

COMMENTS PROVIDED TO PARKS CANADA IN RESPONSE TO THE SECOND PUBLIC COMMENT PERIOD: PRELIMINARY SCREENING PROCESS FOR PROPOSED ESTABLISHMENT OF THAIDENE NENE NATIONAL PARK RESERVE OF CANADA

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May 30, 2019

Jacque Bastick
Natural Resource Conservation Branch
Parks Canada
2 County Rd. 5
Mallorytown, ON K0E 1R0

RE: Response to preliminary screening of the establishment of Thaidene Nënë National Park Reserve

Dear Ms. Bastick:

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

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

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

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

- Water quality in Great Slave Lake watershed;
- The presence of various climatic zones - from boreal forest, to tree-line, to tundra - provide representation and climate change resilience;
- The Northwestern Boreal Uplands is "one of the twelve regions currently unrepresented in the national parks system of Canada"²; and
- 42 mammals, 171 birds, 28 fish and 1 amphibian occur in the Park Reserve area.

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

² *Proposed Thaidene Nene National Park Reserve Consultation and Engagement Report* (Tait, 2017)

Protecting caribou habitat: Thaidene Nënë also represents important caribou habitat for all three barren-ground caribou herds which use the National Park Reserve area during important stages of their annual migration cycles³. Increased human disturbance elsewhere in Canada, including road access into sensitive habitat as well as the effects of growing industrial pressures in the region, have impacted the caribou migration patterns, seasonal habitat use, and population cycles. Caribou require large ranges for their seasonal migration between the Boreal Forest and the calving grounds in the tundra plains north of the tree line. In particular, the Bathurst herd, which has recently drastically declined, relies on large, contiguous habitats like Thaidene Nënë to recover.

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

Ongoing management - planning and capacity: Appropriate conditions are in place to maintain the ecological and cultural integrity of the National Park Reserve into the future. A park management plan is required within 5 years of establishment of Thaidene Nënë and a \$30 million stewardship endowment has been raised to support ongoing management by LKDFN. Shared management agreements will prioritize local knowledge, clarify roles and ensure sustainable and fair management of the National Park Reserve through the Thaidene Nënë Management Board, a joint decision-making body of LKDFN, Canada, and GNWT.

Advancing and diversifying local economy: According to the AMEC cost/benefit analysis⁴, Thaidene Nënë is expected to have a net-benefit to local communities. Parks Canada, GNWT, and LKDFN will create approximately 8-20 jobs⁵ for the LKDFN community and Thaidene Nënë is expected to increase services, tourism, and transportation economies of Łutsël K'é, Yellowknife and Ft. Resolution. Nature United has seen the economic benefits of Indigenous-led conservation areas, such as in Great Bear Rainforest—where 1,000 new jobs were created and 100 new businesses created or expanded⁶. Nature United supports the development of Indigenous Guardian programs as a fundamental means of economic diversification connected to stewardship of Indigenous lands and protected areas. An analysis of Indigenous Guardian programs has shown a return-on-investment of more than 10 to 1⁷, in addition to substantial community and cultural benefits. The LKDFN Ni Hi Hat'ni program, the Guardians of Thaidene Nënë in conjunction with the employment and spending of Parks Canada, is expected to create economic benefit to the local community on the order of \$1M per year⁸.

³ *Migratory Tundra Caribou Seasonal and Annual Distribution Relative to Thaidene Nënë* (Anne Gunn, Kim Poole, and J. Wierzchowski, 2011)

⁴ *Thaidene Nënë Proposed National Park Reserve Landscape Values Summary* (Parks Canada)

⁵ *Thaidene Nene: Land of the Ancestors*, fact sheet created for NWT MLA and Canada Finance Committee MPs (LKDFN 2019)

⁶ *Coast Funds 2018 Annual Report*, <https://coastfunds.ca/wp-content/uploads/2019/04/Coast-Funds-Annual-Report-2018.pdf>

⁷ *Valuing Coastal Guardian Watchmen Programs: A Business Case* (EPI EcoPlan International, Inc.)

⁸ *Thaidene Nene: Land of the Ancestors*, fact sheet created for NWT MLA and Canada Finance Committee MPs (LKDFN 2019)

A long-time partner of the LKDFN, Nature United has provided technical and financial support, science expertise, and support for longer-term sustainable financing for the establishment and ongoing stewardship of Thaidene Nëné. Establishment of the National Park Reserve will protect this ecologically critical landscape, safeguard cultural connections to the land, uphold Indigenous rights, diversify the NWT economy and provide significant benefits to future generations, amid a changing northern and global climate. We strongly support the Thaidene Nëné Conservation Initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Hadley Archer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Hadley Archer
Executive Director, Nature United

De : Christopher

Envoyé : 1 juillet 2019 23:12

À : évaluationsenvironnementale-environmentalassessment (PC) <pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca>

Cc: Private email

Objet : Thaidene Nënë

To whom it may concern

Just a quick note to say that I wholeheartedly support the establishment of this park. After its having been mulled over for so many years, I had assumed that all the wrinkles had long since been ironed out and all objections dealt with, but that seems not to be the case for certain parties and individuals.

However, for those individuals and organizations to still be complaining at such a late date about establishing the park leads me to believe that Parks Canada has heard all of this before during the many-years-long consultation process, but has not been moved from its determination to complete the process of establishing the park. I would suggest therefore that Parks Canada get on with doing so, and waste no more of its scarce resources on endless rounds of further consultation.

Yours sincerely,
Christopher O'Brien

From: Alex Clinton

Sent: July-02-19 12:55 AM

To: évaluationsenvironnementale-environmentalassessment (PC) <pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca>

Subject: Thaidene Nene National Park Reserve preliminary screening

Parks Canada,

On behalf of myself and my wife please accept and recognize this letter as our opposition to Thaidene Nene Park in its current form.

My wife and I have both lived in the north for most of our lives and our three children were all born in the NWT. Massive parks, land withdrawals and moratoriums and blocked access are destroying the NWT economy. It is apparent to us, and most business investors, that the NWT is closed for business. It is highly likely that our children will not have enough opportunities to ensure they stay in the north and it is becoming increasingly likely that we will be forced to leave the north also. Already, the best opportunities in the resource sector are east, west and south of the NWT. It is also worth mentioning that the lack of development in the north is a threat to Canadian sovereignty. Canada claims to own the Arctic but if we don't use it there is a real danger we will lose it.

I realize that Parks Canada is not concerned about displacing families or condemning communities to a life of poverty but please be truthful about it. Quit making false promises about a "Conservation Economy" that other massive northern parks have already proven to be wildly unrealistic. One northern diamond mine spends more money in the north than Parks Canada will spend on Thaidene Nene in 100 years. Even at 100 years I am being generous, Parks Canada has promised to spend "up to 2 million dollars per year" (of taxpayer's money) in the north but one diamond mine spends over 200 million dollars per year in the north.

In my opinion, the decisions for this Thaidene Nene Park were made independent of genuine community consultations and, so far, without proper consideration of the social and economic impacts. Parks Canada appears to be determined to bypass their own guidelines and civic duty in regards to development projects, particularly their duty to the people most impacted. Developments that could have massive social and economic impacts must go through the Environmental Assessment process.

Parks Canada is now hiding behind a poorly written consultant's report that is based on poorly attended community consultations, form letters and a handful of emails (Report available here: <https://www.pc.gc.ca/en/pn-np/cnpn-cnnp/thaidene-nene/nouvelles-news> "Proposed Thaidene Nene National Park Reserve Consultation and Engagement"). The report has made some serious errors with the data collected and as a result has incorrectly concluded

“approximately 90% expressed support for establishing the national park reserve, with 9% neutral and only 1% opposed.” There is not a snow ball’s chance in hell this is correct. Just because a consultant wrote it down, doesn’t make it true! When and where was the opportunity to critique this report? People did try to challenge aspects of the report but were ignored.

Devolution gave northern people control of NWT lands and a few short years later southern people are taking it back: “The vast majority of written submissions were in favour of establishing the national park reserve. It also appears that all but a few written submissions came from outside the NWT.” Northerners will soon need permission from someone in Ottawa just to land a plane in the park. The best way to ensure NWT lands benefit northern people is to ensure northern people have full control northern lands. We don’t need Parks Canada’s “help” to manage NWT lands!

Protection of land in Canada is currently focused on easy targets that win maximum (southern) votes, not on the level of threat to the environment and future generations. For example agricultural land is key to Canada’s (and the world’s) food security yet sprawling cities continue to destroy prime agricultural land at an alarming rate. Where is the protection?

The NWT’s current economic outlook is bleak and the population is already declining. People are moving away from the small communities and people are leaving the north. The NWT is already experiencing negative economic impacts from the proposed park developments due to the decades long interim land withdrawals. There is amazing potential in the north but the people of the north must be allowed to control and unlock that potential.

Regards,

Alex

Alex Clinton

Yellowknife, NT.

From: Nancy Vail

Sent: July-02-19 8:43 AM

To: évaluationsenvironnementale-environmentalassessment (PC) <pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca>

Cc: Private email

Subject: In support of the Thaidene Nene reserve

Dear readers;

I would like to add my name to those who are working to establish this reserve which is so important to the preservation of the quickly disappearing land of the north.

Too often in the past we have lost this precious land to mining and other development and harmful recreational interests and as a result we are losing one of the very endearing things that makes the north unique and contributes to the character of Canada. We know that our wildlife numbers are quickly disappearing as we lose land like this to development interests and at a time when climate change threatens our very existence. It is time to put the land and animals first.

Readers; mining and developers and recreational users will come and go but the land needs to remain forever...not just for our benefit but for those to come.

Thanks to those who have worked so hard on this project; I urge it's quick adoption as is.

Sincerely,
Nancy Vail

From: Council of Canadians NWT Chapter [<mailto:cocnwt@gmail.com>]

Sent: July-02-19 11:32 AM

To: évaluationsenvironnementale-environmentalassessment (PC) <pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca>

Subject: Thaidene Nene National Park Reserve

Hello,

This short note is to voice our support for the establishment of this national park. Since the 1970s, the Lutselke Dene have been working to build a sustainable local economy. Thaidene Nene is the centrepiece of this vision. In these times of climate crisis and uncertainty, all efforts to support local must be given priority.

Thank you.

Lois Little
Co-Chair
NWT Chapter
Council of Canadians

From: Suzette Montreuil

Sent: July-02-19 12:11 PM

To: évaluationsenvironnementale-environmentalassessment (PC) <pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca>

Subject: Thaidene Nene

Alternatives North is a social justice coalition operating in the Northwest Territories. Within our ranks are representatives of churches, labour unions, environmental organizations, women and family advocates and anti-poverty groups. Individual citizens are important participants in our work.

The creation of a conservation regime covering a significant part of eastern Great Slave Lake and surrounding lands has been under public consideration for decades. Parks Canada has sponsored a substantial body of significant research in support. We applaud the work of Parks Canada and the many other parties who have co-operated to respectfully integrate many points of view into a coherent vision for the future of the area, one that will assure continued access for indigenous people to pursue their traditional activities, and also to benefit from economic activities that will arise from establishment of the national park. Unlike most of the national parks in Canada's territorial north, Thaidene Nene will be accessible. In time, we are confident that it will become a choice tourist destination for the Northwest Territories while contributing to conservation of wildlife, notably the threatened barren-ground caribou.

We offer our unreserved support for the proposal and look forward to joining with Canadians throughout the country in celebration of the creation of this new national park reserve, and the complementary GNWT conservation and management regimes crafted in a forward-looking manner in a comprehensive land claims context. Overall, this is a model for conservation that will lead the country. It's time!

Suzette Montreuil
For Alternatives North

Justine Blanchet
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File No. 443136-000002

July 2, 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 – Extended
Deadline and Parks Canada Response**

Thank you for your email of June 20, 2019, enclosing a document entitled “Parks Canada Response to Issues Identified through to Public Review (April 5-May 6, 2019) of the Development Description for the Establishment of Thaidene Nene National Park Reserve of Canada” (the “PC Response”). I understand from your email that Parks Canada are conducting an additional period of public review until July 2, 2019.

As you are aware, our office acts for the East Arm Property Owners Association (the “Association”), and previously submitted comments regarding the preliminary screening for the Thaidene Nene National Park (the “Proposed Park”) on May 6, 2019. The Association is seeking a minor adjustment to the consultation boundary of the Proposed Park, which they have entitled “the Reliance Adjustment”.

Our client once again, wishes to address the conflicting messages received by the public from Parks Canada with respect to the preliminary screening process. It is unclear who has been advised of the extended commentary period, and how they have been advised. At the time of writing this letter, that information was not available on the relevant section of the Parks Canada website.

While we appreciate receiving the PC Response document, that document is not publicly available on the Parks Canada website. We understand that it is available on the Mackenzie Valley Review Board (“MVRB”) website. It is unclear why the document was published by the MVRB, and not by Parks Canada, given that Parks Canada is conducting the preliminary screening process for the Proposed Park. This again raises questions about the review process, and lack of clarity and transparency for the public attempting to engage therein.

We note that the PC Response at page 7 refers to the fact that the Reliance Adjustment was not included in the Consultation and Engagement Report because the report was “based entirely on the formal Parks Canada public consultations sessions...and did not include in-camera meetings”. While our client agrees that the Reliance Adjustment was not formally presented at the Parks Canada consultation sessions, the Reliance Adjustment was submitted to Parks Canada, on more than one occasion, in writing. The Consultation and Engagement Report does reference and summarize written submissions. However, the Reliance Adjustment is not included or mentioned therein. This again raises questions for our client with the process and consideration of submissions from all stakeholders, during consultation and preliminary screening.

Further, the PC Response contains a letter dated November 7, 2017 addressed to Mr. Decorby from Chief Darryl Marlowe. In the interest of transparency and providing a complete picture to the public, I am enclosing a copy of Mr. Decorby’s correspondence to Mr. Marlowe dated July 26, 2017, to provide context to the response received.

We maintain that the preliminary screening process for the Proposed Park is confusing and lacks transparency. Our position remains that the Proposed Park is subject to the *Mackenzie Valley Resource Management Act*, and the Mackenzie Valley Review Board (“MVRB”) should be conducting preliminary screening of the Proposed Park. Having preliminary screening of a development of this permanency and magnitude conducted by the proponent is, in our opinion, unfair, contrary to the principles of natural justice, and amounts to an abuse of process.

Notwithstanding the foregoing, our client appreciates Parks Canada’s commitment to maintaining protections for those who live, recreate and operate businesses in the Proposed Park, as outlined in the PC Response. However, at this stage, there is no way for those protections to be guaranteed or maintained over time, and we question how Parks Canada will ensure these protections will be included as part of the final bill. Our client’s position is, and remains, that the Reliance Adjustment is a minor, site-specific boundary adjustment, which would reflect the needs and interests of those individuals who have been living, recreating and operating businesses in the area for decades, without taking away from the integrity of the Proposed Park as a whole.

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

Yours truly,

BORDEN LADNER GERVAIS LLP

Fov:
JUSTINE BLANCHET

Enclosure

cc. Alan Ehlrich, Mackenzie Valley Review Board (aehlich@reviewboard.ca)

Dear Mr. Marlowe,

July 26th, 2017

As we were unfortunately unable to meet on the date you suggested in your June 1st letter to us, we are reaching out to communicate at this time with respect to our updated land management proposal (enclosed).

The concept of keeping the area around Reliance as a Neutral Area, excluded from the park, is similar in purpose & intent to the exclusion area around LK that will keep your community open to barge traffic as well as many other activities. Reliance, and the TDN area in general, are very special places worthy of special management attention; however we are not convinced a National Park is the right mechanism for managing the area generally, and specifically that it is not beneficial for the area, and opportunities, around Reliance.

While we share, (as previously demonstrated with our opposition to Deze Energy Talston Expansion) your ambitions to preserve/ensure cultural survival and protection of sacred lands; we also believe doors need to be left open for future economic opportunities. We respect the historic Dene connection to the area in general, and in conjunction with your aspirations regarding developing opportunities for your people, we strongly believe, and encourage, any new land-based employment opportunities that arise as a result of keeping Reliance open, should accrue to LK beneficiaries. Schedule G (Arctic Institute) in the document provides an excellent example of the types of opportunities that could happen by keeping Reliance neutral. The magnitude of such economic opportunities from keeping less than 1% of the proposed national area open & neutral around Reliance, is in the same scope as might come from the entire park as well. Therefore the 'Return on Investment' for this adjustment is significant in its potential to provide benefit.

As you are likely aware, the Land Transfer Agreement that will return TDN lands back to Federal Government ownership, is being negotiated. To this effect, please find included in our enclosure a minutes excerpt from a recent meeting with GNWT negotiators where they explain that once the Transfer Agreement has been agreed to in principal, it will be too late to make any changes, or adjustments to the boundaries.

In consideration of the above, we believe it is time to make a minor site-specific adjustment to the boundary of the National component of the park, around Reliance, so that it can remain a Neutral Area for everyone, going forward. As you will see in the maps included with the document, this would place the Interpreter's cabin, half-way down Fairchild Point, at the door-step entrance just inside the National component of TDN; as such it would become one of the gate-way points into the Federal park area.

We are hopeful that common ground exists for a minor adjustment around Reliance that we believe would be of important benefit to everyone involved, including the creation of new, land-based employment opportunities there, for LK Dene. We believe TDN is a very special area that we all hold a strong connection to, and that balancing the interests of all stakeholders through the establishment of this Neutral Area, will allow it to continue to function in harmony. In a spirit of mutual respect as neighbours, and that we share a common interest in the special places in and around the East Arm, we look forward to feedback from you, and hope for your support.

Sincerely, Spencer Decorby

Secretary, EAPOA



From: Andrew Robinson

Sent: July-02-19 12:45 PM

To: évaluationsenvironnementale-environmentalassessment (PC) <pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca>

Subject: Support for Thaidene Nene National Park

To whom it may concern,

I'm writing to support the creation of Thaidene Nene National Park. To be honest I'm a bit annoyed that we need to keep re-stating our support. Just get on with it already!

Regards,

Andrew Robinson
Yellowknife

From: Patrick Clancy [mailto:Patrick_Clancy@gov.nt.ca]

Sent: July-02-19 1:20 PM

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

Subject: Parks Canada - PS19PC0001 - Preliminary Screening of Thaidene Nene National Park - Review of Park Canada Responses to Review Comments

Hi,

ENR GNWT has no further comment on the second review of the project and responses to review comments.

Mársı | Kinanāskomitin | Thank you | Merci | Hąj' | Quana | Qujannamiik | Quyanainni | Máhsı
| Máhsı | Mahsi

Patrick Clancy
Environmental Regulatory Analyst
Environmental Assessment and Monitoring Section
Conservation, Assessment and Monitoring Division
Department of Environment and Natural Resources
Government of the Northwest Territories

5th floor, Scotia Building
PO Box 1320
5102 50th Avenue
Yellowknife, NT X1A 2R3

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www.gov.nt.ca



July 2nd, 2019

Ecology North Comments on Preliminary Screening Notification for the Establishment of Thaidene Nene National Park Reserve

Ecology North was founded in 1971 and continues to this day to be a voice for environmental sustainability in the NWT. Our staff and volunteers are supported by a strong Board of Directors who ensure we work within our mandate of a healthy northern environment forever.

Ecology North supports the establishment of Thaidene Nënë National Park Reserve and Territorial Protected Area. We are pleased that Thaidene Nënë will continue to provide for cultural and ecological values, support food security, hunting, fishing, trapping, traditional activities and will contribute to economic diversification in the NWT. The screening document includes a long list of allowable recreational uses; this is important to NWT residents and visitors who will have ongoing access to the area for recreational enjoyment into the future.

Ecology North doesn't identify any significant concerns with the establishment proposal or believe that Thaidene Nënë National Park Reserve will have any significant adverse impacts to the environment.

Thank-you for the opportunity to comment,

Sincerely,

A handwritten signature in blue ink that reads "Craig Scott". The signature is written in a cursive, flowing style.

Ecology North
Executive Director



Lutsel K'e Dene First Nation

Post Office Box 28
Lutsel K'e, Northwest Territories
X0E 1A0

Phone: (867) 370-3051
Fax: (867) 370-3010

July 2, 2019

Chief Darryl Marlowe
Lutsel K'e Dene First Nation
chief.lkdfn@gmail.com

Jacque Bastick, Impact Assessment Specialist
Parks Canada Agency
jacque.bastick@canada.ca
pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca

Mihcelle Swallow, Manager – Conservation Planning
GNWT
conservationplanning@gov.nt.ca

Ms. Bastick and Ms. Swallow:

RE: Preliminary Screening of Thaidene Nene

The Lutsel K'e Dene First Nation (LKDFN) has been leading the visioning, planning, negotiation, and pre-implementation of Thaidene Nene since 2000. Thaidene Nene is our core primary use area in the LKDFN traditional territory, and our most important cultural and ecological landscape. We take very seriously our responsibility and jurisdiction to effectively caretake Thaidene Nene.

We have now initialled agreements with both Parks Canada for a core National Park Reserve designation, and with the GNWT for abutting territorial protected area designations. By overwhelming majority, LKDFN membership ratified these agreements in February 2019, and we are planning to sign off on the agreements during a ceremony and celebration on July 25, 2019 in Lutsel K'e.

Thaidene Nene forms a significant element of our community's socio-economic and cultural vision for the future. We are building a future where our people can seek jobs and meaningful livelihoods caretaking our traditional territory, showcasing our culture, and hosting visitors. In parallel with our discussions and negotiations with public governments regarding Thaidene Nene, over the past 19 years the LKDFN has expended significant internal time and resources to increase its readiness to take on management and operations responsibilities within Thaidene Nene. We have staffed up our administrative capacity, as well as our on-the-land monitoring, research, and hospitality capacity through our Ni hat'ni Dene Rangers. We have also invested significant resources into starting the development of our local tourism industry, with several local operators coming on-line over the past couple of years. We have developed a community tourism strategy to maximize economic opportunities

associated with Thaidene Nene, and we are currently investigating the feasibility of Thaidene Nene related infrastructure in our community. We are as prepared as we can be for Thaidene Nene to move from concept to reality.

LKDFN will be assuming significant responsibilities for the management and operation of Thaidene Nene, and we will be coordinating our efforts with Parks Canada, the GNWT, and our neighbouring Indigenous governments through collaborative, consensus-based bodies. These bodies will be established as per common terms in the agreements LKDFN enters into with public governments, as well as those entered into between the public governments and our neighbouring Indigenous governments. These bodies will deliberate on matters related to visitor engagement and experience, cultural promotion, infrastructure, etc. The bodies will not and cannot deliberate on matters related to the exercise of Aboriginal and Treaty Rights, as they have no standing as rights holders. Rights-based matters can only be addressed on a nation-to-nation level, via direct consultation between public governments and Indigenous governments. We have comfort that any Aboriginal and Treaty Rights cannot be impacted by any Thaidene Nene designation – the Constitution of Canada protects us, this protection is recognized in both Parks Canada and GNWT legislation, and Thaidene Nene is ultimately subject to any outcome of land claim and treaty negotiations.

Thaidene Nene has the potential to set a new standard for Indigenous-Crown collaboration in protected areas, secure a vital cultural and ecological landscape, and provide for significant new investment into a region that sorely needs it. After many years of planning, negotiations, and engagements amongst and multitude of parties and stakeholders, we are now in the endgame of establishing Thaidene Nene. Our people are ready to move forward with the opportunities Thaidene Nene will bring. Let's not delay any longer.

Marci Cho,



Chief Darryl Marlowe
Lutsel K'e Dene First Nation



CPAWS-NWT submission to Parks Canada Preliminary Screening For the establishment of Thaidene Nene National Park Reserve

July 2, 2019

Canadian Parks and Wilderness Society -NWT chapter (CPAWS-NWT) was established by volunteers in 1996, and since 1999 it has been supported by a local volunteer Board of Directors, and staff who work with public and Indigenous governments and organizations, communities, other non-government organizations and individuals to achieve collective conservation goals.

We confirm our ongoing support for the establishment of Thaidene Nene National Park Reserve. CPAWS-NWT has strongly supported Lutsel K'e Dene First Nation's (LKDFN) vision of protecting Thaidene Nene for a decade and actively participated in the federal and territorial Thaidene Nene public consultations. We are pleased that the National Park Reserve and Territorial Protected Areas will soon become reality. In Thaidene Nene there is an opportunity to ensure continuity of cultural and ecological values and diversification into conservation based local economic activity. NWT residents and visitors will continue to enjoy a wide range of recreational activities in the area as they do today. We believe that Thaidene Nene is a **positive** outcome for the NWT that will have a significant **positive** impact on the environment. Of note is the significant value of Thaidene Nene National Park Reserve and the Territorial designations in protecting large areas of caribou habitat adjacent to lands that are in high demand for infrastructure and industrial development.

The boundary that was agreed on includes the interests of industry, the GNWT and Canada. It was reduced significantly in the northwestern portion of the study area despite that caribou use the habitat annually, and during this time of great uncertainty about the future of barren ground caribou herds. In the context of Thaidene Nene and caribou, an Environmental assessment (EA) will be appropriate when industrial developments are proposed to occur in these areas **excluded** from the final Thaidene Nene boundary or in other areas adjacent to the National Park Reserve. The management plan for Thaidene Nene NPR is an incredibly important resource for caribou co-management within Thaidene Nene and will be a resource for informing EA's as they occur outside of the protected areas. Investment in the management plan and in the Ni Hat'ni Dene program is a good way to ensure that Thaidene Nene contributes to a positive impact on the environment, inside and outside of the boundaries.

We look forward to celebrating Thaidene Nene in the near future,

Kris Brekke - Executive Director

A handwritten signature in black ink that reads "Kris Brekke". The signature is written in a cursive, flowing style.

Canadian Parks and Wilderness Society –NWT CHAPTER

From: Gordon

Sent: July-02-19 4:57 PM

To: évaluationsenvironnementale-environmentalassessment (PC) <pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca>

Subject: Thaidene Nënë National Park Reserve

To Whom It May Concern

Thank you for the opportunity to offer a personal endorsement of the proposed Thaidene Nënë National Park Reserve. I also want to recognise the contribution of the Dënesułiné of Łutsël K'e, the NWT Métis Nation, and others, and the complementary territorial government initiatives.

For more than two decades our family has visited this area, particularly McLeod Bay and Reliance. In 2014, we made a winter trip to Artillery Lake where we shared company with friends from Łutsël K'e. We feel we know it well, and it has a place in our hearts. We look forward to continuing our visits.

The comprehensive conservation regime of which Thaidene Nënë is a part offers great promise for the future of this magnificent area and offers the certainty that long has been sought. I have no doubt that a century from now Canadians will praise the foresight of the conservation leaders who brought this to fruition. This collaboration of public and Indigenous peoples' governments heralds a new relationship that will be envied and copied elsewhere.

Congratulations!

Gordon Hamre
Yellowknife



July 2, 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 and to: pc.evaluationsenvironnementale-environmentalassessment.pc@canada.ca

Dear Ms. Bastick,

Re: Chamber of Mines’ Response to “Parks Canada Response to Issues Identified through Public Review (April 5-May 6, 2019) of the Development Description for the Establishment of Thaidene Nene National Park Reserve of Canada.”

Further to Parks Canada’s email of June 20, “Notification of additional public review period and response to comments received Thaidene Nene National Park Reserve preliminary screening”, and in regards to our review of Parks Canada’s response document, the Chamber of Mines is providing the following comments in regards to the development: “*Establishment of Thaidene Nënë National Park Reserve of Canada*”. We thank you for the additional opportunity for the public to provide comments.

The table below includes, in the left column, the comments we submitted to Parks Canada on our public concerns. In the right column, we indicate in highlighted text if our concerns have been addressed or not, and provide our more detailed comments on Parks Canada’s responses.

Chamber of Mines’ Concerns	Chamber’s comments on Parks Canada’s Responses
<i>Procedural concerns</i>	
<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> This is misleading. Parks Canada states that the consultation boundary was available for comment throughout the period January 2015 to January 2017. It then puts forward additional evidence of consultation by Minister Miltenberger, with a reference to the consultation he held in Yellowknife in July 2015, early in this so called consultation period. However, one can see from the Summary of Proceedings, GNWT Thaidene Nene (TDN)

<p>without any ability for the public to comment or suggest changes.</p>	<p><u>Public Engagement Session Yellowknife – July 15, 2015</u>, that the boundaries were not available for any significant change already at this point, confirming our position that there was no ability to make much difference in the boundaries.</p> <p>Witness this quote:</p> <ul style="list-style-type: none"> ○ “Two people asked whether the boundaries were a 'fait accompli' and the Minister explained that all governments had agreed to the proposed consultation boundaries and so there would not likely be large measure changes but that we are meeting with the public and stakeholders to get information about site-specific concerns that may need to be negotiated.” • We also thank PC for bringing to public light a new fact that the Senior MERA Committee lost its ability to speak to boundaries as a result of devolution, which occurred during the park consultation process, and that the full responsibility for boundaries then transferred to the GNWT. Yet in the letter from PC Director McNamee to the GNWT’s senior negotiator, Parks Canada is clearly in the driver’s seat with respect to boundaries and corridors. • Believe us when we say that we (and the public) had no opportunity provided to comment on boundary options, and the final boundaries were announced as a done deal.
<ul style="list-style-type: none"> • 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. 	<p>Re PC’s comments on Money Expended in Investigating the Economic Potential of Resource Development</p> <ul style="list-style-type: none"> • The MERA did not conduct any hydropower energy assessment. • Even if \$3 million was invested, it is insufficient to assess the potential of approximately 35,000 square kilometres. • We do appreciate that some of the high and medium mineral potential lands will be excised from the original 33,500 sq.km. proposed park. • We argue that with a more fulsome investment in the MERA, there would have been more of these high and medium mineral potential areas identified.
<ul style="list-style-type: none"> • There is no evidence of an energy assessment being conducted and provided for hydropower under the 	<ul style="list-style-type: none"> • PC has not responded to why there was no hydro-energy assessment under the MERA.

<p>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.</p>	<ul style="list-style-type: none"> • This is important, for much has changed in the world with respect to climate change and green energy. To ignore the NWT's third most attractive and natural hydropower development opportunity, removes an important discussion on how that region might make a significant contribution to the planet through hydropower development, and do so by balancing it with protection of the surrounding environment.
<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • There is no discussion by Parks Canada on how this deal was negotiated, which essentially maintained a closure to resource development of two Thaidene Nene parks with a combined area of 26,500 sq.km.
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • The consultation and engagement report by Tait is a poor statistical analysis when it (incorrectly) concludes that "approximately 90% expressed support for establishing the national park reserve, with 9% neutral and only 1% opposed." • This anomalously high figure does not take into account memberships of the Chamber of Mines or Chambers of Commerce or other associations, who represent not just one voice, but thousands who rely on land open to development for important employment and business opportunities. If this had been done, one might guess that support for the park may have been reduced to well below 50%. • In addition, when concerns from other Indigenous groups are factored in, eg, NSMA and others,

<p>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.</p>	<p>support for the park may have been quite minimal.</p>
<p><i>Chamber's substantive concerns</i></p>	
<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> We maintain our position that: Professional geologists familiar with the region have confirmed that high mineral potential was glossed over in the MERA and that the MERA is an inaccurate resource assessment of this exceptionally large area of the NWT.
<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Parks Canada has not addressed this concern at all. There is the bigger picture of cumulative effects of land closures, and there is the effect of the specific closure of lands to Thaidene Nene national park. .

<p>economic losses to all residents of the NWT by the removal of such a significantly large area from future mineral and energy development.</p>	
<ul style="list-style-type: none"> We are unaware of any analysis or trade-off study of the economic impacts of Thaidene Nënë versus potential mineral development. A business case 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. 	<ul style="list-style-type: none"> This has not been addressed. There is no analysis of what a conservation economy will look like. A Diavik mine, at about 15 sq.km. footprint, if found in the proposed Federal Thaidene Nene park of 12,000 sq.km., would occupy a miniscule 0.125% of the area, and yet would return \$15 billion in new wealth. Parks Canada says it will provide \$40 million over the first 12 years, and just over \$3 million per annum thereafter. This is a staggeringly large difference between Parks Canada funding and a mine's returns, yet there is no record of such economic analysis for public review, and perhaps influence on the park size. This also helps reinforce why a more robust MERA is so important to assess potential lost opportunities.
<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> As above. Also, the establishment of a conservation economy and responsible mineral development are not mutually exclusive endeavours. Several of our mines have cultural camps by their mine sites to help measure and show how the two activities can co-exist.

<p>development are mutually exclusive endeavours.</p>	
<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Parks Canada has not addressed our public concern and disclosed any information on the funding arrangements that are being created with the aid of Parks Canada and outside philanthropic organizations. Suspicious can easily arise when undisclosed money is being exchanged to put lands off limits for a single use. We would like to see full disclosure of private and public financing that is being organized behind closed doors that will affect access to public lands. There should be no suggestion of facilitation around this proposal to create a park.
<ul style="list-style-type: none"> Environment and economy are not being balanced. The area east of the proposed Thaidene Nënë Park is already subject to the closure of significant areas to mineral exploration and development, including approximately 18,000 sq km of mineral prospective land in the nearby Upper Thelon watershed, approximately 62,000 sq km of lands under interim withdrawal for the Akaitcho Land Claim settlement, and 55,000 sq km of lands already closed to resource development in the neighbouring Thelon Wildlife Sanctuary, the largest such sanctuary in Canada. When combined with the proposed Thaidene Nënë Park area, these closures total in excess 165,000 sq km of land where potential mineral and other economic development is presently prohibited. There has been no public discussion on potential economic impact of some of these withdrawn lands. This is contrary to the NWT Government's Land Use and Sustainability Framework which 	<ul style="list-style-type: none"> Re PC's response under Diversification of Economy: We continue to maintain this position that environment and economy are not being balanced. This is also an issue of cumulative effects of lands removed from development which is of concern. All of the land alienations considered together (two Thaidene Nene parks, Thelon Wildlife Sanctuary, land claims withdrawals), creates an area greater than the size of England. Relegating it to conservation economy alone will create a significant negative effect on the entire NWT economy. We shared maps of this concern with governments over the past several years (see for example our submission: <i>Overly Restrictive Land Management in the Regions of Thaidene Nene and the Southeastern NWT</i>) which was shared with the current and previous Ministers of the Environment.

<p>commits GNWT to ensure that “Land-management decisions consider ecological, social, cultural and economic values to ensure maximum benefits to current and future generations.”</p>	
<ul style="list-style-type: none"> • Re: Parks Canada commentary on “Lands currently unavailable to mining” 	<ul style="list-style-type: none"> • To try and address percentages of lands unavailable to mining, Parks Canada responded under this heading to portray that the NWT has only a mere 9.21% of lands protected. • This is misleading. • Clearly, the mining recorder’s office has a map that shows that well over 30% is off limits to claim staking. • In addition, GNWT-ENR’s website: https://www.enr.gov.nt.ca/en/state-environment/201-trends-terrestrial-protected-areas-and-conservation-areas states that “There are currently 188,200 km2 of land (including fresh water) in the NWT in core protected areas and Conservation Areas (13.8% of the NWT land base). There are also two other candidate protected areas going through the process: Ramparts and North Arm.
<ul style="list-style-type: none"> • Parks Canada has refused to consider industrial corridors for transportation, power or fibre optic communications, through the proposed Thaidene Nëné 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, 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 	<ul style="list-style-type: none"> • We disagree with PC when it says: The mining industry proposal for a corridor through the park ... has been given due consideration and references an attached letter from Director McNamee to GNWT. • In regards to the McNamee letter, to be clear, we are not discussing the corridor to the north through what would become GNWT park, rather the corridor to the east and southeast beyond the national park. • Regarding having a corridor from Lutsel K’e to the southeast, that would be closer to Hay River and Yellowknife, we are actually trying to get a corridor that would be further away from Yellowknife and Hay River and closer to the southeast NWT. Marine access to the Reliance area and a corridor from there east to the Thelon Geological Basin provides the shortest distance. • We also have comments back from members that the terrain around Lutsel K’e is prohibitively difficult for a corridor.

<p>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.</p>	<ul style="list-style-type: none"> • While Director McNamee’s letter rationalizes that corridors are justified if they were there before parks were established, that is not the case for Ukkusiksalik park, which is analogous to Thaidene Nene – great mineral potential beyond the park’s boundaries, but a government consideration to allow an access corridor sometime in future. For future generations’ options, we continue to recommend this corridor be allowed, and that Parks Canada has the flexibility and power to allow this.
<ul style="list-style-type: none"> • Further, we are unaware of any detailed discussion of navigable waterways that are a federal responsibility, through the lake portion of Thaidene Nënë park. 	<ul style="list-style-type: none"> • We are pleased that Parks Canada has confirmed that the waters of Great Slave lake that are included in the park, 1,067 km2, will continue to be fully navigable and be open to motorized water craft, sail boats, kayaks, canoes and barges.
<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • We are pleased that Parks Canada has confirmed that Landings and take-offs for both recreational and commercial operators will be possible on all water based locations within the proposed national park reserve. • We would ask that the same be said for aircraft to land on ice in the winter months for commercial purposes.
<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Parks Canada did not respond to this concern.

As we concluded in our earlier submission, we continue to have public concern over this development, and ask that it be referred to environmental assessment provide:

- A fair, 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;
- 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