

**COMMENTS PROVIDED TO PARKS CANADA IN RESPONSE TO THE DEVELOPMENT
DESCRIPTION FOR ESTABLISHMENT OF THAIDENE NĒNĒ NATIONAL PARK RESERVE OF
CANADA**

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From: Private Citizen (contact information withheld)

Sent: April-09-19 9:47 AM

To: Bastick, Jacquie (PC) <jacquie.bastick@canada.ca>

Subject: RE: Commencement of Preliminary Screening for Establishment of Thaidene Nëné National Park Reserve

Thank you, I have carefully read the document and have no comments to add. Well done.

Private Citizen (contact information withheld)

Hoarfrost River, NWT (10 miles north of Reliance), year-round resident since 1987

From: Patrick Clancy [mailto:Patrick_Clancy@gov.nt.ca]
Sent: April-25-19 11:45 AM
To: Bastick, Jacquie (PC) <jacquie.bastick@canada.ca>
Subject: Thaidene Nene National Park - PS2019PC0001 - Preliminary Screening

Hi,

The Department of Environment and Natural Resources, Government of the Northwest Territories has reviewed the preliminary screening information at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* and has no comments or recommendations for the consideration of the Parks Canada at this time.

Mársı | Kinanāskomitin | Thank you | Merci | Hąı' | Quana | Qujannamiik | Quyanainni |
Máhsı | Máhsı | Mahsı

Patrick Clancy
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NORTH SLAVE MÉTIS ALLIANCE

32 Melville Drive, Yellowknife NT X1A 0G2



April 25, 2019

Jacquie Bastick
Impact Assessment Specialist
Natural Resource Conservation Branch
Parks Canada
2 County Rd. 5, Mallorytown, ON K0E 1R0
E: jacquie.bastick@canada.ca
T : 613.923.5261 x 103

Dear Ms. Bastick;

RE: Preliminary Screening of A Proposal to Establish Thaidene Nene National Park Reserve of Canada

The North Slave Metis Alliance (NSMA) received an email from you inviting us to comment on the Development Description of the proposed Thaidene Nene (TDN) National Park Reserve (NPR) on April 5, 2019. We reviewed the description and have the following comments for your consideration.

NSMA's Concerns:

1. NSMA is disappointed that this far into the process of establishing the TDN NPR, Parks Canada's Development Description continues to ignore, and thus erase, the significance of the TDN NPR to NSMA and its Aboriginal right bearing Metis members. NSMA is now the only Indigenous organization in the Northwest Territories with a court declaration that its members hold Aboriginal rights as Metis. In making its declaration, the court specifically considered NSMA members' Aboriginal harvesting rights in the area being considered for the TDN NPR (*Enge v. Canada*, 2017 FC 932 at paras. 235-237). The Developer's Description references a number of other Indigenous organizations by name and the significance of this land to their members but fails to even mention NSMA and its Aboriginal rights-bearing members. This failure to mention NSMA and its members suggests a failure to consider and mitigate any impacts on NSMA members' rights.
2. NSMA reminds Parks Canada that NSMA has repeatedly expressed its concern that, without NSMA's involvement in the establishment agreement and

NORTH SLAVE MÉTIS ALLIANCE

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management plan for the TDN NPR, there is no meaningful way to ensure NSMA members' rights will not be adversely affected. NSMA has a keen interest in the health and well-being of the wildlife populations that use the TDN NPR, notably the barren-ground caribou herds mentioned in the Development Description (see page 2). Indeed, NSMA is so committed to monitoring and managing this population that it successfully brought a court action against the territorial government so that it could promote and protect NSMA members' Aboriginal rights as Metis to manage and harvest from these herds.

3. Further, the Development Description envisions the solution to any negative effects of wildlife due to park activity and use will be consideration of mitigation measures by the "cooperative management body" and through the "park management plan" (see pages 4 and 5). NSMA has no information that it is a member of this "cooperative management body" and no information on what will be included in the "park management plan". While the measures that the body and plan might consider and implement will no doubt be well-intended, NSMA needs more details regarding the before it can agree any mitigation efforts undertaken by the body or plan are adequate.

NSMA appreciates the opportunity to comment on the Development Description for the proposed TDN NPR. We look forward to your response to our concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Shin Shiga', is written over a light blue circular stamp.

Shin Shiga
Manager, Environment

From: Dave Nickerson [mailto:dave.nickerson@outlook.com]

Sent: April-30-19 1:06 PM

To: Ministre / Minister (EC) <ec.ministre-minister.ec@canada.ca>; dominic.leblanc@parl.gc.ca

Cc: Bob_McLeod@gov.nt.ca; Wally_Schumann@gov.nt.ca; Robert_C_McLeod@gov.nt.ca; Louis_sebert@gov.nt.ca; jdeneronred@reviewboard.ca; mcliffephillips@reviewboard.ca; Bastick, Jacquie (PC) <jacquie.bastick@canada.ca>; executivedirector@miningnorth.com

Subject: Proposed Thaidene Nëné National Park Reserve-Environmental Assessment

Box 1778,

Yellowknife NT X1A 2P4

April 30, 2019

Hon. Catherine McKenna, PC. MP.

Minister of Environment & Climate Change Canada

Hon. Dominic Leblanc, PC. MP.

Minister of Intergovernmental and Northern Affairs and Internal Trade

Dear Honourable Ministers,

RE: Proposed Thaidene Nëné National Park Reserve-Environmental Assessment

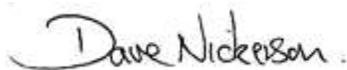
This letter concerns the highly controversial and politically charged Parks Canada proposal for the Thaidene Nëné National Park Reserve in the Northwest Territories.

If this is implemented without NWT residents being properly consulted, and if an assessment is not made by a competent body independent of the proponent, then the view from the North will be that, once again, Ottawa has capriciously imposed its will on Northerners just as when the Prime Minister unilaterally prohibited Northern offshore oil and gas activity.

Fortunately, a system for the proper evaluation of the Parks Canada proposal for a park development exists with the Mackenzie Valley Environmental Impact Review Board (the Review Board) created pursuant to the *Mackenzie Valley Resource Management Act*.

Because of the significant public concern with the Parks Canada proposal you would be doing both Northerners and other Canadians a considerable service by referring it to the Review Board for a thorough environmental assessment.

Respectfully yours,



Dave Nickerson

Cc: Hon. Bob McLeod, Premier of the Northwest Territories

Hon. Wally Schumann, Minister of Industry, Tourism and Investment, G'NWT

Hon R.C. McLeod, Minister of Environment and Natural Resources, G'NWT

Hon. Lou Sebert, Minister of Lands, G'NWT

Joanne Deneron, Chair, Mackenzie Valley Review Board

Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Review Board

Jaquie Bastick, Impact Assessment Specialist, Parks Canada

Tom Hoefer, NWT and Nunavut Chamber of Mines



May 6, 2019

VIA email

Jacquie 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



May 6, 2019

Att: Jacquie Bastick, Impact Assessment Specialist
Parks Canada, Natural Resource Conservation Branch
2 County Rd. 5
Mallorytown, ON K0E 1R0
By email to: jacquie.bastick@canada.ca

Dear Ms. Bastick,

Re: Preliminary Screening for Thaidene Nënë National Park Reserve, NWT

The NWT & Nunavut Chamber of Mines (Chamber) is writing this to respond to the preliminary screening that your agency is conducting in accordance with the *Mackenzie Valley Resource Management Act* (MVRMA) for the development: “*Establishment of Thaidene Nënë National Park Reserve of Canada*”. We thank you for extending the time to respond to the screening to May 6.

We support the development of new national parks and recognize the important role they play in representing nationally significant examples of Canada’s natural and cultural heritage, and in particular, maintaining healthy, diverse and whole ecoregions throughout the country.

However, the minerals industry and its beneficiaries rely 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 made unavailable for economic development, we believe it is incumbent on governments to utilize diligent, open and transparent processes in determining and evaluating the consequences of such action.

Whilst the Chamber is supportive of the concept of the establishment of the Thaidene Nënë park, with this letter we are formally expressing our significant “public concern” over the Thaidene Nënë development process based on procedural and substantive concerns described herein. We ask that Parks Canada 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.

As indicated in your notification, a preliminary screening is required because section 124(2) of the MVRMA stipulates that developments proposed by federal agencies, including establishment of a park subject to the *Canada National Parks Act*, must be reviewed by preliminary screening.

We understand that under clause 125(1) of the MVRMA, in conducting such a preliminary screening, Parks Canada is to:

- a) *determine and report to the Review Board whether, in its opinion, the development might have a significant adverse impact on the environment or might be a cause of public concern; and*
- b) *where it so determines in the affirmative, refer the proposal to the Review Board for an environmental assessment.*

We represent 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 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 hundreds of employees that rely on the minerals industry. The minerals industry is the largest private sector industry in the Northwest Territories (NWT), and is the largest private sector employer of Indigenous northerners. Mineral development benefits today are significantly important to the economic well-being of all northerners and the territory.

Benefits arising from the NWT minerals industry over the past 21 years include:

- 60,000 person-years of employment, approximately half northern and half of those Indigenous workers;
- Over \$20 billion in business expenditures, of which 70% is northern; an unprecedented \$6 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 approximately 35% 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.
- The NWT Government (GNWT) reports that, “In the past three years, diamond mines have contributed 41 percent of the GNWT’s corporate income, fuel, property, and payroll tax revenue.”¹ 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 largest private sector employer of Indigenous northerners.

The NWT is currently realizing a prolonged period of poor investor confidence and the Chamber believes that the process followed in creating Thaidene Nëné is not contributing to increase this confidence. The Chamber and its members are very concerned that, as proposed, the Thaidene

¹ The Good of Mining: Revenues for Public Benefits, 2019: <https://www.iti.gov.nt.ca/en/newsroom/good-mining-revenues-public-benefits>

Nënë development has the potential to negatively affect the economic well-being of residents and communities in the entire NWT. We have been actively submitting our concerns with this proposed development over the last several years but have found they have been either ignored or disregarded. 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:

- Contrary to methods used to define previous northern national park reserves, e.g., Naats'ihch'oh, alternative park boundaries were not shared with the public for their comment and consideration. Final boundaries were negotiated and established by Parks Canada with the GNWT behind closed doors and announced as a done deal without any ability for the public to comment or suggest changes.
- Insufficient money was invested in the Mineral & Energy Resource Assessment (MERA) to evaluate the economic potential that would be lost in removing such a significantly large area from development. The Chamber believes this underfunding has resulted in an inadequate assessment.
- There is no evidence of an energy assessment being conducted and provided for hydropower under the MERA. As a result, the NWT's third most attractive and natural hydropower development opportunity, the Lockhart River system, was ignored. Ignoring discussion of this significant alternative, non-carbon based power development option represents the loss of a significant economic and environmental opportunity to the north and future generations as well as hampering the NWT's ability to reduce greenhouse gas emissions in future.
- 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 the current park proposal has been 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 Territory. 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 proposal has relied on an over-weighting of the views of southern observers compared to the more relevant views of northern residents.

Our substantive concerns with the proposed development include:

- The tens of thousands of square kilometres being proposed for closure to development in Thaidene Nene and arising from Parks Canada's work 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 to the NWT. Professional geologists familiar with

the region have confirmed that high mineral potential was glossed over in the MERA, including potential for minerals such as cobalt and lithium, important to the development of the low carbon, green economy, with low 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 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 analysis or trade-off study of the economic impacts of Thaidene Nënë versus potential mineral development. A business case² 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 by Lutsel K'e. We are unaware of any discussion or study led by Parks Canada, GNWT or any other government agency on the economic trade-offs of establishing Thaidene Nënë park as proposed versus keeping land open for potential responsible mineral resource development. Perhaps the lack of such study or discussion is a function of the inadequate MERA 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.
- It is our understanding there may be financing arrangements contemplated by private interests and Parks Canada as part of, or tied to, establishment of the Thaidene Nënë Park. Considering such financing arrangements would clearly represent an economic impact of the park development, full public disclosure of details should be required.
- 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 Akaiicho 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. This is contrary to the NWT Government's *Land Use and Sustainability*

² 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>

*Framework*³ 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.*”

- Parks Canada has refused to consider industrial corridors for transportation, power or fibre optic communications, through the proposed Thaidene Nënë 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.
- We also note Parks Canada has applied an inconsistent approach with respect to corridors through parks. In their *Development Description*⁴, Parks Canada has stated that a corridor for industrial use is not permitted under the *Canada National Parks Act*. Yet Nahanni Park has a corridor to the Prairie Creek mine development, and Ukkusiksalik park in Nunavut was established with consideration for a corridor through the park to high mineral potential lands beyond to ensure future economic opportunities.
- Further, we are unaware of any detailed discussion of navigable waterways that are a federal responsibility, through the lake portion of Thaidene Nënë park.
- Allowance for float planes to use Ft. Reliance as they have historically done for industrial (e.g., exploration) purposes is not allowed. As per Parks Canada’s *Development Description*, the only allowance for floatplanes is for park visits. This will further affect exploration activities to the east and southeast beyond the park. These issues have been raised but are absent from Parks Consultation & Engagement Report.
- An additional concern raised by our members is that the proponent of the park development is also the Preliminary Screener, creating a reasonable apprehension of bias and potential for a perceived conflict of interest. While we understand that the MVRMA allows for this, this adds additional concern given the lack of transparency and the 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 the proposed Thaidene Nënë 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 a national park development from which they can benefit. We also understand Parks Canada’s interest in advancing this national park reserve. 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 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.

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

⁴ A Proposal to Establish Thaidene Nënë National Park Reserve of Canada: Development Description; http://reviewboard.ca/sites/default/files/ps/development_description_thaidene_nene_establishment_0.pdf

Therefore, on behalf of our many members, we ask that Parks Canada refer the Thaidene Nënë development proposal to the 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 provide:

- A fair and open and unbiased process that matches the rigour which other northern developments must undergo;
- A review of the adequacy of the MERA that was conducted, including missing assessment of low carbon, green energy minerals which are in increasing demand, and the omission of low carbon hydro-energy; and that the MERA accepts input from northern stakeholders, particularly the resource industry;
- A more fulsome analysis and discussion of the economic implications of the proposed park;
- Reconsideration of an infrastructure corridor for future economic developments in the southeastern NWT given that corridors have been allowed in other parks; and
- Full public disclosure of any financial arrangements, both private and public, tied to the establishment of Thaidene Nënë.

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; Hon. Catherine McKenna, Minister of Environment & Climate Change Canada; 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; Hon. Amarjeet Sohi, Minister of Natural Resources Canada; Hon. Marc Garneau, Minister of Transport Canada; Michael McLeod, Member of Parliament for the Northwest Territories; Cathy McLeod, MP and Conservative Critic for Indigenous and Northern Affairs; Shannon Stubbs, MP and Conservative Critic for Natural Resources; Edward Fast, MP and Conservative Critic for Environment; Felix Lee, President of the Prospectors & Developers Association of Canada; Pierre Gratton, President of The Mining Association of Canada

May 6th, 2019

VIA EMAIL

Attn. Jacquie Bastick, Parks Canada; and Alan Ehrlich, Mackenzie Valley Review Board

Re. Preliminary screening for the proposed Thaidene Nene National Park

I am writing to express my concern with the magnitude of the above project, and the resulting permanent, adverse impact it will have on the residents and communities of the NWT. The prospect of seceding this considerable amount of resource-rich land back to a heavy-handed federal agency, Parks Canada, in perpetuity, will surely limit our economic potential as a Territory for generations to come.

~~The process that has advanced this initiative has to date consistently ignored, marginalized and effectively buried stakeholder concerns at every turn. The examples are many, and documented.~~

Years of consistent pressure and influence by well-financed, non-NWT, and foreign funded NGO's; who view the NWT as a 'soft target' have garnered support and convinced an isolated, impressionable, gateway community that their future can be sustained by sterilizing proven economic potential in favor of a "conservation economy", based solely on tourism and associated part-time employment.

While protecting wild spaces and our traditional ways of life is important to most of us in the NWT; we must allow, and leave room for future generations to make choices. To date with over 50% of our lands off limits to resource development, we may never approach our economic independence and potential, and will predictably forever be relegated to the whims of southern politicians and inconsistent handouts. National Parks are permanent, along with their negative implications for the future of the NWT.

As a long term stakeholder and respectful participant of this land, I could live in decent conscience, with the old proposed park boundaries from 1986 that are approximately 7000km², and exclude the Reliance area. Considering the unexpanded thoughts above, I believe a full EA is appropriate and warranted unless such a boundary revision is enacted in advance.

While E.A.'s are appropriate for medium term industrial projects occupying a few square kilometers, it should follow that large-scale government projects of permanent conservancy occupying tens of thousands of square kilometers, thus creating an economic dead-zone that will impact the long term well-being of the NWT; should at very minimum be subjected to the same scrutiny and sober second-thought of an E.A.. What's good for the goose should apply to the gander.

Sincerely,



Ray Decorby

Enclosures (2)

Ray Decorby

March 8th, 2016

Box 2542, Yellowknife, NWT, X1A 2P8

ray@polardevelopments.com

Attn: Mr. Wally Schumann, Minister of Environment and Natural resources

Re: Thaidene Nene

Dear Wally,

Thanks for taking time out to communicate during your first session. Having recently read your mandate letter, I don't envy the enormous responsibilities you have undertaken to make decisions that will positively impact the long-term well-being of 40,000 people.

I remain cognisant of our need to foster and maintain strong relationships with higher level of government; and that recent developments of infrastructure commitments from them is evidence of this government's capacity and achievements at this early date.

However, I was disappointed to read your responses to questions on the floor regarding Thaidene Nene, in that your department is planning to advance your predecessor's combined park proposal and its associated conservation economy. Considering the current circumstances and the magnitude of the withdrawal of resource-rich lands and the resulting isolation of the complete south-eastern portion of the NWT, the proposal appears hastily conceived at a very small table, without broad and meaningful consultation with all stakeholders.

Due diligence on this matter, leading to informed decisions, needs study, time, debate and lots of air, in that long-term impacts and possibilities are well considered before commitments are made on our behalf. The concept of reliance on a 'Conservation Economy' for this isolated area, will need to be supported with realistic projections and details.

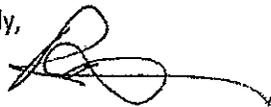
I for one, believe land claims in the area should be concluded (even within the park withdrawal) before conservancy is decided. However, the single most important point I wish to make in this communication is that control of the remainder of our lands must stay within the borders of the NWT. If a federal component is absolutely unavoidable, the size needs to be defined in square hectares, not tens of thousands of square kilometers.

Our concerns on the matter, go well beyond personal assets at risk in the area, and our multi-generational corporate commitments in the NWT. They are focused on our future as a whole, and respectfully on this government's responsibility to make fully informed, prudent, and responsible business decisions. Decisions that will positively impact us, and allow options for our future generations.

We care!

Yours Sincerely,

Ray Decorby



cc. Honourable Bob McLeod, Premier of the NWT.

Ray Decorby
Box 2542 Yellowknife,
Northwest Territories X1A 2P8
ray@polardevelopments.com

February 15, 2016

ATT: DR. C BENNETT

Attn: Honourable Catherine McKenna, Minister of Environment and Climate Change Canada

RE: Thaidene Nene National Park Proposal

I communicate with particular reference to the above initiative, and generally with the level of national conservancy that is being imposed, through Parks Canada, on the people of the NWT, mostly in the last ten years.

In keeping with the spirit and intent of our recent devolution agreement, I hope Canada will step aside and allow us to fulfill our aspirations, by respecting our willingness to make our own decisions about conservancy, land management, and economic development. I assume that the over-arching goal is to enable the NWT to eventually stand on its own, and reduce our burden on the Canadian taxpayer.

Considering the magnitude of the expanded Thaidene Nene land withdrawal (2007) into resource-rich territory; the consultation process has been narrow in scope, less than inclusive, and not forthright. While Parks Canada and some NGO's have expended considerable effort in order to garner support from one gateway community of 300 people, little genuine effort has been directed to the rest of the people of the NWT. For example, since devolution all NWT aboriginal groups share directly (25%) in resource revenues accruing to the NWT. Most of these people have not been consulted with regard to this proposal. Canada's new government has committed to listening and "setting a higher bar for openness and transparency". Yet after a 'public' meeting hosted by Parks Canada in Yellowknife in early December, where substantive opposition was expressed from a very wide audience of public stakeholders and claimant groups; minutes recorded by Parks Canada are not available to the public.

On February 5th, our Prime Minister was quoted underlining a Canadian reality: "...natural resources will always be the foundation of our economy". While public support and limited funding for cottage industries such as eco-tourism in remote communities has merit, it will not sustain development of schools and health centers. Protecting some sacred places in Thaidene Nene is important to all of us. However, permanent sterilization of more of our lands (with questionable benefits), for the pleasure of a few Canadians who can afford access, is inappropriate and lacks consideration of NWT's long term capacity to grow. Decisions of conservancy should be left in the hands of northerners, so as our future generations can make choices in how we explore opportunities, and manage our potential going forward. An NWT wilderness ghetto is not a viable option.

Yours sincerely,

Raymond Decorby



CC: Michael Mcleod, MP
Honourable Bob Mcleod, Premier NWT
Wally Schumann, Minister for ENR NWT
Right Honourable Justin Trudeau, Prime Minister

Enclosures:

✓ DR. C BENNETT, MINISTER OF INDIGENOUS AFFAIRS & NORTHERN AFFAIRS.



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Representing Northern Business Since 1973

May 6, 2019

Attn: Jacquie Bastick, Impact Assessment Specialist
Parks Canada, Natural Resource Conservation Branch
2 County Rd. 5
Mallorytown, ON K0E 1R0
By email to: jacquie.bastick@canada.ca

Re : Preliminary Screening for Establishment of Thaidene Nëné National Park Reserve

Please accept this submission on behalf of the NWT Chamber of Commerce for the proposed Thaidene Nëné National Park Reserve.

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 Nëné National Park Reserve, 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

(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.

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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 Nënë National Park Reserve, 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 Nënë National Park Reserve.
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.
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



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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 National Park Reserve so that both the National Park Reserve 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 km² with the remaining 7,000 km² 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 Bailey, Northwest Territory Métis Nation; Chief Louis Balsillie, Deninue Kue First Nation; Bill Enge, President, North Slave Metis Alliance; Grand Chief George Mackenzie, Tlcho Government; Hon. Amarjeet Sohi, Minister of Natural Resources Canada; Hon. Marc Garneau, Minister of Transport Canada; Michael McLeod, Member of Parliament for the Northwest Territories; Cathy McLeod, MP and Conservative Critic for Indigenous and Northern Affairs; Shannon Stubbs, MP and Conservative Critic for Natural Resources; Edward Fast, MP and Conserative Critic for Environment; Felix Lee, President of the Prospectors & Developers Association of Canada; Pierre Gratton, President of The Mining Association of Canada

May 6th, 2019

VIA EMAIL

Attn. Jacquie Bastick, Parks Canada; jacquie.bastick@canada.ca

Attn. Alan Ehrlich, Mackenzie Valley Review Board; aehrlich@reviewboard.ca

Re. Preliminary screening for the proposed Thaidene Nene National Park

I am writing to express my personal concerns with this proposed National Park.

I am the third generation of my family to use this area on a regular & ongoing basis. Along with my partner Justine, and members of our family, our lifestyle includes activities not compatible with a National Park:

We use the area to net fish; and hunt moose, muskox, caribou, wolves & wolverine for food and clothing. I want to continue to be free to do so, and am concerned this park will prevent those pursuits.

We not only discharge firearms to provide food and clothing, but also for safety. We will not hesitate to shoot an aggressive animal in self-defense if one of us is in jeopardy, which is essential for the safety and survival of any person who is residing in a remote location in Canada.

We travel freely by aircraft, motor boat, snowmobile, ATV; and want to continue to do so freely. Our camps are serviced by barge, and our various modes of transportation are resupplied with fuel by barge. We are concerned this park will prevent, restrict, limit and impede those crucial activities in the future as the rules are progressively tightened over time.

I do not wish to be a Tenant of Parks Canada, and do not want the future prospect of gaining freehold title to my 8.5 acre lease to be jeopardized once land claims are settled, as a National Park would not allow freehold title. I intend to keep this property for future generations of my family and, even worse, am concerned that my lease may not be renewed if controlled by Parks Canada, because my traditional activities are not compatible with a National Park status in the area.

We are concerned about Regulation Creep in the park regulations over time. Activities and uses tolerated at the outset may be banned in the future, and we would be powerless to stop it.

We are deeply concerned about the lack of transparency in the process, with respect to the regulations to date. - They are not on the table.

We are also concerned that relevant precedent was not followed for different boundary options:

A. The last National Park that was established in the NWT (Nááts'ihch'oh) had three boundary options open for public consultation. Conversely, this new proposed park did not consider any alternate boundaries for public consultation, instead they were formulated behind closed doors with no opportunity for input. The CEO for Parks Canada has written to me personally, committing to consult on proposed boundaries; however that did not occur.

B. Nááts'ihch'oh also excluded the inter-modal hub of O'Grady Lake from all possible boundaries to keep it open, which has been beneficial to stakeholders in that area. The area in the vicinity of Reliance also serves, much more significantly, as an inter-modal hub (air, marine, and land), and we are concerned that this precedent is not being followed and that National Park status in this area will be detrimental to it being able to continue to serve in this function unfettered.

These departures from previous precedent, noted above, are unwarranted, ignore Parks' commitment to consult with me on boundaries, and absolutely need to be reconsidered before this process moves forward any further.

We are concerned about being governed by an unaccountable federal agency in Parks Canada. They are not a Federal Department, they are an Agency, which gives them a great degree of autonomy, making them largely unaccountable to the public and stakeholders.

This proposed park would shape 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. If the NWT loses 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. This goes against the spirit and intent of Devolution by placing limitations our prosperity and taking jurisdiction over NWT lands away.

Although we do not support the proposed boundaries currently under review, we would tolerate a return to the old proposed boundaries for Thaidene Nene National Park (outlined by a solid line in 1986 by Parks Canada in their proposal description brochure of that year). For reference, those boundaries are attached. The 1986 boundaries would not materially jeopardize our traditional ongoing uses and they exclude the vicinity around Reliance from the proposed park boundaries.

Sincerely,



Spencer Decorby & Justine Crowe.

Enclosure: Parks Canada 1986 boundaries

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File No. 443136/000001

May 6, 2019

VIA EMAIL: jacquie.bastick@canada.ca

Parks Canada/Government of Canada
2 County Rd 5
Mallorytown, ON K0E 1R0

**Attention: Jacquie Bastick, Impact Assessment Specialist,
Natural Resource Conservation Branch**

Dear Madam:

Re: Preliminary screening for the proposed Thaidene Nene National 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 National 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, given that Parks Canada is both the proponent and conducting the preliminary screening of the proposed Park project. The proposed Park is a permanent removal of a considerable amount of land and water from territorial jurisdiction. The Association's position is that Parks Canada's dual role is inappropriate and represents a conflict of interest for a development of this permanency and magnitude.

Further, we understand that our client has provided previous versions of the Reliance Adjustment to Parks Canada, however the Consultation and Engagement Report produced by Parks Canada makes no mention of having engaged on numerous occasions with the Association, nor of the Reliance Adjustment. These previous omissions are troubling and therefore, the Association seeks positive cooperation and accommodation going forward by providing serious consideration to the Reliance Adjustment. The Association is seeking a pause on the Park as proposed until alternative boundaries are developed for consultation, including exclusion of the vicinity around Reliance.

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 (aehrich@reviewboard.ca)

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.¹

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 29th, 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 area² 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.³

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

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

¹ Please also see Schedules K and Q.

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

³ See Schedule P.

⁴ 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 documentation⁵ as well as those that were ‘less official’.⁶

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.⁷ 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 YFL⁸. 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.⁹ 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;

⁵ See http://www.oag-bvg.gc.ca/internet/English/pet_199_e_28935.html

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

⁷ See Schedule O.

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

⁹ 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.¹⁰

¹⁰ 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.¹¹ 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.¹²

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 km² would bring continued benefit to government, industry, community and individuals alike.¹³

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.¹⁴

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

¹¹ Please see Schedule E.

¹² Please refer to maps contained in Schedule E.

¹³ See Schedule J.

¹⁴ See Schedules C and D.

1. The current boundaries proposed for the National Park Reserve exclude several areas¹⁵, primarily for mineral interests¹⁶. 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.¹⁷

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

¹⁵ Please refer to the area outlined in red on the first map in schedule E.

¹⁶ See Schedule E (red shaded areas).

¹⁷ 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

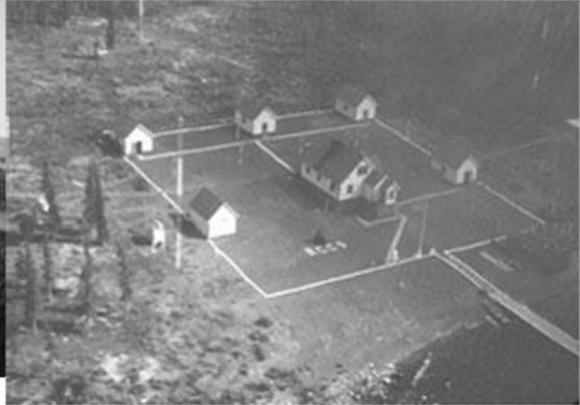
Ft. Reliance - 1950
RC Sigs Station on the right. RCMP barracks on the left.
Taken from Mauffley Point, across from the station.



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.

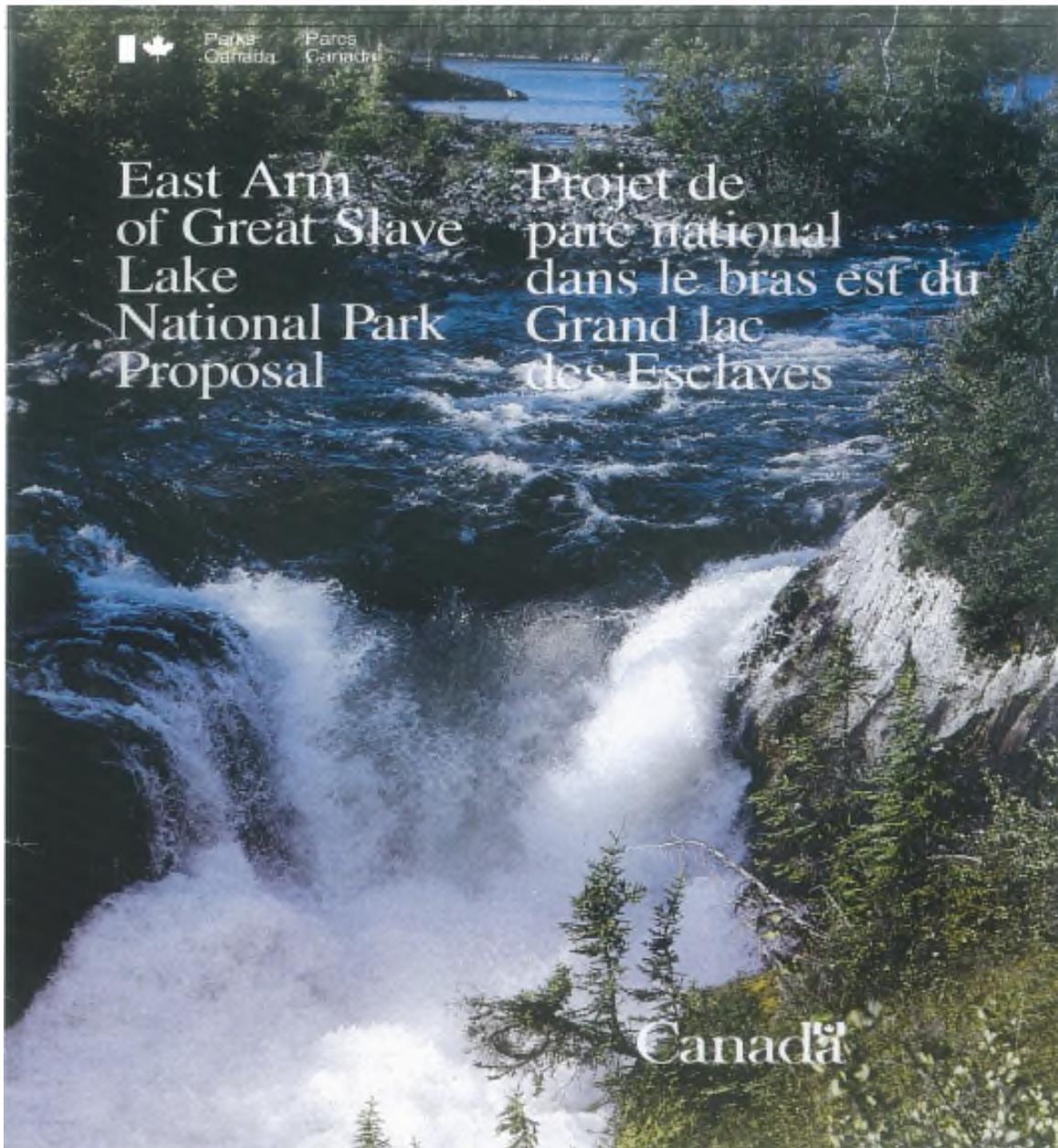
Could you please consider this matter and advise me whether you will be prepared to proceed with the necessary Order in Council to give effect to this required change.

Yours faithfully,

Dave Nickerson

Dave Nickerson, M.P.

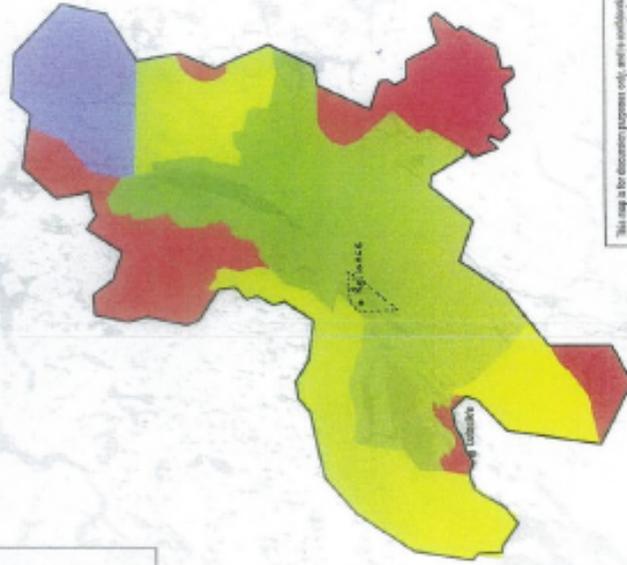
**SCHEDULE D
PARKS CANADA 1985/86 PROPOSAL, BOUNDARY MAP FOLLOWING PAGE
EXCLUDING RELIANCE FROM PROPOSED PARK.**



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**



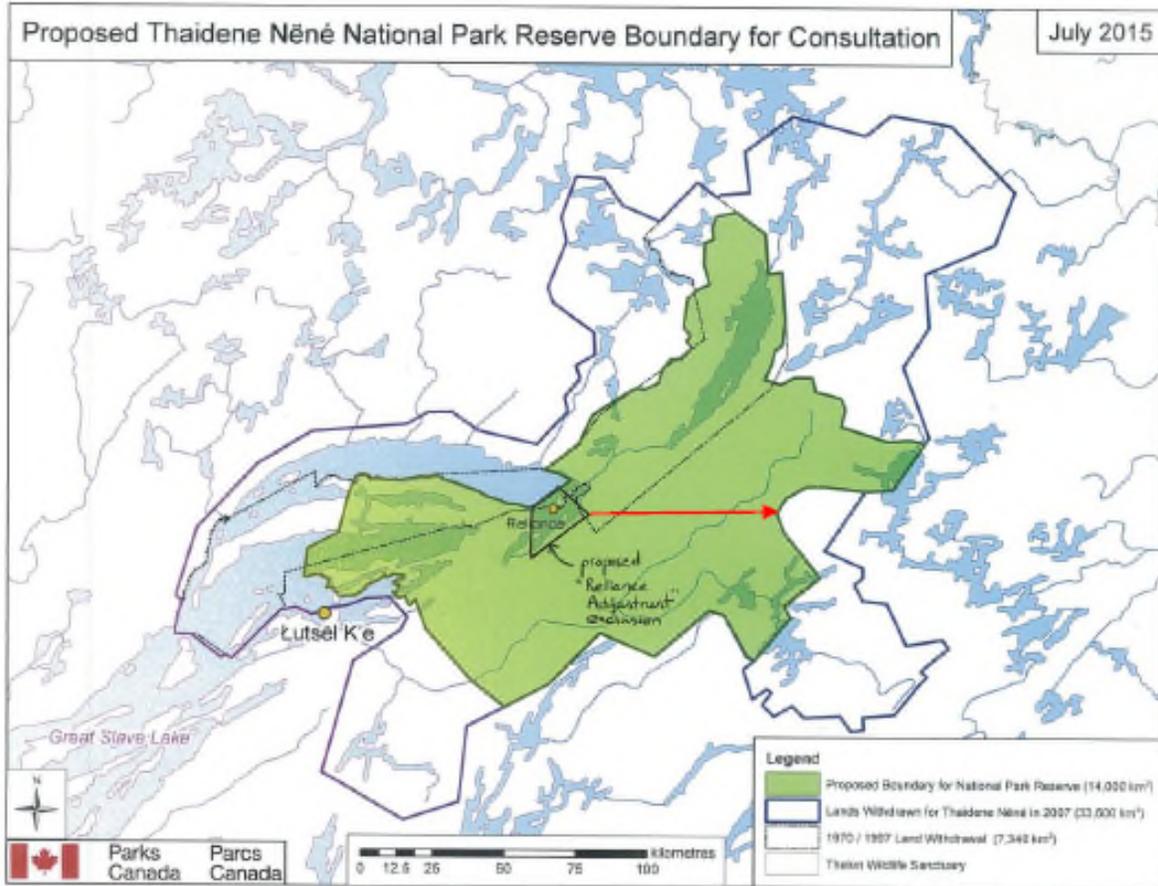
This map is for illustrative purposes only, and is not intended to be used for legal purposes. It may, without notice, be subject to change without notice and is subject to ongoing consultation and negotiation.



Schedule E – cont'd

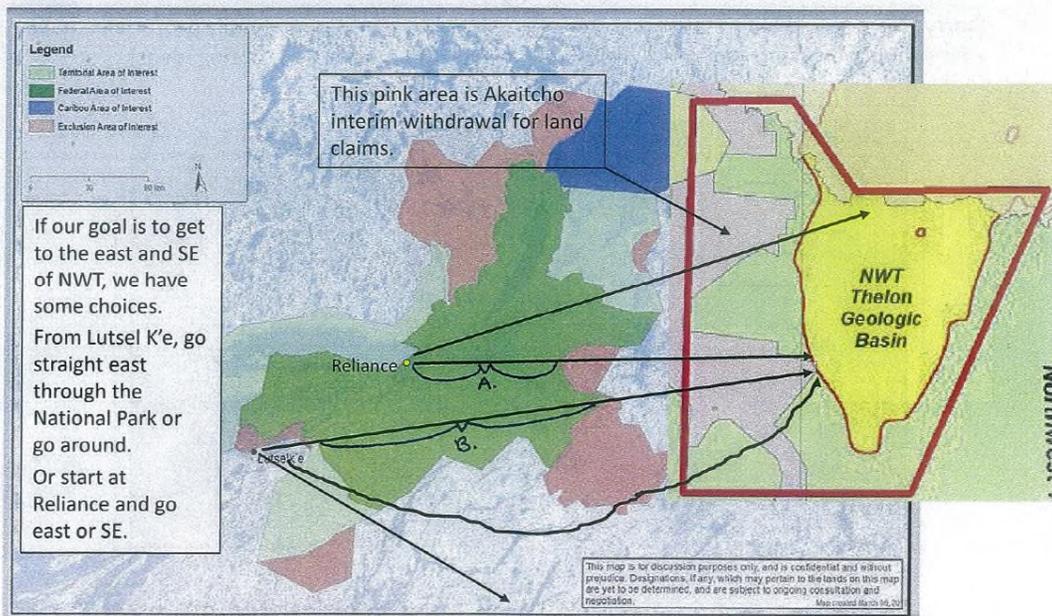
The Reliance Administrative Area represents 0.9% of the Proposed National Park Reserve.

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
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.

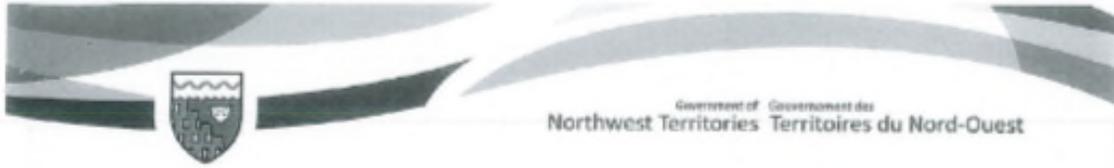
The establishment of an Administrative Area around the settlement of Reliance, by way of exclusion from park designation would be useful to such a research station site. A 'neutral zone' at the strategic location of Reliance, administered by the GNWT, would resolve some site-specific issues, and create 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 18th 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 17th 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 18th 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.

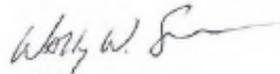
On the point that land claims should be concluded before conservation areas are established, it is a priority of this government to see outstanding land claims settled within the life of this Assembly, but we also see TDN being much better positioned to conclude its business in the shorter term. I strongly 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 4th, 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

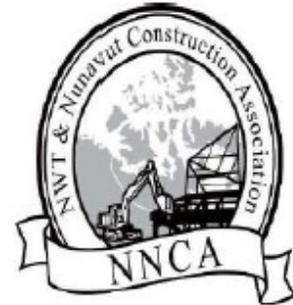
Handwritten signature of Deneen Everett in black ink.

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
SECTION OF THE NATIONAL PARKS ACT 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.

Unanswered to date:



November 17th, 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?

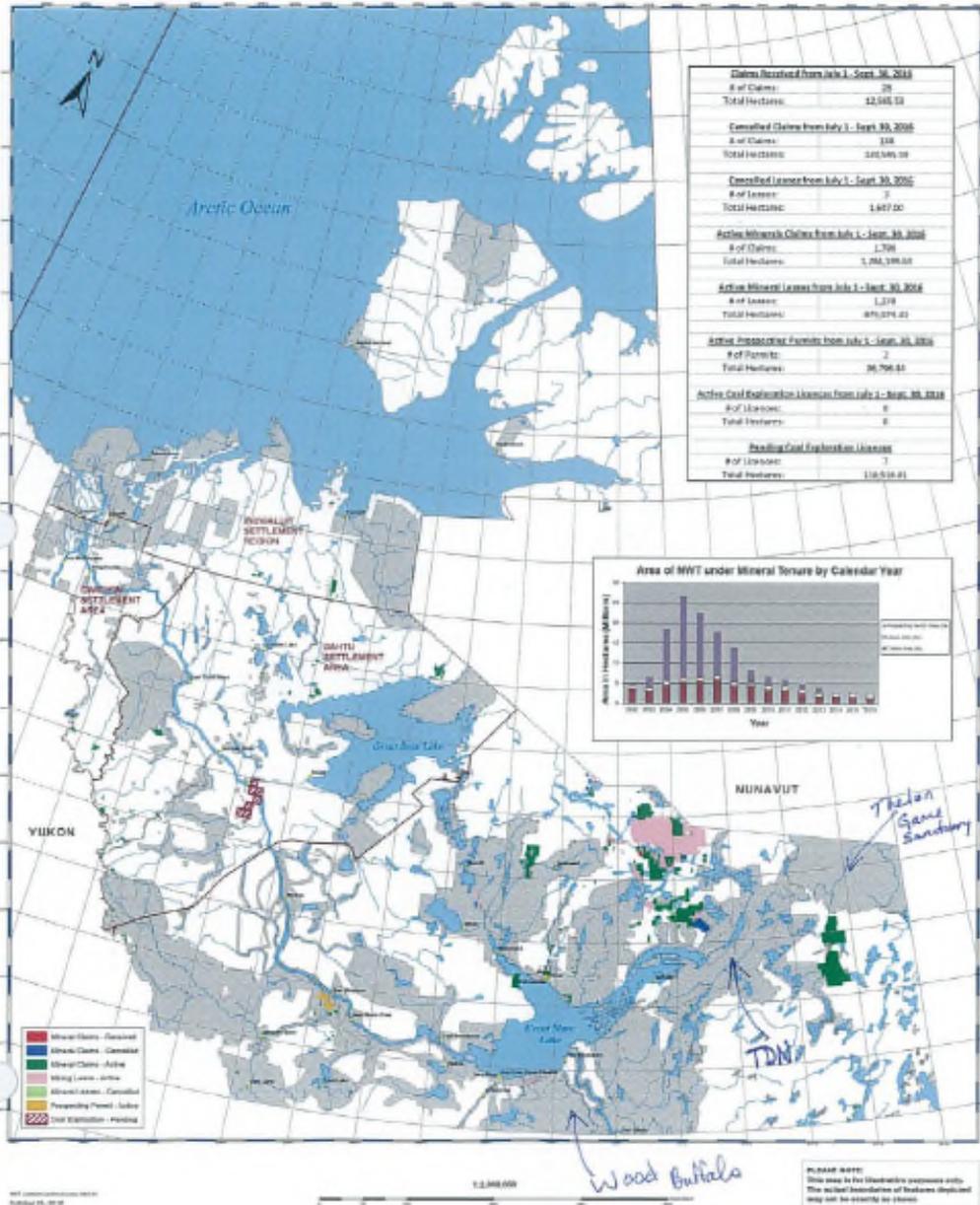
2.a) Research on the establishment process undertaken for our most recent National Park reserve in the NWT, Nááts'ihch'oh, leads one to the corresponding Final Consultation Report. In the report, a process is outlined where three (3) distinctive boundary options were consulted on with the public and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

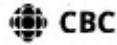
PO Box 2542 • Yellowknife, NT X1A 2P8

Access to the south-east is NWT is restricted

Northwest Territories Mineral Tenure Heat Map - (July 1 - September 30, 2016)

Government of Northwest Territories



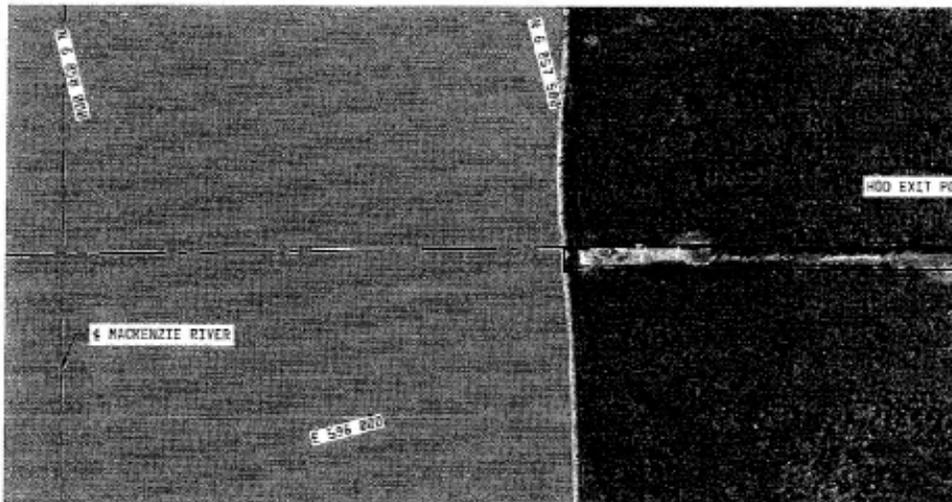


Pipeline replacement project turns taps on spending in Fort Simpson, N.W.T.

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

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 Smea 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 1st, 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 km². 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 km² - 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 km². 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 Nááts'ihch'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 Nááts'ihch'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

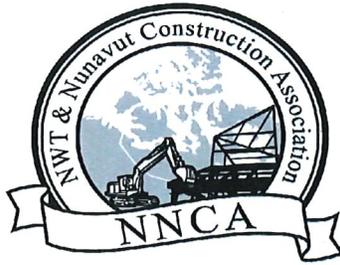


Wallace Finlayson, for East Arm Property Owners Association



Enclosure: *The Reliance Adjustment V.7*

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



May 6, 2019

Attn: Jacquie Bastick, Impact Assessment Specialist
Parks Canada, Natural Resource Conservation Branch
2 County Rd. 5
Mallorytown, ON K0E 1R0

BY EMAIL: Jacquie.bastick@canada.ca

Re: Preliminary Screening for Establishment of Thaidene Nëné National Park Reserve

Please accept this letter on behalf of the Northwest Territories & Nunavut Construction Association (NNCA) in response to the preliminary screening your agency is conducting under the *Mackenzie Valley Resource Management Act* (MVRMA) for the development: "*Establishment of Thaidene Nëné National Park Reserve of Canada*".

We are requesting that the above-mentioned development proposal be referred to the Review Board for an environmental assessment. Section 125(1) of the MVRMA states that a proposal should undergo an environmental assessment if it "might be a cause of public concern."¹

The NNCA is a nonprofit industry association with members based in communities across the Northwest Territories and Nunavut. These include general contractors, trade contractors, manufacturers and suppliers, road builders and heavy construction contractors, logistics & transportation businesses, and allied professionals. The sectors we represent employ thousands of people in communities of the Northwest Territories,² and with the economic well-being of these people in mind, we believe that public concern warrants a more detailed review of the proposal.

This proposal would close off tens of thousands of square kilometers in the territory to development, but unlike the process used to create previous northern national park reserves, no park boundary alternatives have been provided to the public for consideration. In particular, the NNCA 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. We are concerned this minor boundary adjustment will not be incorporated in the establishment of this park reserve.

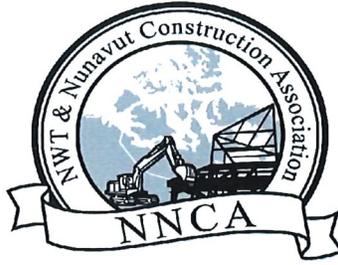
Preliminary screeners are to "consider the proposed development as a whole when conducting screenings, rather than focusing only on the aspects related to their regulatory responsibilities"³ and in doing so are to consider "any of a wide range of different types of impacts."⁴ The MVRMA has also provided you with a

¹ *Mackenzie Valley Resource Management Act, SC 1998, c 25 s. 125(1)*

² NWT Bureau of Statistics (2018) NWT Employment by Industry and Occupation, 2001 to 2018. Retrieved from: <https://www.statsnwt.ca/labour-income/labour-force-activity/>

³ Mackenzie Valley Environmental Impact Review Board (2004) Environmental Impact Assessment Guidelines, p. 16

⁴ *Ibid*, p. 16



guiding principle of “the protection of the social, cultural and economic well-being of residents and communities in the Mackenzie Valley.”⁵

In our view, there is significant potential for public concern related to the economic impacts of this proposal. In order to follow the guiding principles of your preliminary screening and mitigate these concerns, we ask that you refer the proposal before you to the Review Board for an environmental assessment so that a more detailed examination of its impacts can be conducted.

Sincerely,

Duc Trinh
President

Northwest Territories & Nunavut Construction Association

⁵ *Mackenzie Valley Resource Management Act, SC 1998, c 25 s. 115(1)(b)*

To Whom it may concern:

This letter is to document some of my objections to the establishment of the Thaidene Nene Park system.

The Thaidene Nene Park system will consist of a 14,000 square kilometre territorial park, enclosing another 14,000 square kilometre National Park, covering the East Arm of Great Slave Lake and all of Artillery Lake eastward almost to the western boundary of the Thelon Game Preserve. This is a crucial step in creating an 1100 kilometre-long development-free corridor from Wood Buffalo National Park in north-eastern Alberta to Baker Lake, Nunavut. This will effectively preclude the use of most access routes from Manitoba and Saskatchewan to a vast area in the eastern NWT and western Nunavut north of 63° and east of Artillery Lake. It will also isolate the mineral-rich south-eastern quadrant of the NWT from the rest of the Territory, leaving development of that area in the hands of Saskatchewan interests. It appears that we have learned nothing from the Cantung experience where the Yukon has largely benefitted from the mine because of our reluctance to develop any infrastructure on the east side of the continental divide. The Yukon also provides the only road access to the NWT's Nahanni National Park.

An egregious assault on democracy has been another casualty of the Thaidene Nene process, which involved only a few influential people in Lutsel K'e (population 289) and the GNWT. The two permanent resident families on fee simple private property, the two fishing lodges and other leaseholders, the north and south Slave Métis, the YKDFN, the Akaitcho, and one of the main users of the East Arm, the recreational campers and sailors, largely from Yellowknife and Hay River have all been ignored during the negotiations. This is not to mention numerous commercial interests ranging from airlines to outfitters and expeditors and the exploration industry as well as a thriving McCleod Bay-based air charter operation.

The 2012 global workshop of the UN Convention on Biological Diversity has recommended that by 2020 that 17% of terrestrial and inland water areas in every country be set aside as protected areas in one way or another. With the creation of Thaidene Nene Park, the Northwest Territories will have designated 24.8% of its land area as protected from development through territorial parks, national parks, wildlife preserves and protected areas (through The Protected Area Strategy). This does not include the 17,000 square kilometre "God's Country" uranium exploration moratorium zone in the upper Thelon basin and the collectively-owned ethnic enclaves, such as the 39,000 km² Tli Cho land claim area, all of which, in practice, are effectively removed from development for the foreseeable future. It appears that the NWT is doing the heavy lifting in Canada's protected areas warehouse, as the next most-protected jurisdiction is B.C. with somewhere around 9% of its land area reserved.

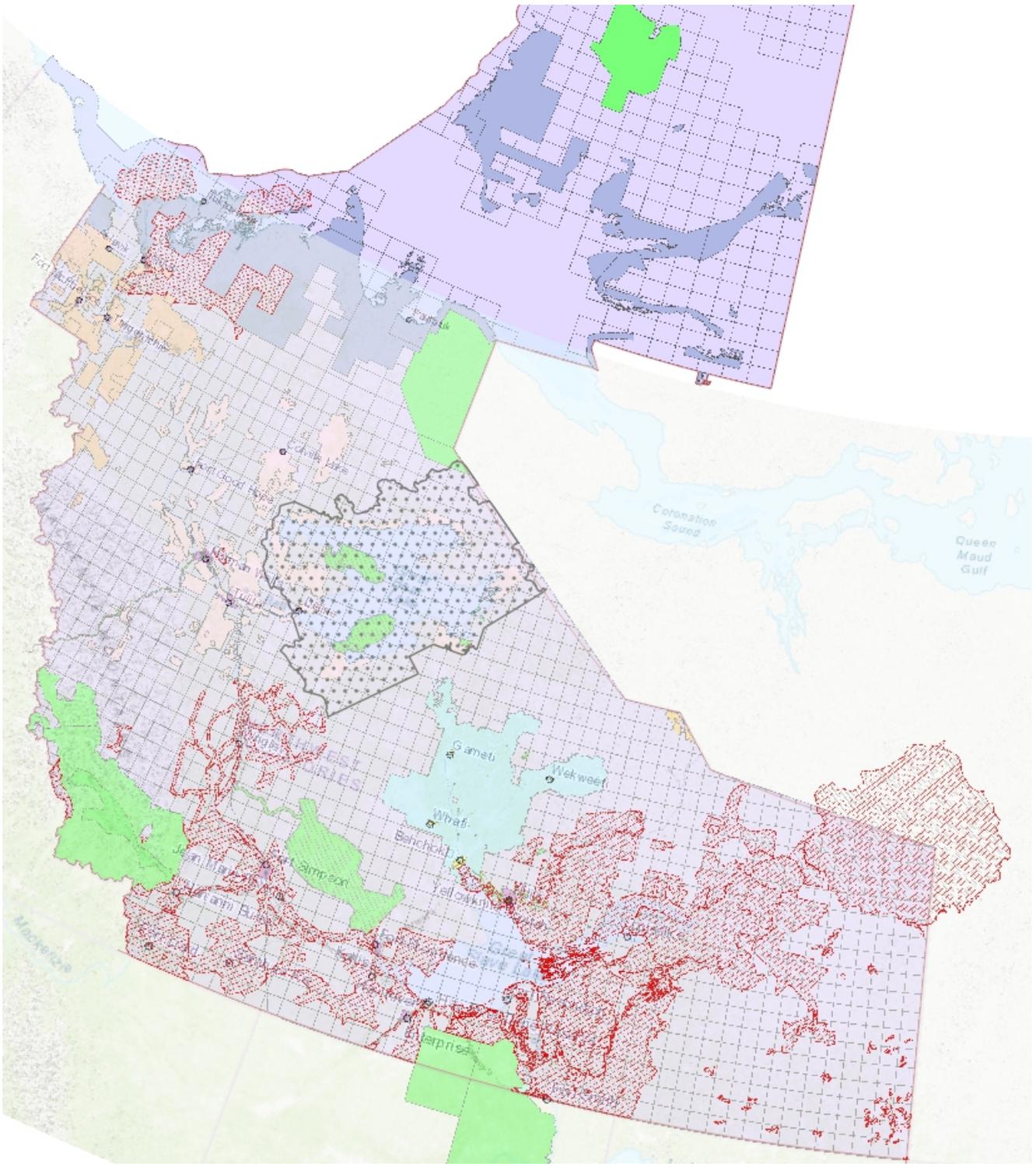
The establishment of the park will also deliver a fatal kick to the NWT exploration industry, already on its knees resulting from a culture of outrageous political interference under the guise of mis-used environmental legislation which was designed to facilitate environmentally sound exploration practices. The creation of the parks will send a strong negative signal at the worst possible time to an eighty-five year-old industry that has historically invested between \$80 million and \$300 million annually in the NWT, resulting in thousands of high-quality real jobs and billions of dollars in real payroll from the producing mines it discovered. But Mr. Miltenberger assures us that we shouldn't worry, as the exploration and mining industries' disinvestment will be replaced by a traditional wildlife harvesting and eco-tourism based "conservation economy" (about which the people of Paulatuk, Fort Chip, Fort Smith and Nahanni Butte can give you an earful).

From a moral point of view, the nimbyism embodied by this sort of anti-development culture encourages the export of mining and exploration activities so necessary to our comfortable existence to jurisdictions having much less stringent environmental and worker protection legislation.

The bull moose in the wall tent of course is the central question of from whom or what are we protecting this area? The NWT is a vast, under-populated and under-developed territory with a declining population of 43,000 people. We are gradually closing our land to exploration (an environmentally benign activity), and so are seeing fewer and fewer visits to our hinterlands compared to the period from 1935 to 2005. These hinterlands are remote and expensive to access, beyond the budgets of most Canadians, and have existed, and will continue to exist, quite happily without the benefit of more parks.

I have appended a map of the NWT which outlines lands partially or completely alienated from mining exploration or development.

Lou Covello
Consulting Geologist
Yellowknife NWT
06 May 2019



MAP OF THE NORTHWEST TERRITORIES
 Showing Areas Where Exploration and Development are
 Currently Compromised or Excluded



May 6, 2019

Jacque Bastick
Environmental assessment Scientist
2 County Road
Mallorytown
Parks Canada

Re: Reliance Adjustment

Dear Jacque Bastick;

We are writing to express our support for the proposed "Reliance Adjustment" proposed by the East Arm Property Owners Association to exclude the area around Reliance from the park boundaries so as to maintain its use as an important transportation and economic hub. We are concerned this minor boundary adjustment will not be incorporated in the establishment of this park reserve.

NATA supports the Reliance Adjustment" as it allows our members continued access to Reliance for refuelling and logistical purposes.

Please feel free to contact me for any discussion on the importance of access for aviation related activity in northern and remote Canada.

Sincerely,

Glenn Priestley
Executive Director
NATA