



# Yellowknives Dene First Nation

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

June 4<sup>th</sup>, 2012

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

Dear Mr. Hubert:

## **Re: Gahcho Kue Environmental Assessment**

### **Item A: Gahcho Kue Round Two Information Requests**

The Yellowknives Dene First Nation (YKDFN) have reviewed your letter of May 28<sup>th</sup>, 2012 and would like to confirm that we consider a second round of Information Requests to be essential to our understanding of the impacts associated with this mine.

YKDFN believe the following issues need further focus as they have not been adequately explored. In addition, the company response during the technical session served to create concerns rather than provide comfort that the project will not result in significant impacts. Notable topics include, but are not limited to:

- Monitoring and Management
- Cumulative Effects
- Caribou
- Winter Road Impacts
- Traditional Knowledge Monitoring
- Air Quality Monitoring and Baseline Collection
- Socio-Economic Issues
- Closure and Reclamation
- Habitat Compensation Measures and Kennady Lake Water Quality
- Downstream Impacts to Water Quality

### **Item B: Gahcho Kue EIR Scope of Development – Treatment of the Tibbitt to Contwoyto Winter Road**

From discussions at the technical session, it seems clear that the company does not believe that their use of the TCWR between Tibbett and the start of the De Beers spur road is within the scope of the development. During the technical session, the company indicated that they would

not consider these impacts as part of their operation. On May 25<sup>th</sup>, 2012 Mr. Cam Stevens stated:

*"I think the real issue here being put forward and being discussed over the past thirty (30) minutes or so, is access and hunting, which is relevant for the impact assessment only to the winter access road, not the Tibbitt-to-Contwoyto Road."*

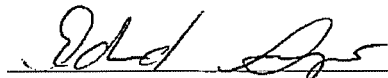
The impacts and effects of the portion of the winter road prior to the start of the spur are derived not just from the additional traffic associated with this new development, but also the winter road's very existence. If we follow Mr. Steven's logic, those same impacts created by the construction of the spur road do not exist with the TCWR and require no monitoring or assessment. Fundamentally, YKDFN do not believe that it is possible to divorce these two matters – if the TCWR did not exist, then the project would not proceed.

In YKDFN's view, the Gahcho Kue Terms of Reference recognize this plainly – on Page 5, the Scope of the Development Table 2-1 clearly states that the "Use of the current Tibbitt-Contwoyto winter road and any alternate routes" is within the Scope of the Development. Thus, the impacts associated with this component must be considered.

YKDFN are asking the Review Board to confirm to De Beers that the TCWR must be included within their impact assessment. The burden to provide appropriate information falls to the developer and if the impacts, and as a consequence, the monitoring of the TCWR is not adequately responded to then the potential for significant direct and cumulative impacts to occur is very real.

If you have any questions or concerns, please contact YKDFN Lands and Environment at 766-3496.

Sincerely,

  
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Chief Edward Sangris

Copy: Steve Ellis, Akaitcho IMA Implementation Office, Lutsel K'e NT, 1-888-714-3209  
Veronica Chisholm, De Beers Canada, Yellowknife, NT; (867) 766-7347  
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James Lawrence, Crown Consultation Support Unit – INAC, Yellowknife, NT (867) 669-2540