thaidene Nene national park reserve has provided sustenance and been travelled by Indigenous peoples since time immemorial and includes numerous areas of spiritual and cultural importance, as identified by the Akaitcho First Nations and the Northwest Territory Métis Nation. In particular, in a submission to this preliminary screening process, Parks Canada has heard from the Lutsel K'e Dene First Nation (LKDFN) that the proposed Thaidene Nene national park reserve is their core primary use area in the LKDFN traditional use area and represents their most important cultural and ecological landscape and they have described it as encompassing "the most important, sacred cultural and heritage places for Dene and Northerners". LKDFN has also expressed that the proposed park reserve forms a significant element of the community's socio-economic and cultural vision for the future and has the potential to set a new standard for Indigenous-Crown collaboration in protected areas. LKDFN has also indicated that they have comfort that any Aboriginal and Treaty rights will not be



impacted by the establishment and operation of Thaidene Nene and that Thaidene Nene is subject to the outcome of land claim and treaty negotiations.

9. APPROVAL


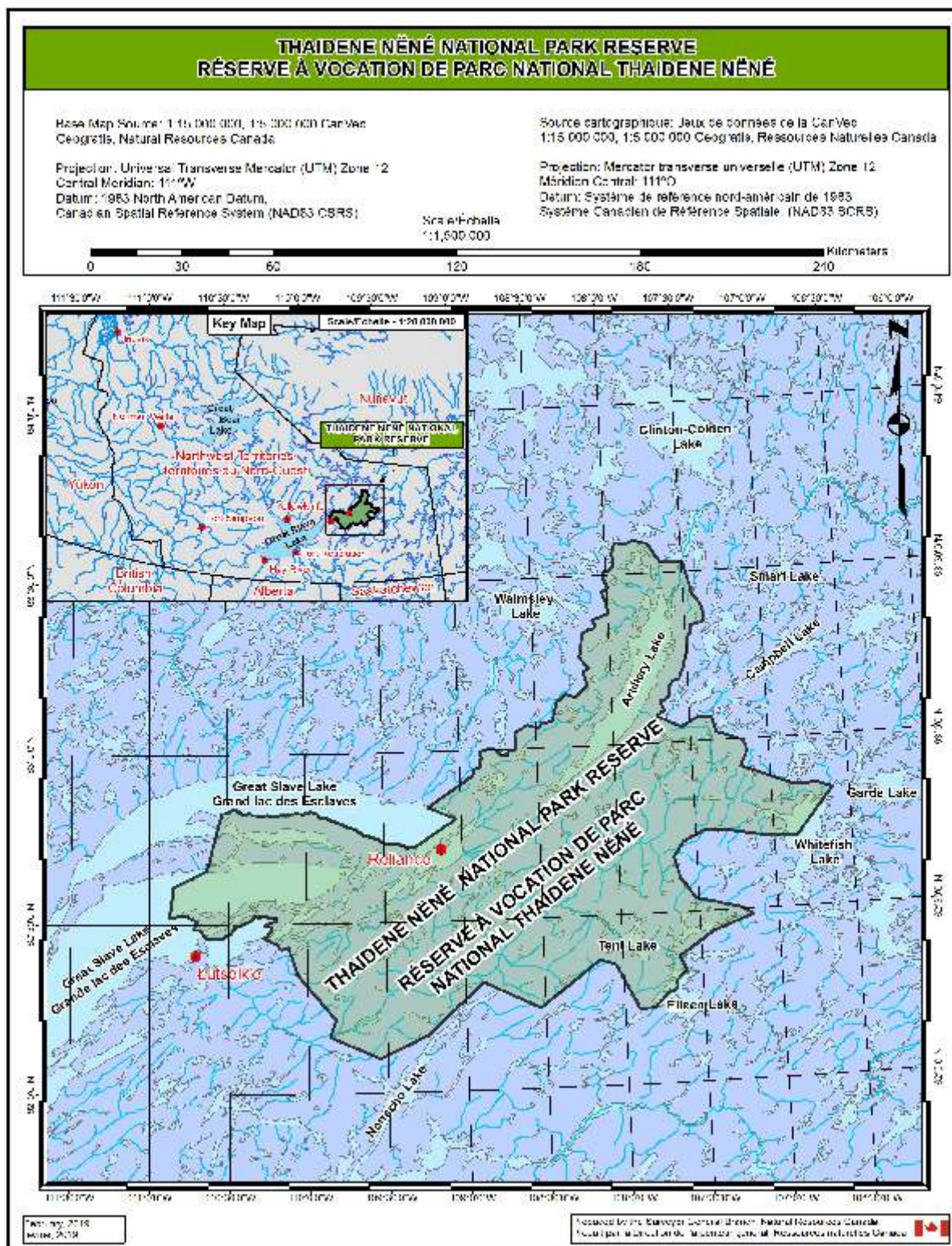
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| Approval Signature:  Kevin McNamee Director, Protected Areas Establishment Branch Parks Canada Agency | Date: Friday, July 5, 2019 |
|---|--|



Figure 1:





APPENDIX 1: Distribution List

| | | |
|--|---|--|
| Air Tindi devon.hicks@airtindi.com bobsc@airtindi.com | Great Slave Lake Advisory Committee ljones@northwestel.net | NWT Floatplane Association/COPA 108 logsdon@theedge.ca |
| Akaiitcho Territory Government secretary@akaitcho.ca tdndepartment@gmail.com | Hoarfrost River Huskies Ltd. base@hoarfrostriver.ca | NWT Recreation and Parks Association gray@nwtrpa.org |
| Alternatives North info@alternativenorth.ca | Ile Royal dconnelly@ileroyale.com | RioTinto alex.clinton@riotinto.com Grant.Stewart@riotinto.com |
| Aurora Geosciences gary.vivian@aurorageosciences.com | LincSat lanedewar@lincsat.com | Seabridge Gold brent@seabridgegold.net |
| Avalon Advanced Minerals dsbubar@avalonam.com mwiseman@avalonam.com | Lutsel K'e Dene First Nation lkdfnlands@gmail.com lkdfn.receptionist@gmail.com | Tides Canada steve.ellis@tidescanada.org |
| City of Yellowknife mayor@yellowknife.ca | Mining North generalmanagernu@miningnorth.com | Tlicho Government georgemackenzie@tlicho.com ambechenemu@tlicho.com |
| Council of Canadians cocnwt@gmail.com | Mackenzie Valley Review Board preliminaryscreening@reviewboard.ca | Trophy Lodge wallacefinlayson@gmail.com |
| CPAWS NWT Chapter kris@cpaws.org | Mackenzie Valley Land and Water Board jpotten@mvlwb.com | Borden Ladner Gervais LLP CMacLeod@blg.com |
| DeBeers Group Erik.Madsen@debeersgroup.com William.Liu@debeersgroup.com | Nahanni Construction Kenny@nahannincl.com | Frontier Fishing Lodge wayne@frontierfishinglodge.com |
| Deninu K'ue First Nation admin@dkfn.ca | Nature United jacqueline.nunes@natureunited.ca tracey.williams@TNC.ORG | Northwest Territory Metis Nation ursula.vogt@nwtmetis.ca |
| Department of Fisheries and Oceans larry.dow@dfo-mpo.gc.ca | North Slave Metis Alliance shin.shiga@nsma.net | NWT Chamber of Commerce admin@nwtchamber.com |
| Ecology North admin@ecologynorth.ca | Northern Air Transport Association glenn@natacanada.org | Great Slave Snowmobile Association moose@theedge.ca |
| Fortune Minerals rgoad@fortuneminerals.com gkoropchuk@fortuneminerals.com | Northwest Territories Tourism executive@spectacularnwt.com brenda@spectacularnwt.com | Northern Security thola@northernsecurityservices.com |
| Government of the Northwest Territories Loretta_Ransom@gov.nt.ca lorraine_seale@gov.nt.ca melissa_pink@gov.nt.ca patrick_clancy@gov.nt.ca glen_mackay@gov.nt.ca Kelly_mahoney@gov.nt.ca | NWT & Nunavut Chamber of Mines executivedirector@miningnorth.com <ul style="list-style-type: none"> Plus four other associated personal email addresses | Ten personal email addresses of concerned citizens |



APPENDIX 2: Summary of Comments Received During Public Review, and Parks Canada Response

| Date Received | From | Public Comment Summary (full text of all comments posted to the <u>Mackenzie Valley Review Board's public registry</u>) | Parks Canada Response |
|--|--|--|---|
| April 9, 2019 | Private Individual Hoarfrost River, NWT | Supportive of establishment and no comments to add. | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| April 25, 2019 (see also submission July 2, 2019) | Department of Environment and Natural Resources, Government of the Northwest Territories | The Department of Environment and Natural Resources, Government of the Northwest Territories has reviewed the preliminary screening information at reference based on its mandated responsibilities under the <i>Environmental Protection Act</i> , the <i>Forest Management Act</i> , the <i>Forest Protection Act</i> , the <i>Species at Risk (NWT) Act</i> , the <i>Waters Act</i> and the <i>Wildlife Act</i> and has no comments or recommendations for the consideration of the Parks Canada at this time. | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| April 26, 2019 | North Slave Metis Alliance (NSMA) | <ul style="list-style-type: none"> Concerned that PCA did not recognize NSMA in the development description and therefore failed to consider and mitigate any impacts on NSMA members' rights Without NSMA involvement in establishment process and in management plan for TDN NPR there is no meaningful way to ensure that NSMA members' rights will not be adversely affected NSMA has no information that it is part of the park's proposed "cooperative management body" or what will be included in the management plan. NSMA needs more details before it can agree to any mitigation efforts undertaken by the body or plan are adequate. | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the information provided in the "<i>North Slave Métis Alliance</i>" and "<i>How have Indigenous Governments been Involved?</i>" sections of Parks Canada's response to comments (posted June 20 and copied following this table) addresses the issues raised.</p> |
| April 30, 2019 | Dave Nickerson | <ul style="list-style-type: none"> NWT residents should be properly consulted and an assessment made by a competent body independent of the proponent Suggests referral to the Review Board for a thorough environmental assessment | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment. Independent assessment of preliminary screenings occurs pursuant to the |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
|---|--|---|--|
| | | | <p><i>Mackenzie Valley Resource Management Act</i> (section 126), through the referral process or determination by the Review Board.</p> <p>Parks Canada believes that the information provided in the "<i>Is the proposed national park reserve responsive to northern interests?</i>" section of Parks Canada's response to comments (posted June 20 and copied following this table) addresses the issues raised.</p> |
| May 6, 2019 | Northwest Territories Floatplane Association | <ul style="list-style-type: none"> • Hope that the park reserve will have no restrictions to access by air, and still be permitted to fish and camp without undue restriction • Concerns regarding accessibility to day use or occasional use permits, as well as the potential associated cost for use of the area if the park reserve becomes established • Supports the exclusion of the Reliance area from the park boundaries | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> • <i>Is the proposed national park reserve responsive to northern interests?</i> • <i>Commercial and Recreational Aircraft Access</i> • <i>Entry Fees</i> • <i>Boundary Options</i> |
| May 6, 2019 (see also submission July 2, 2019) | NWT & Nunavut Chamber of Mines | <p>Supportive of the concept of the establishment of the Thaidene Nene park, but formally expressing significant "public concern" due to:</p> <ul style="list-style-type: none"> • Lack of public details surrounding all consultations for park establishment • Significant economic impact to NWT through inclusions of areas of high mineral content within park boundary • No evidence of any economic studies on these potential economic losses to all residents of the NWT by the removal of such a significantly large area from future mineral and energy development. • Unaware of analysis or trade-off study of the economic impacts of Thaidene Nene versus potential mineral development. • No public discussion of alternative land access options, combined with a smaller park area that could better balance cultural and economic objectives, while guaranteeing the preservation of indigenous rights. | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Independent assessment of preliminary screenings occurs pursuant to the <i>Mackenzie Valley Resource Management Act</i> (section 126), through the referral process or determination by the Mackenzie Valley Review Board.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> • <i>Commercial and Recreational Aircraft Access</i> • <i>Navigable Waters</i> • <i>Money Expended in Investigating the Economic Potential of Resource Development</i> |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
|---------------|-------------|---|---|
| | | <ul style="list-style-type: none"> Require full public disclosure of financing arrangements contemplated by private interests and Parks Canada as part of, or tied to, establishment of the Thaidene Nene Park. Environment and economy are not being balanced. No consideration of industrial corridors for transportation, power or fibre optic communications. Parks Canada has applied an inconsistent approach with respect to corridors through parks. Unaware of any detailed discussion of navigable waterways that are a federal responsibility, through the lake portion of Thaidene Nene Park. Float plane access for industrial purposes absent from Parks Consultation & Engagement Report. The conflict of interest and introduced bias due to the proponent, Parks Canada, being the preliminary screener Ask that Parks Canada refer the proposal to the Mackenzie Valley Review Board for an environmental assessment. | <ul style="list-style-type: none"> <i>Whether the potential for cobalt and lithium was investigated in MERA</i> <i>Alternative Land Access Options, such as corridor duly considered</i> <i>Diversification of Economy</i> <i>Lands currently unavailable to mining</i> |
| May 6, 2019 | Ray Decorby | <ul style="list-style-type: none"> Proposed development limits economic potential of the NWT due to the restriction of resource-rich land for extraction. The consultation process has been narrow in scope, less than inclusive, and not forthright. Supports 1986 boundary proposal of approximately 7000 km², with exclusion of Reliance. Believes a full Environmental Assessment is appropriate | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> <i>Is the proposed national park reserve responsive to northern interests?</i> <i>Boundary Options</i> <i>Reliance Adjustment: Why was it not included in the Consultation and Engagement Report?</i> <i>How have Indigenous Governments been involved?</i> <i>Comparison of Establishment of Thaidene Nene National Park Reserve with Other Economic Opportunities</i> |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
|---|--|---|---|
| May 6, 2019 | NWT Chamber of Commerce | <ul style="list-style-type: none"> • Lack of transparency regarding consultation on proposed boundaries and options • Lack of consideration of all available geoscience information • Lack of meaningful consultation and accommodation with industry, business groups, and Indigenous groups that will be impacted by the park's creation • Supports 1986 park boundary proposal of 7000 km² with remaining 7000 km² set aside through various land management tools • Would like to include a transportation, transmission, and data corridor • Request that an environmental assessment be triggered | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> • <i>Whether the 90% Support for the Establishment of the Thaidene Nene National Park Reserve Represents Northerners</i> • <i>How have Indigenous Governments been involved?</i> • <i>Comparison of Establishment of Thaidene Nene National Park Reserve with Other Economic Opportunities</i> • <i>Money Expended in Investigating the Economic Potential of Resource Development</i> |
| May 6, 2019 | Spencer Decorby & Justine Crowe | <ul style="list-style-type: none"> • Do not wish to be a tenet of Parks Canada • Concerned about creep in park regulations over time and lack of transparency in the process • Concerned that all boundary options were not considered but could tolerate a return to proposed 1986 boundaries, which exclude Reliance | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> • <i>Commercial and Recreational Aircraft Access</i> • <i>Boundary Options</i> • <i>Reliance Adjustment: Why was it not included in the Consultation and Engagement Report?</i> • <i>How have Indigenous Governments been involved?</i> |
| May 6, 2019 (see also submission July 2, 2019) | Borden Ladner Gervais LLP on behalf of East Arm Property | <ul style="list-style-type: none"> • Seeking the Reliance Adjustment, which is omitted from PCA's consultation records provided to date • Concerned with the proposed boundaries for the Park and the lack of alternative boundaries developed and presented for consultation. | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> • <i>Boundary Options</i> |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
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| | Owners Association | | <ul style="list-style-type: none"> • <i>Reliance Adjustment: Why was it not included in the Consultation and Engagement Report?</i> |
| May 6, 2019 | Northwest Territories & Nunavut Construction Association | <ul style="list-style-type: none"> • Proposal would close off “tens of thousands of square kilometers” of the NWT to development • No park boundary alternatives have been presented to public for consideration • Supports "Reliance Adjustment" presented by East Arm Property Owners Association • Request that the development proposal be sent to the Review Board for environmental assessment | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> • <i>Commercial and Recreational Aircraft Access</i> • <i>Boundary Options</i> • <i>Reliance Adjustment: Why was it not included in the Consultation and Engagement Report?</i> • <i>Lands currently unavailable to mining</i> |
| May 6, 2019 | Lou Covello | <ul style="list-style-type: none"> • Excludes access to resources • Many stakeholders ignored during consultations • NWT contains a disproportionate amount of protected areas compared with the rest of Canada • Not in NWT's economic best interest due high commercial interest in the area. Specifically, the resource extraction industry related jobs provided to Northerners, the airlines, and expeditors interest in the proposed area. | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> • <i>Is the proposed national park reserve responsive to northern interests?</i> • <i>Whether the 90% Support for the Establishment of the Thaidene Nene National Park Reserve Represents Northerners</i> • <i>How have Indigenous Governments been involved?</i> • <i>Comparison of Establishment of Thaidene Nene National Park Reserve with Other Economic Opportunities</i> • <i>Diversification of Economy</i> • <i>Lands currently unavailable to mining</i> |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
|---------------------------------|------------------------------------|---|--|
| May 7, 2019 | Northern Air Transport Association | <ul style="list-style-type: none"> Expresses support for the proposed "Reliance Adjustment" proposed by the East Arm Property Owners Association to exclude the area around Reliance from the park boundaries so as to maintain its use as an important transportation and economic hub. NATA supports the "Reliance Adjustment" as it allows their members continued access to Reliance for refuelling and logistical purposes. | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> <i>Commercial and Recreational Aircraft Access</i> <i>Reliance Adjustment: Why was it not included in the Consultation and Engagement Report?</i> |
| SECOND ROUND OF PUBLIC COMMENTS | | | |
| May 30, 2019 | Nature United | Establishment of the National Park Reserve will protect this ecologically critical landscape, safeguard cultural connections to the land, uphold Indigenous rights, diversify the NWT economy and provide significant benefits to future generations, amid a changing northern and global climate. We strongly support the Thaidene Nene Conservation Initiative. | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 | Christopher O'Brien | <ul style="list-style-type: none"> Wholeheartedly support the establishment of this park Suggests that Parks Canada get on with doing so [establishing Thaidene Nene], and waste no more of its scarce resources on endless rounds of further consultation. | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 | Alex Clinton | <ul style="list-style-type: none"> Opposed to Thaidene Nene Park in its current form Massive parks, land withdrawals and moratoriums and blocked access are destroying the NWT economy. Northern parks do not contribute substantially to the economy. The lack of development in the north is a threat to Canadian sovereignty. The best way to ensure NWT lands benefit northern people is to ensure northern people have full control northern lands; don't need Parks Canada's "help" to manage NWT lands. Decisions for this Thaidene Nene Park were made independent of genuine community consultations and, so far, without proper consideration of the social and economic impacts. Parks Canada's consultation report is poorly | <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> <p>Parks Canada believes that the issues raised have been addressed by the information provided under the following headings of Parks Canada's response to comments (posted June 20 and copied following this table):</p> <ul style="list-style-type: none"> <i>Is the proposed national park reserve responsive to northern interests?</i> <i>Whether the 90% Support for the Establishment of the Thaidene Nene National Park Reserve Represents Northerners</i> <i>Comparison of Establishment of Thaidene Nene National Park Reserve with Other Economic Opportunities</i> <i>Diversification of Economy</i> |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
|---|--|---|---|
| | | written, with data errors. Developments that could have massive social and economic impacts must go through the Environmental Assessment process. | <ul style="list-style-type: none"> <i>Lands currently unavailable to mining</i> |
| July 2, 2019 | Nancy Vail | <ul style="list-style-type: none"> Supportive of establishing this reserve which is so important to the preservation of the quickly disappearing land of the north. In the past we have lost this precious land to mining and other development and harmful recreational interests and as a result we are losing one of the very endearing things that makes the north unique and contributes to the character of Canada. We know that our wildlife numbers are quickly disappearing as we lose land like this to development interests and at a time when climate change threatens our very existence. It is time to put the land and animals first. | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 | Council of Canadians (NWT Chapter) | <ul style="list-style-type: none"> This short note is to voice our support for the establishment of this national park. Since the 1970s, the Lutselke Dene have been working to build a sustainable local economy. Thaidene Nene is the centrepiece of this vision. In these times of climate crisis and uncertainty, all efforts to support local must be given priority. | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 | Alternatives North | <ul style="list-style-type: none"> Applaud the work of Parks Canada and the many other parties who have co-operated to respectfully integrate many points of view into a coherent vision for the future of the area, one that will assure continued access for indigenous people to pursue their traditional activities, and also to benefit from economic activities that will arise from establishment of the national park. Offer unreserved support for the proposal | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 (see also submission May 6, 2019) | Borden Ladner Gervais LLP on behalf of East Arm Property | <ul style="list-style-type: none"> East Arm Property Owners Association (EAPOA) reiterates that they are seeking a minor adjustment to the consultation boundary of Proposed Park, which they have entitled the "Reliance Adjustment". Preliminary screening process for this park establishment is confusing and lacks transparency. EAPOA appreciates Parks Canada's commitment to maintaining protections for those who live, recreate, and operate businesses in the | <p>Parks Canada thanks Borden Ladner Gervais(BLG) for this second submission and provides the following response:</p> <p><i>Reliance Adjustment:</i> The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> |



| Date Received | From | Public Comment Summary (full text of all comments posted to the <u>Mackenzie Valley Review Board's public registry</u>) | Parks Canada Response |
|--------------------------------------|--|--|--|
| | Owners Association | proposed Park but questions how Parks Canada will ensure those protections will be included as part of the final bill. | <p><i>Concerns re: Parks Canada conducting this preliminary screening:</i> Parks Canada continues to maintain the position that the May 6 response to BLG (page 17 of this document) addresses the issue of the "Reliance Adjustment" as proposed by the East Arm Property Owners Association.</p> <p>Parks Canada is conducting the preliminary screening for this proposed development pursuant to the <i>Mackenzie Valley Resource Management Act</i>, section 124 (2) that stipulates "<i>Where a development that does not require a licence, permit or other authorization under any federal or territorial law is proposed to be carried out by a department or agency of the federal or territorial government or by the Gwich'in or Sahtu First Nation or the Tlicho Government, the body proposing to carry out that development shall, after notifying the Review Board in writing of the proposal for the development, conduct a preliminary screening of the proposal</i>". Additionally, independent assessment of preliminary screenings occurs pursuant to the <i>Mackenzie Valley Resource Management Act</i> (section 126), through the referral process or determination by the Mackenzie Valley Review Board.</p> <p><i>Protections for those who live, recreate, and operate businesses in the proposed Park:</i> Included in Bill C-97, Division 23: section 41.5 (https://www.parl.ca/LegisInfo/BillDetails.aspx?Language=E&billId=10404016). See section 4(a) of the Development Description for more information on implementation of this Act.</p> |
| July 2, 2019 | Andrew Robinson | I'm writing to support the creation of Thaidene Nene National Park. To be honest I'm a bit annoyed that we need to keep re-stating our support. Just get on with it already! | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 (see also submission | Department of Environment and Natural Resources, | ENR GNWT has no further comment on the second review of the project and responses to review comments. | Parks Canada thanks the Government of the Northwest Territories for this second submission and provides the following response: |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
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| April 25, 2019) | Government of the Northwest Territories | | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 | Ecology North | <ul style="list-style-type: none"> • Ecology North supports the establishment of Thaidene Nënë National Park Reserve • Pleased that Thaidene Nënë will continue to provide for cultural and ecological values, support food security, hunting, fishing, trapping, traditional activities and will contribute to economic diversification in the NWT. | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 | Lutsel K'e Dene First Nation (LKDFN) | <ul style="list-style-type: none"> • Thaidene Nene (TN) is the core primary use area in the LKDFN traditional territory and the most important cultural and ecological landscape. • TN forms a significant element of the community's [LKDFN] socio-economic and cultural vision for the future. LKDFN has increased its readiness to take on management and operations responsibilities within TN including: staffing, investing in starting the development of their local tourism industry, developed a community tourism strategy, and investigating feasibility of TN related infrastructure in the community. • LKDFN will be assuming significant responsibilities for the management and operation of TN and will be coordinating efforts with Parks Canada, the GNWT, and neighbouring Indigenous governments through collaborative consensus-based bodies. • Have comfort that any Aboriginal and Treaty Rights cannot be impacted by any TN designation. • TN has the potential to set a new standard for Indigenous-Crown collaboration in protected areas, secure a vital cultural and ecological landscape, and provide for significant new investment into a region that sorely needs it. | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
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| July 2, 2019 | Canadian Parks and Wilderness Society, NWT Chapter | <ul style="list-style-type: none"> • Confirm ongoing support for the establishment of Thaidene Nene National Park Reserve. CPAWS-NWT has strongly supported Lutsel K'e Dene First Nation's (LKDFN) vision of protecting Thaidene Nene for a decade and actively participated in the federal and territorial Thaidene Nene public consultations. • Of note is the significant value of Thaidene Nene National Park Reserve and the Territorial designations in protecting large areas of caribou habitat adjacent to lands that are in high demand for infrastructure and industrial development. • The boundary that was agreed on includes the interests of industry, the GNWT and Canada. • In the context of Thaidene Nene and caribou, an Environmental assessment (EA) will be appropriate when industrial developments are proposed to occur in these areas excluded from the final Thaidene Nene boundary or in other areas adjacent to the National Park Reserve. | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 | Gordon Hamre | <ul style="list-style-type: none"> • Offers a personal endorsement of the proposed Thaidene Nënë National Park Reserve and recognises the contribution of the Dënesųliné of Łutsël K'e, the NWT Métis Nation, and others, and the complementary territorial government initiatives. • The comprehensive conservation regime of which Thaidene Nënë is a part offers great promise for the future of this magnificent area and offers the certainty that long has been sought. I have no doubt that a century from now Canadians will praise the foresight of the conservation leaders who brought this to fruition. This collaboration of public and Indigenous peoples' governments heralds a new relationship that will be envied and copied elsewhere | The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment or that there might be cause of public concern. |
| July 2, 2019 (see also submission) | NWT and Nunavut Chamber of Mines | <ul style="list-style-type: none"> • Continue to have public concern over this development, and ask that it be referred to environmental assessment • <i>Procedural concerns:</i> availability of alternative park boundary for comment and consideration, insufficient money invested in the Mineral & Energy Resource Assessment (MERA), no evidence of an energy | <p>Parks Canada thanks the NWT and Nunavut Chamber of Mines for this second submission and provides the following response:</p> <p>The submission does not indicate that establishment of Thaidene Nene national park reserve might have a significant adverse impact on the environment.</p> |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
|---------------|------|---|--|
| May 6, 2019) | | <p>assessment being conducted and provided for hydropower under the MERA, negotiation details between Parks Canada and GNWT not public re: size of proposed national park reserve and creation of territorial park; consultation and engagement report by Tait is a poor statistical analysis</p> <ul style="list-style-type: none"> • <i>Substantive concerns:</i> high mineral potential was glossed over in the MERA and that the MERA is an inaccurate resource assessment of this exceptionally large area of the NWT; no evidence of any economic studies on potential economic losses to all residents of the NWT by the removal of such a significantly large area from future mineral and energy development; no analysis of what a conservation economy will look like; would like to see full disclosure of private and public financing that is being organized behind closed doors that will affect access to public lands; environment and economy are not being balanced; Parks Canada's portrayal of the % of land protected is incorrect; recommend that a corridor through the park be allowed; concerned that the proponent of the park development is also the Preliminary Screener. • Pleased that Parks Canada has confirmed that the waters of Great Slave Lake that are included in the park will continue to be fully navigable and be open to motorized water craft, sail boats, kayaks, canoes and barges and that landings and take-offs for both recreational and commercial operators will be possible on all water based locations within the proposed national park reserve ask that the same be said for aircraft to land on ice in the winter months for commercial purposes. | <p><i>Hydroelectric assessment:</i> The Terms of Reference for the "Mineral and Energy Resource Assessment of Proposed National Parks in Northern Canada" (available at: https://www.nrcan.gc.ca/sites/www.nrcan.gc.ca/files/mineralsmetals/pdf/mms-smm/poli-poli/pdf/mera-eng.pdf) indicate that the territorial government conducts the hydroelectric power potential assessment of the area within any proposed new park. The boundary of the proposed park includes one of the rivers that have hydro potential, but leaves the others outside the park. The Lockhart River has the greatest hydro potential as well as important conservation and spiritual values and will be within the proposed park.</p> <p><i>Economic potential related to mining:</i> Parks Canada notes that all residents of the NWT benefit from the economic potential provided by the exclusion of all areas of high mineral values and most of the areas of medium to high mineral values from the proposed park reserve.</p> <p><i>Full public disclosure of the details of any potentially existing financing arrangements:</i> It is not the practice of public government to make bilateral contracts public; to publicly release a contractual document would require agreement by both contracting parties.</p> <p><i>Parks Canada's portrayal of the % of land protected in the NWT is incorrect:</i> Parks Canada provided information from 2017 so that the percentage of lands protected in the NWT could be compared to that protected in other provinces. Updated statistics are not yet reported by CARTS (https://ccea.org/carts/).</p> <p><i>Corridor through the park (with reference to Ukkusiksalik National Park):</i> Parks Canada has addressed this issue in previous correspondence with the Chamber of Mines, outside of this preliminary screening process.</p> |



| Date Received | From | Public Comment Summary (full text of all comments posted to the Mackenzie Valley Review Board's public registry) | Parks Canada Response |
|---------------|------|--|--|
| | | | <p><i>Concerns re: Parks Canada conducting this preliminary screening:</i> Parks Canada is conducting the preliminary screening for this proposed development pursuant to the <i>Mackenzie Valley Resource Management Act</i>, section 124 (2) that stipulates "<i>Where a development that does not require a licence, permit or other authorization under any federal or territorial law is proposed to be carried out by a department or agency of the federal or territorial government or by the Gwich'in or Sahtu First Nation or the Tlicho Government, the <u>body proposing to carry out that development shall, after notifying the Review Board in writing of the proposal for the development, conduct a preliminary screening of the proposal</u></i>". Additionally, independent assessment of preliminary screenings occurs pursuant to the <i>Mackenzie Valley Resource Management Act</i> (section 126), through the referral process or determination by the Mackenzie Valley Review Board.</p> <p><i>Aircraft landing on ice in the winter months for commercial purposes:</i> This is permitted, as these are still considered water-based locations.</p> <p>Parks Canada continues to maintain the position that the May 6 response to the NWT and Nunavut Chamber of Mines (page 15 of this document) addresses the remaining issues raised.</p> |



PUBLIC RESPONSE TEXT (as posted on the Review Board's public registry):

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ATTACHMENT 1: Letter from Lutsel K’e Dene First Nation Chief Darryl Marlowe

ATTACHMENT 2: Letter from Parks Canada (McNamee) to GNWT



Introduction

In accordance with the *Mackenzie Valley Resource Management Act* (MVRMA), Parks Canada is conducting a preliminary screening of the development Establishment of Thaidene Nene National Park Reserve of Canada.

A preliminary screening is required because section 124(2) of the MVRMA stipulates that developments proposed by federal agencies, including establishment of a park subject to the *Canada National Parks Act*, must be reviewed by preliminary screening. The purpose of a preliminary screening is to determine if a development has the potential to cause significant adverse environmental impacts or public concern.

On April 5, 2019, Parks Canada sent a Development Description to interested parties. The comment period originally scheduled for Thursday April 25, 2019 was extended to May 6th, at the request of some of the commenters.

The following is the Parks Canada response to issues raised by commenters.

Overview

Parks Canada is addressing issues raised during 2015-2017 public consultations on establishment of Thaidene Nene through two mechanisms:

- 1. Memorandum of Agreement for Thaidene Nene National Park Reserve” (Land Transfer Agreement); and,
- 2. Amendments to the *Canada National Parks Act*

The Land Transfer Agreement is a contractual arrangement under negotiation but substantially complete, between Parks Canada and the Government of the Northwest Territories (GNWT) to transfer administration and control of the proposed national park reserve lands to Parks Canada. In this agreement, Parks Canada and the GNWT agreed that a number of activities which may not normally be permitted in national parks would be allowed within the proposed Thaidene Nene national park reserve. These commitments are being confirmed through amendments to the *Canada National Parks Act* and will apply specifically to the proposed Thaidene Nene national park reserve. The amendments are part of the Budget Implementation Act (Bill-97), currently before Parliament.

Is the Proposed National Park Reserve Responsive to Northern Interests?

The land transfer agreement addresses interests of northerners such as:

- Recreational uses;
- Use of firearms
- Aircraft landings and take off and fuel cache; and
- Existing leases, including the fishing lodge in the Reliance area.

(See also "*Commercial and Recreational Aircraft Access*", "*Reliance Adjustment*", and "*How Have Indigenous Governments Been Involved?*")

The following activities will continue in the proposed Thaidene Nene national park reserve:

Activities and Land Uses in proposed Thaidene Nene National Park Reserve

| Activity |
|---|
| Sport fishing (includes ice fishing) |
| Berry picking for personal use |
| Gathering medicinal and healing plants for personal use |
| Kayaking |
| Canoeing |
| Paddle boarding |
| Sailing |
| Boat mooring, including overnight |
| Cultural learning activities |



| |
|--|
| Motorized recreational and commercial transportation including; take-off and landing on any water-body by aircraft, vessels and over-snow vehicles |
| Camping (includes back country and front country) |
| Hiking |
| Dog sledding |
| Snowshoeing |
| Cutting and gathering of wood for personal use for campfires and temporary shelters |
| Campfires |
| Shore lunches |
| Geocaching |
| Cross-country skiing |
| Underwater diving |
| Kite skiing and kite surfing |
| Waterskiing |

In addition to the activities and land uses listed above, Parks Canada will provide for:

- **Use of firearms** for protection in Thaidene Nene National Park Reserve. Transportation and storage of firearms will be subject to the *Firearms Act*. Use of firearms will be subject to terms, conditions, limits, seasons, and measures as Parks Canada considers reasonable to ensure public health and safety, sustainable use and conservation.
- **Barge transit** and resupply through Thaidene Nene.
- Parks Canada will maintain a location for the public to cache fuel near **Reliance** in accordance with applicable environmental protection and public health and safety standards.
- The ability for existing **commercial lodges** within Thaidene Nene National Park Reserve to **cut firewood** for lodge use, subject to sustainable use, conservation, and the terms and conditions of any applicable permit or business licence.
- **Leaseholders**, at the time of transfer of lands, will also have the permission to **hunt small game** for subsistence purposes.
- Special harvesters will be able to continue **subsistence harvesting**.
- Existing recreational and commercial lodge **leases** will be honoured with the same terms and conditions as they are currently under, including transferability.

These provisions are confirmed through amendments to the *Canada National Parks Act*.

Parks Canada will also:

- Bring funding into remote communities as a result of federal investment in the park and Indigenous park-related operations.
- Offer services in safety and fire management and science.
- Consult with public for the enactment of regulations and the management plan. The land transfer agreement stipulates that both the federal and territorial governments will conduct a public meeting annually.

Parks Canada has worked closely with GNWT to respond to interests of northerners. The GNWT supports the establishment of the Thaidene Nene national park reserve and its land configuration in conjunction with the Territorial Protected Areas and has included the establishment of Thaidene Nene in the mandate of the current 18th Legislative Assembly.

The above information is in response to letters from: Mr. Lou Covello, Mr. Ray Decorby, the NWT Floatplane Association, Mr. Spencer Decorby, and Mr. Dave Nickerson

[Whether the 90% Support for the Establishment of the Thaidene Nene National Park Reserve Represents Northerners](#)

Comments received in response to the Development Description questioned whether 90% support for the proposed national park reserve reported in the “Proposed Thaidene Nënë National Park Reserve Consultation and Engagement Report” (Consultation and Engagement Report) represented northerners.



Information gathered through the formal **public consultations on establishment of Thaidene Nene** from 2015 to 2017 was compiled in a consultation report produced by an independent consultant, TAIT Communications & Consulting Inc., a third party independent of Parks Canada. The report is available on the Parks Canada website at <https://www.pc.gc.ca/en/pn-np/cnnp-cnnp/thaidene-nene/apprendre-learn/consultations>.

The Consultation and Engagement Report included comments from three general public meetings in the Northwest Territories (Yellowknife (2 meetings), Hay River (1 meeting)) and twelve stakeholder/interest group meetings in the Northwest Territories (NWT) and three general public meetings in the south (Calgary, Vancouver and Ottawa). The meetings in the NWT elicited vastly more comments (103) than all three of the southern meetings combined (22). NWT residents were also provided with opportunities to provide comments through comment forms available at the meetings and through the website. Analysis of these consultations, by TAIT, concluded there was a 90% overall support for the project. This analysis included all comments, letters, emails, and comment forms submitted by northerners, southerners and international residents.

The report states that meetings in Yellowknife focused on questions of clarification regarding what recreational activities would continue in the park and how Parks Canada management might change the current usage of the area. A large proportion of Yellowknifers who attended consultation sessions on the proposed national park reserve were interested in the area for outdoor recreation and enjoyment of the wilderness. Those interests among northern residents are consistent with environmental protection of the East Arm of Great Slave Lake (see also "*How Have Indigenous Governments Been Involved?*").

The key purpose of the consultations was to identify the key issues that needed to be addressed in establishing the proposed national park reserve. The consultations were successful in this regard, resulting in Parks Canada addressing the concerns raised by northerners both through the Land Transfer Agreement and amendments to the *Canada National Parks Act*.

The above information is in response to letters from: NWT Chamber of Commerce, Mr. Lou Covello

Commercial and Recreational Aircraft Access

In response to concerns raised during 2015-2017 consultations with recreational and commercial aircraft operators, landings and take-offs for both recreational and commercial operators will be possible on all water based locations within the proposed national park reserve, as reflected in the list of permissible activities in the Land Transfer Agreement (see page 2). In the future, any restrictions on landings/take-offs, due to congestion for example, will be subject to consultation with recreational and commercial operators during the development of the park's management plan.

Aircraft access permits can be issued for the day of a flight, a time window, or for a season. Locations for landings and take-offs can be flexible for safety issues such as weather, mechanical issues, smoke and delays. There is no fee for an aircraft access permit. Parks Canada is committed to working with aircraft operators during development of the park's management plan to ensure an efficient permitting process.

A fee does apply for business licences for commercial aircraft operating in the park reserve that are receiving "gain or profit" (e.g., air charter for park visitors or researchers). For a commercial aircraft that is not operating a business in the national park reserve, an aircraft access permit is required, but there is no business licence fee.

People who access the proposed national park reserve, by any transportation means, will be able to continue their current activities including: berry-picking for personal use, camping, sport fishing, shore lunches, campfires, gathering wood, etc (see list of permissible activities on page 27).



The above information is in response to letters from: NWT Floatplane Association, Northern Air Transport Association, Mr. Spencer Decorby and Ms. Justine Crowe, NWT and Nunavut Chamber of Mines, Northwest Territories and Nunavut Construction Association.

Entry Fees

There will be no entry fees for the proposed Thaidene Nene national park reserve. However, Parks Canada facilities and services may have a fee for use. Those fees are retained for reinvestment in the park.

The above information is in response to a letter from: NWT Floatplane Association

Navigable Waters

The waters of Great Slave Lake that are included in the park, 1,067 km², will continue to be fully navigable and be open to motorized water craft, sail boats, kayaks, canoes and barges.

The above information is in response to a letter from: NWT and Nunavut Chamber of Mines

Boundary Options

The proposed boundary provided for public consultation was developed through negotiations between Parks Canada, the GNWT, Łutsël K'e Dene First Nation and the Northwest Territory Métis Nation. The consultation boundary was available for comment throughout the formal consultation period, at meetings, mail-outs and the Parks Canada website, from January 2015 to January 2017. The map handout was clearly labelled "Proposed Thaidene Nene National Park Reserve Boundary for Consultation". Former GNWT Minister Miltenberger also conducted consultations with Indigenous governments and the general public on the matrix of boundaries, including the national park reserve, the territorial protected areas and the excluded areas in 2015 (https://www.enr.gov.nt.ca/sites/enr/files/resources/tdn_summary_notes_-_yk_public_session.pdf).

Parks Canada reviewed all the comments collected during the 2015-2017 formal consultation period. The most common theme was: "why was the boundary limited". These comments inquired why the national park reserve did not include the entire 33,600 km² study area; whether it included watersheds (there is no full watershed within the proposed national park reserve); why the Łutsël K'e community wasn't included; whether Reliance would be included; opposition to development near the national park reserve; and requests for buffer zones.

There is no set procedure for the number of boundary options which should be presented during consultations on establishment of a national park reserve, nor do the public consultation records note any requests for additional boundary options.

Following the devolution of the administration of lands and resources to the GNWT, the Senior Mineral and Energy Resource Assessment (MERA) Committee, chaired by the federal government, did not have a role in recommending boundary options for the proposed Thaidene Nene national park reserve. Instead the Government of the Northwest Territories represented its constituents in developing the consultation boundary.

The above information is in response to letters from: Mr. Spencer Decorby and Ms. Justine Crowe, Ms. Justine Blanchette, Borden Ladner Gervais LLP, Mr. Ray Decorby, Northwest Territories and Nunavut Construction Association, Northwest Territories Float Plane Association

Reliance Adjustment: Why was it not included in the Consultation and Engagement Report?

Representatives from the East Arm Property Owners Association proposed the "Reliance Adjustment" for the purpose of excluding an area around Reliance from the proposed Thaidene Nene national park reserve. For several years, Parks Canada has met with proponents of the "Reliance Adjustment" proposal, including an in-camera meeting March 16th, 2016. The



proposal was not raised during the twelve stakeholder meetings nor the public meetings in Yellowknife, with the exception of a question regarding whether the Reliance area would be included in the proposed national park reserve. This latter comment is within the notes of the NWT Floatplane Association's meeting in the Consultation and Engagement Report.

The Consultation and Engagement Report was based entirely on the formal Parks Canada public consultation sessions. The report was compiled and authored by an independent consultant and not produced by Parks Canada. In-camera meetings did not include the consultant and therefore, were not part of the Consultation and Engagement Report.

The in-camera meetings with the East Arm Properties Owners Association were instrumental in the decisions about what would continue to be permitted in the area around Reliance. Parks Canada views those decisions as fully addressing all of the concerns raised in the public interest and taking into full account the interests in the "Reliance Adjustment" (see also attached letter from Łutsel K'e Dene First Nation Chief Darryl Marlowe).

The above information is in response to letters from: Mr. Ray Decorby, Mr. Spencer Decorby and Ms. Justine Crowe, Ms. Justine Blanchette, Borden Ladner Gervais LLP, Northwest Territories and Nunavut Construction Association, Northern Air Transport Association.

How Have Indigenous Governments Been Involved?

Parks Canada has consulted with all Indigenous Governments and Indigenous Government Organizations with territories overlapping the proposed Thaidene Nene national park reserve. The proposed national park reserve falls within the territories of the Akaitcho First Nations (Łutsel K'e Dene First Nation, Yellowknives Dene First Nation and Deninu K'ue First Nation) and the Northwest Territory Métis Nation.

Łutsel K'e Dene First Nation, the closest community to the proposed Thaidene Nene national park reserve, initially rejected the idea of a national park in 1969. In the early 2000s, Chief Felix Lockhart approached the federal government with a request to re-open discussions regarding establishing a national park reserve. Their initiative brought the parties together to discuss the proposal and ultimately to reach an initialled establishment agreement. Łutsel K'e has been a strong advocate for the establishment of the park reserve over the past number of years on all levels. Thaidene Nene national park reserve is being established to be consistent with the principles of Indigenous Protected and Conserved Areas.

Agreements are also under negotiation between Parks Canada and the other Akaitcho Nations: Yellowknives Dene First Nation and Deninu K'ue First Nation.

The Akaitcho Nations have been working on terms and conditions for a regional management body for the national park reserve and the territorial protected areas.

Parks Canada and the Northwest Territory Métis Nation have been negotiating an Impact and Benefit Agreement since 2013 and have reached an initialled agreement.

All First Nations and Métis with claims accepted by the Government of Canada for negotiation have been engaged in the negotiation of Thaidene Nene national park reserve-related agreements. Nothing in these agreements will abrogate or derogate from any existing section 35 rights. Any section 35 rights (Aboriginal, treaty or land claim) that exist at present or in the future will continue to exist after the establishment of the park. Section 35 rights are included in the treaty or land and resources agreements of Akaitcho First Nations and Northwest Territory Métis Nation within the National Parks chapters. The Akaitcho Treaty is nearing the completion of Agreement in Principle negotiations and the Northwest Territory Métis Nation agreement is in Final Agreement negotiations.

Although North Slave Métis Alliance do not have a land claim accepted for negotiation by the Government of Canada, they have asserted rights to harvest caribou, which have been recognised in court. Consultations with the North Slave Métis Alliance are on-going in which



Parks Canada has assured their leadership that their rights will be respected and the duty to consult directly with them regarding their asserted rights will be observed. Parks Canada's obligations include consulting directly with the North Slave Métis Alliance on the management plan and any management actions which may adversely affect their asserted rights to harvest. T'licho First Nation, with a settled land claim, has 1670 km² of their Mowhi Gogha De Niitlee within the proposed Thaidene Nene national park reserve. The National Parks Chapter of the Tlicho Agreement describes the relationship between Parks Canada and the Tlicho. Section 15.9 of the Agreement specifically relates to a "national park in the vicinity of the East Arm of Great Slave Lake". All applicable clauses within this section will be complied with by Parks Canada.

Łutsël K'e Dene First Nation, pursuant to a provision in their Framework Agreement signed in 2010, confirmed support for the establishment of Thaidene Nene with a membership vote, resulting in 89 percent in favour of the establishment of the national park reserve.

Conditional support for the establishment of Thaidene Nene national park reserve has been expressed by the Yellowknives Dene First Nation, the Deninu K'ue First Nation, the Northwest Territory Métis Nation and the T'licho. A determination of support from these First Nations and the Northwest Territory Métis Nation is expected before September, 2019.

Thaidene Nene national park reserve will continue to be designated as a national park reserve under the *Canada National Parks Act* until all claims with respect to aboriginal rights that have been accepted for negotiation by the Government of Canada are settled. This designation recognizes that Indigenous land title has not been resolved and land claim rights are yet to be finalized. If the First Nations or Métis select lands in the national park reserve through a land claim process, they may be removed from the national park reserve. Once all the claims are settled, Thaidene Nene would be designated as a national park and moved from Schedule 2 to Schedule 1 of the *Canada National Parks Act* and renamed Thaidene Nene National Park of Canada.

The above information is in response to letters from: NWT Chamber of Commerce, Mr. Ray Decorby and Ms. Justine Crowe, Mr. Lou Covello, North Slave Métis Alliance

North Slave Métis Alliance (NSMA)

The Development Description circulated April 5th mistakenly excluded vital information. The full Development Description was posted May 16th and is available on the preliminary screening portion of the Board's public registry (<http://reviewboard.ca/registry/preliminary-screenings>) and can be located by selecting "Thaidene Nene Park Establishment" from the Development drop-down menu. The information missing from the April 5th version is now found on page one of the May 16th version. It states, "The proposed national park reserve is also claimed by the North Slave Métis Alliance." It also refers to North Slave Métis Alliance on the same page, "Parks Canada is also consulting and engaged with the Deninu K'ue First Nation, the Yellowknives Dene First Nation, the North Slave Métis Alliance and the Tlicho Government".

The Development Description refers to cooperatively managing hunting and other traditional activities carried out by Indigenous people. It also references the cooperative management body considering mitigation measures that might arise as a result of visitor activities. In the first instance, Parks Canada will consult directly with NSMA as it will with other Indigenous governments and groups with regard to the exercise of their hunting and other traditional activities rights. The management body does not have, as part of its mandate, jurisdiction over Indigenous rights-based activities.

The above information is in response to a letter from: North Slave Métis Alliance

Comparison of Establishment of Thaidene Nene National Park Reserve with Other Economic Opportunities

Parks Canada's investment over the first twelve years of the established national park reserve will be \$40 million for capital development and operational costs. After the first 12 years and



into the future, subject to Parliament appropriations, there will continue to be an annual expenditure of funds from Parks Canada of \$3.4 million per year in operations.

In addition to Parks Canada's direct operational funding, Łutsël K'e Dene First Nation will invest annual funds from its trust fund for their operations, the capital for which will only be available if the national park reserve proceeds. Parks Canada will also be contributing funds to other First Nations and Métis with asserted territories overlapping the national park reserve for their roles in regional management of the national park reserve and/or in consultations.

Direct federal expenditures and contributions to Indigenous governments can have a multiplier effect, providing start-up money for operations in communities to support tourism and other ventures and will engage all First Nations and Métis in meaningful management of the lands.

Tourism services, accommodation, guiding and transportation services are all businesses which are amenable to small business entrepreneurs and jobs. Profits are most likely to stay within the local community and provide further potential investments and economic development.

With the support of a new Parks Canada office in Łutsël K'e, training opportunities and the benefits of Parks Canada's national and international tourism brand, there are more opportunities for growth of this sustainable economic activity. Parks Canada and GNWT have committed to cross marketing tourism products, which will increase market reach. Tourism also produces economic benefits from sharing cultural knowledge, experience and activities; thus promoting the continuation of Indigenous ways of life.

Commitments by Parks Canada to use Indigenous languages in signage and publications will also support Indigenous language use.

In addition to enhanced opportunities in Łutsël K'e, the gateway communities of Fort Resolution and Yellowknife will also have benefits for their Indigenous residents and the communities as a whole. Increased traffic through both of those communities will have wide ranging effects, adding to the tourism product offerings in NWT.

The national park reserve and adjoining territorial protected areas will offer Indigenous residents the opportunity to be intrinsically involved in the management of land within their territories and also supports a permanent, sustainable local conservation economy.

The above information is in response to: NWT Chamber of Commerce, Mr. Ray Decorby, Mr. Lou Covello

[Money Expended in Investigating the Economic Potential of Resource Development](#)

The Government of Canada spent close to three million dollars on the *Mineral and Energy Resource Assessment of the proposed Thaidene Nene National Park Reserve in the area of the east arm of Great Slave Lake, Northwest Territories*, released as Open File 7196 in September 2013. For the 2013 study, Parks Canada Agency provided almost \$1.4 million, augmented by a contribution from Natural Resources Canada of almost one million dollars. In addition, there were costs for earlier field work in 2008. The 2013 study entailed two years of new field work and incorporated those results with the field work done in the 1980s and an extensive review of known occurrences, deposits and other sources of geological information. This study contained all relevant mineral and energy potential for the 33,600 km² study area, as well as an additional area of up to 30 km surrounding the study area to ensure that all interactions and potential need for external industrial corridors were taken into consideration. It was peer reviewed by the GNWT Geological Survey (as it is now known) and the results of MERA were instrumental to the GNWT and Parks Canada in determining the consultation boundary.

The proposed boundary excludes all high, and most medium-high, areas of mineral potential. In addition, 12,000 km² of the study area will be territorial protected areas.



In establishing national parks, values other than resource development potential are weighed during public consultation. These values include the protection of ecological integrity for the benefit, education and enjoyment of all Canadians, to be made use of so as to leave the lands unimpaired for the enjoyment of future generations. Please see the section above "*Comparison of Establishment of Thaidene Nene National Park Reserve with Other Economic Opportunities*" for details on other economic benefits related to this park establishment proposal.

The above information is in response to letters from: NWT and Nunavut Chamber of Mines, NWT Chamber of Commerce

Whether the Potential for Cobalt and Lithium was Investigated in MERA

Potential for rare earth elements (REE) and rare metals (Zr, Nb, Ta, Li [Lithium], Be) deposits in the Thaidene Nene study area are considered in Chapter 13 of the 2013 MERA Report cited above. This includes a discussion on the peraluminous ($[Na+K/Al < 1]$) granitic pegmatite hosted deposits of Li, Ta and REE. It was noted that there were twenty-two occurrences of this deposit type known in the Area of Compilation and four deposits in the study area. Two of these occurrences – Moose #2 and Best Bet – were mined in the 1940s and 1950s for Lithium. The potential for peraluminous granitic pegmatite REE, Li and Ta type deposits were modelled in Chapter 23 and a map of potential is shown on pg. 581 of the MERA Report.

Potential for Iron Oxide-Copper-Gold (IOCG) type deposits are discussed in Chapter 19 of the MERA Report. These deposits are a polymetallic hydrothermal mineral deposits that generally contain Cu and Au in economic concentrations but also abundant in other minerals including Cobalt (Co), for example, the Fortune Minerals NICO Deposit in the Northwest Territories is an IOCG type deposit. The potential for IOCG type deposits is modelled in Chapter 23 of the 2013 MERA Report and a map showing the potential is shown on page 603 of the MERA Report.

The above information is in response to a letter from: NWT and Nunavut Chamber of Mines

Alternative Land Access Options, Such as Corridor Duly Considered

The mining industry proposal for a corridor through the park, made in stakeholder meetings and in letters to the Minister of Environment and Climate Change has been given due consideration (see attached letter McNamee to GNWT).

Also, in a letter submitted to Northern News Service Limited, in December of 2017, Lutsel K'e Dene First Nation then-Chief Felix Lockhart stated his community's opposition to a corridor beginning in Reliance and running through the national park reserve as disrupting "the most important, sacred cultural and heritage places for Dene and Northerners". Lutsel K'e Dene First Nation instead, he stated, support such a corridor beginning in Lutsel K'e which would take advantage of an airport there and be closer to Yellowknife and Hay River.

The above information is in response to a letter from: NWT and Nunavut Chamber of Mines

Diversification of Economy

Parks Canada agrees that conservation of lands must be balanced with economic opportunities in other resource extraction sectors, such as mining. With these principles in mind, the boundary that was selected for consultation excluded the areas of high, and most of the moderate to high, mineral potential from the proposed national park reserve. To our knowledge, there is no scientific assessment available, apart from the federal government funded Mineral and Energy Resource Assessment (MERA), which provides evidence for areas of mineral potential within the proposed national park reserve boundaries.

The establishment of Thaidene Nene national park reserve would create a degree of certainty for future access to potential mineral resources. Rather than the current land withdrawal, covering 33,600 km², the high and moderate to high mineral potential areas of 7,500 km² have been excluded from the federal and territorial protected areas. It is expected that once the



protected areas are established, the GNWT, with the responsibility for the land withdrawal, will make those lands available to industrial development (see also "*Comparison of Establishment of Thaidene Nene National Park Reserve with Other Economic Opportunities*").

The above information is in response to letters from: NWT and Nunavut Chamber of Mines, Mr. Lou Covello

Lands Currently Unavailable to Mining

Letters cited percentages of land unavailable for development of 24% and 50% of NWT. There may be other reasons lands are unavailable but these percentages do not represent lands that are actually under protection designation. The NWT Environment and Natural Resources website (<https://www.enr.gov.nt.ca/en/state-environment/201-trends-terrestrial-protected-areas-and-conservation-areas>) shows core protected and conservation areas as of 2014 were about 9.2% protected in federal, territorial and Indigenous protected and conserved areas (including fresh water, National Parks/Park Reserves, National Historic Site, Thelon Wildlife Sanctuary, Migratory Bird Sanctuaries, areas under Land Claim Agreements) and 4.6% in conservation areas (Territorial Natural Environmental Parks, Gwich'in Territorial Recreational Park, Pingo Canadian Landmark and conservation areas through approved land use plans). As of December 2017, the CARTS report <https://ccea.org/carts/> gives neighbouring provinces of Alberta 12.53%, British Columbia, 15.33% in protected areas and lists NWT with 9.21%.

The 55,000 km² Thelon Wildlife Sanctuary was identified by commenters as an impediment to resource development in correspondence submitted in response to the Development Description. The Thelon Wildlife Sanctuary has been in existence since 1927 and expanded in 1956. In the NWT there are 21,270 km² but the majority of the area is in Nunavut. The interim land withdrawals in the Northwest Territories for treaty and land claim settlement are pending the completion of the treaties and land claims. Although the Indigenous claimed land may currently not be available for development, land status is dependent upon the conclusion of the negotiations and cannot be characterised as perpetually unavailable for development.

The above information is in response to letters from: NWT and Nunavut Chamber of Mines, Mr. Lou Covello, Northwest Territories & Nunavut Construction Association.



Lutsel K'e Dene First Nation

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7 November 2017

Mr. Spencer DeCorby
Secretary, East Arm Property Owner's Association
P.O. Box 2542, Yellowknife, NT, X1A 2P8
sdecorby@gmail.com

Mr. DeCorby:

RE: Lutsel K'e Dene First Nation position on the "Reliance Adjustment" proposed by the East Arm Property Owner's Association

Thank you for your July 26th, 2017 letter and information package detailing the proposed "Reliance Adjustment". We have reviewed the information package carefully, and I thank you for your time compiling the information. We wish to inform you that LKDFN does not agree with your proposal, and will be advancing the area outlined as the "Reliance Adjustment" as a key portion of the Thaidene Nene National Park Reserve.

The main points of our rationale are as follows:

- As you have noted, it is important that the Reliance area remain accessible to private and commercial air and water-based transportation and traffic. It is also a key staging and storage area. We note that such activities will continue within the National Park Reserve designation, and may be enhanced by park-related infrastructure and safety development. Government activities and non-extractive economic development in the area will also be enhanced by the National Park Reserve designation, and will be sustained by investments by the Lutsel K'e Dene First Nation, the Government of Canada, and the GNWT in infrastructure and operations.
- We appreciate that you value your relationship with the Reliance area, and want to maintain this relationship into the future. It is a special place. We do not believe that the establishment of a National Park Reserve in the Reliance area will hinder this relationship in any way. Much of what you and other users enjoy today you will be able to pursue post-designation, including boating, fishing, camping, enjoying your cabin, making campfires, etc. The exception is perhaps big-game hunting, which is a bit of a non-issue due to the caribou hunting bans across the territory.



- While there is a recent history of settler activity in the Reliance area, such history is but a portion of the much deeper history of our people in the area. This heritage is not limited to the area of “Ft. Reliance” as defined in your information package, but indeed permeates the entire landscape of Thaidene Nene and beyond. Unfortunately, knowledge of our heritage in the area has been diminished after a few generations of forced cultural degradation. The place-names on official maps of the region are evidence of the regrettable policies and practices of the past – names like “Charlton Bay” and “Fairchild Point” obscure this history, and serve to erase our own names from the public consciousness. Designation of Thaidene Nene as a National Park Reserve is a means for my people to revitalize our heritage in the region. We will work closely with Parks Canada to celebrate not only our deep, centuries old history in the Reliance area, but the more recent settler story as well.
- We have confirmed with the Arctic Institute of North America that they adamantly do not support the proposed “Reliance Adjustment”.
- My Council and I are unclear whose property and rights the East Arm Property Owner’s Association (EAPOA) represents. To our best knowledge, there is only one parcel of Fee Simple Title within the boundaries of the proposed Thaidene Nene National Park Reserve. This is the small parcel occupied by the Catlings. We are not aware if the Catlings are members of the EAPOA. Our understanding is that their rights and interests are being discussed and potentially accommodated by Parks Canada directly.

We know there are leasehold interests in the Reliance area, most notably that upon which Trophy Lodge sits, and the other occupied by yourself. We are not aware if the owners of Trophy Lodge are members of the EAPOA. While leasehold interests convey certain *interests*, they do not convey any ownership of land, nor do they convey any rights beyond the specific terms of the lease. Leasehold interests are regulated and permitted privileges, nothing more. Therefore, while your proposal may reflect the interests of the EAPOA and its members, there is no foundation to your claims that the National Park Reserve will infringe on rights.

- We strongly disagree with your characterization of the “Reliance Adjustment” proposal as one advocating for the maintenance of “neutral ground”. The status quo is anything but neutral. The Lutsel K’e Dene First Nation’s sovereignty and responsibility in its traditional territory, including Thaidene Nene, have been seriously diminished over the past couple of generations by government policies, social upheaval, and outside interests. Today we are in a period of rapid resurgence, and our relationship with the Government of Canada in Thaidene Nene will be one of acknowledged rights and shared jurisdiction. The status quo is not acceptable to us. We will implement our sovereignty and exercise our Dene laws throughout Thaidene Nene, including the Reliance area, and the designation of Thaidene Nene as a National Park Reserve is a key positive step in this direction. We look forward to engaging with all stakeholders, the EAPOA included, concerning the exercise of our jurisdiction within Thaidene Nene.



I hope that the Lutsel K'e Dene First Nation's position and rationale with respect to the "Reliance Adjustment" is clear.

Respectfully,

Chief Darryl Marlowe

cc: Kevin McNamee – Director, New Park Establishment, Parks Canada Agency
Rick Bargery – Thaidene Nene Chief Negotiator, Government of the Northwest Territories
Steven Nitah – Thaidene Nene Chief Negotiator, Lutsel K'e Dene First Nation



Parks Canada Parcs Canada



March 10, 2018

Mr. Richard Bargery
Senior Negotiator
c/o Department of Environment and Natural Resources
Government of the Northwest Territories
P.O. Box 1320
Yellowknife, NT
X1A 2L9

Dear Mr. Bargery,

Re: Potential Corridors and Thaidene Nene National Park Reserve

The purpose of this letter is to confirm that Parks Canada cannot agree with the proposed language within our Land Transfer Agreement that provides for future corridors through the Thaidene Nënë national park reserve (“the park”) for access to developments or activities located outside of the park (i.e. mineral and hydro). The rationale for Parks Canada’s view is as follows:

1. Legislation and related policy in the form of the *Canada National Parks Act* and *Parks Canada's Guiding Principles and Operational Policies*, do not provide for the construction of a road or railway across a national park for the purposes of industrial development. Such infrastructure is considered contrary to the purpose for which national parks are created.
2. In early 2015, the Office of the then Minister of Environment and Minister Responsible for Parks Canada informed the Government of the Northwest Territories (GNWT) that if the proposed park is of an appropriate design and size, winter and all-weather roads across the park to access minerals outside it could be permitted but only with an amendment to the *Canada National Parks Act*. At the time, Parks Canada envisioned a national park reserve of approximately 28,000 square kilometres in size, 5,000 square kilometres less than Łutsel K'e Dene First Nation's vision for a 33,000 square kilometre park. Please note that offer did not pertain to hydro-electric corridors.

In April 2015, Parks Canada, the GNWT, and the Łutsel K'e Dene First Nation agreed on a park boundary that was 14,000 square kilometres in size. The configuration removed from the original proposals the extremities for mineral development and territorial conservation areas that, to our understanding, could provide for industrial corridors. Subsequently announced

Canada



in July 2015 by the three parties and the Northwest Territory Metis Nation, in our view, the smaller size and compact configuration of the 2015 park boundary meant there are likely more feasible routes for access to mineral areas beyond the park.

3. At the April 2015 negotiation session that agreed on the current boundary, it was Parks Canada's understanding that new configuration for the park, having removed all areas of high to very high mineral potential from the park, negated the need for a corridor through the park as mineral interests adjacent to the park could be accessed more easily by going around the park. In particular, the north shore of the Great Slave Lake had been completely removed from national park consideration to facilitate access to existing and potential mineral areas north of the park.
4. Through the establishment process to achieve this national park reserve, including the studies, field trips, information exchanges and consultations, it became increasingly clear that Thaidene Nene is both a natural and a cultural landscape. Underpinning decades of work is the vision to pass on this landscape and its inherent values to future generations as an undeveloped area with ecological and cultural integrity, and an area collaboratively managed with Indigenous communities. Providing for a mineral or hydro access corridor runs counter to this vision and is not supported by the key Indigenous proponent and closest community to the national park reserve, Lutsel K'e Dene First Nation.
5. Aligned with the idea of maintaining a large, intact landscape, Parks Canada is of the view that this park will be the most visited northern national park. Canadian and international tourists will be attracted to this park because of its wilderness values, and their ability to experience authentic Indigenous cultures. Parks Canada, as well as Indigenous, philanthropic and commercial interests, will be making long-term investments in conservation and visitor programs and infrastructure precisely because of the role it will play in protecting an important northern landscape, offering unique visitor experiences and ensuring Indigenous peoples are integral to its management. These investments, and the associated visitor experiences, will continually be at risk if the prospect of industrial corridors remains a distinct possibility.
6. It has been noted that through an amendment to the *Canada National Parks Act*, Parliament did provide Parks Canada with the authority to authorize mineral access roads within Nahanni and Nááts'ihch'oh National Park Reserves, not within national parks in general. However, it must also be noted



that these roads are largely on the periphery of these park, existed prior to park establishment, and were compromises that, relative to the achievement of protecting over 34,000 square kilometres, were worth the risk.

7. Finally, I would observe that within the same Land Transfer Agreement that Parks Canada is being asked to consider industrial corridors across the national park reserve, we are also being asked to immediately, upon legal designation of the park, impose a ban on the hunting of barren ground caribou by Indigenous and non-Indigenous persons. Frankly, our ability to consider restricting Indigenous harvesting all the while being open to one or more industrial corridors cutting across the national park that would segment a critical, undeveloped migration route of the vulnerable Bathurst caribou herd is, in our view, indefensible.

In conclusion, with the potential for mineral development zones adjacent to a much smaller national park reserve, coupled with the possibility of mineral and hydro access corridors within the territorial conservation areas, Parks Canada is of the view that provision of mineral and hydro corridors would further compromise the national park reserve.

If you require any further details on our views, please do not hesitate to contact me.

Yours sincerely,

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