



Mackenzie Valley Environmental Impact Review Board

Box 938 , 5102-50th Avenue, Yellowknife, NT X1A 2N7

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Date:	Sept. 18, 2003	Pages:	3 including this page
To:	Distribution	Fax:	
		CC:	Bob Wooley
Re: YDFN Request for Extension to IR Period (EA-03-006)			

NOTES:

Please see attachment.

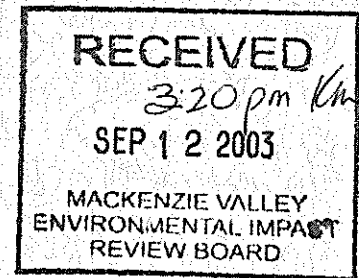
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September 12, 2003

Todd Burlingame
Chair: Mackenzie Valley Environmental Impact Review Board
Box 938, 200 Scotia Centre, (5102-50th Avenue),
Yellowknife, NT. X1A 2N7
Fax: (867) 766-7074

RE: Request for Addition Time to Review the Snowfield Development Corporation (Developer), Developer Assessment Report and Prepare Information Requests (IR) for the Proponent

Dear Mr. Burlingame,

The Yellowknives Dene First Nation Land and Environment Committee (YKDFN L&E) is unable to meet the Review Board's amended work plan timeline for submission of IRs for the Snowfield Development Corporation Environmental Assessment.

The YKDFN L&E understanding based on the EA workplan is that DAR is not officially recognized by the Board as received, therefore the DAR comment period has not officially triggered. In addition, there is also a 10-day period after getting the cumulative effects report in order to provide comments on that document.

The developer in a letter dated September 1, 2003 quotes the direction provided by Mr. Vern Christensen in a letter dated August 26, 2003 regarding cumulative effects. That quote is as follows. "The Review Board will therefore allow Snowfield Development Corporation (sic) to amend their submission on Cumulative Effects at the Public Hearing after the cumulative effects study is released."

As the Review Board is enabling the developer a structured, planned and formalized opportunity to amend its DAR, it is unreasonable for the YKDFN to prepare IRs on an incomplete DAR wherein cumulative impacts and public concern form a significant component of document and part of the reasons for referral to EA.

Respecting the unanticipated changes in the work plan through the introduction of IRs, the incomplete proponent DAR, the forthcoming consultant cumulative effects report and

the structured and facilitated opportunities for the developer to amend its DAR based on that report, and the YKDFN respectfully request additional time to prepare IRs.

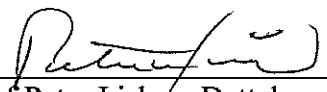
It is reasonable to provide the proponent an opportunity to amend its DAR based on the results of the cumulative effects report, as committed by Mr. Christensen. It is equally reasonable to enable the YKDFN to prepare IRs on a suitably complete DAR in order to identify appropriate issues for any future hearing. The proponent's development spans five years, involves bulk sampling, grid line work, and extensive drilling. In addition, respecting the multi-year, multi faceted, geographically expansive program, the YKDFN have to undertake further internal review work to collect the broader information sets necessary for the EA.

The YKDFN also want to bring to the Board's attention that the Snowfield Development Corporation EA is distinct and separate from other EAs in the Yellowknives Dene Territory, and there is no underlying rationale for forcing this EA into other EA timelines.

In conclusion, the YKDFN request the Board to rule on the following:

1. Request to amend the Snowfield Development Corporation EA work plan based on the preceding rationale and to initiate the comment period for the EA when and if the developer amends its Cumulative Effects submission based on the results of the Review Board sponsored Cumulative Effects study.
2. Request to have the Board's environmental assessment officers/practitioners place on the record, their certification of EA practice adequacy regarding the DAR before starting the IR period or comment period.
3. To initiate the formal IR period upon the Board's formal adoption of the DAR as suitably complete for its purposes.

Sincerely,


Chief Peter Liske – Dettah


Chief Darrell Beaulieu - Ndilo

c.c. Sherry Sian, Environmental Assessment Officer, Mackenzie Valley
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