

Louie Azzolini

From: Louie Azzolini

Sent: Thursday, April 11, 2002 3:52 PM

To: Alan Ehrlich; Brett Hudson (E-mail); Bridgette Larocque; Buddy Williams (E-mail); CARC Kevin (E-mail); Chamber of mines ED (E-mail); Chris (E-mail); CPAWS (E-mail); Dechi Laot'i First Nation (E-mail); Denholm Eric (E-mail); Dennis Bevington (E-mail); DFO Marc Lange (E-mail); Doug Soloway (E-mail); Ecology North (E-mail); Ellis Roy (E-mail); Eric Denholm (E-mail); Fairman Fraiser (E-mail); Gordon Wray (E-mail); Government Akaitcho (E-mail); Health Canada 2 (E-mail); Jennifer Keith (E-mail); Joan Freeman (E-mail); Joe Acorn; John Donihee (E-mail); John Donihee (E-mail); John Ramsey (E-mail); Judy Langford (E-mail); Julie Dahl (E-mail); Kathrin Wessendorf (E-mail); Kevin Ledrew (E-mail); LKDFN Wildlife Lands Environment Ctte (E-mail); Lutsel K'e Dene First Nation (E-mail); Mark Dahl (E-mail); Mary Tampsell (E-mail); Matt Bender (E-mail); McNeill Jason (E-mail); Morison Steve (E-mail); MVLWB Permit (E-mail) (E-mail); Nick Lawson (E-mail); NSMA Bob Turner (E-mail); Nunavut Impact Review Board (E-mail); Paula Pacholek [Yel] (E-mail); Robin Johnstone (E-mail); Roland Semjanovs; Roland Semjanovs (E-mail); Sierra Legal Defence Fund (E-mail 2); Stephen Harbicht (E-mail); Steve Mathews (E-mail); Tamara Hamilton (E-mail); Tim Byers (E-mail); Tony Pearse (E-mail); Vern Christensen; Wha Ti First Nation (E-mail); William (Bill) Carpenter (E-mail); WWF - Peter J. Ewins (E-mail); WWF Tony Y. (E-mail); YK Chamber of Commerce (E-mail)

Subject: GNWT CONFORMITY SUBMISSION

The GNWT provided the Review Board its Conformity Report. The attached report and any other conformity related matters will be provided to the Review Board for its consideration.

Sincerely,
Louie Azzolini

Louie,

The Government of the Northwest Territories has identified some non-conformity items with respect to socio-economic impacts. The attached document identifies and explains these areas.

With regards to environmental impacts, we have not identified any non-conformity items but we have also not been able to complete as thorough a review on these sections. We are focusing our review on the adequacy of the information provided and the preparation of IR's which will be submitted by April 15th.

Unfortunately, I do not have the email distribution list so I request that you send this on to all the other participants.

Take care,
Ray Case
Manager, Technical Support
Wildlife and Fisheries Division
Resources Wildlife and Economic Development

BDY.TXT

Louie,

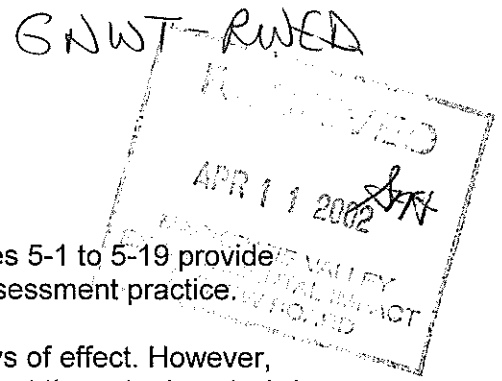
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Ray Case
Manager, Technical Support
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Socio-economic Impacts

Chapter 5 contains the socio-economic impact assessment. Pages 5-1 to 5-19 provide general background for socio-economic environmental impact assessment practice.

Pages 5-19 to 5-27 discuss, in general terms, theoretical pathways of effect. However, as stated on page 5-22, *'the diagrams and discussion points are not the actual analysis.'*

Pages 5-27 to 5-38 provide baseline data, which leads to a general discussion of the NWT future on pages 5-38 to 5-40. Baseline data on Aboriginal governments and their historical interest in the Snap Lake area are outlined on pages 5-40 to 5-45. Demographic baseline data is found on pages 5-46 to 5-81, and baseline concerns, interests and hopes as expressed by Aboriginal communities and some broader organizations is documented on pages 5-82 to 5-104.

The analysis of socio-economic impacts is covered on the following pages:

- 5-122 to 5-143 (general socio-economic impacts)
- 5-159 to 5-161 (residual impacts)
- 5-104 to 5-120 (economic impacts)
- 12-19 to 12-39 (cumulative effects).

Non-Conformity Items

Communities impacted by increased traffic volumes

ToR lines 246-248 — The scope of the assessment for socio-economic variables should include communities that could reasonably expect to experience impacts because of the development, **including but not limited to, increased traffic volumes** or employment and business opportunities.

The EIS does not identify which NWT communities (or residential areas) would be affected by increased traffic volumes. The socio-economic and noise sections seem silent on this ToR item. Table 12.5-2 page 12-90, identifies the distance between a range of communities and the mine site. However, the EIS appears silent on the distances between NWT communities and increased traffic volumes.

Effect of closure on mine employees

ToR lines 242-256 — Temporally, De Beers shall assess environmental impacts of the proposed development for all phases of the proposed development including construction, operation, closure and post-closure. Provide sufficient detail to address the relevant impact issues on VEC's over the entire temporal scope of the development. Distinguish between biological, physical, social, cultural and economic parameters.

The EIS appears silent with regard to the effects of closure on mine employees.

Project Components — Employment

ToR lines 488-491 — De Beers shall provide a detailed summary of ... minimum skill requirements for its predicted labour force, including contract and subcontracted employees.

ToR lines 459 – 460 — [the Proponent will describe] ... wage and salary employment by skills category over the life of the proposed development, including estimates of northern participation;

Page V.3-3 of the EIS refers to skills needed during operations, but the EIS is silent with regard to skills required during the construction phase.

Environmental Impacts — Net Effect on Government

ToR line 472 — This directs the Proponent to examine federal and territorial revenues and costs.

While revenues are addressed, it is not clear the EAR addresses the issue of costs. For example, at no point in Section 5 of the EAR is there a specific reference to an increased GNWT cost burden related to the socio-economic impacts or opportunities associated with this Project.

Environmental Impacts — Subsistence Economy

ToR line 471 — Directs the Proponent to examine impacts on the subsistence economy.

The Proponent Conformity Table lists several sections as responding to this ToR request. However:

- Section 5.2.2.3 is baseline data;
- Section 5.3.1.2.2 identifies community concerns;
- Section 5.3.4.3.7 notes De Beers' support for cultural activities.

None of these three sections address assessed impacts.

Section 12.2.7 discusses possible cumulative effects on *cultural practices and traditions*. However, these are separate from the issue of a subsistence economy and potential impacts to it.

Consideration of Alternatives — Rotation

ToR lines 188-189, line 196 — Include a description of the main development / production / technical alternatives, in particular, those associated with ... employee work schedules

The Proponent discusses its reasons for considering a 2-2 shift schedule during operations. This is the only operations alternative described. The alternative of a 1-1 rotation, referred to on page 5-85 as the most desirable rotation schedule, is not examined in Section 2, Project Alternatives and Opportunities.

Section 2 states a 3-1 rotation will be used during construction, but does not examine any other alternative for the construction phase.

Cultural Effects

ToR lines 439-441 — Describe potential impacts of the proposed development ... on the cultural well being of the impacted communities [this] should include, for example, anticipated or possible changes on social cohesiveness or language use.

The Section 5 discussion of project impacts is silent with regard to social cohesiveness or language use. Page 12-33 discussed the importance of social cohesiveness, but not the cumulative impacts to this component.

Sustainable Development

ToR line 198-199 — DeBeers shall discuss the option of sorting and marketing the diamonds mined at the proposed mine. This should include a clear explanation of the options considered and the reason for selecting the preferred option.

The Proponent has not discussed the sorting and marketing of rough in its report.

Infrastructure Effects

ToR lines 508-510 — Assess the impacts of the proposed development on existing social, institutional and community services, transportation facilities, services, infrastructure (e.g., transportation safety), and permanent changes to the infrastructure and services arising from the proposed development.

The Conformity Table (Appendix I.3, page I.3-22) notes this is dealt with in the following sections of the EIS:

- (a) 5.2.3.2.7, 5.2.3.3.7, 5.2.3.5.7, 5.2.3.6.7, 5.2.3.7.7, 5.2.3.8.7
- (b) 5.3.1.3.2
- (c) 5.3.3.4, 5.3.4.2, 5.3.4.3
- (d) 6.6

However, the GNWT makes the following observation on the above items:

- (a) Section 5.2.3 deals with community baseline data, not with impacts;
- (b) Section 5.3.1 deals with constituent concerns;
- (c) Section 5.3.4 deals with planned mitigation measures;
- (d) Section 6.6 deals only with the winter road.

While some impacts are captured in Table 5.3-7, it is not evident whether the Proponent meant to extrapolate the impacts identified there to the larger potential infrastructure impacts.