

August 22, 2007

Mr. John T"Seleie  
Executive Director  
Sahtu Land Use Planning Board  
P.O. Box 235  
Fort Good Hope, NT  
X0E 0H0

Our File: SLUPB  
Your File:

Dear John,

**Re:               Sahtu Land Use Plan – Draft 1**  
**February 16, 2007**  
**Comment from SAHTU Land & Water Board**

Staff of the SAHTU Land & Water Board have considered your e-mail and attached letter of March 6, 2007 seeking comments about the "Sahtu Land Use Plan – Draft 1" dated February 16, 2007.

Unfortunately other work priorities prevented us from providing comments by May 31, 2007, however our comments are now provided in the enclosed Notes to File.

In the near future it would be beneficial for our staff and Board Members if you could attend one of our Board meetings and discuss the Sahtu Land Use Plan – Draft 1.

respectfully yours,  
**SAHTU Land & Water Board**

enclosure: 1

G.T. Govier  
Executive Director

copy to: SLWB Members

Re: **Draft 1 - Sahtu Land Use Plan**  
**February 16, 2007**

1.1 Definitions and Abbreviations

- Page 7 - "Appropriately Qualified Professional" – should not make reference to SLWB.
- Page 7 – "migrating caribou" – should not make reference to SLWB.
- Page 8 – "SL&WB" – should be SLWB

1.3.3.2 Acceptable Uses in Conservation Zones

- Page 14 – Item 7 – "SL&WB" should be SLWB

1.3.4.1 Special Management Zone Prohibitions, Management and Developer Conditions

- Page 18 – Item P 10 – adit or drill site within 100m of the normal high water mark of a stream unless approval in writing is obtained from the SLWB. – should add, "where a Land Use Permit or Water Licence is required".
- Page 18 – Item P 13 – locate any sump within 100m of the normal high water mark of any stream. – should revise setback standard from 100m to 30m to allow for sumps associated with mineral exploration.
- Page 20 – Item R 8 – not site facilities within 150m of fish-bearing streams. – should revise setback standard from 150m to 30m to allow for all types of facilities except fuel storage.
- Page 20 – Item R 9 – not site facilities within 800m of the banks of main channels. - should revise setback standard from 800m to 30m to allow for all types of facilities except fuel storage.
- Page 20 – Item R 10 – not site facilities within 150m of all other fish-bearing water bodies. - should revise setback standard from 150m to 30m to allow for all types of facilities except fuel storage.
- Page 21 – Item S 6 – aircraft maintain a horizontal distance of 3 km from large concentrations of birds. – may want to revise setback standard from 3 km to 1.5 km to conform with standard prescribed by Environment Canada (CWS).
- Page 23 – Item T 5 – not be permitted to increase linear disturbance density (for linear disturbances greater than 3m wide, except for roads) beyond 1 km /1 square km. – may wish to revise this standard to allow for winter seismic using sleighs and vibroseis techniques; and subject to a report from a committee studying the issue, involving Environment Canada, GNWT-ENR, National Energy Board (NEB), SLWB, and MVLWB.
- Page 23 – Item T 9 – all new linear disturbances in ungulate habitat be of minimal width (less than or equal to 3m width) and limit the line-of-sight from roads. - may wish to revise this standard to allow for winter seismic using sleighs and vibroseis techniques; and subject to a report from a committee studying the issue, involving Environment Canada, GNWT-ENR, National Energy Board (NEB), SLWB, and MVLWB.
- Page 23 – Item 11 – all aircraft maintain a minimum altitude of 610m over known caribou habitat year round... - may wish to revise this standard to conform with the standard (650m) set in S 7 on Page 21.
- Page 26 – Item Y 2 – shall time barging and dredging for the spring when water levels are higher to limit the extent of dredging. – should change "shall" to "should" so as to permit barging during seasons other than the spring.

#### 1.3.4.2 Sahtu Land and Water Board Conditions

- Page 28 – Item A – the Sahtu Land & Water Board and other appropriate authorities shall in addition to complying with Special Management Zone Prohibitions and Condition... – should change “shall” to “may” because the SLUPB does not have legislated authority to compel the SLWB, a Regulatory Authority, to prescribed specific terms & conditions in Land Use Permits and/or Water Licences.
- Page 28 – Item A 1 – shall ... ensure that each authorized party or the prospective assignee of that party establishes and maintains a site-specific research and monitoring program that is appropriate to the scale of its proposed activity(ies). – “research” and “monitoring” should be defined.
- Page 28 – Item A 3 – shall... ensure that each authorized party or prospective assignee of that party furnishes and maintains security with the Minister sufficient for achieving the purposes in 1 and 2 above, as well as for any ongoing measures that may be required after abandonment or closing. – should change “shall ensure” to “should consider” because the SLUPB does not have legislated authority to compel the SLWB, a Regulatory Authority, to prescribed specific terms & conditions, including security deposits, in Land Use Permits and/or Water Licences.

G.T. Govier  
Executive Director