



Yellowknives Dene First Nation

P.O. Box 2514, Yellowknife, NT X1A 2P8

July 16th, 2012

Chuck Hubert
Mackenzie Valley Environmental Impact Review Board
Box 938
Yellowknife, Northwest Territories
X1A 2N7
Fax: (867) 766-7074

Dear Mr. Hubert:

Re: Round 2 Gahcho Kue Information Requests

The Yellowknives Dene First Nation (YKDFN) would like provide the enclosed information requests. Because of the late submission of the documents referenced in the Review Board's June 29th, 2012 letter, YKDFN leadership has not had sufficient time to review and prepare comments.

In the event that there are issues or concerns, these matters will be brought up directly with the company with copies to the registry to ensure transparency.

We hope that these Information Requests and any answers provided in good faith can inform the process and would like to thank the Review Board for the opportunity to raise these issues. If you have any questions or concerns, please contact YKDFN Lands and Environment at 766-3496.

Sincerely,

Randy Freeman, Director
Lands Management

Copy: Chief Edward Sangris, Yellowknives Dene First Nations, Dettah NT; Fax: (867) 873-5969
Kerri Garner, Director of Lands – Tlicho Government, Behchoko NT; Fax (867) 392-6406
Stephen Lines, De Beers Canada Inc., Yellowknife NT; Fax: (867) 766-7347
Loretta Ransom, Government of the NWT, Yellowknife NT; Fax: (867) 873-7905

Round 2 Gahcho Kue Information Requests

Yellowknives Dene First Nation

FROM:

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TO:

Chuck Hubert
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Mackenzie Valley Review Board
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Section 1: WEMP Best Practices

IR Number: YKDFN 2.1

Source: Yellowknives Dene First Nation

To: De Beers

Subject: Territorial Best Practices for Wildlife Effects Monitoring

Preamble:

Wildlife Effects Monitoring for industrial development has been ongoing in the NWT for a number of years. YKDFN believe that the conversation regarding the development of a new plan should commence with a review on the lessons learned and best practices established for each of the other mines. As an example, the wolverine hair snagging project has emerged as a best practice for monitoring the population stability of this Valued Ecosystem Component (VEC).

Request:

1. For each VEC, please identify what components are required to be monitored such that a robust decision making process can be established. For example, caribou monitoring should include not just distribution monitoring, but also behavioural response monitoring.
2. For each VEC component, please identify what the best practice for monitoring has been developed. If the proponent does not believe a best practice has been established, please identify the methods used at each of the NWT minesites and the 'pro's and cons' of each study design.
3. Please identify what mitigations are available for each VEC should negative trends be observed.
4. As this project does not exist in isolation, please identify what cumulative effects monitoring effort the project will undertake.

Section 2: Oversight History

IR Number: YKDFN 2.2

Source: Yellowknives Dene First Nation

To: De Beers

Subject: History with independent oversight bodies

Preamble:

As with IR 2.1, YKDFN believe that before creating a new and unclear mechanism for oversight, the Parties should consider precedent best practices, lessons learned, and elements of change advocated by the company. De Beers, along with governments and aboriginal parties, created the Snap Lake Environmental Monitoring Agency (SLEMA) through an Environmental Agreement in 2004 to provide oversight of the Snap Lake Diamond Mine. Before adopting a new scheme, YKDFN need to understand why the company chose not to pursue this model – what worked and what didn't work.

Request:

- 1) Please explain what the company feels that SLEMA does well.
- 2) Please explain what aspects of SLEMA that the company believes it does poorly.

Section 3: TK Resources and Inclusion

IR Number: YKDFN 2.3

Source: Yellowknives Dene First Nation (YKDFN)

To: De Beers

Subject: Resources and Commitment for TK inclusion and monitoring

Preamble:

Traditional Knowledge and western science are supposed to be viewed equally by the regulatory and review processes, but communities clearly feel as though this is treated only as an afterthought.

Request:

- 1) Please provide figures that indicate the value of expenditures related to western science (water testing, caribou surveys, etc.) for each of the Snap Lake Mine and Gahcho Kue mine. For Snap Lake, the proponent should provide these values as 'permitting' (before the LWB permit) and 'operations'
- 2) For the future of Gahcho Kue, please provide clear indication as to the minimum resources, and details of potential related programs, that will be available for:
 - a. The collection of additional traditional knowledge
 - b. Incorporation traditional knowledge monitoring into monitoring programs such as the AEMP and WEMP
 - c. Explain how traditional knowledge monitoring will factor into the Adaptive Management plan.