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Northwest
Territories Resources, Wildlife and Economic Development

Mr. Vern Christensen
Executive Director
Mackenzie Valley Environmental Impact Review Board
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Dear Mr. Christensen:

fax version received
Jan 23, 2004

Comments on the "Draft Work Plan for the Environmental Assessment of the Mackenzie Valley Gas Pipeline Project"

These comments on the "Draft Work plan for the Environmental Assessment of the Mackenzie Valley Gas Pipeline Project" are provided on behalf of the Government of the Northwest Territories (GNWT) and replace our earlier submission. The GNWT appreciates the extension provided by the Mackenzie Valley Environmental Impact Review Board (MVEIRB). As a result of the extension, we have had the opportunity to clarify our concerns with the Draft Work Plan.

The GNWT recognizes the significance of the Mackenzie Gas Project (MPG) to the Northwest Territories. The GNWT has participated in the development of the cooperative planning process and supports a timely and in-depth environmental assessment process based on documentation that describes the project and the projected environmental, social, cultural and economic effects in detail. The GNWT believes that this is best accomplished through the joint environmental review process as described in the "Cooperation Plan for the Environmental Impact Assessment and Regulatory Review of a Northern Gas Pipeline Project through the Northwest Territories" ("the Cooperation Plan").

The GNWT's concerns related to the Draft Work Plan for the environmental assessment of the MGP revolve around the change proposed by the MVEIRB in the conduct of its normal mid-level environmental assessment for the Mackenzie Valley Gas Pipeline Project and the difficulties raised by the Review Board's proposed requirements in its Phase 1 / Phase 2 approach. Our understanding is that the primary purpose of the Phase 1 is predominantly to gauge the level of public concern and that the Preliminary Information Package (PIP) is the basis for the MVEIRB's environmental assessment.



The Draft Work Plan currently includes other purposes in Phase 1. The GNWT recommends that Phase 1 be designed to focus on the determination of sufficient evidence to refer the Project to Environmental Impact Review (EIR) based on public concern. In this situation, the inclusion of all aspects described in the PIP will provide greater certainty and demonstration of public concern both territorially and nationally.

The GNWT also recommends that Phase 1 be designed in a manner to allow written submissions as evidence and for the public hearings to be conducted in a cost effective and timely manner. The GNWT suggests that there may be other appropriate materials available to the Review Board as evidence. The GNWT is also concerned regarding the amount of resources available to communities and the capacity to respond to the variety of activities that have similar scope. It is our understanding that there will be significantly greater access to funding sources during the joint environmental review process as described in the Cooperation Plan. If that is indeed the case, it represents another reason for moving with promptness to that process.

However, Phase 2 of the environmental assessment, should it be the path followed, should be scoped to only include project aspects within the Mackenzie Valley. In this case, the development of an appropriate Developers Assessment Report will provide greater definition of the project to be assessed for significant adverse impacts. It would not be practical for intervenors to attempt to address the very broad scope indicated in the Draft Work Plan. As mentioned, the GNWT envisions the EIR or Joint Panel as the appropriate level because this would include representation from the Inuvialuit Environmental Impact Review Board.

In summary, the GNWT appreciates the initiative taken by the MVEIRB. We have some concerns with the Phase 1 / Phase 2 approach under consideration as it relates to arriving at the timely and in-depth environmental assessment process required by a project of this magnitude and significance. The GNWT respectfully requests that the MVEIRB reconsider its approach.

Sincerely,



Peter Vician
Deputy Minister