

**COMMENTS PROVIDED TO THE GOVERNMENT OF THE  
NORTHWEST TERRITORIES (ENVIRONMENT AND NATURAL  
RESOURCES DEPARTMENT) TO THE DEVELOPMENT DESCRIPTION  
FOR ESTABLISHMENT OF  
THAIDENE NĒNÉ NATIONAL PARK RESERVE**

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**File No. 443136.000002**

June 3, 2019

**E-mail: Michelle Swallow@gov.nt.ca**

Environment and Natural Resources  
Government of Northwest Territories  
500, 5102-50th Avenue  
Yellowknife, NT X1A 2L9

**Attention: Michelle Swallow  
Manager, Conservation Planning and Implementation**

Dear Madam:

**Re: Preliminary screening for the proposed Thaidene Nene Park**

Please accept the enclosed submission on behalf of the East Arm Property Owners Association (the "Association") regarding the preliminary screening for the Thaidene Nene Park (the "Park"). The Association is concerned with the proposed boundaries for the Park, specifically near Reliance, Northwest Territories. The Association is seeking a minor boundary adjustment and is hereby submitting a document entitled "the Reliance Adjustment" which addresses these concerns and provides a solution for consideration. On review, you will note that the Reliance Adjustment is supported by numerous organizations that represent a broad and diverse cross section of several thousand stakeholders.

Please note this correspondence is being copied directly to the Mackenzie Valley Review Board. Our client is concerned that the GNWT is both the proponent and conducting the preliminary screening of the proposed Park project. The Association's position is that GNWT's dual role is inappropriate and represents a conflict of interest for a development of this permanency and magnitude. The proposed Park is a permanent removal of a considerable amount of land and water from economic development and is contrary to the spirit and intent of Devolution in the NWT as it places limitations on the ability for northerners to prosper. The Association is of the opinion that the GNWT will and does have the final decision making authority regarding the Park pursuant to the *Canada National Parks Act*, SC 2000, c. 32.

We understand that when the boundary matrix was presented to the public in 2015, it was made clear that no alternative boundaries would be considered; however site-specific adjustments would be entertained. The Association therefore tabled the Reliance Adjustment, which was well received. In the spring of 2016, the Minister for ENR wrote to Association members stating "The maps and related information you provided suggest to me that creative solutions may be possible

to address your interests.” In the summer of 2016, the Deputy Minister for ENR, stated on Hansard in the Legislative Assembly that “..refinement needs to be completed on boundaries” and “That refinement is to be a minor area and all of that is actually in the National Park area.” To date this has not occurred. In July of 2018, the Chief Negotiator for GNWT wrote to our client and indicated that in the upcoming months, they along with other stakeholders, would be given the “opportunity to review the provisions in the draft Land Transfer Agreement and other draft agreements relating to the establishment of Thaidene Nene.” No drafts have been received to date.

Further, we understand that your office has had recent contact with other stakeholders indicating that the draft agreements are in fact confidential. Our client is concerned with the contradictory information provided by your office and failure to fulfill prior commitments.

The GNWT has an obligation to protect the people who live here when making permanent decisions over land jurisdiction. The Association seeks positive cooperation and accommodation going forward by implementing the Reliance Adjustment. The Association is seeking a pause on the Park as proposed until alternative boundaries are developed with adequate and appropriate input from all stakeholders affected.

Please feel free to contact the undersigned with any questions or concerns.

Yours truly,

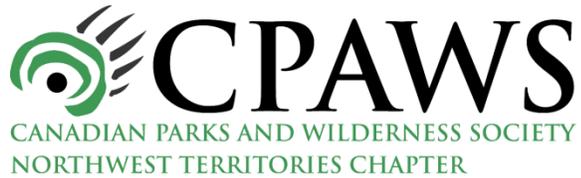
**BORDEN LADNER GERVAIS LLP**



**JUSTINE BLANCHET**

Enclosure

cc. Alan Ehlrich, Mackenzie Valley Review Board ([aehlich@reviewboard.ca](mailto:aehlich@reviewboard.ca))



**June 3, 2019**

Re: Thaidene Nene Screening  
Canadian Parks and Wilderness Society – NWT Chapter  
Submitted by E-mail: conservationplanning@gov.nt.ca

**CPAWS-NWT Comment on Preliminary Screening Notification for the Establishment of the Thaidene Nënë Territorial Protected Area**

Thank you for this opportunity to comment on the establishment of Thaidene Nënë Territorial Protected Area. We appreciate the thorough information provided in your *Description of Proposal* document.

CPAWS-NWT has been engaged in the full length of the establishment process and at this stage we are confident that the Thaidene Nënë Territorial Protected Area will be successful to provide for ecosystems and biodiversity, cultural continuity, conservation compatible economic activity and allow for residents to enjoy a wide spectrum of recreational uses.

We **do not** have any significant concerns and support that the establishment and regulation process is completed by August 2019.

**From:** [Michelle Swallow](#)  
**To:** [Patrick Clancy](#)  
**Cc:** [Loretta Ransom](#); [Darin Bagshaw](#)  
**Subject:** RE: Preliminary Screening Notification for the Establishment of the Thaidene Nënë Territorial Protected Area  
**Date:** Tuesday, June 04, 2019 9:03:43 AM

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Thanks Patrick

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**From:** Patrick Clancy  
**Sent:** Tuesday, June 04, 2019 8:42 AM  
**To:** Michelle Swallow  
**Cc:** Loretta Ransom  
**Subject:** Preliminary Screening Notification for the Establishment of the Thaidene Nënë Territorial Protected Area

Hi Michelle,

ENR has no comments or recommendations for the subject screening at this time....

Mársi | Kinanaskomitin | Thank you | Merci | Hą́ı' | Quana | Qujannamiik | Quyanainni |  
Máhsı | Máhsı | Mahsi

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**GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:**

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (*i.e.* the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (*i.e.* bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).

<b><u>TOPIC</u></b>	<b><u>COMMENT</u></b>	<b><u>RECOMMENDATION</u></b>
<i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i>	<i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i>
Preliminary screening of the Territorial Protected Area of Thaidene Nënë	The Government of the Northwest Territories (GNWT), Department of Lands - Securities and Project Assessment (SPA) Division has reviewed the proposal summary for the preliminary screening of the Territorial Protected Area of Thaidene Nënë. Based on the Department of Lands' mandate and key principles, the GNWT-SPA has no comments or recommendations at this time.	The GNWT-SPA has no comments or recommendations at this time.
Preliminary screening of the Territorial Protected Area of Thaidene Nënë - Page 2 "All existing leases in the Territorial Protected area of the Thaidene Nënë will continue under their current terms."	The Government of the Northwest Territories (GNWT), Department of Lands - Land Administration (LA) Division has reviewed the proposal summary for the preliminary screening of the Territorial Protected Area of Thaidene Nënë. Based on the Department of Lands' mandate and key principles, the GNWT-LA is in agreement with the statement that the existing leases in the protected area will continue under their current terms. LA is currently drafting notification letters to the lease holders in the protected area.	No recommendation at this time.

## **The Reliance Adjustment**



Submitted on behalf of:

East Arm Property Owner's Association

May 6, 2019

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## THE RELIANCE ADJUSTMENT

The Reliance Adjustment (the “Adjustment”) is a land management proposal with a focus on the area in and around Reliance, Northwest Territories (“NWT”), in the context of the proposed Thaidene Nene National (“National Park Reserve”) and Territorial Park (“NWT Protected Areas Strategy”) designations for the greater surrounding area.

This proposal was initially developed by members of the East Arm Property Owners Association (the “Association”). The Association is a group of concerned property owners from the East Arm area of Great Slave Lake. The proposal is now supported by numerous other stakeholder groups, associations and chambers, as outlined further below.<sup>1</sup>

The notion of creating a National Park in the East Arm of Great Slave Lake has been under discussion for 50 years. On July 14, 2015, the Government of the Northwest Territories (“GNWT”) convened a stakeholder meeting, and on July 29<sup>th</sup>, Parks Canada announced its proposed boundary for the National Park Reserve and initiated consultation on the boundary. Unfortunately, the most recent boundary proposed for the National Park Reserve now includes personal and commercial property interests, industry and stakeholder interests, sterilizes Reliance in its function as an inter-modal hub and staging area, and restricts access to the entire south-east NWT from within the NWT.

The Association requests that Reliance and its surrounding area<sup>2</sup> be excluded from the proposed National Park Reserve and that it be maintained as Commissioners land to be administered by the GNWT as territorial crown/Commissioners lands. Further, the Association requests that the Reliance Administrative Area be administered and managed in a neutral manner that recognizes and respects the prior occupation and use of the area in a variety of aspects by all interested parties and stakeholders.

In order to achieve this goal, the Association is seeking a small adjustment to the proposed National Park Reserve boundary (the “Reliance Adjustment”) that would exclude the Reliance Administrative Area from being included in any national or territorial park or park reserve. Parks Canada has made a commitment to “broad public consultations” including stakeholders and interested parties regarding the proposed park boundaries.<sup>3</sup>

A detailed description of the Reliance Adjustment and the rationale for this proposal are set out below in detail.<sup>4</sup>

### **1. What is the significance of Reliance and the surrounding area?**

Although generally in the same region and adjacent to each other, the area referred to as ‘Reliance’ is *not* in the immediate vicinity of the areas of historical importance held sacred to the First Nations. The modern day community known as Reliance is roughly 20 kilometres from the special

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<sup>1</sup> Please also see Schedules K and Q.

<sup>2</sup> Please see Schedule E and hereinafter referred to as the “Reliance Administrative Area” and corresponding transportation corridor.

<sup>3</sup> See Schedule P.

<sup>4</sup> Please refer to Schedule M for a more complete chronology of events.

and spiritual place for the Dene and Metis known as “Old Fort Reliance”. This is an important distinction for the people involved: the two places have very different histories, and the two areas have importance to two distinct populations that have co-existed for approximately 100 years. Due to the remoteness of the area, historical documents often refer to the activities and facilities at Reliance, as taking place at Fort Reliance. This occurred in official documentation<sup>5</sup> as well as those that were ‘less official’.<sup>6</sup>

Fort Reliance includes the mouth of the Lockhart River, the First Nations gathering site and the traditional Dene route to the barren ground. There are many Dene elders buried in the area and remains of an old Dene village as well as officially recognized sites of importance such as the Fort Reliance National Historic Site of Canada (remains of George Back’s Chimneys) and the spiritual site of Our Lady of the Falls on the Lockhart River. Fort Reliance is a special and spiritual place for the Lutsel K’e Dene First Nation (“LKDFN”) and should be protected according to their wishes.

Reliance has historically been the place of private, commercial, government activities in the area and has several permanent structures that remain in use. For over a hundred years, Reliance has served as the key logistical staging ground for travel to the southeast NWT barren grounds and any government activity in the region.<sup>7</sup> The settlement of Reliance hosts a sheltered deep-water port unique to the area for barge transportation allowing staging of supplies that has been in use dating back to Hudson's Bay Company operations and the Dominion Explorers Company in 1910. Reliance is still used as a staging ground for goods transported by aircraft and barge for activities in the east arm of Great Slave Lake including: local use, tourism, forest fire monitoring, wildlife counts, land inspections, search & rescue, meteorological activity and many other administrative purposes.

Further, Reliance is a registered unmonitored aerodrome, designation YFL<sup>8</sup>. Reliance offers shelter for parking aircraft that is unparalleled elsewhere in the region, as well as options for take off and landing in several directions that are sheltered from large swells on McLeod Bay. There is also a vital refuelling area facilitated by the deep-water barge landing access that makes Reliance an inter-modal hub as the point of access to the eastern reaches of the NWT and beyond for aircraft.

Significantly, Reliance has been excluded from proposed park boundaries in the past.<sup>9</sup> It was, and continues to be, a fuel cache that to this day, has been an invaluable resource to Dene, Metis and non-Dene alike for trapping, hunting, exploration, and for all forms of transport in the region. Important historical events in the region include:

- 1910: Dominion Explorers Company built a trading post and expediting point in what is referred to locally as Police Bay;

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<sup>5</sup> See [http://www.oag-bvg.gc.ca/internet/English/pet\\_199\\_e\\_28935.html](http://www.oag-bvg.gc.ca/internet/English/pet_199_e_28935.html)

<sup>6</sup> Note the photographs in Appendix A taken of facilities at Reliance that are labelled ‘Ft. Reliance’.

<sup>7</sup> See Schedule O.

<sup>8</sup> YFL operates under the name Fort Reliance as well as Reliance. Please refer to the aeronautical map in Schedule B.

<sup>9</sup> Please see Schedule C – a 1979 letter from NWT Member of Parliament, Dave Nickerson, to the then Minister of Parks Canada requesting exclusion of Reliance from the park reserve boundary that was under consideration at that time. Please also refer to Schedule D, which includes Parks Canada documents circa 1985 showing Reliance and surrounding area as excluded from the proposed park.

- 1927: RCMP established a detachment, and lent their name to the bay, across from the fuel cache. The detachment was established mainly to police, protect and monitor the newly created Thelon Game Sanctuary. The detachment was closed in 1960 as aircraft patrol utilizing the fuel cache became more efficient;
- 1935: Gus D'Aoust built and operated a trading post on the west side of Police Bay across from the RCMP detachment, which was operated until approximately 1972;
- 1944: Royal Canadian Core of Signals built a communication station on property adjacent to the RCMP detachment. Over the years, this evolved into a Ministry of Transportation (“MOT”) weather station that operated until 1990. The site is currently a Government of Canada property, which is undergoing environmental clean up. The site still contains an AES automated weather station in use today;
- 1964: The Finlayson family acquired the closed RCMP detachment and turned the site into a fishing lodge that opened in 1965. The Finlayson family is still operating Trophy Lodge on this site under a lease with GNWT;
- 1964: Logs from the old Dominion Explorers trading post were salvaged and repurposed to build new structures in Reliance, which still stand to this day. Of these, one cabin was built by Red Noyes (a Metis trapper whom Noyes Lake was named) and several of the Meteorologists from the nearby MOT Weather Station that is currently owned and maintained by Ray Decorby;
- 1974: Title was issued to a property at the end of Police Bay, which is currently owned by Roger Catling who, along with his family, lives on the property and uses it as his base for hunting and trapping;
- 1980: A lease was granted to a property on Charlton Bay in the Reliance area that was outside of the former proposed boundary. It was acquired by Spencer Decorby who uses the site year round as a personal and hunting and fishing camp (lease designation from the GNWT);
- 2016: The Arctic Institute of North America, which was created by an act of parliament in 1945, sent a formal expression of interest to the GNWT for the establishment of a new scientific research station at the site of the abandoned MOT base at Reliance. Similar to their station at Kluane Lake in the Yukon, the base was to be located outside park boundaries.<sup>10</sup>

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<sup>10</sup> Please see schedule G.

## **2. What are the changes being sought in the Reliance Adjustment?**

The Reliance Adjustment would create a neutral area that would allow Reliance to continue to serve the NWT as a strategic logistical access point from which a wide variety of personal, cultural and commercial activities could continue. This can be accomplished by excluding the area outlined in Schedule E from the National Park Reserve and allowing for a corresponding transportation corridor to the east.<sup>11</sup> In doing so, many site-specific interests would be addressed and a variety of valuable personal, cultural and commercial activities could continue.

The boundary for ‘Reliance Administrative Area’ would start on the east side of Charlton Bay extending from a point just north of Glacier Creek, extending in a south-westerly direction for approximately 18 kilometers just past the southern end of Meridian Lake then north for approximately 13 kilometers to the Territorial/Federal Consultation Boundary line, north-easterly along that Boundary line then south-easterly above Fairchild Point to the northeast corner just above Glacier Creek.<sup>12</sup>

The Reliance Administrative Area encompasses numerous aircraft and marine landing sites, a fuel cache used by GNWT Department of Environment and Natural Resources (“ENR”) as well as commercial and private interests, a fishing lodge, a homestead (titled), a weather station, a private hunting and fishing camp, and cabins. Due to its location at the Eastern extremity of Great Slave Lake, Reliance is a vital staging area for accessing lands to the north and east, as far away as Nunavut, making it a valuable Public resource. Allowing Reliance to retain these functions with this minor boundary adjustment of approximately 130 km<sup>2</sup> would bring continued benefit to government, industry, community and individuals alike.<sup>13</sup>

## **3. Rationale and Precedent for the changes being sought**

The Reliance Adjustment would result in a minor revision to the edge of the boundary of the proposed National Park Reserve that would be of long-term benefit to all stakeholders, and would preserve its function as an inter-modal hub which is a valuable public resource serving as a neutral staging area. It represents 0.03% of the overall land withdrawal, and 0.9% of the proposed National Park Reserve. The Reliance Adjustment would result in a significant cost-benefit saving for northern people, businesses, industries and governments alike. By excluding the Reliance Adjustment from of the National Park Reserve, Reliance can retain the functions that it has held for over 100 years, which make it a valuable public resource for the people, businesses and industries of the NWT. By keeping Reliance in the hands and control of Northerners, the area will be able to continue in this service for future generations. Historically Reliance was excluded from prior proposed park boundaries at the request of residents and government representatives for the very similar reasons as those being proposed herein.<sup>14</sup>

The Reliance Adjustment would be in keeping with precedent for park development in the NWT and Nunavut, as follows:

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<sup>11</sup> Please see Schedule E.

<sup>12</sup> Please refer to maps contained in Schedule E.

<sup>13</sup> See Schedule J.

<sup>14</sup> See Schedules C and D.

1. The current boundaries proposed for the National Park Reserve exclude several areas<sup>15</sup>, primarily for mineral interests<sup>16</sup>. However, the Association understands that the exclusion area around Lutsel K'e was included for the same reasons proposed for the Reliance Adjustment, including unfettered access and operation of the settlement for the benefit of the public.
2. Wager Bay in Nunavut was excluded from the park so that barges can continue to access the head of the bay where aircraft can stage from there. The Association submits that this is identical in nature to Reliance serving as a staging area for barges and aircraft.
3. The exclusion area within Nahanni National Park is a key example that maintaining logistical access to resources can be integrated successfully in the establishment process of National Parks. For example, please see exclusion zone for Prairie Creek located in Nahanni National Park.
4. Most recently, during the establishment process for Nááts'ihch'oh National Park Reserve in the NWT, the GNWT identified the continued and historical importance of O'Grady Lake as a valuable public resource for staging, landing aircraft, and accessing the general area. Subsequently, O'Grady Lake was not included in any of the boundary options for the park so that it could continue in its functions serving the public. The Association submits that Reliance should be excluded from the National Park Reserve for the same reasons.

The Association submits that the rationale which has excluded Reliance from proposed park boundaries in the past has not diminished with the passing of time, and should be in and of itself adequate precedent for continuing to exclude Reliance from the proposed National Park Reserve.

The Reliance Adjustment would respect all of the special interests that have been identified by governments and the Dene as being in need of protection. These interests were identified through consultations, including with the Lutsel K'e Dene during land claim negotiations since the 1980s and via a number of studies including: the federal Mineral and Energy Resource Assessment (MERA) conducted for the 2007 land withdrawal, the 2009 Parks Canada Assessment of Landscape Values (ecological goods and services) and the 2015 GNWT matrix of protected area designations. Reliance does not contain any of the ecological, cultural, wildlife, mineral, or energy interests identified as being of importance and in need of protection.<sup>17</sup>

The Association is seeking to have Reliance maintained as Territorial land that is not restricted by National Park Regulations. It should simply be a neutral area where existing interests and functions are recognized and respected and maintained within the current Territorial regulatory regime.

Retaining open and unfettered access to Reliance and its surrounding area would maintain the area as somewhere that people live, work and recreate. The Reliance Adjustment and corresponding transportation corridor would serve to maintain access to the southeast NWT into the future. It would preserve access to the Reliance Administrative Area for all parties and for key activities such as use of the fuel cache and aerodrome, a marine transportation port, staging for transportation

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<sup>15</sup> Please refer to the area outlined in red on the first map in schedule E.

<sup>16</sup> See Schedule E (red shaded areas).

<sup>17</sup> See Schedule F.

of goods and people, tourism, economic development through mineral resource exploration and development, and government activities (wildlife monitoring, land inspections, forest fire fighting, water management support, search and rescue, environmental clean-up, access to the weather station, park management etc.).

The Association would like to thank you for considering this change to the proposed boundary for the National Park Reserve, as outlined in the enclosed Reliance Adjustment. The Association respectfully requests that the Reliance Adjustment and corresponding transportation corridor be excluded from the National Park Reserve.

**SCHEDULE A  
PHOTOS FROM THE SIGNAL CORPS OF THE SIGNAL STATION AND THE  
TRADING POST AT RELIANCE**

**VEU - Fort Reliance, NWT.**

Position: 62:45N-109:05W. Opened in July 1948 to provide weather information. It was transferred to the Department of Transport on 11 March 1959.



Photo: Courtesy Fred Burwell

**RCSigs Station Ft. Reliance, 1948**



Photo: courtesy Fred Burwell

**Canso At Ft. Reliance - 1948**



Photo: courtesy Fred Burwell

**RCSigs Compound Ft. Reliance 1948**



Photo: Courtesy Peter Sinclair

**Ft. Reliance - 1950**  
RC Sigs Station on the right. RCMP barracks on the left.  
Taken from Mauffley Point, across from the station.



Photo: Courtesy of Peter Sinclair

**Ft. Reliance - 1950**  
On the left is the RC Sigs station and on the right the HBC Post.



**RC Sigs Station Fort Reliance, 1956**



Photo: Courtesy of Edith Nielsen

**RC Sigs Station Ft. Reliance c. 1950**  
(Our thanks to Dave Kiernan of  
Victoria BC for confirmation of the location)



Photo: Courtesy of Fred Burwell

**RCSigs Station Ft. Reliance 1957**



RCSigs Station Fort Reliance - 1956



Photo: Courtesy Fred Burwell

RCSigs Station Ft. Reliance 1957  
Fuel drums



Photo: courtesy Fred Burwell

Ft. Reliance, C. 1952. The man on the left is wearing puttees so he may be a signaller from the station. The one on the right is obviously RCAF and is thought to be Roger Powers. If anyone can confirm this, or offer information to the contrary, please contact us.



Photo: C&E Museum

U-101

Ft. Reliance, c. 1956. Unknown corporal with Kenny Bellefontaine's famous lake trout. If anyone can identify this man please get in touch with us.

From: <http://nwtandy.rcsigs.ca/stations/reliance.htm>

**SCHEDULE B  
AERONAUTICAL MAP SHOWING THE UNMONITORED AERODROME AT  
RELIANCE**



**SCHEDULE C**  
**1979 LETTERS FROM NWT MP, DAVE NICKERSON TO MR. LUEBBERT AND MINISTER FOR**  
**PARKS CANADA**

**Regarding a minor change to the proposed National Park boundary to exclude Reliance**



HOUSE OF COMMONS  
CANADA

Box 1778  
Yellowknife, N.W.T.  
September 17, 1979

Mr. L.M. Luebbert  
Fort Reliance, N.W.T.

Dear Mr. Luebbert:

Thanks for your letter of September 3, 1979. Unfortunately, as you have been advised before by various government officials the land which you seek to lease has been withdrawn from disposal under the Territorial Lands Act by Order in Council 1970-526 in order to establish a National Park Reserve. The only way to change this is by way of another Order in Council (made by the federal cabinet) and I would suggest that you write to the Honourable John Fraser, the Minister responsible to Parks Canada urging him to bring this matter before cabinet.

I have spent some time studying this subject and am astounded that Fort Reliance and all of Fairchild Point have been included in the Reserve. I find that you are by no means alone in wanting land in this area and indeed because of the special location the Government itself will in all probabilities require land here at some time in the future.

Accordingly, I have written to Mr. Fraser requesting that he takes steps to exclude at least the Southwest end of Fairchild Point from the Reserve and I remain hopeful that he will see the wisdom in such a change. A copy of my letter to him is enclosed. If such a change is made then of course you would be in a position to reapply for the land you require.

Yours faithfully,

*Dave Nickerson*  
Dave Nickerson, M.P.



HOUSE OF COMMONS  
CANADA

Box 1778  
Yellowknife, N.W.T.  
September 17, 1979

Honourable John Fraser, P.C., M.P.  
Minister responsible for Parks Canada  
House of Commons  
Ottawa, Ontario

Dear Mr. Fraser:

Under the authority of Order in Council 1970-526 certain lands in the East Arm area of Great Slave Lake were withdrawn from disposal under the Territorial Lands Act in order to establish the East Arm National Park Reserve.

Apart from the larger argument as to whether or not a National Park should be established here bearing in mind the traditional interest of hunters and trappers in the area, the mineral and hydro-electric potential and the fact that the proposed Y-line gas pipeline might, if constructed, need to pass through the area, together with the inability of the government to properly develop existing Parks in the North I wish to bring to your attention a rather minor point concerning the Reserve boundary which could easily be rectified now but might be difficult to do once a National Park had been brought into being.

With reference to the accompanying map you will see that the present boundary puts within the Reserve all of Fairchild Point including the post of Fort Reliance. Fort Reliance is by far and away the most suitable location for a settlement in the area. It is used as a base by hunters and trappers some of whom make their permanent residence there and would most certainly like to acquire title to the land on which their dwellings are situated. In addition there are government installations such as air radio and weather stations together with an RCMP post which I believe is now used as a fishing lodge. There is a natural harbour which is used by the Northern Transportation Company Ltd., a federal crown corporation, and because of the sheltered location several aviation companies use it to cache gas and supplies. If a National park were ever established Fort Reliance would be the logical

place from which outfitters and others with Park oriented interests should operate.

For these reasons it would make eminent sense to make a minor change in the reserve boundary locating it along the Northwest shore of Fairchild Point instead of the Southeast side. This proposed change is outlined in red on the map.

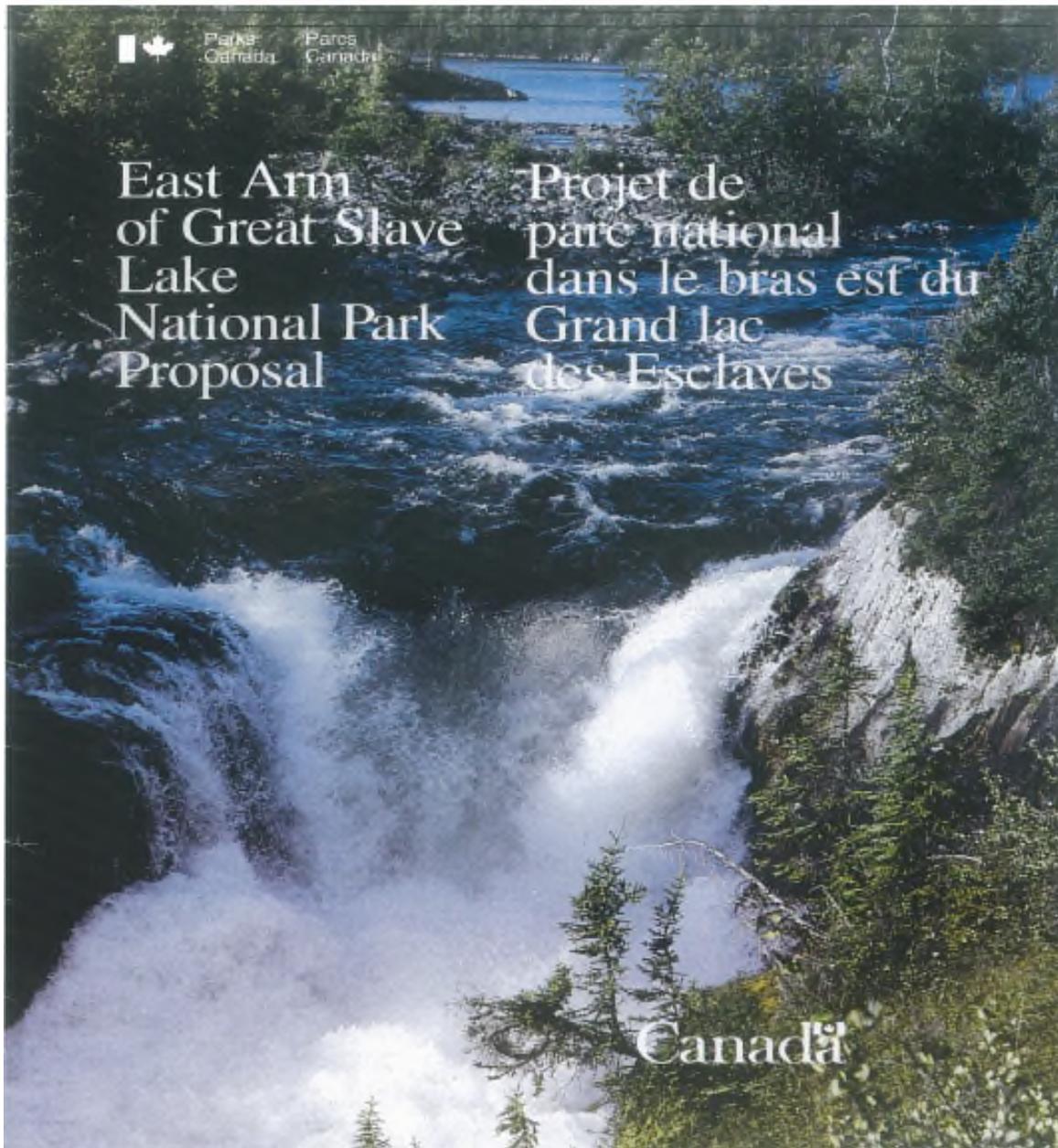
Could you please consider this matter and advise me whether you will be prepared to proceed with the necessary Order in Council to give effect to this required change.

Yours faithfully,

*Dave Nickerson*

Dave Nickerson, M.P.

**SCHEDULE D  
PARKS CANADA 1985/86 PROPOSAL, BOUNDARY MAP FOLLOWING PAGE  
EXCLUDING RELIANCE FROM PROPOSED PARK.**

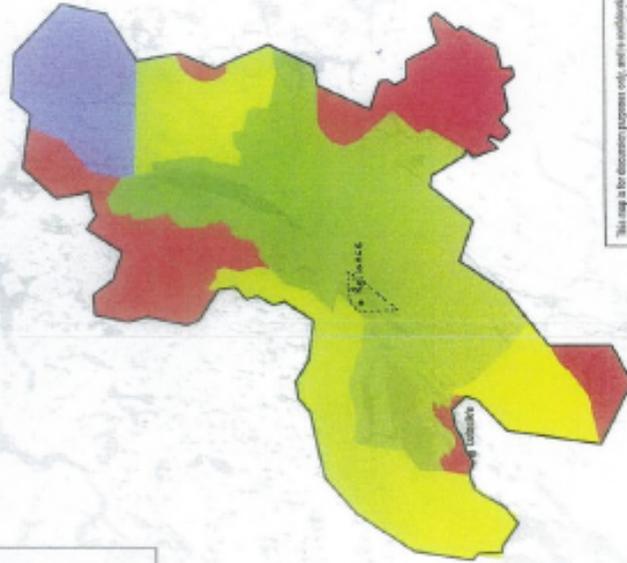




**SCHEDULE E**

**MAPS (3) OF LANDS TO BE EXCLUDED FOR THE RELIANCE ADJUSTMENT, AS INDICATED BY THE DOTTED LINE OUTLINING THE RELIANCE ADMINISTRATIVE AREA, WHICH REPRESENTS 0.38% OF THE LAND WITHDRAWAL**

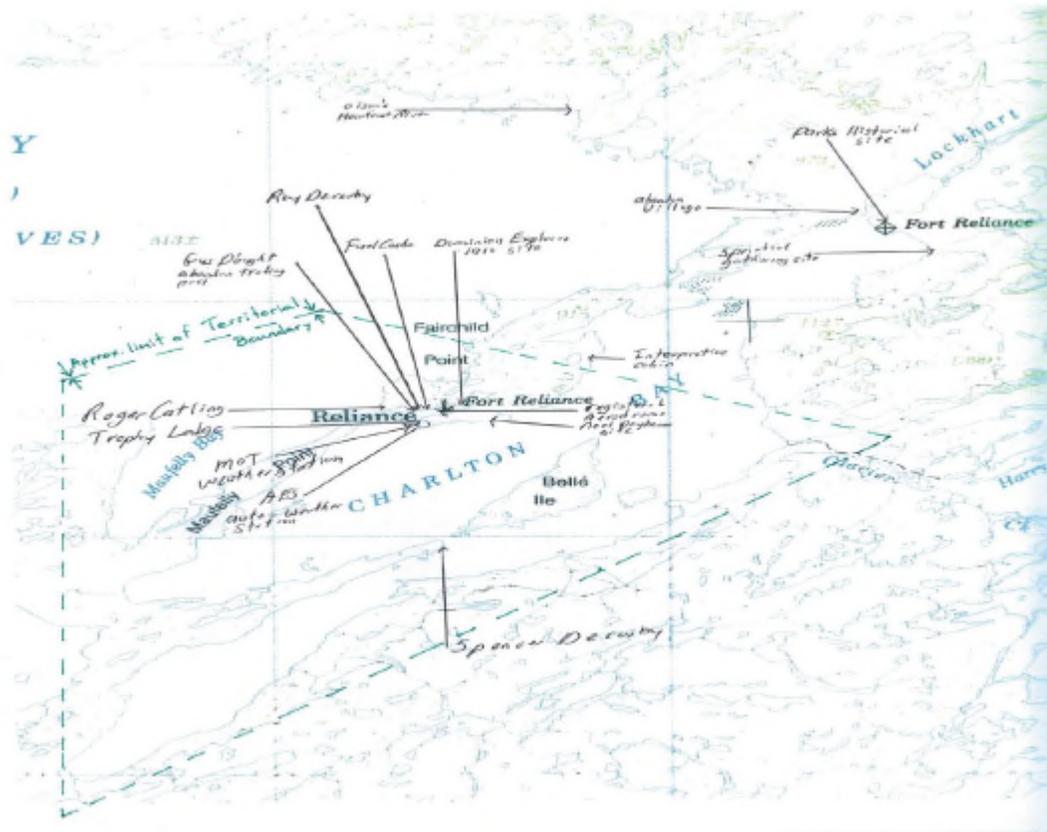
**TDN Conservation Areas  
Consultation Boundaries**



This map is for illustrative purposes only, and is not intended to be used for legal purposes. It may, without notice, be subject to change without notice and is subject to ongoing consultation and negotiation.



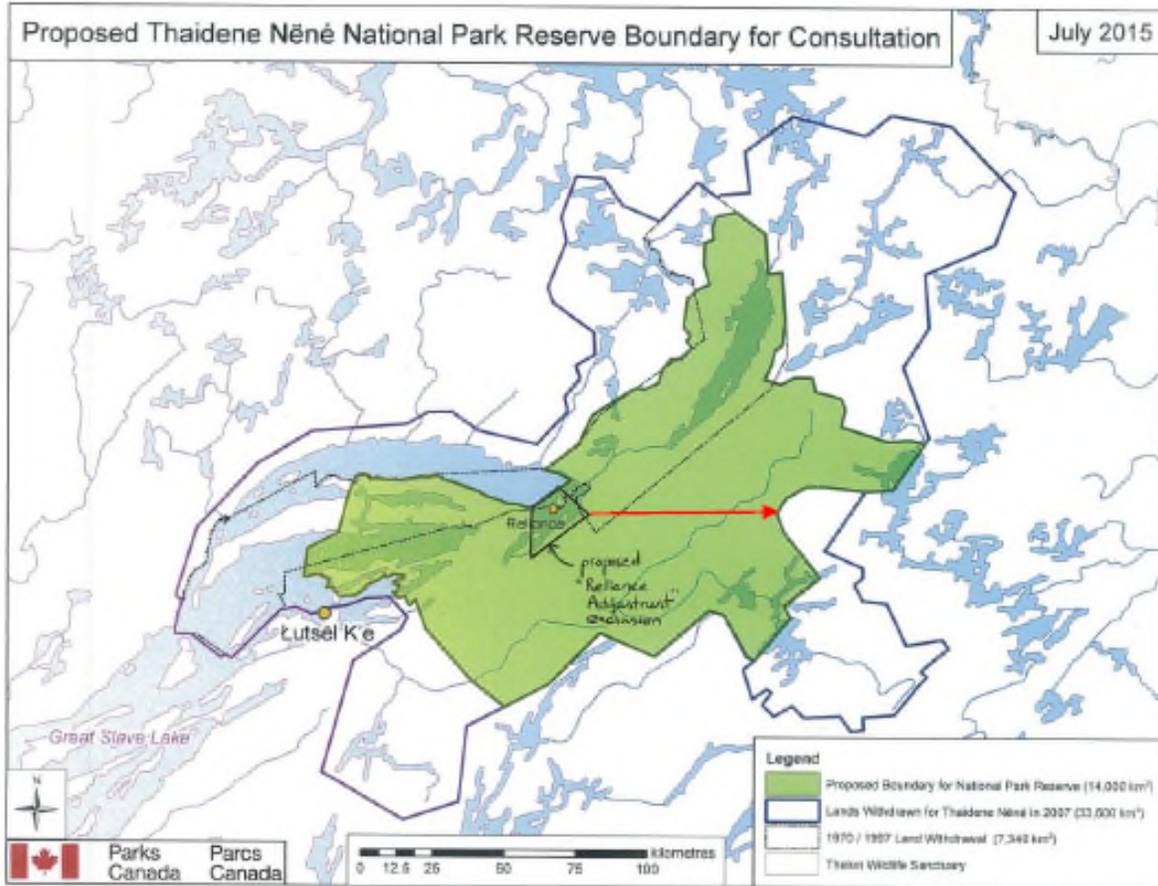
Schedule E – cont'd



## Schedule E – cont'd

The Reliance Administrative Area represents 0.9% of the Proposed National Park Reserve.

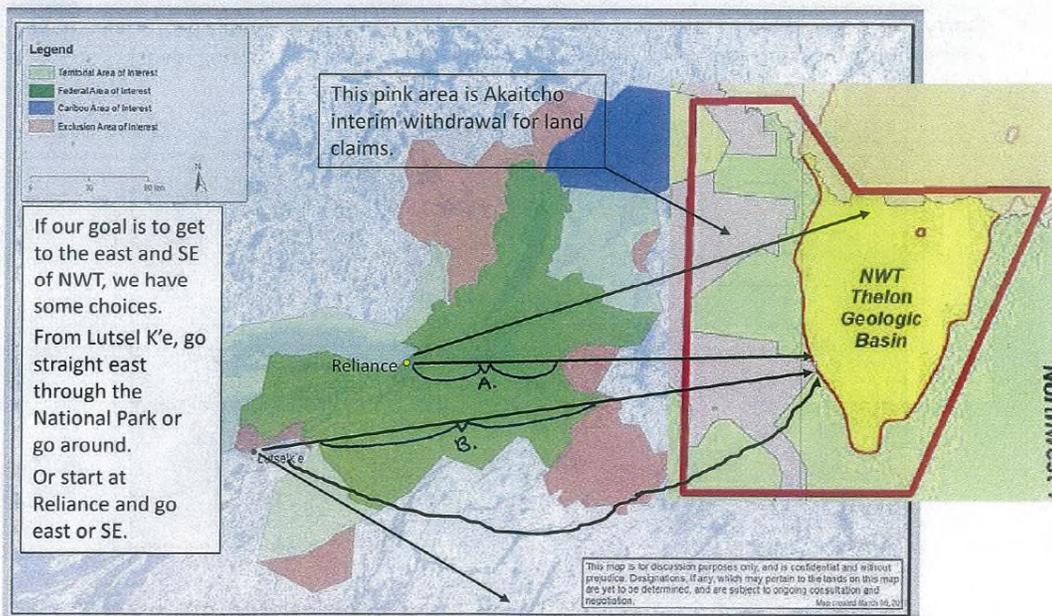
The corresponding transportation corridor to the southeast NWT indicated in Red.





**SCHEDULE G  
CHAMBER OF MINES' WORK ON POTENTIAL CORRIDOR ROUTING DEMONSTRATING  
RELIANCE AS THE BEST DEPARTURE POINT.**

I've tried to position the high mineral potential in the Thelon region on this map to show it as one target for possible future mining development and access. The best way to get there is from Reliance thru the national park, not Lutsel K'e. Lutsel K'e should be asked if they will keep this Thelon area off limits forever too, and that position should be used in discussions on park boundaries, corridors, etc.



Another area to perhaps reach is the SE of NWT. We have some choices. Go from Lutsel K'e through the National Park (they don't want that), or go around it as shown. That's a lot further to SE NWT, or to the Thelon. Or start at Reliance and go east or SE.

4

*Note: "A" is half the distance of "B". Therefore departing from Reliance results in a corridor through the National component of TDN that is half as long.*

Federal Government Mineral Resource Assessment for TDN acknowledging the area contains significant mineral resource potential

CHAPTER 11.  
POTENTIAL FOR KIMBERLITE-HOSTED DIAMOND OCCURRENCES,  
THAIDENE NENE MERA STUDY AREA

B.A. Kjarsgaard

Geological Survey of Canada, 601 Booth Street, Ottawa, Ontario K1A 0E8

INTRODUCTION

There are twenty known kimberlite occurrences in the Thaidene Nene Area of Compilation that lie within the 540–520 Ma (Henman et al., 2003, 2004) southeast Slave kimberlite field (Figs. 11.1, 11.2). All of the known kimberlite occurrences lie outside the Area of Interest for the proposed Thaidene Nene national park, however, the Faraday, Kelvin, and Hobbes kimberlite pipes are less than 250 m from the border of the study area (Fig. 11.2). Ten of the twenty occurrences are in two kimberlite complexes: within the Gahcho Kué kimberlite cluster, the 5034 body contains the centre lobe, north lobe, south lobe, and east lobe; the MZ Lake kimberlite occurrence consists of six distinct sills. A National Instrument (NI) 43-101 compliant mineral-reserve statement was recently completed (October 15, 2010: <http://www.mountainprovince.com/>) on the Gahcho Kué joint venture (De Beers Canada 51%, Mountain Province Diamonds 49%), i.e., the 5034, Hearne, and Tuzo kimberlite pipes. This study reports probable reserves of 31.3 Mt of kimberlite grading 1.57 carats/tonne, with 49 million contained carats of diamond. Gahcho Kué stone values were recently re-appraised utilizing April 2011 diamond prices. Revised values are 108/carats, 315/carats, and 93/carats for the 5034 Centre/East Lobe, 5034 West Lobe, and Hearne and Tuzo bodies, respectively (May 5, 2011: <http://www.mountainprovince.com/>).

POTENTIAL FOR ADDITIONAL  
KIMBERLITE PIPES IN THE  
THAIDENE NENE STUDY AREA

The potential for additional kimberlite bodies in the Thaidene Nene study area can be determined on the basis of a number of different geological factors that are summarized in Kjarsgaard (2007). Kimberlite-hosted diamond deposits are found within ancient Precambrian terrains older than 1.5 Ga (Clifford, 1966: "Clifford's Rule"). Diamond (i.e. macrodiamonds, as opposed to microdiamonds) requires specific pressure and temperature (P-T) conditions to form and remain stable with respect to graphite. These P-T conditions (typically  $P > 4.0$  GPa and  $T < 1350^{\circ}\text{C}$ ) are only present within thick, old lithospheric mantle roots that have

low paleogeothermal gradients. These roots lie under ancient continental nuclei. Modern geochronological studies on Precambrian terrains have led to better temporal understanding of the formation of continental nuclei, which Janse (1984: "Janse's Rule") utilized to suggest kimberlite-hosted diamond deposits are in fact found within Archean continental blocks. The age of major producing or past-producing kimberlite-hosted diamond mines worldwide ranges from ca. 1200 Ma to ca. 52 Ma. The age of the Gahcho Kué kimberlite pipes (520–540 Ma), coupled with an underlying thick mantle root and cool paleogeotherm (Kopylova and Caro, 2004) within this part of the Archean Slave Province, are consistent with their diamond tenor.

The Thaidene Nene study area comprises five major tectonic elements: the Archean Slave and Churchill (Rae Domain) cratons, separated by the Paleoproterozoic Taltson and Thelon magmatic-tectonic zones and the younger Paleoproterozoic East Arm Supergroup volcano-sedimentary package (Fig. 11.1). Of significant importance for diamond potential is the tectonic relationship between the Paleoproterozoic Thelon and Taltson magmatic-tectonic zones and the Archean Slave and Churchill (Rae Domain) cratonic blocks. Based on results of a teleseismic transect from the Slave Craton, across the Taltson magmatic-tectonic zone, and into the Churchill (Rae Domain) (Fig. 11.1), Snyder (2013) suggests that the Taltson magmatic-tectonic zone is underlain by Slave lithosphere, and that Slave lithosphere also partly underlies Churchill (Rae Domain) lithosphere. Given that there are three diamond mines in the Slave Craton (Ekati, Diavik, Snap Lake), a fourth, Gahcho Kué, in environmental impact review (August 2, 2011: <http://www.mountainprovince.com/>), and that the MERA study area is predominantly underlain by Slave or Churchill (Rae Domain) lithosphere, suggests that there is potential for diamondiferous kimberlite within a significant portion of the study area. Thus there is a possibility that there is diamond potential in the Taltson magmatic-tectonic zone (and also in the East Arm Supergroup), if these terranes are in fact underlain by Slave lithosphere.

There are also two significant diamond occurrences worldwide that at a first approximation do not follow

Kjarsgaard, B.A., 2013. Potential for kimberlite-hosted diamond occurrences, Thaidene Nene MERA study area, Chapter 11. In Mineral and Energy Resource Assessment for the Proposed Thaidene Nene National Park Reserve in the Area of the East Arm of Great Slave Lake, Northwest Territories, (eds.) D.F. Wright, E.J. Ambrose, D. Lemkow, and G.F. Bonham-Carter; Geological Survey of Canada, Open File 7198, p. 339-348.

**SCHEDULE H**  
**EXCERPT FROM THE ARCTIC INSTITUTE OF NORTH AMERICA'S RECENT EXPRESSION OF**  
**INTEREST FOR ESTABLISHING A SCIENTIFIC RESEARCH STATION AT RELIANCE THAT IS**  
**SPECIFIC TO EXCLUDING RELIANCE FROM PARK DESIGNATION**

**CONFIDENTIAL**  
**DRAFT FOR DISCUSSION**

**EXPRESSION OF INTEREST**  
**COLLABORATION IN PROPOSED RESEARCH**  
**STATION**  
**AT RELIANCE, NORTHWEST TERRITORIES**

**From: ARCTIC INSTITUTE OF NORTH AMERICA**  
**UNIVERSITY OF CALGARY, ALBERTA**

**To: DEPARTMENT OF EDUCATION, CULTURE AND**  
**EMPLOYMENT**

**GOVERNMENT OF THE NORTHWEST TERRITORIES**

**November 17, 2016**

**Contact:**  
**Mary Stapleton**  
**Cultural Liaison, AINA**  
[mary@stapleton.ca](mailto:mary@stapleton.ca)  
403.931.2453

Reliance. It was built in 1833 by Alexander Roderick McLeod of the Hudson's Bay Company to serve as a base of operations during the Arctic Land Expedition of Captain George Back, R.N. It served as the winter camp for the search for the missing John Ross Expedition. This expedition also explored much of the Thelon, and Great Fish Rivers (now the Back River). Half a century later, a log cabin was built on the site by Buffalo Jones, an American trapper, in 1897. It was later occupied by explorer and author Earnest Thompson Seton. Four stone fireplaces and daub chimneys remain, and accessible by water from present-day Reliance.

The number and frequency of explorers such as Back and McLeod having spent time in the Reliance area has left a legacy of archived journals, recorded data, and general historic information. The benefit of this historic information to present-day scientific research is immense, as it provides researchers with base line information going back so many years, which in turn allows their studies to take a long-view in time when making hypotheses and conclusions.

### Issues

The land withdrawal for a park reserve, which was developed over many years by the federal government, is currently subject to regulatory conditions which allow the possibility of creating a joint federal/territorial park. The land is withdrawn until 2017.

As soon as remediation of the former Environment Canada MOT site by the Federal Government is completed, the land can be handed over to the GNWT, per the Devolution agreement. At that time the development of the Research Station could begin if need and desirability have been agreed upon. It would be desirable to save certain existing buildings for re-purposing.

The establishment of an Administrative Area around the settlement of Reliance, by way of exclusion from park designation would be useful to such a research station site. A 'neutral zone' at the strategic location of Reliance, administered by the GNWT, would resolve some site-specific issues, and create conditions similar to the Kluane Lake Station, which is just outside the Kluane Lake National Park. This proximity provides easy access to pristine park wilderness for research, but also allows the Station itself to function outside of those regulatory confines. More generally, it will allow Reliance to remain a logistical hub of activity going forward, providing access to the overall area, and allowing for uses such as the establishment of a scientific research station.

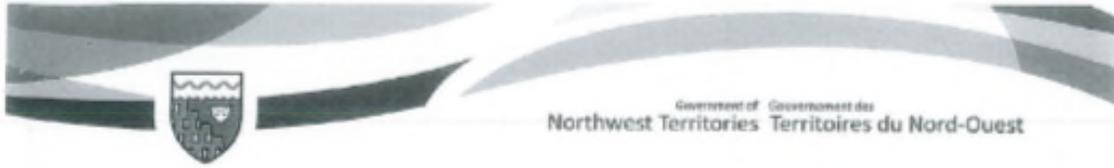
### Conclusion

This seems to be a unique opportunity for the Northwest Territories and the scientific community to respond to the growing demand for northern research. We are hopeful that both Governments involved will consider the feasibility to become



## SCHEDULE J

### LETTER FROM MINISTER TO ASSOCIATION MEMBER SUGGESTING A SOLUTION IS POSSIBLE



APR 01 2016

Mr. Ray Decorby  
BOX 2542  
YELLOWKNIFE NT X1A 2P8

Dear Mr. Decorby:

#### **Thaidene Néné**

Thank you for your letter of March 8, 2016 regarding Thaidene Néné (TDN). I appreciate your comments on the responsibilities that come with the role, and I am looking forward to achieving the goals that the 18<sup>th</sup> Legislative Assembly has set. Your letter makes several points, and I would like to address each of those in turn.

The letter expresses disappointment in the response I gave in the Legislative Assembly to a Member concerning TDN because my department was perceived to be advancing my predecessor's park proposal. The approach advanced on TDN in the 17<sup>th</sup> Legislative Assembly, while led by then Minister J. Michael Miltenberger, had the full support of Cabinet. As the lead Minister, and as the mandate of the 18<sup>th</sup> Assembly directs, I look forward to completing the task and establishing TDN within the life of this Assembly.

The letter suggests the process was hasty and did not involve enough consultation with stakeholders. We made the considered decision to adopt an expedited, collaborative process to build consent among the parties to TDN negotiations. Given your considerable knowledge of the timelines for other land - related processes in the Northwest Territories (NWT), I am sure you can appreciate why we chose a more nimble process. On the issue of broad and meaningful consultation, I fully support our Chief Negotiator's initiative to engage directly with interest holders in the TDN to allow for meaningful input to address interest holders' specific land-related issues in the area. I am pleased that my officials have worked with you and other interest holders to identify your concerns and seek creative solutions to address those. The maps and related information you provided suggest to me that creative solutions may be possible to address your interests. I would encourage you to continue to work with my officials to resolve your concerns.

.../2

While your letter suggests more time and study is needed to address long-term impacts, our work on TDN is intended to demonstrate that nimble and focused negotiations of this nature result in agreements which create certainty. This is good for business. The proposed conservation areas were adjusted significantly through negotiations to exclude areas of high mineral potential. On the conservation economy, we are working with Aboriginal governments to develop a model that ensures the communities can engage in sustainable tourism initiatives and related ventures that can build a long-term economic base in the area.

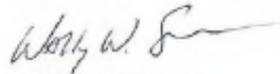
On the point that land claims should be concluded before conservation areas are established, it is a priority of this government to see outstanding land claims settled within the life of this Assembly, but we also see TDN being much better positioned to conclude its business in the shorter term. I strongly believe that the TDN model may help to pave the way for concluding land claims.

Lastly, I agree with your view that control of lands should remain within the NWT. Given that the TDN area has been under consideration for a national park reserve since 1970, that Parks Canada has a significant investment in the area, and that Canada has recently released further statements where the federal government makes clear their intention to exceed, if possible, their target of having 17 percent of Canada set aside into conservation areas, I believe we achieved a significant reduction in the federal footprint.

I want to encourage you to continue to work with my officials to discuss your interests in the TDN area. I understand you are confirming a meeting at the end of the month. Working together, I believe we can arrive at a solution that meets our mutual interests and the interests of others in the TDN area.

W.R.A.

Sincerely,



Wally Schumann  
Minister  
Environment and Natural Resources

- c. The Honourable Robert R. McLeod, Premier  
Mr. Gary Bohnet, Principal Secretary  
Mr. Martin Goldney, Deputy Minister  
Aboriginal Affairs and Intergovernmental Relations

**SCHEDULE K**  
**STAKEHOLDER LETTERS IN SUPPORT OF THE RELIANCE ADJUSTMENT.**



January 4, 2016

Attn. Spencer Decorby, Secretary, East Arm Property Owners Association

Dear Mr. Decorby,

We are in receipt of the position paper developed by the East Arm Property Owners Association regarding the Reliance Adjustment.

After review, and good discussion at our last director's meeting, our executive has resolved to support the Reliance Adjustment, as proposed, without amendment.

Thank-you for reaching out to our organization.

Sincerely,

Hal Logsdon, President  
NWT Floatplane Association



Spencer Decorby  
Secretary  
East Arm Property Owners' Association

January 4<sup>th</sup>, 2016

Re: Reliance Adjustment

Dear Spencer,

We are writing to express our support for the proposed "Reliance Adjustment" to allow our members continued access to Reliance for refuelling and logistical purposes. Please feel free to contact us if there is anything we can do to help support you in this matter.

Sincerely,

Stephen Nourse

Executive Director

NATA



January 11, 2016

Mr. Spencer Decorby  
Secretary  
East Arm Property Owners' Association  
Yellowknife, NT

Dear Spencer,

**Re: Reliance Adjustment and proposed Thaidene Nene National Park Reserve**

Further to your request to the Chamber of Mines to support an adjustment of the proposed boundaries of the Thaidene Nene National Park Reserve that would see Reliance excised from the Park, we are pleased to support such a change.

Such an adjustment is consistent with our general desire to see other locations too being protected for transportation and other logistical purposes so that lands in, or beyond the proposed park region are able to be accessed freely for industrial and other future development purposes.

Please feel free to contact us if there is anything we can do to help support you further in this matter.

Sincerely,

**NWT & NUNAVUT CHAMBER OF MINES**

Tom Hoefler  
Executive Director



Mr. S. Decorby  
Secretary *property*  
East Arm Cabin Owners Association  
Yellowknife, NT

May 24 2017

Dear Mr. Decorby,

**Re: Reliance Adjustment - Proposed Thaidene Nene National Park**

You have requested the NWT Chamber of Commerce to provide a letter of support in relation to an adjustment of the boundary of the proposed Thaidene Nene national Park in the East Arm of Great Slave Lake.

We have reviewed the document "The Reliance Adjustment V4.2017" and concur with the rationale expressed in that document, noting the importance of this location for logistical and transportation purposes and the preservation of access for local communities and northern based industry.

We are pleased to support your proposal for a boundary adjustment.

Please do not hesitate to contact us if you require any additional support in pursuing this matter.

Yours sincerely,

**NWT Chamber of Commerce**

A handwritten signature in blue ink, appearing to read "Trevor Wever", is written over a horizontal line.

Trevor Wever  
President



#21, 4802 50th Avenue  
Yellowknife, NT X1A 1C4  
Phone: (867) 920-4944  
Fax: (867) 920-4640  
ExecutiveDirector@YKChamber.com

May 26, 2017

Spencer Decorby  
Secretary  
East Arm Property Owners' Association

**RE: Reliance Adjustment for the proposed Thaidene Nene National Park Reserve**

Dear Mr. Decorby,

Your document, *Reliance Adjustment V.4*, was presented to the Board of Directors of the Yellowknife Chamber of Commerce on May 23, 2017 for discussion. We are pleased to support your recommendation that Reliance be excluded from the boundaries of the proposed Thaidene Nene Nation Park Reserve.

Please let us know if you require any additional information.

Sincerely,

Handwritten signature of Renée Comeau in black ink.

Renée Comeau  
President

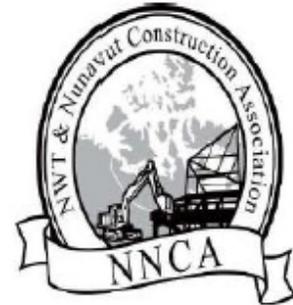
Handwritten signature of Deneen Everett in black ink.

Deneen Everett  
Executive Director



Mr. Spencer Decorby  
Secretary  
East Arm Property Owners Association  
Yellowknife, NT

April 27, 2018



Dear Spencer,

**Re: Reliance Adjustment and proposed Thaidene Nene National Park reserve**

Further to your request and review of the position paper the NNCA supports this adjustment proposal to maintain Reliance as Territorial lands.

Such an adjustment is vital for northern based business and our desire is to guaranteed it remain available as a logistical transportation hub, in conjunction with a corresponding transportation corridor for logistical purposes to the east through the proposed National Park. This adjustment will provide solid access for northern stakeholders to the south east NWT and beyond.

Sincerely,

Dave Brothers  
President  
Northwest Territories and Nunavut  
Construction Association

**SCHEDULE L**  
**RELEVANT SECTIONS OF THE CANADA NATIONAL PARKS ACT, SC 2000, C 32**

**GRANTING GNWT AUTHORITY TO DETERMINE WHETHER THE PARK PROCEEDS, HOW BIG IT IS, AND WHERE THE BOUNDARIES LIE, BEFORE THEY AGREE**

*GNWT is in control:*

Relevant Sections of the Canada Parks Act

- **6. (1)** Subject to section 7, the Governor in Council may, by order, for the purpose of establishing or enlarging a park reserve, amend Schedule 2 by adding the name and a description of the reserve, or by altering the description of the reserve, if the Governor in Council is satisfied that the government of the province in which the lands to be included in the reserve are situated has agreed to their use for that purpose.

- **Marginal note:** Reserve lands becoming park

(2) Where a claim referred to in subsection 4(2) is settled, the Governor in Council may, by order,

- (a) amend Schedule 2 by removing the name and description of the park reserve or by altering that description; and
- (b) if the settlement provides that the park reserve or part of it is to become a park or part of one, amend Schedule 1 by adding the name and a description of the park or by altering the description of the park, if the Governor in Council is satisfied that Her Majesty in right of Canada has clear title to or an unencumbered right of ownership in the lands to be included in the park.

*read Territory - NWT is now incl. in list of definitions in N.P.A. as a Province*

- **Marginal note:** Judicial finding as to title

(3) If a court of competent jurisdiction finds that Her Majesty in right of Canada does not have clear title to or an unencumbered right of ownership in lands within a park reserve, the Governor in Council may, by order, amend Schedule 2 by removing the name and description of the reserve or by altering that description.

- **Marginal note:** No reduction of reserve area

(4) Except as provided by subsections (2) and (3), no amendment may be made by the Governor in Council to Schedule 2 for the purpose of removing any portion of a park reserve.

- 2000, c. 32, s. 6;
- 2002, c. 18, s. 31.2.

**Marginal note:** Amendment to be tabled and referred

- **7. (1)** Before an amendment is made to Schedule 1 or 2 for a purpose referred to in subsection 5(1) or 6(1), respectively, the proposed amendment shall be tabled in each House of Parliament, together with a report on the proposed park or park reserve that includes information on consultations undertaken and any agreements reached with respect to its establishment, and an amendment so tabled stands referred to the standing committee of each House that normally considers matters relating to parks or to any other committee that that House may designate for the purposes of this section.

- **Marginal note:** Disapproval by committee

(2) The committee of each House may, within 30 sitting days after the amendment is tabled, report to the House that it disapproves the amendment, in which case a motion to concur in the report shall be put to the House in accordance with its procedures.

- **Marginal note:** Amendment allowed

(3) A proposed amendment to Schedule 1 or 2 may be made if 31 sitting days have elapsed after the tabling of the amendment in both Houses and no motion referred to in subsection (2) has been proposed in either House.

- **Marginal note:** Amendment not allowed

(4) A proposed amendment to Schedule 1 or 2 may not be made if either House passes a motion referred to in subsection (2).



## Cone of silence fell on Parks Canada when province pulled plug on national park

By Oliver Chronicle - September 28, 2016



*The national park reserve plan has stirred up renewed emotions since the recent announcement by federal, provincial and First Nations officials. (Richard McGuire file photo)*



A cone of public silence dropped over Parks Canada officials in the two months following the B.C. government's abrupt announcement in December 2011 that it was ending talks about a national park reserve in the South Okanagan.

*The proposed national park reserve is not just simply a walk in the park. (Photo by Richard McGuire)*

At first federal officials sought to defend the park plan, while acknowledging that Parks Canada couldn't proceed without provincial support.

But then a "change in direction" came down and media calls went unanswered, meetings with stakeholder groups were cancelled and messaging was sanitized on Parks Canada's website to avoid any statements that might cause offence to the B.C. government.

This information came to light in hundreds of pages of federal and provincial documents obtained by the *Osoyoos Times* during a two-year investigation into the

circumstances that derailed the national park proposal.

Some of the heavily redacted (censored) documents obtained from Parks Canada took almost a year and a half to release, in violation of the federal Access to Information Act.

The documents make clear that Parks Canada sought to protect the progress it was making on collaboration with First Nations, while at the same time treading gently so as not to damage its relationship with the B.C. government.

But it was also anxious to continue productive discussions with local ranchers aimed at addressing their concerns about grazing rights.

The B.C. cabinet decided in January 2011 not to proceed with a national park, but that decision was kept secret for nearly a year.

It was only revealed when Environment Minister Terry Lake replied to several stakeholder groups on Dec. 21, 2011, stating: "...the Province is not convinced there is enough local support to move forward with this proposal at this time."

Parks Canada officials had been aware since February 2011 that a decision was "on hold," but they continued talks with local First Nations and ranchers in the hopes that talks with the province would resume.



November 17<sup>th</sup>, 2017

1 of 2

Attn. Mr. Kevin McNamee, Director  
Parks Establishment, Parks Canada Agency  
kevin.mcnamee@pc.gc.ca

**Re. Proposed Thaidene Nënë National Park Reserve**

Dear Kevin,

On February 16th, 2015 I received an email from you providing update to the status of Thaidene Nene, at which point a pause in the process was in effect due to Devolution in the NWT. In the communication you stated that "During this pause we will be working with the GNWT to ensure a coordinated approach to the project and with third parties and stakeholders. The views of stakeholders are important to us and we will be following-up with you in the near future.... we will follow-up with you when we resume our communications and meetings."

You may recall, that shortly after this exchange between us, our group put together a proposal for a site-specific adjustment to the proposed boundary of Thaidene Nene, "The Reliance Adjustment". An earlier version of the document was sent to you on our behalf on August 11, 2015 by Letha MacLachlan, Q.C.. We would like to take this opportunity to provide you with the updated version of that document (attached), which you will see has evolved considerably. Some of the new highlights include numerous letters of support from various stakeholder organizations & chambers; additional visual aids such as GNWT & PC maps; GNWT communications on the subject; and a comparison of the approach taken toward the establishment of Nááts'ihch'oh versus Thaidene Nene.

It is in relation to the last two additions, as well as PC reports, that I seek your thoughts:

1. The two GNWT communications included in the current version of our document are supportive of our proposal and its intent to keep the area around Reliance neutral (pg 23-25). Considering that you have stated in the above caption, the importance of a coordinated approach with GNWT on this project, why has Parks yet to synchronize with this post-devolution sentiment, and demonstrate flexibility with the boundaries in this area (that represents 0.9% of the proposed National area) by allowing Reliance to remain neutral, and under the control of the GNWT going forward?

2.a) Research on the establishment process undertaken for our most recent National Park reserve in the NWT, Nááts'ihch'oh, leads one to the corresponding Final Consultation Report. In the report, a process is outlined where three (3) distinctive boundary options were consulted on with the public and stakeholders. Can you please outline why this same democratic engagement



2 of 2

process was not followed when the TDN Consultation Boundaries (attached on pg 17) were released, (as there was only the one configuration presented to the public, and no alternatives presented, entertained or acknowledged - this despite PC CEO Mr. Latourelle's commitment to me to consult with stakeholders on the creation of the park boundaries attached on pg 39)?

2.b) In advance of developing the three boundary options for Nááts'ihch'oh, a valuable public resource, the O'Grady Lake inter-modal hub/staging area was identified as an important access point to remain open & neutral. It was subsequently left out of all boundary options presented. Considering Reliance shares the same status as a valuable public resource for staging & as an inter-modal hub (with arguably much greater significance) than O'Grady Lake, why has it not been treated with the same distinction, and followed precedent by leaving it as neutral ground while establishing the proposed boundaries of TDN?

3. As you mention above that the views of stakeholders, and follow-up, are important to PC; we do not understand why PC staff in your branch have not entertained any meaningful discussion/engagement/consideration, at any of the meetings we have had thus far, specifically regarding our "Reliance Adjustment" proposal, since it was first sent to you in August of 2015?

4. The Consultation and Engagement Report for TDN that is available on the PC website includes a section about NWT Stakeholder Meetings (p15), and continues onto a section regarding Written Submissions. A) Considering that representatives from our Association have met formally with PC representatives on numerous occasions over the last seven years, where PC staff and contractors recorded minutes, we do not understand why there no mention or summation contained in the Report of this engagement that occurred, and we hope that can be addressed? B) Since you have personally been in receipt of an older version of our written submission "The Reliance Adjustment" for almost 2-1/2 years we do not understand why has this not been mentioned or summated in the written submissions section of the Report? C) Three other stakeholder groups that are recognized specifically on pg. 15/16 of the Report formally support the Reliance Adjustment (NWT Floatplane Association, Air Transport Operators – NATA , and Chamber of Mines) as you will see letters in support from each of them in the appendices of our Reliance Adjustment document, we hope this can be reflected in the summation of their positions contained in the report?

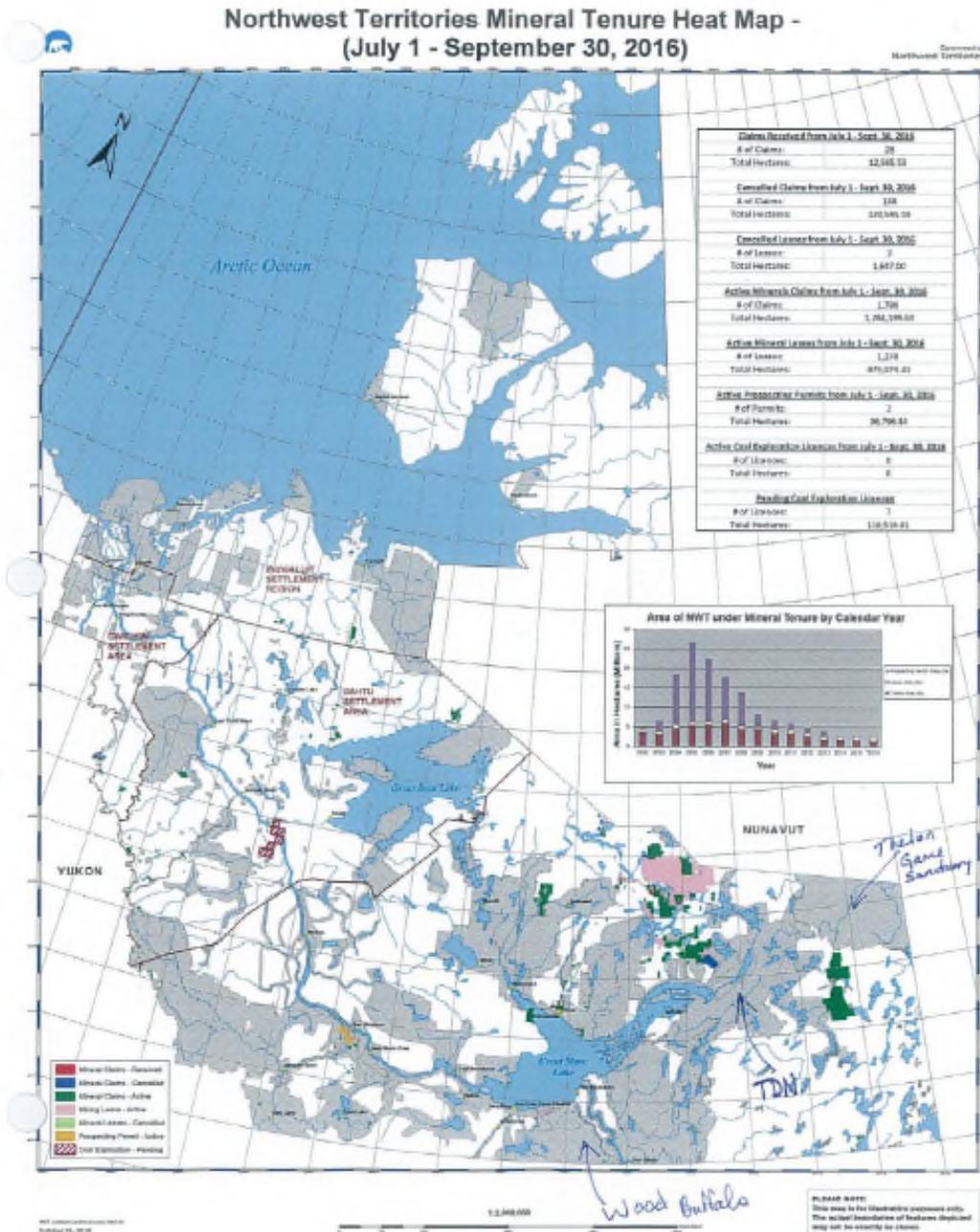
Thank-you for your time & consideration of our document and these questions.

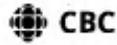
Regards,

  
Spencer Decorby, Secretary  
East Arm Property Owners Assoc.

Enclosure (The Reliance Adjustment V.5)

Access to the south-east is NWT is restricted



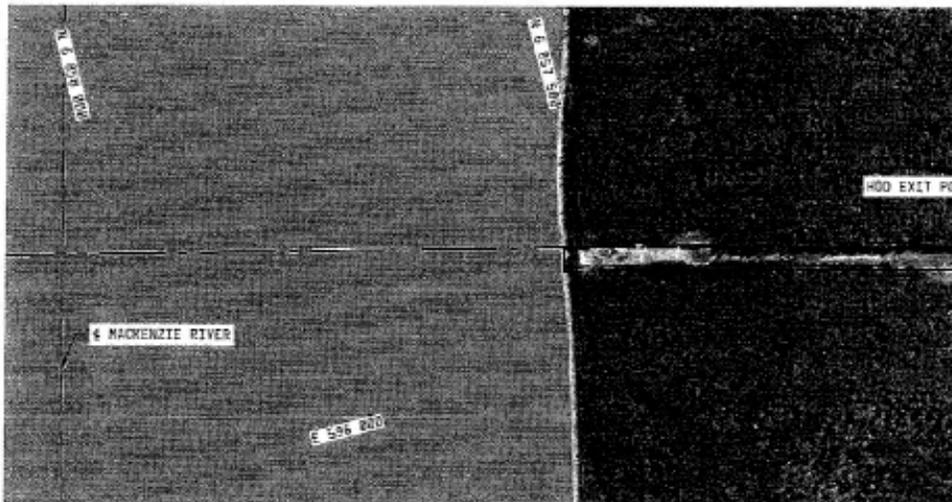


## Pipeline replacement project turns taps on spending in Fort Simpson, N.W.T.

People 'very excited' about prospects of employment, says chamber president

Randi Beers · CBC News ·

Posted: Mar 23, 2018 4:00 AM CT | Last Updated: March 23



Enbridge plans to drill a 2.5-kilometre line under the Mackenzie River to replace the existing line this summer. (Enbridge via NEB)

The village of Fort Simpson, N.W.T. is enjoying a little economic renaissance.

The bustling community is a sight for Kirby Groat's sore eyes. The Fort Simpson Chamber of Commerce president has watched businesses struggle through two years of scant spending in the Dehcho region.

In 2016, Enbridge shut down its Line 21 oil pipeline, which runs 869 kilometres between Norman Wells, N.W.T. and Zama, Alta. The company made the move because a riverbank beneath a portion of the line near Fort Simpson had become unstable.

- **Enbridge shuts down Norman Wells pipeline, citing 'stability concerns' along riverbank**

According to Groat, shutting down the pipeline effectively shut down the economy in the region.

"It's been quite a depressing last couple years with no activity whatsoever," he said, adding the economy pretty much dwindled to government-driven spending.

Earlier this month, Enbridge started work to replace the 2.5-kilometre section of pipeline through a horizontal drilling process underneath the Mackenzie River.

- **National Energy Board approves repairs to Enbridge pipelines near Fort Simpson, N.W.T.**

The company is only just setting up right now, preparing the work site and building camps, but Groat has already noticed a big difference in his community.

"The town is full of people right now from communities [such as] Fort Providence," he said. "Young fellas are all in here working. They are very happy, very excited about the prospects of steady employment."

The \$53-million project is expected to bring approximately 120 jobs to the area, according to Enbridge spokesperson Jesse Semko.

## Growing impatient, Nahanni Butte starts building own road to mine

Band could face issues if land use permits are not secured

By Mark Rendell, [CBC News](#) Posted: Jan 30, 2017 5:00 AM CT Last Updated: Jan 30, 2017 10:36 AM CT

After waiting nearly three years for the approval of an all-season road into the heart of Nahanni National Park, the Nahanni Butte Dene Band began cutting its own path last week.

The proposed road to the Prairie Creek zinc mine has been limping through the Mackenzie Valley Review Board's environmental assessment process since mid-2014.

"We've been waiting well over two years for this so-called permitting process to give the green-light for the road," said Mark Pocklington, the community's senior administrative officer. "And, in this process, the review board and others have put demands on further and further studies."

- [Canadian Zinc's Prairie Creek Mine a go](#)
- [Prairie Creek Mine road to get environmental assessment](#)
- [Parks Canada approves Prairie Creek Mine road](#)

Growing impatient, Nahanni Butte Chief Peter Marcellais gave the go-ahead to community members to start cutting a trail across Indian Affairs Branch land — set aside by the federal government for the band's residential use — near the community

"It's going through our IAB lands so nobody can tell us anything because it's our land," Marcellais said.

"There's really nothing else happening," he said. "We're really just trying to create jobs, and all [our] youth summer camps, they're right on the trail themselves. It's just something for them to do, and we're having the elders go with them, just to show them how to work a chainsaw and stuff like that."

Pocklington said the trail could eventually be five metres wide and up to 60 kilometres long, running to "the second gap," where the community hopes to set up a youth camp and wellness centre.

"It shows the community is not just sitting around talking about something," Pocklington said. "They are genuinely keen to let everyone know that we believe the road is beneficial to everyone in the region, and we don't see anything wrong with an access trail to get things started."

## Land use permits

It won't be an engineered road, says Pocklington — more of a trail for quads and snowmobiles. Still, the community could run into permitting problems.

Though the band likely won't require an environmental assessment, the band may still need a land use permit from the Mackenzie Valley Land and Water Board said Mark Cliffe-Phillips, the Mackenzie Valley Review Board's executive director.

If the band doesn't get that land-use permit, it could face a stop work order from the federal department of Indigenous and Northern Affairs or the GNWT's department of lands if the trail extends beyond 1.5 metres wide, explained Laurie Nadia, the GNWT's regional superintendent for Deh Cho.

## **SCHEDULE M**

### **CHRONOLOGY OF EVENTS RELATING TO THE RELIANCE ADJUSTMENT**

1979: The settlement of Reliance was proposed for exclusion from the land withdrawal for a new National Park. See attached letters from Hon. Dave Nickerson, MP. A close look at the old boundary lines shows it was just alongside the boundary of the land withdrawal area at the time.

1985: Parks Canada issues a revised boundary proposal in their literature to exclude the area around Reliance from the proposed park. See attached Parks Canada map (circa 1986) 'Schedule D' herein.

2007: A new, much larger land withdrawal is taken out, and Reliance is no longer excluded from the National park proposal. This expanded withdrawal area was set to expire March 31st, 2014.

2010: The East Arm Property Owners Association (the "Association") is formed at an inaugural meeting in Reliance, NWT. It is described as a vehicle for the membership to engage on the proposed park initiative.

May 2010: Parks Canada CEO wrote to Spencer Decorby, secretary of Association, committing to consultation on the creation of the park and its boundaries.

2014: The new (2007) land withdrawal is renewed for two additional years the day before devolution in the NWT. Subsequently, the 2007 land withdrawal is divided into areas of interest for a National Park, Territorial Parks, and Territorial areas set aside for mineral development. Reliance is shown just inside the proposed National Park Reserve boundary despite no consultation with EAPOA.

July 2015: GNWT holds stakeholder meetings in Yellowknife regarding the National Park Reserve. It was there that excluding the area around Reliance from park designation, in order to address numerous site-specific issues, was once again proposed, 35 years later. The Minister for ENR (present) was very receptive to the idea.

July 2015: The Association endorses the proposed adjustment around Reliance.

July 2015: GNWT Minister for ENR instructs their chief negotiator on the file to pursue the proposed Reliance Adjustment.

August 2015: Members of the Association develop further detail on the proposal, dubbing it the Reliance Adjustment, and retain a legal counsel to help articulate their position and instruct her to work collaboratively with the GNWT's chief negotiator.

August 2015: Legal counsel for the Association sent the formal proposal for the Reliance Adjustment to the GNWT negotiator, as well as the Director for Protected Areas Establishment at Parks Canada.

September 2015: The Association wrote to the Chair of the GNWT Standing Committee on Economic Development and Infrastructure, submitting the Reliance Adjustment proposal for the committee's consideration.

September 2015: the GNWT Standing Committee on Economic Development and Infrastructure agreed to support the Reliance Adjustment. The Committee Chair sends a letter to the Minister for ENR to indicate this support on October 8th, 2015.

January 2016: The Northern Air Transport Association, the NWT Floatplane Association, and the NWT & Nunavut Chamber of Mines issue formal communications in support of the Reliance Adjustment (see Schedule I).

April 2016: The Minister for ENR (Schumann) writes to the EAPOA suggesting a solution is possible (see Schedule J).

September 2016: The Arctic Institute of North America approaches the GNWT (Department of Education, Culture and Employment) with an Expression of Interest for establishing a Scientific Research Station at the site of the former MOT Weather Station in Reliance. The document specifically calls for an adjustment to the proposed park boundaries to exclude Reliance & the surrounding area.

November 2016: The Association wrote to the new Minister for ENR (McLeod) after recent media quotes him as saying the “negotiations are in the final stages” for TDN. The Minister responded and directed the Association to work with the new Chief Negotiator for TDN on the Reliance Adjustment.

January and March 2017: The new Chief Negotiator for GNWT met with members of the Association re the Reliance Adjustment. The Chief Negotiator indicated at that time that the Land Transfer Agreement (would be signed within a matter of months, after which any adjustments to the boundary of the National Park Reserve would no longer be likely as the agreement would contain a legal description of the boundaries for the National Park Reserve.

October 2017: Parks Canada released its consultation engagement report for the TDN establishment initiative. The report contained a section regarding NWT stakeholder meetings, as well as a section on written submissions. Although members of the Association had formally met with Parks Canada on numerous occasions, there was no mention of the Association alongside the other stakeholder groups listed. Further, of the stakeholder groups supportive of the Reliance Adjustment that were named, the report contained no mention of their support for the Reliance Adjustment in the summaries. Further, the ‘written submissions’ section of the report contains no mention of, or link to, the Reliance Adjustment proposal despite having formally sent it to the Director of the Establishment Branch of PC 2-1/2 years earlier, with receipt acknowledged at that time.

November 17, 2017: The Association wrote to the Director of the Establishment Branch at Parks Canada to inquire about having been omitted from the consultation engagement report, and to ask a few basic questions about the establishment process. To date, there has been no response to that inquiry.

January 2018: The NWT & Nunavut Chamber of Mines maps routing options for a corridor from Great Slave Lake to the known geological deposits in the eastern extremity of the NWT (Thelon geological basin). This work is shown in Schedule G herein. The results indicate departing from Reliance is the shortest route and traverses the least amount of the National Park Reserve.

June 2018: The Reliance Adjustment is posted to five (5) supportive stakeholder organizations websites, as follows:

Northern Air Transport Association

<http://dnn.nata-yzf.ca/AboutUs/PublicInformationAdvocacy.aspx>

NWT Floatplane Association/COPA 108

<https://www.nwtfloatplane.com/east-arm-national-park-reserve.html>

NWT & Nunavut Chamber of Mines

<http://www.miningnorth.com/rsc/site-content/library/protectedareas/ThaideneNene-Reliance-Adjustment-Backgrd.pdf>

NWT Chamber of Commerce

<https://nwtchamber.com/news/reliance-adjustment>

NWT & Nunavut Construction Association

<https://nnca.ca/news/nnca-supports-reliance-adjustment>

# SCHEDULE N EXECUTIVE SUMMARY OF THE RELIANCE ADJUSTMENT

## Reliance Adjustment – Executive Summary:

<u>Logistical &amp; Strategic Value:</u>	<u>Socio-Economic Value:</u>	<u>GNWT Signals of Support:</u>	<u>Precedents etc.:</u>
<ul style="list-style-type: none"> <li>• Strong transportation presence due to ideal conditions - Sheltered location + deep water - eg. NAUTA               <ul style="list-style-type: none"> <li>◦ Hub for large and aircraft - Aerodrome</li> <li>◦ Fuel Cables - All aircraft charters and helicopter companies</li> <li>◦ Allows access to the South East NWT</li> </ul> </li> <li>• Military staging area – eg. Comms</li> <li>• Wildlife monitoring (caribou/moose/wolf counting)</li> <li>• Search and rescue staging area</li> <li>• Forest fire-fighting staging area</li> <li>• Land inspections (via aircraft &amp; water)</li> <li>• Weather station</li> <li>• Staging for mineral resource development activities</li> </ul>	<ul style="list-style-type: none"> <li>• Established fishing lodge</li> <li>• Harvesting genes (farming, fishing, trapping)</li> <li>• Allows for the establishment of AWA Research Station.               <ul style="list-style-type: none"> <li>◦ Local Employment opportunities - UDDFM</li> <li>◦ Expands scientific knowledge which develops better scientific understanding of our Territory</li> <li>◦ Education opportunities</li> <li>◦ Maintains future opportunities and potential for the area</li> </ul> </li> <li>• Maintains territorial interest through the governance of the Settlement of Reliance</li> </ul>	<ul style="list-style-type: none"> <li>• Endorsement letter from GNWT Standing Committee on Economic Development to former Minister (Frankling/Bourne)</li> <li>• GNWT Hazard - ENR DMR indicating there will be a minor adjustment to the boundary in the federal area.</li> <li>• Letter from former Minister indicating adjustment is possible</li> <li>• Letter from current Minister indicating the adjustment is in keeping with GNWT vision for area</li> <li>• Express support for adjustment from at least one sitting Cabinet Member (Abernethy)</li> <li>• Statement from current Minister: "...ensure that all GNWT interests are met by the boundary".</li> </ul>	<ul style="list-style-type: none"> <li>• In keeping with previous 1985 Parks Canada proposal, where Reliance area was excluded</li> <li>• Same rationale as two other enclosures around Lutuel K'e in current proposal</li> <li>• Similar economic rationale to the doughnut hole in the middle of Nahasai National Park (access to mineral resources)</li> <li>• Added value of educational and cultural elements with AWA campus proposal (including employment opportunities for neighbouring FN)</li> <li>• Fits into NWT Protected Area Strategy compensation process (alternative to cash settlement)</li> <li>• In keeping with GNWT Land Use Sustainability Framework</li> <li>• Respects GNWT assessment of culturally significant areas (see GNWT assessment map)</li> </ul>

### Further current thoughts...

The area outlined by the Reliance Adjustment (RA) has been the historical center of government, commerce and staging for the vast area of the eastern Great Slave Lake. This has been documented since Dominion Explorers located there in about 1919 and probably earlier with seasonal barges by the Hudson's Bay Co. and others to service the fur trade.

There is currently another opportunity for a development within the RA that would provide employment opportunities for the Lutuel K'e Dene, would be non-detrimental to the environment and would fit well with the conservation initiatives being planned for the area.

The Arctic Institute has expressed interest in establishing a campus on the site of the old MDT Weather Station located within the area of the RA. They cannot operate within the area of National Parks and are very committed to protecting the environment and providing opportunities of local communities. Their campus on the border of Smeaton National Park in the Yukon provides a center for research without any damage to the land but with opportunities for the local people.

A campus by the Arctic Institute at the old MDT site would be a brown field development and provide the Lutuel K'e Dene with economic opportunities perhaps of similar magnitude to those associated with Thaidene Nene. While the planning for such a campus is in very early stages, there would likely be employment for core taking, wildlife monitors, historical background consultants and field coordinators, not to mention any jobs during the construction of the campus.

The RA contains the only natural and safe harbor for both barges and aircraft in the eastern end of Great Slave Lake, which is why development that occurred did so within the area of the proposed adjustment. Over the years the sort of development has changed along with the rest of the world and there is now the understanding that the Lutuel K'e Dene should be engaged on what type of development could occur over time.

Even if the Arctic Institute does not locate a campus within the RA, the RA should be established to provide a site for future development that would fit with the goals of the Lutuel K'e Dene. Once Thaidene Dene is established, any future opportunities will be lost forever.

**SCHEDULE O  
BARGE LANDING & AIRCRAFT AT RELIANCE, NWT**









Canada Day at Reliance



**SCHEDULE P**  
**PARKS CANADA CEO COMMITMENT TO CONSULT ON BOUNDARIES**

MAY 21 2010

Mr. Spencer Decorby  
chummyp@hotmail.com

Dear Mr. Decorby:

I am replying on behalf of the Honourable Jim Prentice, Minister of the Environment, to your letter of April 6 regarding the Framework Agreement with the Lutsel K'e Dene First Nation for the proposed East Arm of Great Slave Lake national park reserve.

Minister Prentice signed a Framework Agreement on April 7, 2010, that commits the Lutsel K'e Dene First Nation and Parks Canada to negotiating a park establishment agreement. When completed, it will be one measure allowing the Minister to recommend to Parliament the establishment of this national park reserve. Attached is a copy of the Framework Agreement, including a map of the study area. Please note there is no proposed park boundary at this time. Parks Canada is close to concluding a similar agreement with the Northwest Territory Métis Nation.

In 1986, Canada made a commitment to then Chief Felix Lockhart of the Lutsel K'e Dene Council, that a national park would not be established in the area of the East Arm of Great Slave Lake without its support. The Agreement is an expression of the First Nation's new willingness to endorse this conservation initiative.

Now that there is a real prospect of success for the establishment of this proposed national park reserve, Parks Canada will begin broad public consultations later this year that will include stakeholders and interested parties like you, to solicit views regarding the creation of the park and its boundaries. These consultations are required before Parliament can establish a new national park reserve.

I am pleased that you recently acknowledged the possible creation of this national park reserve in your letters to the Mackenzie Valley Environmental Impact Review Board of May 10 February 18 and March 5, 2010, posted on the Board's Web site. Your endorsement of the inherent value of this area is a welcome contribution to the public discussion.

I trust this information is helpful.

Yours sincerely,



Alan Latourelle  
Parks Canada  
Chief Executive Officer

Attachment

## SCHEDULE Q

**Letter of broad public concern, supporting the boundary adjustment, by 6 organizations, representing a broad cross section of approximately 5000 NWT residents, business and stakeholders.**

August 1<sup>st</sup>, 2018

Honourable Bob McLeod  
Premier for NWT  
Government of the NWT  
P.O. Box 1320  
Yellowknife, NT X1A 2P9

Re. Thaidene Nene

We the undersigned are requesting that the GNWT put a hold on further advancement of this initiative to create National and Territorial Parks in the East Arm area of Great Slave Lake until your Government can, at very minimum, secure boundary adjustments to the Thaidene Nene National Park (TDN) proposal. Adjustments that will *ensure & preserve guaranteed access to south-east NWT lands and resources into the future by maintaining control of the logistical hub and corresponding transportation corridor access route attached hereto as the Reliance Adjustment - V.7.*

The Land Transfer Agreement for the National component of TDN contains a legal description of the boundaries, and once signed it will be nearly impossible to make adjustments and changes from that point on.

The proposed addition of TDN to the NWT's already extensive mosaic of protected areas presents a particular challenge for access to the south-east part of the NWT and Nunavut. This situation is clearly evident in viewing the GNWT Mineral tenure Heat Map (attached on pg. 39) that displays 'no-go' zones in grey: A continuous band of grey extends from Northern Alberta, north-east from Wood Buffalo National Park through the proposed Thaidene Nene National and Territorial Parks, then eastward through the Thelon Game Sanctuary and into Nunavut. In addition to the unsettled land claims in the area, TDN restricts access to the south-east quadrant of the NWT creating a situation of 'stranded resources' and sterilized access that can only be procured and developed from Saskatchewan. This is not a desirable situation for the NWT.

Although the 'band of grey' no-go zones in the mineral heat map does contain a portion of unsettled land claims, eventual claimed land would not be guaranteed to provide access and would not inspire investor confidence. This is exemplified by recent developments with Fortune Minerals' difficulty in securing right of way for their spur-road to their potential NICO mine.

Clearly development of NWT resources should provide maximum benefit first to NWT stakeholders, business, and residents. Therefore maintaining access to NWT lands from within the NWT needs to be provided and ensured. Further we believe it is important to note that although the MERA for TDN falls well short of its intended purpose, it does state on page 22 of the attached that the entire TDN area is "diamondiferous throughout a large portion". If we lose control of our lands (to the Federal Government), we lose control over our resources; and we have then lost control of a significant portion of our economic future.

Although we (the undersigned) are generally supportive of protecting very special places, this should be done at a Territorial level so the NWT retains control of its lands, and protected areas be as small as necessary. In the 1960's a National Park was proposed in this area that was to be 7,340 km<sup>2</sup>. It excluded

Page 1 of 3

Reliance and maintained access to the south-east quadrant of the NWT (pg. 16 of the attached.) The current proposal for TDN shows a National Park that is proposed to be 14,000 km<sup>2</sup> - twice the size as before, includes Reliance and blocks the south-east access. If the Territorial component 'mirrors' the rules & regulations of the National component, the area of restricted access doubles again to around 30,000 km<sup>2</sup>. This is a significant variance from what has been on the table for the last 50 years.

Although we applaud NWT communities for attempting to build prosperity through alternative economic means, we question the rationale for relying on a conservation economy, as this is unproven, and particularly when it may preclude proven economic generators. To experiment with such a model may have merit so long as it does not exclude established economic opportunities such as resource exploration and development. With the current boundaries of TDN blocking access to the south-east NWT and giving away Reliance, a course is being set that allows solely for un-proven, cottage-level industry in the area. We are further concerned that foreign funds from groups such as the Tides Foundation may be influencing NWT decisions and shaping our future in a manner that propagates a reliance on unproven means of economic prosperity while sterilizing main-stream economic generators, such as resource development.

We note that, according to Wikipedia, Ft Simpson is the "gateway to Nahanni National Park" one of the best-known national parks in the country, visited by prime ministers etc. Yet, according to the local chamber in a recent CBC article (attached on pg. 41), the economy has been in a slump without industry doing business in the region. This is a perfect example that GNWT should heed going forward: the idea of a "conservation economy" is unproven to work in practice, even with a very established, well known park such as Nahanni. Further evidence that a conservation economy is not to be heavily relied upon, is the initiatives undertaken by Nahanni Butte to get access into Prairie Creek Mine. Chief Marcellais says it is because "We're really just trying to create jobs" which Nahanni National Park is not generating (pg. 42 of the attached).

To date the process for consultation by Parks Canada on TDN has lacked primary foundation elements. Firstly, when the land withdrawal for TDN expired, and was quietly renewed the day before devolution, the Federal Government appears to have acted in bad faith toward GNWT by saddling us with this burden - the day before we 'left home'. Secondly, when the GNWT initially presented the current configuration of NWT & Federal components of TDN to the public in June of 2015, in Yellowknife, the former Minister for ENR stated at the outset that GNWT would not entertain any changes to the one, single boundary option he presented to the public, beyond minor "site-specific adjustments." The excuse was he was fast-tracking the project. Three years later, we question the rationale for short-cutting due process. Conversely, when Nāáts'jéhch'oh National Park Reserve was being proposed to the NWT public, three distinct boundary options were presented for discussion and consultation input. Further precedent in the development of Nāáts'jéhch'oh National Park Reserve was exemplified by the identification of O'Grady Lake as a key logistical hub that was important for stakeholders to remain open (much like Reliance viz a viz TDN), and the area's subsequent exclusion from all three boundary options. Another example is the expansion of Nahanni National Park Reserve where Prairie Creek was identified as important for access, and the subsequent transportation corridor that was established. Clearly TDN lacks in due diligence and process in these respects and does not follow relevant precedents. In spite of the commitment made by the CEO of Parks Canada to consult on the boundaries of TDN (pg. 51 of the attached), no alternative boundary options are being considered. Parks Canada's consultation has been nothing but an empty exercise in lip-service to the residents, stakeholders and businesses of the NWT.

Their consultation & engagement report omits groups they consulted whose position was not in line with their vision and input from other groups was misconstrued to a significant degree. Even in this "courting phase" that we [the NWT] are in now with Parks Canada, when thoughtful, fair questions are posed to Parks Canada by stakeholders, they don't bother to respond (pg. 37/38 of the attached). A case for re-examination and accommodation seems clear.

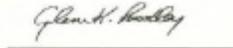
We understand there may be some reluctance to push back on TDN because of the clause in the devolution agreement stating the Federal Government can take NWT lands for the purposes of establishing National Parks, and we suspect they are pointing that out in this process. However, there is an issue of Paramountcy under the law that demonstrates, although they do have that right, *it would still need to be done in accordance with the National Parks Act, and that Act states that NWT must be in agreement before an Order in Council can establish a Park Reserve*. In other words, GNWT has the final say on whether the Park with the suggested boundaries goes ahead or not. Please consider your fiduciary duty to NWT residents and stakeholders before giving these lands away, as this is not in the best interest for the future of the NWT in the present format.

Thank-you for your attention to this important matter.

Trevor Wever, for NWT Chamber of Commerce



Glen Priestly, for Northern Air Transport Association



Dave Brothers, for NWT & Nunavut Construction Association



Gary Vivian, for NWT & Nunavut Chamber of Mines



Hal Logsdon, for NWT Floatplane Association



Wallace Finlayson, for East Arm Property Owners Association



Enclosure: *The Reliance Adjustment V.7*

C/c. Gary Bohnet; Richard Bargery; Joe Dragon; Paul Guy; Tom Jensen; and Willard Hagen

May 30, 2019

Michelle Swallow  
Environment and Natural Resources  
Government of Northwest Territories  
PO Box 1320  
Yellowknife, NT X1A 2L9  
[conservationplanning@gov.nt.ca](mailto:conservationplanning@gov.nt.ca)

RE: Response to preliminary screening of the establishment of Thaidene Nënë  
Territorial Protected Area

Dear Ms. Swallow:

We are writing in response to the preliminary screening of the establishment of Thaidene Nënë Territorial Protected Area being conducted under section 124(2) of the *Mackenzie Valley Resources Management Act*.

Nature United is dedicated to conserving nature as the foundation of strong communities, a prosperous economy and a future worth passing onto our grandchildren. We work in partnership with Indigenous people, industries and governments in the Northwest Territories, coastal British Columbia, and northern Manitoba. Our approach is to support local leadership and communities in their visions for improved local and regional economies and community well-being.

Thaidene Nënë is an area of major cultural and ecological significance, having been part of the Dene peoples' way of life for millennia. The Łutsël K'é Dene First Nation (LKDFN) relies on the region's lands, waters and wildlife for physical and spiritual wellbeing. Securing Thaidene Nënë, in part as a Territorial Protected Area in addition to the establishment of the Territorial Wildlife Conservation Area and National Park Reserve, will help secure their way of life and is incredibly important for conservation of this regionally and globally significant area.

**Securing ecological values:** Many conservation plans and surveys have documented the importance of conserving the region of Thaidene Nënë for water quality, species conservation including caribou, and climate change resilience.<sup>1</sup> More specifically, ecological values include:

- Water quality in Great Slave Lake watershed;
- The presence of various climatic zones - from boreal forest, to tree-line, to tundra - provide representation and climate change resilience; and
- 42 mammals, 171 birds, 28 fish and 1 amphibian occur in the Thaidene Nënë area.

**Protecting caribou habitat:** Thaidene Nënë also represents important caribou habitat for all three barren-ground caribou herds which use the proposed Territorial Protected Area area

<sup>1</sup> *Preliminary Area of Interest for a National Park in the East Arm of Great Slave Lake* (Claude Mondor, 2006); *Thaidene Nënë State of Knowledge Report* (SENES Consultants Ltd. and Ray Griffith, 2006); *Healthy Land, Healthy Peoples' Conservation Network Planning 2016-2021 Strategy* (GNWT); *The Northwest Territories Protected Areas Strategy* (Government of Canada and GNWT); *Thaidene Nene National Park Reserve Ecological Values Summary* (Parks Canada);

during important stages of their annual migration cycles<sup>2</sup>. Increased human disturbance elsewhere in Canada, including road access into sensitive habitat as well as the effects of growing industrial pressures in the region, have impacted the caribou migration patterns, seasonal habitat use, and population cycles. Caribou require large ranges for their seasonal migration between the Boreal Forest and the calving grounds in the tundra plains north of the tree line. In particular, the Bathurst herd, which has recently drastically declined, relies on large, contiguous habitats like Thaidene Nënë to recover.

**Promoting cultural heritage and Indigenous rights:** The establishment of Thaidene Nënë is a major step in realizing the LKDFN's land use vision for their territory. Securing the Territorial Protected Area will ensure LKDFN can continue to practice their way of life, including maintaining their right to hunt, fish, travel, and other cultural and spiritual activities conducted on the land. The Establishment Agreement process that has been used to establish Thaidene Nënë implements a true co-management and nation-to-nation relationship between LKDFN, GNWT and the federal government.

**Ongoing management - planning and capacity:** Appropriate conditions are in place to maintain the ecological and cultural integrity of the Territorial Protected Area into the future. Protected Area management agreements will prioritize local knowledge, clarify roles and ensure sustainable and fair management of the Territorial Protected Area through the Thaidene Nënë Management Board, a joint decision-making body of LKDFN, Canada, and GNWT. In addition, a \$30 million stewardship endowment has been raised to support ongoing management of the complete Thaidene Nënë protected area system by LKDFN.

**Advancing and diversifying local economy:** According to the AMEC cost/benefit analysis<sup>3</sup>, Thaidene Nënë is expected to have a net-benefit to local communities. Parks Canada, GNWT, and LKDFN will create approximately 8-20 jobs<sup>4</sup> for the LKDFN community and Thaidene Nënë is expected to increase services, tourism, and transportation economies in Łutsël K'é, Yellowknife and Ft. Resolution. Nature United has seen the economic benefits of Indigenous-led conservation areas, such as in Great Bear Rainforest—where 1,000 new jobs were created, and 100 new businesses created or expanded.<sup>5</sup> Nature United supports the development of Indigenous Guardian programs as a fundamental means of economic diversification connected to stewardship of Indigenous lands and protected areas. An analysis of Indigenous Guardian programs has shown a return-on-investment of more than 10 to 1<sup>6</sup>, in addition to substantial community and cultural benefits. The LKDFN Ni Hat'ni program, the Guardians of Thaidene Nënë, is expected to create economic benefit to the community on the order of \$1M per year<sup>7</sup>.

A long-time partner of the LKDFN, Nature United has provided technical and financial support, science expertise, and support for longer-term sustainable financing for the establishment and ongoing stewardship of Thaidene Nënë. Establishment of the Territorial Protected Area will

<sup>2</sup> *Migratory Tundra Caribou Seasonal and Annual Distribution Relative to Thaidene Nënë* (Anne Gunn, Kim Poole, and J. Wierzchowski, 2011)

<sup>3</sup> *Thaidene Nënë Proposed National Park Reserve Landscape Values Summary* (Parks Canada)

<sup>4</sup> *Thaidene Nene: Land of the Ancestors*, fact sheet created for NWT MLA and Canada Finance Committee MPs (LKDFN 2019)

<sup>5</sup> *Coast Funds 2018 Annual Report*, <https://coastfunds.ca/wp-content/uploads/2019/04/Coast-Funds-Annual-Report-2018.pdf>

<sup>6</sup> *Valuing Coastal Guardian Watchmen Programs: A Business Case* (EPI EcoPlan International, Inc.)

<sup>7</sup> *Thaidene Nene: Land of the Ancestors*, fact sheet created for NWT MLA and Canada Finance Committee MPs (LKDFN 2019)

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 Nënë Conservation Initiative.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hadley Archer', with a stylized, sweeping flourish at the end.

Hadley Archer  
Executive Director, Nature United



23 Mitchell Dr PO Box 1093  
Yellowknife, NT X1A 2N8  
Tel (867) 920-9505 Cell (867)445-7680  
Email: [admin@nwtchamber.com](mailto:admin@nwtchamber.com)  
Web: [www.nwtchamber.com](http://www.nwtchamber.com)

*Representing Northern Business Since 1973*

June 03, 2019

Attn: Michelle Swallow, Manager, Conservation Planning and Implementation  
Environmental Stewardship and Climate Change  
Environment and Natural Resources  
Government of the Northwest Territories  
5th floor, Scotia Centre  
PO Box 1320 5102 50<sup>th</sup> Ave.  
Yellowknife, NT X1A 2L9

By email to: [conservationplanning@gov.nt.ca](mailto:conservationplanning@gov.nt.ca)

Re : Government of the Northwest Territories Preliminary Screening Notification for the Establishment of the Thaidene Nënë Territorial Protected Area

Please accept this submission on behalf of the NWT Chamber of Commerce for the proposed Thaidene Nënë Territorial Protected Area.

The NWT Chamber of Commerce is the largest and most broadly - based business organization North of 60, with representation from every region of the NT. Working in association with the network of community chambers in Inuvik; Norman Wells; Fort Simpson, Hay River, Thebacha and Yellowknife, the NWT Chamber represents the interests of members across the NT. For over 45 years we have been the only pan-territorial voice of businesses across all sectors of the northern economy.

The NWT Chamber of Commerce acknowledges that both the Canadian government and the Government of the Northwest Territories (GNWT) are in the process of an inspiring time of reconciliation. Partnering with Indigenous Nations in economic initiatives through both industry and conservation is the future of economic independence.

In regards to the proposed Thaidene Nënë Territorial Protected Area, the NWT Chamber has a number of concerns about the manner in which the process of determining the boundaries or providing options has been conducted. These concerns range from public concern over a process that has not been transparent; has not considered all of the geoscience information; has not presented boundary options as been tradition in the past; and a lack of meaningful consultation & accommodation with industry, business groups and Indigenous land claimants that will be impacted by the park's creation. Due to these concerns we respectfully request an environmental assessment be triggered. We believe through the process of an environmental assessment much more time, effort and transparency will be given to the proposed development so as to make a better decision, one that reduces public concern, and ensures:

*(a) the protection of the environment from the significant adverse impacts of proposed developments;*

*(b) the protection of the social, cultural and **economic** well-being of residents and communities in the Mackenzie Valley; and*

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*(c) the importance of conservation to the well-being and way of life of the aboriginal peoples of Canada to whom section 35 of the Constitution Act, 1982 applies and who use an area of the Mackenzie Valley.*

We see tremendous economic potential in the north and want to ensure that it is explored and, if appropriate, utilized in a manner that is respectful of our Indigenous communities and strong history of environmental stewardship but also conscious of the need to provide better and more long term economic depth to the people and communities of the NWT.

While the proponents are undoubtedly committed to the process of establishing the proposed Thaidene Nëné Territorial Protected Area, our view is that the GNWT has failed to properly balance the needs of all stakeholders.

Some of our specific concerns are listed below –

1. There were no park boundary alternatives submitted for public review and discussion before the final boundary was set as was done for the Naats'ihch'oh park process.
2. The process by which these particular park boundaries were determined was outdated based on current abilities for exploration or the regulatory environment in which development would operate.
3. Indigenous groups not immediately associated with the Park have not had their claims investigated nor taken into account in the setting of the Park boundaries.
4. Final boundaries were negotiated in a non-transparent way, and announced as a done deal without anyone being able to comment.
5. Insufficient money has been invested into investigating the economic potential of the area, specifically the potential associated with responsible resource development.
6. No reference has been made to the Lockhart Hydro potential.
7. Insufficient attention has been paid to the reduction in economic opportunity created for all Northwest Territories residents, caused by the annexation of such a large parcel of potentially productive land.
8. The GNWT has failed to honour its commitment to ensure inclusion, consultation and collaboration, by its refusal to engage with those who do not support the creation of the proposed Thaidene Nëné Territorial Protected Area.
9. Much of the consensus for the creation of the park has been with members of the public who do not live in the North. These southern residents, who think that another park is a great idea, have little to no knowledge of the North, the state of our economy, nor the detrimental impact that land withdrawals of this magnitude will have on the opportunities for generations of the North's citizens. Surely, enough disadvantage has already been caused by the policies and decisions made by comparatively privileged communities from the South.

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10. Alternative land access options that would better balance cultural and economic objectives, while guaranteeing the preservation of traditional rights do not appear to have been considered.
11. Given that Indigenous groups with settled land claims have negotiated sharing of resource royalties generated from anywhere in the NWT, and given that the GNWT has promised sharing of additional resource royalties generated from anywhere in the NWT with Indigenous groups who have signed onto devolution, then those Indigenous groups should be able to participate in any initiative that proposes to remove tens of thousands of square kilometres of the NWT from resource development and royalty generation.

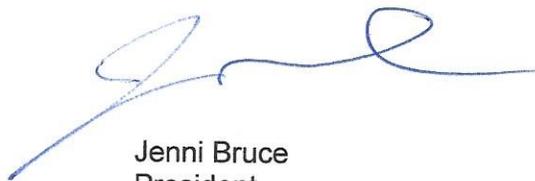
Economic disadvantage will continue to be one of the greatest challenges faced by this and future generations of NWT citizens. The large scale withdrawal of lands with economic potential is at odds with interrupting this certain future. The message to potential investors is that the Northwest Territories is not friendly to, nor open for business. We hope the GNWT will be open to the need to support economic exploration in advance of presumptive decisions that remove access to areas of otherwise tremendous economic potential. We note that the hope for economic opportunities with a new park will only be improved with better transportation and communications infrastructure.

The NWT Chamber would like to find a better way to work with the GNWT, Parks Canada and the new Thaidene Nëné Territorial Protected Area so that both the Territorial Protected Area as well as our economic opportunities can flourish in unison. Our vision would keep the Thaidene Nëné National Park Reserve at the approved 7,000 km<sup>2</sup> with the remaining 7,000 km<sup>2</sup> set aside through the various land management tools available to us. Our final request would be to include a transportation, transmission and data corridor as outlined in the new proposed Bill 38, Protected Areas Act section 35. We have a great opportunity to show Canada and the world how both the conservation and mineral industries can compliment each other and bring prosperity and economic independence to all in the area.

Regards,



Renée Comeau  
Executive Director  
NWT Chamber of Commerce



Jenni Bruce  
President  
NWT Chamber of Commerce

*c.c.:Ms. Joanne Deneron, Chair, Mackenzie Valley Environmental Impact Review Board; Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board; Hon Bob McLeod, Premier of the Northwest Territories; Hon. Wally Schumann, NWT Minister, Industry, Tourism & Investment; Hon. Lou Sebert, NWT Minister, Lands; Hon. R.C. McLeod, NWT Minister, Environment & Natural Resources; Hon. Catherine McKenna, Minister of ECCC; Chief Darryl Marlowe, Lutsel K'e Dene First Nation; Chief Edward Sangris, Yellowknives Dene First Nation; Chief Ernest Bettsina, Yellowknives Dene First Nation; Garry*



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*Bailey, Northwest Territory Métis Nation; Chief Louis Balsillie, Deninue Kue First Nation; Bill Enge, President, North Slave Metis Alliance; Grand Chief George Mackenzie, Tlicho Government; Michael McLeod, Member of Parliament for the Northwest Territories; Felix Lee, President of the Prospectors & Developers Association of Canada; Pierre Gratton, President of The Mining Association of Canada*



May 6, 2019

VIA email

Jacque Bastick  
Impact Assessment Specialist  
Natural Resource Conservation Branch  
Parks Canada  
Government of Canada  
2 County Rd. 5  
Mallorytown, ON K0E 1R0

Dear Ms. Bastick;

Thank you for the opportunity to comment on the development description for the Thaidene Nëné National Park Reserve. We have previously provided comments on the proposed park reserve to Parks Canada and most of our current comments are the same. We hope we can continue our open, two-way communications as the planning for a park in the East Arm of Great Slave Lake progresses.

The NWT Floatplane Association is a registered society in the NWT and is also affiliated with the Canadian Owners and Pilots Association as Flight 108. Our members include aircraft owners, pilots and student pilots and aviation enthusiasts.

Our members love the wilderness and the great natural beauty of the East Arm. Most agree this is a special place and any development should be carefully monitored. Of course, not all our members believe the entire area reserved should be included in a park if one is established but all of us defend the right to continue to visit and travel the area by aircraft, fish and camp without undue restriction

We have reviewed the *National Parks of Canada Aircraft Access Regulations*, and note there are different levels of restriction for aircraft access for different national parks in Canada. Some have no restriction on where airplanes can land (like Vuntut); one allows landing at any water-based location (Tuktut Nogait), and some limit access to one very small area (like Banff). Some have several locations listed; for instance Nahanni Park Reserve has 7 areas approved for landing.

However we can't help but notice that the vast majority of national parks completely prohibit access by air. For the most part, the parks that allow the most access by air are northern parks. We sincerely hope Thaidene Nene Park we will have access by air that is similar to that of Vuntut Park, and not that of Banff (or even Nahanni Park Reserve).

At present many of our members visit the East Arm regularly. Members have spent many days in places like Wildbread Bay sitting on the rocks, enjoying the spectacular setting and the fishing without ever seeing another person or even hearing a boat or another airplane. We believe that if you limit the areas that we can access with our aircraft, you will see much heavier use in those limited areas, increasing the risk of environmental damage. If one specific place only sees an airplane occasionally, the 'footprint' left is much smaller than if two dozen airplanes fly to the same spot every weekend.

Since every national park has charges to access and use the park, we expect Parks Canada will propose the same approach with Thaidene Nene. If fees are going to be implemented, we believe you should offer reasonably-priced annual and seasonal passes as well as daily or occasional-use passes that are readily available on line. The daily or occasional-use access permits must be flexible. Many of us have taken off for the East Arm only to have to turn around because of weather or smoke from forest fires. Because of work, weather and other issues, it may be days, weeks or months before we can try the trip again.

NWTFA supports the "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. Parks Canada recently released its report on public consultations respecting establishment of this park reserve. This report fails to accurately portray the concerns and positions advanced by NWTFA and various other organizations respecting proposed boundaries and permitted uses. In particular, it overlooks the specific input provided by NWTFA and fails to acknowledge the proposed Reliance Adjustment. We are concerned this minor boundary adjustment will not be incorporated in the establishment of this park reserve. We note that previous park consultations in the NWT, the most recent being Nááts'ihch'oh, have had several boundary options for public consultation, whereas this one has not had any options presented.

To summarise our position, we hope that if Thaidene Nene Park is established (or if it becomes a Park Reserve):

- That aircraft access will be unrestricted as in Auyuituuq, Vuntut, Simirlik and Wapusk national parks
- That Access Permits be available for a reasonable price on-line, and that annual, seasonal and occasional-use permits be available.
- That occasional-use or daily Access Permits be flexible to allow for weather, mechanical, smoke or other delays
- That people who access the park by air be allowed to continue in the activities now common like berry-picking, camping, fishing, and so on.

- That the existing fuelling areas, such as the one at Ft. Reliance will be allowed to continue.

We look forward to participating in the continuing public discussion about the proposed park and ask you to ensure our Association is advised when those discussions occur.

Alan Latourelle, CEO of Parks Canada said, "We are here to protect our national parks for Canadians, not from Canadians." Members of the NWT Floatplane Association /COPA 108 are heartened by those words and hope those of us who travel by motor boat, snowmobile and small airplane will continue to have good access to all areas under consideration for inclusion in Thaidene Nene Park.

Yours truly,



Hal Logsdon

President

NWT Floatplane Association/ COPA Flight #108

3901 Bryson Drive

Yellowknife, NT X1A 1Z9



NORTHWEST TERRITORY MÉTIS NATION

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June 5, 2019

By Email: [Michelle Swallow@gov.nt.ca](mailto:Michelle.Swallow@gov.nt.ca)

Department of Environment and Natural Resources  
Government of the NWT  
P.O. Box 1320  
Yellowknife, NT  
X1A 2L9

Attention: Michelle Swallow, Manager, Conservation Planning

Dear Ms. Swallow:

**Re: Preliminary Screening Notification - *Proposed* Thaidene Nene  
Territorial Protected Area**

Further your letter, dated May 8, 2019, regarding the preliminary screening for the *Proposed* Thaidene Nene Territorial Protected Area, this letter sets out the concerns of the Northwest Territory Métis Nation.

The NWTMN has the following “public concerns” with the proposed Thaidene Nene Territorial Protected Area:

1. What is the legal authority for GNWT to undertake a preliminary screening as the *Protected Areas Act* is not effective yet?
2. The NWTMN has a right to be involved in any decisions in respect to planning and designation of the East Arm area on a Government to Government basis;
3. The “Description of Proposal” references the intention of GNWT to partner with Indigenous Governments “to develop and support economic and social benefits from the establishment of the territorial protected area”. This screening process should be deferred until an impact and benefit agreement is concluded with the NWTMN. GNWT is not providing any financial accommodation to the NWTMN for this Protected Area;
4. The Protected Area will remove land from potential mineral development,

which conflicts with the NWTMN's desire to support the Northern economy. The NWTMN is requesting GNWT commission a mineral and energy resource assessment and a socio-economic assessment to inform the land use choices available to the GNWT and the NWTMN; and

5. The Protected Area will prejudice land selection negotiations for the NWTMN Land Claim Agreement.

### **Loss of Income from Development and Resource Royalties**

Another aspect of the lack of financial compensation is related to the loss of income for the NWTMN from development and resource royalties. The Mineral and Energy Resource Assessment completed in 2013 ("MERA") for Thaidene Nene noted mineral deposits, including kimberlite-hosted diamonds were found on or just outside the proposed boundary for Thaidene Nene. The NWTMN considers the MERA to be incomplete as do others, including industry. The establishment of the Proposed Thaidene Nene Territorial Protected Area will have a negative impact on the resource extraction in the NWT and negatively impact the economic development opportunities and future royalties of the NWTMN.

### **Impact on NWTMN Land Selection**

As you know, the NWTMN is negotiating a land claim agreement and will be commencing land selection negotiations with the Government of Canada and the GNWT. The proposed Thaidene Nene Territorial Protected Area will prejudice NWTMN land selection as the NWTMN anticipates the status of the area will make it very difficult to extract land to satisfy our legitimate Métis Land quantum requirements.

### **Impact on Harvesting by Indigenous Métis Members**

Indigenous Métis Members find that their harvesting and cultural activities are monitored within these park areas, such as in Wood Buffalo National Park. This deters Indigenous Métis Members from using the areas we've traditionally used for harvesting and other cultural purposes.

## **Opposition**

Until the foregoing concerns are addressed by the GNWT, the NWTMN will oppose the establishment of the proposed Thaidene Nene Territorial Protected Area.

Sincerely,

**NORTHWEST TERRITORY MÉTIS NATION**

A handwritten signature in black ink, appearing to read "Garry Bailey". The signature is written in a cursive, flowing style.

Garry Bailey,  
President

c.c.: Lloyd Cardinal, President, Fort Resolution Métis Council  
Ken Hudson, President, Fort Smith Métis Council  
Trevor Beck, President, Hay River Métis Government Council

June 3, 2019

Att: Michelle Swallow  
Manager, Conservation Planning  
GNWT – Environment & Natural Resource  
P.O. Box 1320  
Yellowknife, NT X1A 2L9  
By email to: [conservationplanning@gov.nt.ca](mailto:conservationplanning@gov.nt.ca)

Dear Ms. Swallow,

**Re: Preliminary Screening for Establishment of the Territorial Protected Area of Thaidene Nënë under the Proposed Protected Areas Act**

The NWT & Nunavut Chamber of Mines (Chamber) is writing to respond to the preliminary screening that the Government of the Northwest Territories (GNWT) is conducting through your department in accordance with the *Mackenzie Valley Resource Management Act* (MVRMA) for the following development: *Establishment of the Territorial Protected Area of Thaidene Nënë under the Proposed Protected Areas Act*.

We support the development of protected areas and recognize the important role they play in representing significant examples of the Northwest Territories (NWT) natural and cultural heritage, and in particular, maintaining healthy, diverse and whole ecoregions throughout the country.

However, the success of the minerals industry to provide benefits to the NWT and its residents relies on access to land for exploration and development. Therefore, when large areas of land, whether as parks, sanctuaries or other protected areas, are proposed to be removed from non-renewable resource development, we believe it is incumbent on governments to utilize diligent, open and transparent processes in determining and evaluating the consequences of such action. It is government's responsibility to act in the public interest and to evaluate all the social and economic impacts of these decisions with a focus on opportunity costs.

Under section 111(1) of the MVRMA, a territorial park is to be considered a "development." It is our understanding and expectation that your preliminary screening will consider Thaidene Nënë like other developments, with strong attention to transparency, diligence and a full understanding of all of its impacts. These would not be limited to environmental impacts, but also to the impacts on the "economic well-being of residents and communities in the Mackenzie Valley" as required under the MVRMA.

To this end, with this letter we are formally expressing our significant “public concern” over the Thaidene Nëné development process based on procedural and substantive concerns described herein, and we ask that GNWT refer the proposal to the Mackenzie Valley Review Board for an environmental assessment, where a more fulsome review of all aspects of the development can be reviewed and mitigated.

For background and perspective, our Chamber represents a significant and important part of the northern public that participates in, relies on and benefits from the minerals industry for its economic well-being. Our direct corporate and individual membership numbers nearly 400, representing over 3,000 workers – Indigenous and non-Indigenous – directly employed in our industry, along with many additional businesses with their thousands of employees that rely on the NWT minerals industry. The minerals industry is the largest private sector industry in the NWT, and is the largest private sector employer of Indigenous northerners.

Minerals industry benefits today have grown significantly important to the economic well-being of all northerners and the territory and are well described in the recent publication tabled by the Minister of Industry, Tourism and Investment.<sup>1</sup> Over the past 21 years, these benefits include:

- 60,000 person-years of employment, approximately half northern and half of those Indigenous workers;
- Over \$21 billion in business expenditures, of which 70% is northern, and an unprecedented \$6.4 billion has been with Indigenous business;
- Well over \$100 million to communities in various impact and benefit agreements, in scholarships, and corporate social responsibility contributions; and
- Billions of dollars in various taxes and royalties which are now being shared with Indigenous governments across the Northwest Territories in constitutionally entrenched land claim agreements and under the devolution royalty sharing agreement.
- The minerals industry directly contributes over 37% of the gross domestic product of the NWT. This percentage is even higher when indirect benefits to other sectors of the economy are taken into account. For example, every direct job in diamond mining generates 2.8 other indirect jobs in the NWT.
- The NWT Government (GNWT) reports that, over the past three years to 2018, diamond mines have contributed 44 percent of the GNWT’s tax revenue, through corporate, property, fuel, and payroll taxes.” If Federal transfer payments were not included, the mining industry’s contributions would increase significantly to the majority of the GNWT’s income.
- Mineral exploration contributes many millions more in investment annually, supports additional employment and business benefits, and is a key component of a sustainable minerals industry.
- The minerals industry plays an important role in furthering Indigenous reconciliation in the NWT. As in Canada, the NWT mineral industry is the largest private sector employer of Indigenous northerners.

Of great importance to the discussion is that all of these significant mining benefits has come from a land footprint of less than 0.005% of the NWT. And this tiny footprint will be reclaimed

<sup>1</sup> Government of the Northwest Territories: *2018 Socio-Economic Agreement Report, for diamond mines operating in the Northwest Territories*: [https://www.assembly.gov.nt.ca/sites/default/files/td\\_432-183\\_1\\_0.pdf](https://www.assembly.gov.nt.ca/sites/default/files/td_432-183_1_0.pdf)

by the mining companies once their work is completed. The public should be informed of the magnitude of the consequences of removing tens of thousands of square kilometres in parks as part of a fulsome analysis and discussion. Unfortunately, no such studies were done and shared with the public in advancing either of the huge Thaidene Nënë territorial protected area and federal park.

The NWT is currently realizing a prolonged period of poor investor confidence and the Chamber believes that the process followed in advancing the Thaidene Nënë parks (National and Territorial) is not contributing to increasing this confidence. The Chamber and its members are very concerned that, as proposed, the Thaidene Nënë development has the potential to negatively affect the economic well-being of residents and communities in the entire NWT and will reduce the economic opportunities for generations to come. We have been actively submitting our concerns with this proposed development over the last several years but have found they have not been taken into consideration, especially as other current Federal legislation such as Conservation 2020 seeks to withdraw further prospective lands in Canada's north without considering the economic sustainability of the territory's people and communities. As a result, we continue to have significant and substantive concerns, both procedural and with the content of the proposed development. We therefore recommend that the proposed development be referred to an environmental assessment.

Procedural concerns with the proposed development include:

- The Territorial candidate area was created in an unusual fashion. Whereas other candidate protected areas were advanced through the Protected Areas Strategy, the Thaidene Nënë Territorial Protected Area emerged from confidential discussions between the GNWT and Parks Canada. No boundary options were shared with the public for comment and consideration, as was done with Naats'ihch'oh Park, rather were negotiated and established by GNWT and Parks Canada behind closed doors. The NWT's Minister of the Environments simply announced the boundaries as complete and provided the public with no ability to suggest changes.
- The GNWT did not conduct a mineral and energy resource assessment of the candidate protected area to evaluate the economic potential that would be lost in removing such a significantly large area from development. Rather, GNWT relied on the Mineral & Energy Resource Assessment (MERA) that Parks Canada had conducted over the candidate areas. This MERA was insufficiently funded for such a large area, and has resulted in an inadequate resource assessment.
- Discussions between the GNWT and Canada resulted in the proposed National Park Reserve being reduced to 14,000 sq.km. However, given the negotiation details are not public, from the outside it appears they were only able to do so by committing to the creation of a territorial park that essentially mirrors Parks Canada's initial intent to close the much larger area of 26,500 sq.km to future potential resource development.
- Much of the consensus building in support of both the territorial and federal Thaidene Nënë parks has been by Parks Canada with members of the public who do not live in the North. Parks Canada's consultation and engagement report documents responses from many southern residents, who admitted they have never been to the north, and know little of the NWT. Presumably these respondents also know little of the state of the North's environment or economy, nor the detrimental impact that land withdrawals of this

magnitude could have on economic opportunities for future generations of Northern citizens. Nor will they understand the unique and extensive environmental protections provided by the MVRMA. We are concerned that support expressed for the current park and protected area proposals has relied on an over-weighting of the views of southern observers who will not have to suffer any negative socio-economic consequences of either of the parks' creation.

Our substantive concerns with the proposed development include:

- The thousands of square kilometres being proposed for closure to development in Thaidene Nënë is significant, and equals the areas of Vancouver Island, or that of Great Slave Lake, the tenth largest lake in the world. This will have significant negative economic effects on the NWT. Professional geologists familiar with the region have confirmed that high mineral potential was missed or disregarded in the MERA, including potential for minerals such as cobalt and lithium, important to the development of a lower carbon, green economy, with reduced greenhouse gas emitting power generation and power storage technologies. As a result, the MERA is an inaccurate resource assessment of this exceptionally large area of the NWT. The GNWT has also not conducted its own resource assessment of the candidate Territorial Thaidene Nënë Protected Area.
- The benefits of resource development royalties in the NWT today are shared across the Territory. For example, royalties from diamond mining in the Tlicho-Akaiicho regions are shared with the Gwich'in and Sahtu regions, much farther away. We find 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.
- We are unaware of any economic analysis or trade-off study of the economic impacts of Thaidene Nënë versus mineral development. 'Conservation economy' has been mentioned, but there is no analysis or definition of what that is, or its economic benefits. A business case<sup>2</sup> conducted by the Lutsel K'e Dene First Nation revealed very small economic returns through employment and capital infrastructure investments – returns that are orders of magnitude smaller than those created by potential mineral development. For example, the effects of just one year of operations of a diamond mine would exponentially exceed multi-year benefits of the park as calculated in the Lutsel K'e study. We are unaware of any discussion or study led by GNWT or any other government agency on the economic trade-offs of establishing Thaidene Nënë protected area versus keeping land open for potential responsible mineral resource development. Perhaps the lack of such study or discussion is also a function of the inadequate mineral resource assessment and thus illustrates the need for a more extensive MERA to better inform the consultations and decisions.
- There has been 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. We do not believe that establishment of a conservation economy and responsible mineral development are mutually exclusive endeavours, but there has been little discussion or analysis in that regard.

<sup>2</sup> THAIDENE NENE –LAND OF OUR ANCESTORS BUSINESS CASE, Prepared by: Cathy Wilkinson, On behalf of: Lutsel K'e Dene First Nation, April 2013; <http://landoftheancestors.ca/wp-content/uploads/2014/04/Business-case-FINAL-with-maps-April-2013-title.pdf>

- It is our understanding there are financing arrangements contemplated by private interests and the community of Lutsel K'e as part of, or tied to, establishment of the Thaidene Nënë Park. Without providing any specific details, Parks Canada has recently informed us they are considering a contribution to a trust fund of an Indigenous government in relation to Thaidene Nënë. Given the proposed NWT Protected Areas Act would allow for similar arrangements, perhaps GNWT is considering similar financing arrangements. This has not been revealed. Confidential discussions around exchange of moneys with respect to protected areas could be construed as facilitation without full public disclosure, discussion and understanding of the details. This lack of transparency is highly concerning and speaks to areas of the current process that should be reviewed.
- Environment and economy are not being balanced. The area east of the proposed Thaidene Nënë Park is already subject to the closure of significant areas to mineral exploration and development, including approximately 18,000 sq km of mineral prospective land in the nearby Upper Thelon watershed, approximately 62,000 sq km of lands under interim withdrawal for the Akaitcho Land Claim settlement, and 55,000 sq km of lands already closed to resource development in the neighbouring Thelon Wildlife Sanctuary, the largest such sanctuary in Canada. When combined with the proposed Thaidene Nënë Park area, these closures total in excess 165,000 sq km of land where potential mineral and other economic development is presently prohibited. There has been no public discussion on potential economic impact of some of these withdrawn lands, or their cumulative effects. This is contrary to the NWT Government's *Land Use and Sustainability Framework*<sup>3</sup> which commits GNWT to ensure that "*Land-management decisions consider ecological, social, cultural and economic values to ensure maximum benefits to current and future generations.*"
- There is no clarity on corridors through the Thaidene Nënë protected area / park area. Parks Canada has refused to consider industrial corridors or areas for transportation, power, fibre optic communications, or other logistical support through or within the proposed Thaidene Nënë National Park area to allow for access to significant mineral potential in the southeast portion of the NWT. The loss of this access is of great concern as it may effectively prevent future economic development in an area much larger than the proposed park. Such exclusion of logistical support areas will also reduce the sustainability of the proposed park as a tourism economic engine and thus limit potential economic benefits to communities considerably.
- In addition, the GNWT Proposal for Thaidene Nënë protected area says the Protected Areas Act under which it would be established could allow corridors "when certain conditions are met". However, these conditions appear to be controlled by Establishment Agreements that have not been released and cannot be shared. Thus, there is no guarantee that corridors will be allowed, and this will also have unknown economic implications.
- We are unaware of any detailed discussion of navigable waterways that are a federal responsibility, through the lake portion of Thaidene Nënë park or protected area.
- Float plane access via Ft. Reliance as has historically occurred to support industrial (e.g., exploration) purposes is not allowed. As per Parks Canada's *Development Description*, the only allowance for float planes is for park visits. This will further affect exploration

<sup>3</sup> NORTHERN LANDS NORTHERN LEADERSHIP, The GNWT Land Use and Sustainability Framework, <https://www.lands.gov.nt.ca/en/land-use-and-sustainability-framework-0>

activities to the east and southeast beyond the park. These significant concerns have been raised but are absent from Parks Consultation & Engagement Report. We are uncertain how this will also occur in the protected area.

- An additional concern raised by our members is that the proponents of both the Thaidene Nënë Park and Protected Area are also the Preliminary Screeners, creating a reasonable apprehension of bias and potential for a perceived conflict of interest. While we understand that the MVRMA allows it, this increases our public concern given the lack of transparency and the many, various concerns outlined above.

Our members are well versed in preliminary screenings of development projects. They observe that the level of detail and the transparency that they are required to provide for what are often much, much smaller development proposals, far exceeds what they have witnessed with both the proposed Thaidene Nënë park and the protected area development. This is creating the impression that there is a double standard at work: one for industry development and one for park development.

We very much understand the community's interest in having some kind of park development from which it can benefit and feel assured the values of the region are protected. We also understand Parks Canada's interest in advancing this national park reserve. However, we are becoming confused with the added complexity that combining a Territorial Protected Area into the discussion now also brings. There has been no fulsome discussion on the implications of using two protection tools, and what effects – positive and negative – they bring.

It is important that northerners and other public have comfort that a full, fair and transparent process has been used in proposing the establishment of this territorial protected area, and also the park. More fulsome and transparent consideration of economic values will allow for a land management decision that ensures maximum benefits to current and future generations of residents in the NWT and Canada.

Therefore, on behalf of our many members, we ask that GNWT refer the Thaidene Nënë protected area development proposal to the Mackenzie Valley Review Board for an environmental assessment, where a more open review of all aspects of the development can be evaluated by northern residents under the MVRMA.

We ask that this environmental assessment, at the least, provide the following:

- A fair and open and unbiased process that matches the rigour which other northern developments must undergo;
- An updated MERA of the proposed park area, including assessment of low carbon, green economy minerals and low carbon hydro-energy; and that this reconsideration of the MERA accepts input from northern stakeholders, particularly the resource industry;
- A more fulsome analysis and discussion of the socio-economic impacts of the proposed park and protected area vs no park and protected area, and taking into consideration the updated MERA;
- Reconsideration of the proposed park boundaries, which were created without public consultation and without in-depth economic analysis;

- Confirmation that acceptable infrastructure (fibre, power, transportation, and logistical support) corridors and areas will be included in the park areas; and
- Full public disclosure of financial arrangements, both public and private being proposed for the establishment of Thaidene Nëné.

In closing, the Chamber of Mines is supportive of the creation of parks and protected areas where they are required to protect special values and landscapes. However, in considering the closure of such vast areas of the NWT to resource development, it is essential that governments follow an open, transparent and fully considered process to ensure that the best decisions for the people of the Northwest Territories are made. Consequently, we believe that an environmental assessment of the proposed Thaidene Nëné protected area will ensure that government is able to make a well-informed decision that is in the public interest.

Yours truly,

**NWT & NUNAVUT CHAMBER OF MINES**

Gary Vivian  
President

c.c.: Ms. Joanne Deneron, Chair, Mackenzie Valley Review Board; Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Review Board; Hon. Bob McLeod, Premier of the Northwest Territories; Hon. Wally Schumann, NWT Minister, Industry, Tourism & Investment; Hon. Lou Sebert, NWT Minister, Lands; Hon. R.C. McLeod, NWT Minister, Environment & Natural Resources; Chief Darryl Marlowe, Lutsel K'e Dene First Nation; Chief Edward Sangris, YK Dene First Nation; Chief Ernest Betsina, YK Dene First Nation; Garry Bailey, Northwest Territory Métis Nation; Chief Louis Balsillie, Deninu K'ue First Nation; Bill Enge, President, North Slave Metis Alliance; Grand Chief George Mackenzie, Tlicho Government; Felix Lee, President of the Prospectors & Developers Association of Canada; Pierre Gratton, President of The Mining Association of Canada

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780-678-7992 or 778-330-0904

June 3, 2019

To all those involved in establishment and governance process for the proposed Thaidene Nënë Protected Area:

Over the past couple weeks, I have read through the description of the proposal for the Thaidene Nënë Territorial Protected Area, and would first like to say that I support the conservation mindset represented by the proposal. I have grown up in the area included in the boundaries of the proposed protected area and after 23 years of calling it home, I am still humbled by its wilderness. There are few places like this left in the world, and the proposal for this protected area formally acknowledges that our wilderness is worth protecting.

That said, I find some of the details (and lack thereof) in the proposal troubling. First, I would like to highlight an error. In the first section “Cultural, Ecological, and Socio-economic Values,” the authors indicate that the area contains no titled property, only “leases.” The homestead where I have been raised and continue to live gained title in 1982, and the title has been under the ownership of my parents since 1985. A small oversight in the proposal document, but one that should be corrected as discussions and management plans progress.

One of my concerns stems from the proposal’s description of the orientation and permits that visitors to the protected area will have to “acquire” yearly and/or each time they enter the area. Because I *live* within the protected area, this raises questions for my personal life. Does this mean that friends and family coming to visit our homestead will be subject to the orientation and need to “acquire” permits? Where can visitors acquire these documents and will there be fees associated with that acquisition? These details are not found in the provided document.

I am also concerned by the “prohibited and allowable activities” section. Paragraph four of the section states that visitors with treaty rights will not need to pay a fee for these “certain circumstances” activities, thereby implying that visitors and residents without those rights *will* pay. The proposal does not provide any details for the process for non-treaty residents should an activity such as gardening be important for them. These details cannot be left up to the imagination and like the permit and orientation processes, they must be made transparent before the area is established.

Regarding the proposal's timeline, the authors state that "Establishment Agreements" will be taking place between Indigenous governments and organizations. Will the creation of these agreements leave space for more public involvement in the finalization of regulations, and room for residents such as myself at the table? I feel strongly that the five-year development of the management plan should involve the public, especially those who live year-round in the area. I am one of only three people in my generation to have spent the entirety of my youth, adolescence, and teenage years —day in and day out — in the area which will now formally become "Thaidene Nënë." I continue to call it home. My voice, and the voices of other year-round residents of Thaidene Nënë, offer a unique perspective in the the governance of the protected area, but the proposal document leaves the details of our position in the ongoing decision-making process blurry.

The initial request for feedback asked for respondents to raise issues that have "potential to cause public concern or significant adverse environmental impacts to the area." From an environmental perspective, this act, and others like it, receive my support. Anything that takes the long view in protecting areas of the NWT's wilderness, and recognizing the North's role as an ecological and human refuge from increasing development elsewhere is a prudent move. The wilderness that remains now is a resource unto itself. It will only gain value as the uncertain future unfolds.

My issue with the proposed area is one of public concern. Any action that makes this area less accessible to those with loyal and loud voices who love it does not take into account the potential power of a well-rounded relationship between people and place. "The land lives in its people," wrote poet John Haines. Hurdles that forgo common sense and make forming a relationship to a place more complicated than necessary for human beings — of all skin colours, from all walks of life — cripple that place. It cannot speak for itself. The greatest threat to its health comes from human beings, and so its best protection comes from human beings who fight to protect the rivers they have paddled, the shorelines they have camped on, and the hills they have hiked. The regulatory processes, including those four points in the "Visitor Access" section, threaten to serve to keep people out of the protected area. I urge the Indigenous governments, the organizations, and the other participants in the development of the management plan for Thaidene Nënë to keep that in mind. Make access as simple as possible while monitoring the environmental integrity of the area. Those of us who live here and who visit here often care deeply about this place and its long-term health. Keep that in mind.

I look forward to your response to the questions posed herein and to opportunities for the public's continued involvement in this process.

Sincerely,

Annika Olesen

Hoarfrost River, NWT

Att: Michelle Swallow, Manager, Conservation Planning and Implementation  
Environmental Stewardship and Climate Change  
Environment and Natural Resources  
Government of the Northwest Territories

From: Dave Olesen, Hoarfrost River, Northwest Territories

Re: proposed Thaidene Nënë Territorial Protected Areas, surrounding proposed Thaidene Nënë National Park Reserve area in the easternmost arms of Great Slave lake, and beyond.

Date: May 31, 2019

This document contains my response to your document titled ***Establishment of the Territorial Protected Area of Thaidene Nënë under the proposed Protected Areas Act***. We received this from you as an e-mail attachment on May 8, 2019, with the following instruction:

*Members of the public are asked to notify the GNWT if they believe the proposed territorial protected area has the potential to cause public concern or significant adverse environmental impacts to the area. Please provide your input to [conservationplanning@gov.nt.ca](mailto:conservationplanning@gov.nt.ca) on or before June 3, 2019.*

By way of introduction, I am Dave Olesen. Since 1987 my family and I have lived year-round on a parcel of titled land located just west of the mouth of the Hoarfrost River, about 16 kilometers north of Reliance NWT and 90 kilometers northeast of Lutsel K'e, and 280 kilometers east-northeast of Yellowknife.

From this vantage point, and the perspective of our 32-year residence within the proposed boundary of the Protected Area, I have read your document with intense interest.

Here are some of my notes and concerns:

- Your document states that *“the territorial protected area... contains a number of key ecological features, including spectacular cliffs... numerous lakes, rivers and waterfalls, peninsulas, diverse landscape formations shaped by ancient ice sheets, and migratory barren-ground caribou herds.”*

**My notes alongside this passage are – “Yes, in other words it is in this regard identical to the entire Northwest Territories.” Also a question – why is a “spectacular cliff” a “key ecological feature?”**

- Your document goes on to state that *“Surrounding areas with high mineral potential, and most areas with average to high potential, have been excluded from the territorial protected area...”*

**My notes: I am no cheerleader for the mining and development sector, but the claim is demonstrably false, and I cite as one specific example the well-known cobalt deposits situated along the north shore of McLeod Bay. Cobalt is currently in booming demand as it is a key ingredient in the manufacture of lithium-ion batteries for electric vehicles. As contrasted to a gem diamond for a necklace or ring, cobalt, like many other minerals, actually has a useful purpose in the modern world. Your glib pronouncement that the area is free of all “high mineral potential” is unsupportable. It is simply a glib pronouncement, meant to re-assure people, and it is false. It should not be allowed to appear in any further documents.**

- Your document states that *“The land and waters in question are unencumbered by third-party interests, save a few private land leases...”*

**My notes: My family and I do not live on a leased property. We own a parcel of deeded land here, which appears in the federal land survey registry, and which I purchased in August 1985 from the former owner, the late Mr. James Colburn of Yellowknife.**

- Your document states that *“The GNWT intends to partner with Indigenous governments and organizations to develop and support economic and social benefits...”*

**My notes: Where, how, and when will the framework of this vaguely-referenced “partnering” be laid out, made available for public comment, and considered with a view to the interests of all residents of the Northwest Territories and beyond? This is a dangerously vague statement. For starters, the inclusion of the words “and organizations” leaves me wondering which organizations – only the ones the GNWT chooses to “partner with?” Or any organization with a demonstrable long-term interest in the area, i.e. “third-party stakeholders,” as the current bureaucratic**

jargon likes to lump this category? Who will have a seat at the table when this “partnering” is done?

Under the next heading, “Governance Structure,” we again find ominous references to these ambiguous and un-named “organizations” with whom the GNWT will work out their draft management plan for the area. **WHO ARE THESE ORGANIZATIONS AND WHY ARE THEY NOT NAMED HERE?** (I have my suspicions as to who they are and what their agenda will be, but perhaps you can lay those suspicions to rest by naming these “organizations” who will be collaborating and deciding all of this, perhaps behind closed doors.)

- We read in your document, at the top of page 3, that before entering the proposed territorial protected area, visitors will be required to, in item 2, *“Acquire any requisite licenses or permits.”*

**Again, ominously vague. Does one “acquire” a license or permit for free, or does one “acquire” it by paying someone for it? If free, will a quota system be instituted? If by payment, what will the fee be and where will the funds go? If the payment is significant and the regulations and registration process are cumbersome, the net effect of this effort to “boost tourism” may be just the opposite. As a career conservationist who is a personal friend of mine once said with a smile, “Well yes, I work to create parks, but as soon as an area becomes a park I don’t go there anymore. Too expensive. Too many rules.” Hmm. Thought-provoking.**

- Your document states that people with treaty rights will not require a permit in order to exercise those rights, and will not be *required to pay a fee to do so.*

**Convoluting wording, but again, an ominous inference that others not falling under the blanket of treaty rights will in fact be paying to enter the area.**

- On Page 4, under Infrastructure, I read that the infrastructure will include, among other things such as offices and visitor orientation centres, *“Operational storage of historical and cultural information and objects for ongoing interpretation, research and monitoring.”*

**By this phrase I am truly dumbfounded. What does this mean? (Does anyone know?)**

- The final heading in your document is “Public Engagement.”  
**Here I can only say that I do appreciate the limited amount of consultation and input that my family and I have been invited to submit, as a part of the “general public” and also as “stakeholders.” We had a very productive and encouraging meeting with the Minister of the Environment in late summer of 2015, and while that person (Michael Miltenberger) is no longer in that position, we can hope that a similarly productive dialogue can resume soon. So far, it has not.**

**In conclusion, my notes jotted into your document just express my ongoing frustration that as we see a steadily declining use and travel and passage and knowledge of this area we call home, the plan and steps ahead are vague and they are issued in bits and pieces. It is not an overstatement to claim that right now my family and I know as much or more about the northerly of the two areas in question as anyone alive. You would do well to tap into some of that knowledge.**

**We are not opponents of this proposal. But we do feel left out of it, all in all. I am 62 years old this October, and I have lived for over half of my lifetime out here at the Hoarfrost, where Kristen and I have raised a family and made a living. This place is, in effect, who we are. Thus my family and I feel as though we should be more “engaged” in this process than John and Jane Doe of the general public. Is that fair? Not sure.**

**Thank you,**

**Dave Olesen**

Attention: Michelle Swallow, Manager, Conservation  
Planning and Implementation  
Environmental Stewardship and Climate Change  
Environment and Natural Resources  
Government of the Northwest Territories

Kristen Olesen  
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June 3, 2019

To those involved in the process for the proposed  
Thaidene Nënë Protected Area:

I have read the Territorial Protected Area document with pen in hand and have marked it with questions and concerns that came up while reading.

I would like to start off by saying I support the idea of establishing a territorial protected area. Thaidene Nënë has the potential to be an important resource in the future of the Northwest Territories.

While I support this plan for a protected area, as a year round local resident of this area I found the document unable to address some of my concerns. Below I have shared my concerns under the bold headings.

### **Location and Map**

1) Is there a detailed map of the protected area's boundary on McLeod Bay. As it is just to the east of our home I am interested in the exact location of the eastern boundary along the north shore.

### **Cultural, Ecological and Sociology-economic Values**

1) The biggest concern for me was not acknowledging our presence here as year-round residents on titled land. I understand there are lease owners up and down the lake but presently we are the only full-time residents in the proposed park.

2) Who are the "organizations" in the first sentence, sixth paragraph under this heading. This word continues to be vague throughout the document. This is the first time it appears but it left me wondering who this is talking about.

### **Visitor Access**

1) You give four requirements for visitors entering the park. I am wondering where these visitors will need to go to complete these requirements. What about friends, family and visitors that fly direct from Yellowknife to Hoarfrost River for a visit. Do they need to pay fees and register before they visit?

2) The document discusses visitors but what are we to expect as full-time residents in terms of fees and the four requirements mentioned under this heading?

### **Infrastructure**

This discusses the infrastructure needed to operate Thaidene Nëné but it doesn't give details.

1) Where will the various buildings be located? Will all visitors to the park need to stop by in person or will there be an online registration?

2) What exactly is the “operational storage of historical and cultural information and objects for ongoing interpretation, research and monitoring” talking about?

3) Patrol and monitoring cabins are listed. Where will these be and what is their intended purpose? Who will be the keeper of the cabins? In addition to the people who are trained to monitor and patrol the park will visitors be able to use them?

### **Timeline**

You say this process should be completed by August 2019, just a little over two months away from now. Will there be opportunity for more conversations to address these issues?

Thank you for this opportunity and I look forward to continued conversation.

Sincerely,

Kristen Olesen

Hoarfrost River, NT