



October 8, 2021

Sharon Ehaloak
Executive Director
Nunavut Planning Commission
P.O. BOX 1797
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by EMAIL

Dear Sharon Ehaloak:

Government of the Northwest Territories Review of the 2021 Draft Nunavut Land Use Plan

The Government of Northwest Territories (GNWT) is pleased to provide the Nunavut Planning Commission (NPC) with its comments and recommendations on the 2021 Draft Nunavut Land Use Plan (DNLUP). The GNWT carried out an interdepartmental review of the 2021 DNLUP. As such, the comments and recommendations in this submission are from a GNWT-wide perspective and are focused on components of the DNLUP that have, or may have, transboundary implications.

The GNWT commends the NPC for their efforts in working towards a Nunavut Land Use Plan and appreciates its consideration of transboundary issues.

If you have any questions or wish to set up a meeting to discuss these comments, please contact Justin Adams, Manager, Land Use Planning at Justin_Adams@gov.nt.ca.

Sincerely,

Gina Ridgley
Director, Land Use and Sustainability
Lands

Attachment

Government of the Northwest Territories submission on the 2021 Draft Nunavut Land Use Plan

October 8, 2021

The Government of the Northwest Territories (GNWT) carried out an interdepartmental review of the 2021 Draft Nunavut Land Use Plan (DNLUP). The comments and recommendations in this submission are from a GNWT-wide perspective and are primarily focused on issues that have, or may have, transboundary impacts to the Northwest Territories (NWT).

General Comments and Recommendations

The GNWT expects that the Nunavut Planning Commission will engage with all Indigenous governments or organizations that have neighboring or overlapping traditional territory with Nunavut, including but not limited to:

- Inuvialuit Regional Corporation
- Sahtu Secretariat Incorporated
- Tłıchǫ Government
- Akaitcho Dene First Nations
- Athabasca Denesuline
- Ghotlne Dene K'odtineh Dene

Specific Comments and Recommendations

Section 2.2 - Caribou

Pages 17-18, sections 2.2.1, 2.2.2 and 2.2.3

Comment:

The "Plan Requirements" text box for each of these three sections lists two requirements that are seemingly contradictory. Requirements 2.2.1-1, 2.2.2-1 and 2.2.3-1 designate caribou calving areas as Limited Use areas and list incompatible activities as prohibited. GNWT recognizes that no further proposals for these activities will be allowed without an amendment to the Plan. In addition, requirements 2.2.1-2, 2.2.2-2 and 2.2.3-2 stipulate that there are seasonal restrictions during which project proponents must cease all uses of those sites (except research and tourism). If the activities in 2.2.1-1, 2.2.2-1, and 2.2.3-1 are entirely prohibited, then it is unclear how or what seasonal activities restrictions might apply to. In particular, improved clarity is needed on whether the seasonal restrictions would apply to projects in areas of existing rights within the limited use areas.

Recommendations:

- 1) Clarify which activities the seasonal restrictions in Section 2.2.1-1, 2.2.2-1 and 2.2.3-1 might apply to, and whether the intent of requirement 2.2.1-2, 2.2.2-2 and 2.2.3-2 is to include projects associated with existing rights.
- 2) Revise requirement 2.2.1-2, 2.2.2-2 and 2.2.3-2 to read "Proponents, *including those of projects associated with existing rights*, must cease all uses at those sites, except research and tourism related to caribou conservation, during the dates identified in Table 2: Caribou Seasonal Restriction."

Section 5.3 - Terrestrial Linear Infrastructure

Page 41, Section 5.3.1/Map B

Comment:

The 2021 Draft Nunavut Land Use Plan includes some existing and potential terrestrial linear infrastructure projects on Map B. It is unclear which projects are shown.

Recommendation:

The GNWT recommends labeling the existing and potential terrestrial linear infrastructure projects shown on Map B for improved clarity.

Editorial Recommendations

Page #	Comment/Recommendation:
Throughout	<p>Comment: Reference to Map A is unclear as there does not appear to be a map labeled 'Map A' in the document or attachments. Throughout the draft Plan similar references are made to maps and tables that are not labeled in the way in which they are referred to in the document. Correcting references to maps will facilitate easier use of the Plan.</p> <p>Recommendation: The GNWT recommends that references to Map A and other maps and tables in the Plan are examined and labeled with consistent terminology.</p>
Pages: 19-20	<p>Comment: Under Plan requirements in sections 2.2.6-1 and 2.2.7-1 the list of sites to which the requirement applies appears to be missing.</p> <p>Recommendation: The GNWT recommends that the site numbers are added. In addition, the GNWT recommends adding a hyperlink to Table 1 for ease of reference.</p>