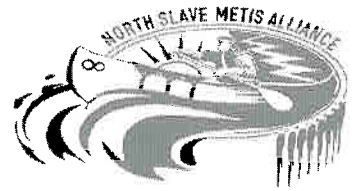


NORTH SLAVE MÉTIS ALLIANCE

PO Box 2301 Yellowknife, NT X1A 2P7



August 31, 2007

Mackenzie Valley Environmental Impact Review Board
200 Scotia Center
Box 938, 5102-50th Ave
Yellowknife, NT X1A 2N7

Siden
Re: EA 0506-05 Consolidated Goldwin Ventures.

Please accept the North Slave Metis Alliance's comments on the proposed recommendations for the above noted environmental assessment.

The NSMA represents the North Slave Indigenous Métis People. These are the Métis People who are descendents of Dene and/or Métis People who not only “used and occupied” the Mackenzie River Basin before, and since the “Crown” took “effective control” of the area, but also signed Treaty 11. In other words, the NSMA represents the North Slave Indigenous Métis people who possess Aboriginal Rights, including Aboriginal Title, and Treaty Rights to the lands and resources in the North Slave region of the NWT.

Accordingly, the NSMA takes its representation mandate seriously, and has and will continue to ensure it is “consulted and accommodated,” on any and all forms of activities planned or underway by public and private sector organizations, wishing to or undertaking activities on its traditional lands.

IR Number 2.1 Increased Access

NSMA agrees that some of the disturbance to our activities results from increased recreational use of the area resulting from improved access. “Helicopter only access” would mitigate against some of this additional recreational access. However, helicopters are also highly disruptive, and without ground access there is likely to be increased helicopter activity. Increased helicopter activity will not only disrupt Metis activities, but is likely to increase the risk to heritage resources and the disturbance of wildlife. Unlike road traffic, the route a helicopter will take can not be accurately predicted or reliably avoided. It will be extremely difficult to monitor helicopter traffic for compliance with laws protecting fish and wildlife, heritage resources, historical and archaeological sites, or objects and places of recreational, scenic or ecological value.

An alternative, and potentially more complete and cost-effective mitigation might be take advantage of the provisions of section 26 (a), (b), (j), (k), (o) and (q) of the Mackenzie Valley Land Use Regulations to require the proponent to submit an “Environmental Management Plan”, for approval, prior to the construction of any access route. The management plan should include specific details regarding the route selected, construction methods, timing of construction, times of use, and decommissioning criteria. The plan should take into consideration, and include a public education campaign and enforcement patrols to protect, the historical and archaeological

sites, and objects and places of recreational, scenic, and ecological value along the way. Enforcement patrols should employ Dene and Metis individuals, selected by their communities (not by the proponent), while the ground access is in use and until decommissioning is completed satisfactorily. The Board could insure that Adequate Consultation between the proponent and Aboriginal Peoples takes place simply by withholding their approval of the "Environmental Management Plan" until they receive sufficient evidence of Dene and Metis satisfaction with and support of the Plan. The proponent would be wise to include the NSMA in the design of the plan, including the provision of resources to enable NSMA to participate, in order to ensure the resulting plan accommodates our needs, and gains our support.

IR Number 2.2 Impacts on Heritage and Burial Sites

NSMA agrees that there is a significant risk of unacceptable damage to heritage sites, including ethnographic sites and grave sites if the developer is permitted to drill areas where thorough heritage surveys have not been conducted. The suggested mitigations are acceptable, but only if the NSMA is involved meaningfully in the heritage resource surveys. The recommendation could perhaps be worded differently, to indicate that no drilling (or access route construction) shall be permitted in any area which has not been subjected to a thorough heritage resource assessment involving both of the Aboriginal Peoples (Dene and Metis) whose heritage resources may be at risk. In addition, protection measures for each heritage site identified should be included in an "Environmental Management Plan" as suggested above.

Thank you very much for accommodating the NSMA's interests to the best of your ability in this environmental assessment.

Sincerely,

delivered by email on September 3, 2007.

Sheryl Grieve
Manager, Environment and Resources.
lands@nsma.net