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1	General	All	methodology to support	In the previous January, 2023 review of the DAR, ECC-Wildlife identified at least 13 specific areas where there is confidence lacking in the methodology and/or definitions associated with effects assessments. The following comments break down those concerns into more specific components. ECC-Wildlife has concerns with the assessment methods for, and the substantiation of the conclusions about, residual and cumulative effects.	ECC has outlined recommendations for each of the 13 specific areas in the comments below.	ECC-Wildlife		DAR has been revised where appropriate following discussion with ECC Subject Matter Experts (SMEs) to address concerns and improve confidence in the assessment methods.
2	General	All	and cumulative effects.	Effects assessments throughout the DAR rely primarily on qualitative variables which has produced subjective, uncertain and difficult-to-defend outcomes. Well-defined measurable variables/impacts_would greatly improve the reliability of assessment outcomes. We understand the Consultant and INF has considered previous comments from ECC. ECC-Wildlife has concerns with the assessment methods for, and the substantiation of the conclusions about, residual and cumulative effects.	See chapter 10 comments for specific areas and topics where a lack of quantitative assessment is identified and specific recommendations are made.	ECC-Wildlife	Yes	DAR has been revised in the cumulative effects section following discussion with ECC SMEs to included quantification of the effective habitat loss for caribou and moose at three scales (NT1, Management Planning Regions, and the Caribou/Moose Local Assessment Area (LAA)) in the cumulative effects section to address concerns and improve confidence in the assessment methods for residual and cumulative effects.
3	General	All	assessments of residual effects and cumulative effects	Lack of peer-reviewed sources cited. Effects assessments throughout the DAR rely primarily on qualitative variables which has produced subjective, uncertain and difficult-to-defend outcomes. Findings are often unsupported by accepted, peer-reviewed literature. Citation of current, peer-reviewed literature to support assessment findings would greatly improve the reliability of assessment outcomes. We understand the Consultant and INF has considered previous comments regarding inclusion of more references from ECC. ECC-Wildlife has concerns with the assessment methods for residual and cumulative effects.	See chapter 10 comments for specific areas and topics where a lack of peer-reviewed sources is identified and specific recommendations are made.	ECC-Wildlife	Yes	DAR has been revised following discussion with ECC SMEs to address concerns and improve confidence in the assessment methods for residual and cumulative effects. DAR includes additional justification for the assessment area used for caribou and moose - albeit, caribou deferred to ECCC's 500 m buffer, but did acknowledge variability in reported literature. The DAR also includes additional reference to the TASR review and WRRB's suggestion for 2,500 m buffer.
4	General	All	Insufficient evidence to support assessments of residual effects and cumulative effects		See chapter 10 comments for specific areas and topics where a lack of current data is identified and specific recommendations are made.	ECC-Wildlife	Yes	DAR has been revised following discussion with ECC SMEs to address concerns and improve confidence in the assessment methods for residual and cumulative effects. DAR includes edits to the maps; BNE "current" distribution (UDs) were updated with the last 10 years of collar data; updates made to distribution of boreal caribou collar locations in the LAA as well as the habitat disturbance statistics.

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5	General	All	Insufficient evidence and methodology to support assessments of residual effects and cumulative effects			ECC-Wildlife	Partially	DAR has been revised following discussion with ECC SMEs to address concerns and improve confidence in the assessment methods for residual and cumulative effects. Cumulative effect adjusted to identify that there is a pre-existing exceedance of the disturbed habitat threshold within the LAA. Secondary criteria for significance was discussed in the DAR; however, the extent of discussion was not as extensive as the Reviewer would have preferred.
6	General	All	Misleading statements around future wildlife management and monitoring abilities	Several places in the DAR there are vague monitoring and mitigation descriptions along the lines of, "The boreal caribou collar program, currently conducted by the GNWT-ECC, will continue to collect ongoing information" and "However, harvest will continue to be managed by the GNWT and the co-management boards" This type of broad wording overstates the current management authority and information GNWT has on wildlife in NWT. This is especially prevalent in DAR sections describing wildlife harvest monitoring.		ECC-Wildlife	Partially	DAR has been revised following discussion with ECC SMEs to provide additional clarification and confirm that additional monitoring programs or enhancement to existing monitoring programs will be required. Further refinement of monitoring and mitigations will be completed as the EA progresses, and through further refinement of the WMMP.
7	General	All	Cumulative effects	The definition and application of cumulative effects assessment was found to be vague. Cumulative effects should consider human disturbances beyond presence of projects in the area (harvesting, etc.), as well as natural factors such as climate change, forest fires, etc Climate change was found to not be a valued component but should be factored into the DAR. Consideration of only development footprints does not sufficiently address all cumulative effects to wildlife. For example, in past and future burn areas, impacts from project effects	Please strengthen and clarify cumulative impacts definition and broaden scope.	ECC-Wildlife	Partially	DAR has been revised following discussion with ECC SMEs to improve the habitat disturbance-based assessment of cumulative effects and revise the significance determination to match pre-defined significance criteria. The TOR did not request information on cumulative effects assessment of non-developmental activities. The uncertainties related to non-development activities (such as climate change and harvesting) are addressed in prediction confidence and "gaps and uncertainties sections that are located within each Key Line of Inquiry (KLOI) or Subjects of Note (SON) section of the DAR.
8	General	All	Consultation and Engagement	could multiplicatively affect wildlife. In Chapter 2 - page 2-1 - 1st paragraph and throughout chapter and document - use of the term 'other affected parties' is unclear if you are discussing consultation or indigenous based engagement	Evaluate for the appropriate use of 'other affected parties' throughout the chapter and document. If distinctly Indigenous based engagement, suggest to remove 'other affected parties from the statement in that section. A find search for 'affected' brought all the instances up.	EIA-IMPL	Yes	DAR has been revised to eliminate ambiguity and include a definition of "Affected Parties"
9	General	All	Consultation and/or Engagement	In Chapter 1.6; Page 1-15 - use of the term 'other affected parties' is unclear if you are discussing consultation or indigenous based engagement	Evaluate for the appropriate use of 'other affected	EIA-IMPL	Yes	DAR has been revised to eliminate ambiguity and include a definition of "Affected Parties"
10	General	All	Other affected parties	In Chapter 3.1; Page 3.2 - It is mentioned that Traditional Knowledge (TK) involves Indigenous Governments, Indigenous Organizations and other affected parties.	Clarify who are other affected parties.	ECC-PAB	Yes	DAR has been revised to eliminate ambiguity and include a definition of "Affected Parties"
11	General	All	Reasonably Foreseeable Projects	PCAR (Phase 1) is almost done construction. It needs to be clear in the cumulative effects discussions of each KLOI and SON that this is an already almost completed project. In the Socio-Economic Impact Assessment (SEIA) section, there is several instances where it is used.	Revise text.	INF-SID	Yes	DAR has been revised to include the Prohibition Creek Access Road Project under the Past and Present Projects. The DAR presents the Great Bear River Bridge Project as a Reasonably Foreseeable Physical Activity.
12	General	Throughout the chapter	Mitigation Funding	Any MVH specific mitigations run by ECE program areas that are in addition to existing services will require consideration of incremental financial support.	Include funding for departmental support from ECE (and all other participating GNWT departments) in any funding requests for this initiative.	ECE- PLC	Yes	DAR has been revised to include references to where incremental financial support will be required for implementation of proposed mitigations.

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13	General - 20. Birds and Bird Habitat	20.4.2.3.1, Table 20.11	1 Existing vs residual habitat for the Dehcho Region	The LAA total existing conditions for the Dehcho Region is 16,333.6 ha and the residual condition is 16,625.3 ha. How is the existing less than the residual when further clearing will occur and the table shows a decrease in total habitat for each classification in the residual column?	Did the math - change '16,625.3' to '15,625.4' in the residual Dehcho column on page 20-36 Check similar tables throughout DAR for this	INF-SID	Yes	DAR has been revised to ensure calculations are correct.
14	1. Introduction to the	1.0	Proponent	This issue was also noticed in chapter 19, table 19.11 The Proponent is the GNWT.	Revise first sentence to "The Government of the	INF-SID	Yes	DAR has been revised to clarify the GNWT is the project proponent and the Department of
	Assessment				Northwest Territories (GNWT) is proposing the construction of the Mackenzie Valley Highway (the Project). The project is led by the Department of Infrastructure "			Infrastructure is project lead.
15		1.2	Cost of Living	Cost of living assessments in chapter 9 do not indicate cost of living	Change to "Improve access and variety in non-	HSS	Yes	DAR has been revised to include improved access and variety in non-traditional food goods
16	Assessment 1. Introduction to the	1.2.2	Updating of business case &	reduction. " economic studies will be revisited to support the updating of the	traditional food goods for residents". Business case and project cost estimates will be	INF-SID	Yes	for residents. DAR has been revised to clarify business case and cost estimates will be updated.
17	Assessment 1. Introduction to the	1.3.1	cost estimates	Business Case and overall project cost estimate""	updated not developed	INIT CID	Yes	DAR has been revised to clarify scope is focused on that portion of the MVH from Wrigley to
17	Assessment	1.3.1	Incomplete context	"The project proposed at the time has since been re-scoped as reflected in the current Terms of Reference (TOR) (MVEIRB, 2015 [PR#66])"	to Norman Wells."	IIVE-2ID	res	Norman Wells.
18	Introduction to the Assessment	1.4.2	Proponent	The Proponent is the GNWT.	Revise first sentence to "The GNWT is the proponent, and the Department of Infrastructure is the Project lead."	INF-SID	Yes	DAR has been revised to clarify the GNWT is the project proponent and the Department of Infrastructure is project lead.
19	1. Introduction to the Assessment	5.4.3	Permanent Structures	Note that communities engaged suggested temporary structures be able to be converted to permanent dwellings.	This may make a good footnote.	HSS	Yes	DAR has been revised to better reflect discussions that occurred during community engagement regarding alternative uses for camp facilities (post construction).
20	1. Introduction to the Assessment	4.3.3.2	Project Activities	Section 3.1 of the TOR states that "the scope of the project includes construction, operation and reclamation of an all-weather highway". This may confuse the public that reclamation of the highway is included within the scope of the EA.	For clarity, suggest indicating in section 1.4.3, that while progressive reclamation is planned for facilities, and unused portions of the Mackenzie Valley Winter Road (MVWR), reclamation of the all-weather highway itself is not part of the Project nor the scope of the EA as the highway is intended to operate for an indeterminate period.	ECC-PAB	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made. DAR includes clarification in Section 4.3.3.2 that closure and reclamation of the all-season highway (specifically) is not a component of the project.
21	1. Introduction to the Assessment	1.4.5	Scope of the Project	Section 1.4.5 (Existing Permits and Approvals) is the first instance where it states that the MGAR is included within the scope of the Project being assessed in the DAR. It is unclear whether the MGAR is included within the scope of the Project.	Provide clarity on whether the MGAR is included or excluded from the scope of the Project by listing it	ECC-PAB	Yes	DAR has been revised to eliminate ambiguity and provide clarity that MGAR is included in the scope of the MVH project.
22	1. Introduction to the Assessment	1.6	Departmental roles	The second paragraph outlines the Department of Lands role for environmental decisions in the Mackenzie Valley. This is not accurate. Description should reference the Ministers of ECC's delegated authority of the federal Minister and note that the Minister is communicating a decision on behalf of all responsible ministers.	Suggested revision to paragraph two: "The Department of ECC acts as the GNWT lead for coordinating GNWT participation in the environmental assessment of the project. The Minister of ECC is the delegated federal minister under the MVRMA. Upon completion of the Report of Environmental Assessment by the MVIERB, the Minister of ECC, along with other responsible ministers, will make the final decision based on the relevant evidence provided during the EA. The Minister of ECC may decide to accept, refer back, accept and modify, or reject the Board's recommendation on whether the Project should proceed or not."		Yes	DAR has been revised as suggested to provide clarity on the GNWT's role as "Responsible Minister" under the MVRMA.
23	Consultation and Engagement	2	Section Preamble	Additional information needed in first paragraph to introduce the section.	GNWT to provide draft text for this section.	INF-SID	Yes	DAR has been revised to include a preamble and additional context for the Consultation and Engagement Chapter.
24	Consultation and Engagement	2.1.1	ROW or PDA	Consultation section uses PDA. New text in DAR v3 says ROW. Confirm	Confirm and revise, if necessary.	INF-SID	Yes	DAR has been revised to ensure consistency in use of terminology for ROW.
25	Consultation and Engagement	2.1.2	Consistency	Content in Chapter 1 says that the project was introduced in the 1950s. 1972 is also mentioned in Table 2.3.	Revise text.	INF-SID	Yes	DAR has been revised to ensure accuracy/consistency.
26	Consultation and Engagement	2.1.2	Engagement missing.	There was a sentence in DAR v2 that captured the engagement that the GNWT completed between 2018 and 2020. "Between 2018 and 2020, GNWT visited the Sahtu and Dehcho communities to share project information and provide updates." This needs to be captured here.	Revise text.	INF-SID	Yes	DAR has been revised to integrate information regarding the project-specific engagement activities completed between 2018 and 2020.
27	2. Consultation and Engagement	2.1.2	Wrigley community engagement	Community engagement with Wrigley different from others and did not include community engagement to corroborate interviews.	Note in brackets that community engagement with Wrigley did not include community engagement to corroborate interviews.	HSS	Yes	DAR has been revised to provide additional context and clarification in regards to engagement efforts with PKFN/Wrigley.
28	2. Consultation and Engagement	2.1.3	Dates	Engagement was impacted from the start of the pandemic.	Revise 2021 to 2020.	INF-SID	Yes	DAR has been revised to improve accuracy.

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29	2. Consultation and Engagement	2.1.4.1	Languages for advertisements	Since language is a factor in receiving an advertisement, may be worth stating the languages use for advertising each of the engagement opportunities.	Include a sentence stating what languages were use in the advertisement as is done at the end of 2.1.4.2.	HSS	No	All advertising was in English (with the exception of local radio ads issued by the local radio station). No additional revision required.
30	Consultation and Engagement	2.1.4.1	Rationale for virtual workshops	The virtual meetings were in response to community request and/ or travel restrictions. This should be clear in the text.	Revise text.	INF-SID	Yes	DAR has been revised to clarify rationale for virtual workshops.
31	Consultation and Engagement	2.1.4.2	Languages for Interactive map	May be worth stating the map is not available in traditional languages, since other engagement techniques did include them.	Add ", but not traditional languages."	HSS	No	Language in DAR was deemed sufficient, no additional revision made.
32	2. Consultation and Engagement	2.1.4.10	PKFN	Surveys were completed with PKFN as part of the PDR engagement.	Revise to include survey's under Section 2.1.5.2 as they were part of the engagement done during the 2010-2012 PDR work.	INF-SID	Yes	DAR has been revised to provide additional context and clarification in regards to engagement efforts with PKFN/Wrigley.
33	Consultation and Engagement	2.1.5	INF engagement	Engagement completed in 2019 and 2020. Needs to be added as a subsection in this section.	Add text. GNWT to provide information on engagement completed.	INF-SID	Yes	DAR has been revised to integrate information regarding the project-specific engagement activities completed between 2018 and 2020.
34	2. Consultation and Engagement	2.1.5.3	What communities were engaged with at current time?	This section needs to present information more directly.	State specifically what communities were engaged with, and what relevant communities have not been engaged with. You can also present specific plans to engage with communities in the future.	HSS	Yes	DAR has been revised to provide additional context and clarification in regards to engagement efforts.
35	2. Consultation and Engagement	2.1.6.3	Mount Gaudet Access Road (MGAR) as part of MVH EA	Section 2.1.6.3 gives information about what was shared with the communities during August 2021 as part of DAR Scoping Engagement. The first bullet point under this section lists the GNWT's capacity building projects that are NOT part of the MVH Project viz. Mount Gaudet Access Road (MGAR) and three other projects. Because the bulleted list draws attention of the reader, sometimes even without fully reading chapter 2 or rest of the DAR, it is important to clarify that MGAR is now part of MVH EA	project and <insert appropriate="" as="" rationale=""> now it is rolled back into the MVH Project/EA.</insert>	ECC-PAB	Yes	DAR has been revised to eliminate ambiguity and provide clarity that MGAR is included in the scope of the MVH project.
36	2. Consultation and Engagement	2.1.6.4	Specificity in last row of the table	Should provide one example of how lessons learned from other projects have been integrated into the DAR.	There are indeed multiple examples of this across chapters, but it might be worth adding one example to allay concerns to those reading the early chapters first.	HSS	Yes	Upon additional consideration, language in DAR was deemed sufficient in that it reflected the discussions during engagement. No additional revisions were made.
37	2. Consultation and Engagement	2.1.6.6	GNWT response Table 2.6 Row 2.	Text in row 2 indicates: "Concern was expressed that diverse voices may not be heard at community engagement sessions" This doesn't really answer the concern.	If no more specific plans are in place, should at least add the GNWT is committed to hearing from a broad set of communities during its engagement process. The comment is wide enough that I'd consider expanding it with some detail. What was this person really asking?	HSS	Partially	DAR has been revised to include "Concern was expressed that diverse voices, such as youth, may not be heard at community engagement sessions". Upon additional consideration, language in other sections of the DAR capture the broad set of groups that are to be engaged during the project including Indigenous Governments, Indigenous organizations, residents and other affected parties in the Sahtu and Dehcho regions. No additional revisions were made.
38	2. Consultation and Engagement	2.2/1.5.1	Consultation; Developer's Vs Decision Maker's Consultation	For the Mackenzie valley Highway Project, GNWT is both Developer and Decision Maker. Developer's consultation and Decision Maker's consultation need to be differentiated.	Differentiate Developer's consultation from Decision Maker's Consultation when the GNWT is the Proponent/Developer. Developer's consultation is initiated by GNWT-INF, and the Decision Maker's consultation is initiated by the delegated federal minister viz. minister of ECC/their delegate on behalf of all responsible ministers. From INF: This should be addressed in the Whole of Government section in Chapter 1.	ECC-PAB	Yes	DAR has been revised as suggested to differentiate between the GNWT's Duty to Consult as "Responsible Minister" and "Developer"
39		2.3	SEIA	SEIA related commitments need to be added to the table.	Add commitments	INF-SID	Yes	DAR has been revised to incorporate the SEIA related commitments in Section 2.3.
40	Engagement 2. Consultation and Engagement	2.0	Page 2-1, 7th bullet lists the 2013 Sahtu Land Use Plan as one of the sources that provides guidance on project engagement.	It is noted that the Sahtu Land Use Planning Board completed a 5-year review of the Sahtu Land Use Plan, which has been approved by all approving parties to the Plan as of June 2023. This is now the most up-to-date version of the Plan (i.e., not 2013) and should be referred to going forward. Plan documents are available on the Planning Board's website	The Sahtu Land Use Planning Board has completed the 5-year Plan review, which is approved and reflects amendments of the 2013 version, and is the most current version of the Plan. This version should be considered going forward. It is noted the 2013 Plan, and specific text of the Plan is referenced in other parts of the draft DAR.		Yes	DAR has been revised to provide additional context and clarification in regards to SLUP integration.
41	2. Consultation and Engagement	Appendix 2B	Engagement efforts with PKFN	It is mentioned within Chapter 2 that GNWT-INF is committed to engaging with PKFN and continues to work with PKFN on opportunities to engage on the Project. Engagement log needs to better reflect PKFN engagement efforts.	within engagement log	ECC-PAB	Yes	DAR has been revised to provide additional context and clarification in regards to engagement efforts with PKFN/Wrigley.
42	3. Traditional Knowledge	Throughout Chapter	Consultation and/or Engagement	Use of the term 'other affected parties' is unclear if you are discussing consultation or indigenous based engagement. Are TK holders 'other affected parties'? Does not seem to align with the definition of TK.	Evaluate for the appropriate use of 'other affected parties' throughout the chapter and document. If distinctly Indigenous based engagement, suggest to remove "other affected parties from the statement in that section. A find search for 'affected' brought all the instances up.	EIA-IMPL	Yes	DAR has been revised to eliminate ambiguity and include a definition of "Affected Parties"

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43	3. Traditional Knowledge	3.0		"and integrate TK into the Developer's Assessment Report (DAR), where applicable." Consider revising this statementthe main reason for TK is to incorporate it into project design and mitigation measures, which should align with paragraph 3 below, bullet point #3 of section 5.2.1 (Page 5-4) as well as the last two sentences of section 4.1 (Page 4-1) of the Project Description.	Follow recommendation	INF-SID	Yes	DAR has been revised to provide additional clarity on how TK has been incorporated.
44	3. Traditional Knowledge	3.2.1	TK temporal boundaries, 25 years, 1997 onwards	Disagree with the reasoning that "Twenty-five years was chosen as the temporal boundary for considering effects of a change in the environment on current cultural and traditional use because knowledge about traditional practices or locales may be lost or may not be passed on if it goes unused for a generation" and "there are no pathways for the Project to result in effects to Oral Traditions (such as stories about Yamoria), or TK about caribou migrations in the 1950s." As previously, mentioned, caribou distribution in past decades is indeed a good indicator of caribou distribution in the future. However, if I understand correctly, 1997 is a 'cut-off' for published secondary source TK material and TK information used in preparation of	temporal boundaries for TK. Could instead say something like "TK information considered in the DAR has been obtained from published TK source materials dating back to 1997; TK information from other sources may date back farther."	ECC-Wildlife	Yes	DAR has been revised to provide additional clarity on how TK has been incorporated.
45	3. Traditional Knowledge	3.2.2.3			Be explicit that PKFN was supported by capacity funding as well as continue efforts from GNWT to	ECC-PAB	Yes	DAR has been revised to provide additional context and clarification in regards to engagement efforts with PKFN/Wrigley.
					ensure that their TK gets incorporated into the DAR.			
46	4. Assessment Methods	4.3.3.2/4.5.4		The TOR states that the temporal boundary should extend "until no potentially significantly adverse impacts are predicted". How is that requirement addressed in this section?	Clarify with GNWT, and revise text if necessary	INF-SID	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
47	4. Assessment Methods	4.6.1		Many of the projects in the PIL are either very old; or work is continuing but their permits are out of date. Can text be provided to outline why these projects are on the list? In addition, is there a timeframe that was used to filter the projects? It isn't ALL projects that have occurred (for example, construction of the Enbridge line isn't there). Some text to explain that would be beneficial. There is a comment in the DAR v2 comment table asking for a blurb about why communities are not included to be added in this section as well. Communities were included in the cumulative effects chapters though as past and present projects.	Revise text	INF-SID	Yes	DAR has been revised to add context and provide clarification on projects considered for inclusion or excluded from the project inclusion list.
48	4. Assessment Methods	4.6.1	Table 4.2 - PCAR to be classified under present projects	1	Move PCAR construction project from the list of "foreseeable" projects to "present" projects	ECC-PAB	Yes	DAR has been revised to include the Prohibition Creek Access Road Project under the Past and Present Projects.
49	4. Assessment Methods	4.6.1	for PCAR projects	project as S20S-001, which is the regulatory reference for the geotechnical investigation project for PCAR.	1) Provide the correct reference for PCAR construction project as S20E-005/S20L8-002; 2) insert a new row to include information regarding the geotechnical investigation project for PCAR, a past project - reference - S20S-001.	ECC-PAB	Yes	DAR has been revised to correct discrepancy and provide additional information on the previous geotechnical studies completed.
50	4. Assessment Methods	4.9		Text needs to be inserted in this section outlining that there will be collaboration with IGs, IOs and affected parties prior to finalizing the management plans.	Revise text	INF-SID	Yes	DAR has been revised to add context and provide clarification on future collaboration on development of management plans.
51	4. Assessment Methods	4.9		Socio-economic management plans not included. They should be included.	Revise text	INF-SID	Yes	DAR has been revised to correct discrepancy.
52	5. Detailed Project Description	Throughout Chapter	'	consultation or indigenous based engagement	Evaluate for the appropriate use of 'other affected parties' throughout the chapter and document. If distinctly Indigenous based engagement, suggest to remove "other affected parties from the statement in that section. A find search for "affected" brought all the instances up.	EIA-IMPL	Yes	DAR has been revised to eliminate ambiguity and include a definition of "Affected Parties"
53	5. Detailed Project Description	5.1		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Clarify whether the MGAR, is included within the scope of the project being assessed in the DAR by including it	ECC-PAB	Yes	DAR has been revised to eliminate ambiguity and provide clarity that MGAR is included in the scope of the project.

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54	5. Detailed Project Description	5.3.2	constructed vs to be constructed	, , , , , , , , , , , , , , , , , , , ,	Clarify whether the CCASAR and PCAR are constructed or not.	ECC-PAB	Yes	DAR has been revised to correct discrepancy.
55	5. Detailed Project Description	5.3.5	Great Bear River Bridge construction schedule	Says constructed between 2023-2027. Subject to regulatory authorizations, funding and final construction decision. Unlikely to begin prior to 2024.	Edit 2023-2027 to 2024-2027 in any locations that mention GBRB schedules.	INF-SID	Yes	DAR has been revised to correct discrepancy.
56	5. Detailed Project Description	5.4.5.1	Evaluation of ground ice	The development activities listed here for borrow sources (bottom of page 5-28 and top of page 5-29) don't include the evaluation of the ground ice content of the source in advance. Is this identified somewhere else, or was this investigative work already done in connection with preparing the volume estimates in table 5.4?		ECC-Land Management and Administration, NTGS	Yes	DAR has been revised as suggested to include ice content as a specific criteria for assessing suitability of potential borrow sources.
57	5. Detailed Project Description	5.4.11/Appendix 5A	Water source locations	Are these potential water source locations mapped?	Reference where these locations are mapped	INF-SID	Yes	DAR has been revised to include potential water source locations in map book.
58	5. Detailed Project Description	5.4.12	Waste Diversion	"Recyclable wastes and hazardous wastes will be backhauled for disposal and/or recycling at accredited facilities capable of accepting such wastes within or outside of NWT."	If location is referenced in WMP, reference that here. If not, provide further definition of where hazardous waste will be diverted or when waste facilities will be established as a receiver	INF-SID	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
59	5. Detailed Project Description	5.5.9.1	Volumes	The WMMP is developed to mitigate for 50 vehicles/day. Any consideration for additional measures in the WMMP when traffic increases to 200 vehicles/per	GNWT acknowledges that increases in the number of vehicles per day on the MVH has not been factored in. What is consultant' recommended approach to dealing with this comment in the context that it will impact the other chapters where # vehicles /per day are described. Would this be worked through the adaptive management plan.	INF-SID	Yes	DAR has been revised to include commitments that require the GNWT to review WMMP mitigation measures if the predicted annual average daily traffic (50 vehicles per day) is exceeded by 20 % in two consecutive years as part of Adaptive Management. Further refinement of monitoring and mitigations will be completed as the EA progresses, and through further refinement of the WMMP.
60	from ch.1	5.4.3	Permanent Structures	Note that communities engaged suggested temporary structures be able to be converted to permanent dwellings.	This may make a good footnote.	INF-SID	Yes	DAR has been revised to better reflect discussion of alternative uses for camp facilities (post construction).
61	6. Authorizations, approvals and agreements	6.1	Correct Names/entities	Table 6.1 - The authority for the Sahtu Settlement Lands in the Tulia/Norman Wells District is the Tulita District Land Corporation Ltd. Under Authority for this same item, change 'Tulita District' to 'Tulita/Norman Wells District'. Suggest verifying (if not already done) whether the authorization is a Quarry Permit versus some other type of document, such as a lease, etc.	Make changes to the name of authority and District and possibly, the authorization.	EIA-IMPL	Yes	DAR has been revised to correct deficiencies as suggested.
62	6. Authorizations, approvals and agreements	6.1	Correct Names/entities		Recommend verifying whether a letter of approval is required from each organization and the correct name of the organization.	EIA-IMPL	Yes	DAR has been revised to correct discrepancy.
63	6. Authorizations, approvals and agreements	6.1	Correct Names/entities	Table 6.1 last Row. Need verification, as the Norman Wells Land Corporation is not listed on the COT as the owner of SSL. Further, add the word 'Ltd' for the TDLCL. the Activity is described as 'Establishment of a permanent roadway' though that does not necessarily correlate to acquiring ownership to the land, which we think is wanted. i.e you can have a long term quarry on SSL by way of a lease or other types of land tenure.	Recommend clarifying if its land ownership that is sought for this item.	EIA-IMPL	Yes	DAR has been revised to correct discrepancy.
64	6. Authorizations, approvals and agreements	6.3	General comment on conformity with Sahtu Land Use Plan	Regarding conformity with the Sahtu Land Use Plan, the draft DAR could benefit from clearer analysis to demonstrate how the proposed project (and proposed mitigation measures) is consistent with the values to be protected/respected/taken into account in Conservation and Special Management Zones that the proposed routing traverses and	Recommend being clearer with analysis to demonstrate how the proposed project (and proposed mitigation measures) is consistent with the values to be protected/respected/taken into account in Conservation and Special Management Zones that the proposed routing traverses and demonstrating that conditions applying to conservation zones as per CR#1 related to 'transportation corridor and infrastructure development' are being met.	ECC-LUPU	Yes	DAR has been revised to provide additional context and clarity on conformity with SLUP.

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65	6. Authorizations, approvals and agreements	6.3	Sahtu Land Use Plan	First paragraph says the project is subject to the 2013 version of the SLUP. Note that the Sahtú Land Use Plan's ("SLUP") 5-Year Review Amendments are in effect as of June 7, 2023. The 5 year review amendment package that was approved in June 2023 is available here: https://registry.mvlwb.ca/SLUPB/Shared%20Documents/5- Year%20Review/slup_zone39_addendum_5year-reviewmay31_2021.pdf Examples of changes resulting from 5-year amendment: 2.4. Application to Land Use Activities and Applicants — Clarified how the plan applies to Government Access provisions in S. 23.1 of the Sahtu Dene and Métis Comprehensive Land Claim Agreement (SDMCLCA). CR #2 - Community Engagement and Traditional Knowledge (p.82) - This CR has been updated based on feedback from a regulator regarding the necessity of applicants to engage community members on the proposed activities as well as the potential impacts of the proposed activities. Clarity is also provided regarding the definition of community organizations Zone 32, Petinipah (Bear Rock) Conservation Zone - The SLUPB refined the zone based on elevation contour lines to capture the extent of the hill. These changes were confirmed with the Tulit'a District Land Corporation on February 20, 2020. At present, the amended SLUP is undergoing graphic design, and will be available sometime during the summer of 2023.	The DAR needs to demonstrate how the Project will adhere to the Plan prior to construction.	ECC-LUPU	(YES/NO/PARTIALLY) Yes	DAR has been revised to provide additional context, references, and clarity on how the project conforms with SLUP.
66	7. Assessment of Alternatives	7.3.2.2.6	Paragraph 2	"The short segment construction alternative and the project construction approach do not differ in terms of permanent changes to the socio-economic environment once the Project is constructed."	Would the benefits gained from the greater business and employment opportunities of the short segment approach not have greater permanent socio-economic changes? Would having a road sooner not lead to greater chance of minerals projects being developed in an earlier commodity cycle? Would having a road sooner not lead to a greater chance of oil and gas development? These questions are for consideration. If the answers are no or too unknown to change our analysis, no follow-up is required regarding this comment.	ITI	Yes	DAR has been revised to add clarification on realization of socio-economic benefits associated with the project construction approach.
67	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	Throughout Chapter	Clarity Required	Vulnerable Community Members, vulnerable populations, other vulnerable, are used through the chapter inconsistently to refer to the same group of people	The recommendation is for additional analysis to be included to show how the project conform to the LUP. Ultimately, it is up to INF to satisfy regulators that the project conforms with the land use plan.	INF-SID	Yes	DAR has been revised to add definition of "vulnerable" and ensure consistency in use.
68	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	8.2	Reference to Indigenous communities versus communities	1st para, 1st sentence. The title for this section references local social and economic considerations which would seem to imply that the public at the local level (and non-indigenous people) would be engaged. The first sentence suggests a narrower engagement with only Indigenous interests. Would suggest revising to reflect that all communities, public and Indigenous stakeholders were engaged.		EIA-IMPL	Yes	DAR has been revised to provide additional context and clarification in regards to engagement.
69	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	9.13.5	Summary of analysis incomplete - assessment of cumulative effects	Section 8.2.3.2 summarizes the Project's effect on local community health services, but appears to be missing information on the effects to other types of social infrastructure outlined earlier in this section (i.e. protection and emergency services).	missing information.	ECC-PAB	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.

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70	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	8.2.6	Maximized Indigenous Employment	The title suggests that the section will address Indigenous employment in addition to local employment, however the section does not address or even mention Indigenous employment nor activities that would support it specifically.	specifically support Indigenous employment, which	EIA-IMPL	Yes	DAR has been revised to better reflect mitigations specific to Indigenous employment.
71	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	8.2.9	Mitigations for adverse effects on access and availability of traditional foods	It is not clear how assessing the presence of wildlife addresses adverse effects on access or availability of traditional foods. Monitoring of wildlife presence indicates if traditional food is likely available or not. The WMMP also doesn't assess the presence of traditional foods such as fish or berries, as they are outside the scope of "wildlife" as defined under the Wildlife Act. Having monitors assess presence of wildlife during Project activities will help mitigate impacts to wildlife directly, only if detection of presence of those wildlife leads to implementation of other mitigation measures such as stopping traffic, delaying blasting, protecting a nest, etc. If this is the case then indirectly you could say it would help to address negative impacts to availability of traditional foods. It is unclear how it address impacts to access to traditional food.	Clarify explicitly how the proposed mitigation measures included in the WMMP will address availability and/or access to traditional foods. Discuss whether berries and fish would be captured in other management plans.		Yes	DAR has been revised to provide additional context and clarify how the WMMP will be used to mitigate adverse effects on access and availability of traditional foods.
72	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	8.2.10	Missing mitigation proposed to address adverse effect on capacity of local educational institutions.	Section 8.2.9, par 2 states: "The project is anticipated to have an adverse effect on the capacity of local educational institutions to meet the demand for education and skills training, but after mitigation is applied, the residual effect is anticipated to be not significant. On review of section 8.2.9.1 it is not explicitly clear what mitigation is proposed to address local educational institution capacity.	Clarify in section 8.2.9.1 what mitigation is proposed to address the project's adverse effect on local educational institution capacity.	ECC-PAB	Yes	Upon additional consideration, DAR includes proposed mitigations for adverse effects on local institution capacity in Section 8.2.10.2, no additional revisions made.
73	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	8.3.3	Summary of the findings of assessment of indirect effects on barren-ground caribou	Section 8.3.3. states that "The indirect effects of the Project on barrenground caribou from stressors such as increased access have been assessed." There is no summary of the findings of that assessment, which readers would expect to see here in the Summary of KLOI.	Please add a summary of the findings of assessment of indirect effects on barren-ground caribou.	ECC-WMD	Partially	DAR has been revised to clarify that the indirect effects of the Project on barren-ground caribou from stressors such as increased access have been assessed and consider the future possibility of range expansion where there might be a greater overlap with the Project. Updated metrics have been provided in Chapter 10.
74	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	8.3.5	Additional analysis	"Available GNWT collar data indicate the presence of boreal caribou in certain parts of the PDA in all seasons, suggesting the possibility that crossings may have occurred; however, it is not certain if the current MVWR acts as a barrier to their movements. The GNWT is completing further analysis of available data." Who is carrying out this analysis and when will it be completed? If this information is not included in the DAR it will certainly come up in an Information Request.	Can we provide a statement about when this additional analysis will be shared during the EA process?	ECC-WMD	Yes	DAR has been revised to provide additional context and clarify anticipated timing of supplementary filing for Boreal Caribou Movement Analysis.
75	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	8.3.7	Mitigation measures for wildlife-vehicle collisions	During operations phase of the MVH, it is stated that vegetation control on the ROW will be one of the mitigation measures, but there is no mention of installing signage at potential wildlife crossing areas (e.g areas adjacent to or through moose pastures). Is wildlife signage one of the proposed mitigation measures?	Add installation of wildlife signage at key areas as one of the mitigation measures.	ECC-WMD	Yes	DAR has been revised to include wildlife signage as a proposed mitigation measure where appropriate.
76	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	8.3.11	Sensory effects to winter seasonal traffic	Caribou and moose tolerance of exposure to sensory effects of winter seasonal traffic: "Based on collar information and moose surveys, boreal caribou and moose have been recorded near the MVWR during all seasons, including during its operation in winter. This indicates that boreal caribou and moose may currently tolerate the exposure to the sensory effects of winter seasonal traffic." The conclusion that presence of moose and caribou near the current winter road indicates tolerance of sensory effects of winter seasonal traffic seems very speculative. Can the statement be backed up by any data comparing health of caribou/moose that use areas near the road to those that live far from the road?	Avoid including speculative statements or conclusions that don't have data or citations from existing literature to back them up. Might be better instead to acknowledge that it is currently unknown.	ECC-Wildlife	Yes	DAR has been revised to provide clarity that observations suggest that the MVWR is not a complete barrier to moose and caribou movements, however, it's possible that there has been a reduction in movement compared to the habitat prior to the MVWR.

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77	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	9A.2.2	IMA source	1. Two sentences refer to the DFN IMA. One reference is to 2016 and one reference is to 2019. It is unclear what these references are pointing to. The Interim Plan is being developed pursuant to the 2001 IMA. 2. It is unclear why the reference to the Plan is followed by inclusion of a partial description of the IMA highlighting the provision on sale of land as it seems unrelated to the bullet and is confusing.	Check reference. The IMA was signed in 2001 (available online), not 2016 or 2019. Unclear what the 2016 and 2019 references are to. Suggest considering removing the description of the IMA here and/or moving to a different place, or revising the bullet to simply state that 'the Dehcho Land Use Plan is being developed pursuant to the 2001 DFN IMA.'	ECC-LUPU	Yes	DAR has been revised to address discrepancy, and clarify status of DLUP.
78	Chapter 8 - Summary of Assessment of Key Lines of Inquiry	Throughout	SLUP version	As noted in comments on Section 6, the Sahtu Land Use Plan was amended as of June 2023. A review of the amendments and an update of the reference is required	Update whole of MVH DAR reflect the current version of the Sahtu Land Use Plan (2023). Review changes to ensure project conforms with current version of Plan	ECC-LUPU	Yes	DAR has been revised to provide additional context and clarification in regards to SLUP integration.
79	Chapter 9: Socio- Economic Impact Assessment	9.1.1	Introduction	Suggest adding the prediction confidence in the summary of assessment section.	Provide information	INF-SID	Yes	DAR revised to include summary of prediction confidence in summary of assessment.
80		Throughout Chapter	Interconnectedness Graph	Impact Assessment of within community ties is insufficiently addressed. This concern is actually brought up in Section 9.5.4.4, and needs to be expanded. Current follow-up assessment of disruption of connection between within local community members was seen with TASR, and likely to members of individual communities spending more time and effort outside of their town of residence. HSS recommends the addition of additional sections regarding disruption of within community ties in Sections 9.1.5 (Diagram), 9.2.4.1, 9.4, 9.5.4, 9.13.2.3, 9.13.7.1, and 9.16.2.3.	Change bubble to "Increase in Inter-community social Ties"	HSS	Partially	DAR has been revised to incorporate additional context on the assessment of community and social ties, including lessons learned from the TASR project. Effects pathways have also been updated and a reference has been included in the cumulative effects section.
81	Chapter 9: Socio- Economic Impact Assessment	9.2.2.2	Clarity and reference	Confirm which departments were involved. If these are the ones in Appendix 9A (pg. 8A.17), there are 10 departments, not 11. "Regulatory and stakeholder engagement consisted of meetings and interviews with senior staff of eleven GNWT departments and two agencies, each of which have mandates related to one or more of the five socio-economic VCs. This engagement also included representatives of federal departments and agencies such as Parks Canada, and the RCMP-GRC. " Also - several of the departments engaged are not regulators. Suggest revising the header.	Amend number of government departments (there are 10 not 11) and identify the ones with mandates related to Socio-Ec Vcs.	INF-SID	Yes	DAR has been revised to improve accuracy and identify departments with socio-economic mandates.
82		9.2.2.2, Table 9.2	Restricting recreational and non-traditional hunting activities	Page 9.15: "The GNWT will develop and implement a WMMP that will include measures related to monitoring of wildlife levels, and some measures intended to mitigate adverse effects of the Project on wildlife by restricting certain types of recreational and non-traditional hunting activities." For restricting certain recreational activities, this is technically true because the WMMP states public access to borrow sites and quarries and associated access routes will be restricted and contains setback distances for pedestrians and ATVs for certain bird species. It is unclear if the mitigations people would look for are within the scope of the WMMP. It is unclear what restrictions on non-traditional hunting is being referred to. The WMMP is only mentions prohibiting project personnel from hunting while housed in work camps.	The DAR should not include any statements about potentially restricting recreational activities or non-traditional hunting beyond those already identified for Project Staff during the construction phase. Additional engagement with wildlife co-management boards and IGOs will inform any new restrictions on recreational activity or resident (non-traditional) hunting activities once the MVH opens for public use. Revise the sentence to: "The GNWT will develop and implement a WMMP that will include measures related to monitoring of wildlife levels, and some measures intended to mitigate adverse effects of the Project on wildlife by restricting certain types of recreational and prohibiting hunting activities by Project staff during the Construction phase."		Yes	DAR has been revised as suggested to provide clarification that proposed restrictions for recreational activities and hunting are specific to project staff during construction.
83	Chapter 9: Socio- Economic Impact Assessment	9.2.4	Effect pathways qualification	Some effect pathways from Tables 9.3 to 9.7 (tables and text) are expressed in terms of "change" while others are qualified as "increase", "decrease", "reduced" or "improved". However, when assessing the residual effects, these effects fall into either a negative or positive category. It seems like describing the effect pathways as a "change" is a bit too vague and might be unclear for the reader.	Recommend keeping a consistent approach when qualifying the effects pathway. This comment was in V2.	INF-SID	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.

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84	Chapter 9: Socio- Economic Impact Assessment	9.2.4.1	Additional Effect - Change in Community/family and social ties	Impact Assessment of within community ties is insufficiently addressed. This concern is actually brought up in Section 9.5.4.4, and needs to be expanded. Current follow-up assessment of disruption of connection between within local community members was seen with TASR, and likely to members of individual communities spending more time and effort outside of their town of residence. HSS recommends the addition of additional sections regarding disruption of within community ties in Sections 9.1.5 (Diagram), 9.2.4.1, 9.4, 9.5.4, 9.13.2.3, 9.13.7.1, and 9.16.2.3.	Include this effect pathway. For all comments referencing effect pathways, considering adding to all tables and sections where relevant.	HSS	Partially	DAR revised to incorporate additional context on the assessment of community and social ties, including lessons learned from the TASR project. Effects pathways have also been updated and a reference has been included in the cumulative effects section.
85	Chapter 9: Socio- Economic Impact Assessment	9.2.4.1	Unit of Measurement - Public Safety	Given issues with medical transportation for workers and drivers on the new road, it is important both to track traffic accidents, but also fatalities and injuries.	Include measurement unit for Number (count) of traffic fatalities, and Number (count) of traffic injuries.	HSS	Yes	It was confirmed that data is not available to support inclusion of the number of traffic fatalities, and number of traffic injuries. No additional revisions were made.
86	Chapter 9: Socio- Economic Impact Assessment	9.2.4.3	Effect and Measurable Parameter - Change in employment and income	GNWT responses to engagement feedback are often repetitive/generic answer. The purpose of this table was to "bookend" the comments provided during engagement and should be specific responses.	Increase specificity of the GNWT response in order to properly bookend.	HSS	Yes	DAR has been revised to provide greater detail where appropriate with regards to specific responses to feedback received through engagement.
87	Chapter 9: Socio- Economic Impact Assessment	9.2.4.3	Change Effect Pathway - Change in cost of living and consumer prices	Because of loss of the Nutritional Subsidy, as presented in this document, there wasn't strong evidence of a reduction in cost of living. So should be changed to "Change in" rather than "Reduced"	"Change in" rather than "Reduced" or provide additional context to support reduced.	HSS	Yes	DAR has been revised as suggested to clarify "change in" cost of living, as opposed to "reduced" cost of living where appropriate (i.e. where it is unknown if the cost of living will be reduced, the word change is used).
88	Chapter 9: Socio- Economic Impact Assessment	9.2.4.4	Unit of Measurement - Change in housing and accommodation		Should include measurement such as house price, house price relative to income, others.	HSS	Yes	It was confirmed that data is not available to support inclusion of the measurements suggested. No additional revisions were made.
89	Chapter 9: Socio- Economic Impact Assessment	9.8	Unit of Measurement - Change in social, public, institutional infrastructure and services	No units of measurement are listed.	Should include specific units such as medical personal per population, funding per patient etc. Tracers per public, average internet speed, number of internet disruptions etc.	HSS	Yes	It was confirmed that data is not available to support inclusion of the measurements suggested. No additional revisions were made.
90	Chapter 9: Socio- Economic Impact Assessment	9.3.2.1	Missing info	"Colville Lake has a health cabin but it does not have either a fire hall or its own RCMP detachment".	Describe what the health cabin is?	INF-SID	Yes	DAR has been revised to provide additional context and clarify what is referenced when discussing the "Health Cabin" in Colville Lake.
91	Chapter 9: Socio- Economic Impact Assessment	9.5	Mitigations for decreased access to harvesting areas or traditional foods	Page 9.29: "For adverse project effects on wildlife that leads to decreased access to harvesting areas or traditional foods, the GNWT has committed to the development and implementation of a WMMP that includes measures intended to mitigate adverse effects on wildlife." This statement might be misleading. It's not made clear how decreased access to a harvesting area is addressed in the WMMP.	Provide specific examples from the WMMP of the mitigation measures that address decreased access to harvesting and traditional foods	ECC-Wildlife	Yes	DAR has been revised to provide additional context and clarify how the WMMP will be used to mitigate adverse effects on access and availability of traditional foods.
92	Chapter 9: Socio- Economic Impact Assessment	9.5.2.1.1	Norman Wells Engagement Unaddressed	Norman Wells suggested construction camps be repurposed as housing once construction complete. No reference was made to this subsequently.	Plans for construction camps to be repurposed should be given, or reasoning for rejection of this suggestion should be given.	HSS	Yes	DAR has been revised to better reflect discussion of alternative uses for camp facilities (post construction).
93	Chapter 9: Socio- Economic Impact Assessment	9.5.2.1.2	Positions	In this section direct / indirect and induced PYs are described. Clarify what this means and why this is used rather than positions (similar to 9.7.2). Staffing is also discussed in 9.8.2.1.1 and the numbers aren't consistent with what is outlined. The information needs to be consistent with what is provided in Chapter 5.	Ü	INF-SID	Yes	DAR has been revised to ensure consistency in reporting of employment figures, and to distinguish between construction employment and operation employment.
94	Chapter 9: Socio- Economic Impact Assessment	9.5.3.1.1	Definition	Non-residents need to be defined - are these people who aren't from LAA and RAA communities? Northerners?	Clarify in text.	INF-SID	Yes	DAR has been revised to include definition of "Non-Resident"
95	Chapter 9: Socio- Economic Impact Assessment	9.5.4.4	Significance of Adverse Effects on Change in Community/Family and Social Ties		Provide more specific argument as to why Adverse effects mentioned in 9.5.4.4 deemed insignificant.	HSS	Partially	Upon additional consideration, this specific determination of significance is consistent with assessment definition, and the assessment of residual effects. No additional revisions were made.
96	Chapter 9: Socio- Economic Impact Assessment	9.5.5		Examination of the effect of the road on the traditional economy and harvesting remains not fully consistent with TASR findings. Mostly a phrasing issue and lack of detail. The MVH SEIA mostly suggests that traditional harvesting will increase through increased access to traditional resources (9.54, 9.58, 9.59, 9.125, 9.170, 9.192). The TASR project suggests increased non-traditional employment and good options will reduce participation in the traditional economy (including harvesting). It also states that while the road might increase harvesting in across the region, purely local harvesting knowledge may diminish. However, as in the TASR, the MVH SEIA does suggest a long term reduction in the availability of traditional foods (9.188 and others), but does not justify its reasoning. In all, TASR suggests that there are more risks than benefits identified for harvesting and justifies it, whereas MVH comes to a final conclusion of a negative effect without justifying its reasoning.	Create consistency with TASR SEIA by including specifics on reduction of traditional food gathering.	HSS	Partially	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.

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97	Chapter 9: Socio- Economic Impact Assessment	9.5.5.1	Changes in Food Security needs work to bring in line with TASR.	Based on TASR, reduced availability of traditional foods should change to reduced availability and use.	On this page change "reduced availability" to "reduced availability and use". (Note that they may be referring only to the construction section, but if that's the case it should be in the construction section.	HSS	Yes	DAR has been revised to better reflect "reduced access and availability of traditional foods.
98	Chapter 9: Socio- Economic Impact Assessment	9.5.5.1.2	Nutrition North	Adequacy of Nutrition North description	The description of what the Nutrition north program is should be made early in the paragraph following the bolded sentence on the page rather than near the bottom of the page. Confirm what is said here is consistent with what is presented in Section 9.7.5.1.2	INF-SID	Yes	DAR has been revised as suggested to ensure Nutrition North program has been appropriately referenced.
99	Chapter 9: Socio- Economic Impact Assessment	9.5.5.4	Determination of Significance for Change in Food Security	Justification of significance in this case should include more specific references to relevant sections in Chapter 11 and 19. (Need not be super detailed, just reference to summary sections with significance). Use section 9.5.8.1.1 as a reference for this. This would improve section 9.7.6.1.2 indirectly which referenced 9.5.5 while stating the exact same thing).	Include more specific references to important sections of 11 and 19.	HSS	Partially	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
100	Chapter 9: Socio- Economic Impact Assessment	9.5.7.2	Mitigations for impacts from air emissions or noise levels	Some of the examples of mitigations for air impacts and noise have no clear link to mitigate these impacts. For example: •Wildlife monitors will assess for the presence of wildlife on or near the PDA during project activities, in accordance with the WMMP> Not sure the WMMP says whether presence of wildlife leads to other mitigation measures to reduce the impact of noise? •The GNWT will work with the Sahtu Renewable Resources Board (SRRB) and other resource managers to address uncertainty regarding the effects of increased access created by the Project on harvested resources in the study areas. This would include monitoring of harvest that can be used to identify the need for management actions to be taken by the appropriate resource management organization." -> This has nothing to do with noise or dust. •Project personnel will be prohibited from hunting and fishing while housed in work camps for the Project. Personnel will not feed, harass, or hunt wildlife while working on the Project." -> How does prohibiting hunting will prevent adverse impacts from air or noise levels?		ECC-Wildlife	Partially	DAR has been revised as suggested to remove reference to mitigations not specific to impacts from noise and dust. Further refinement of monitoring and mitigations will be completed as the EA progresses, and through further refinement of the WMMP.
101	Chapter 9: Socio- Economic Impact Assessment	9.5.9.2	Potential Mitigation for Public Safety	In the past, HSS has recommended including a statement that the contractor should be required to provide medical transportation services to its own workers. This may be an effective mitigation technique given no other ambulance services will likely be available locally.	Add a section in the mitigation section stating the contractor be required to provide its own medical transportation services.	HSS	Yes	DAR has been revised to include that the GNWT will require contractors provide medical transportation services for own workers and that this will be reflected in the Emergency Response Plan.
102	Chapter 9: Socio- Economic Impact Assessment	9.5.9.2	Emergency Services	"All plans will be developed in collaboration with communities and will build on existing programs and services that the GNWT currently offers across the NWT."	Note - Other than highway safety and enforcement there are no existing programs and services that would be relevant to the establishment of GA and HR services where they do not exist already. Tying this section back to the NWT Road Safety Plan is good.	INF-SID/MACA	Yes	DAR has been revised to add a qualifier to acknowledge that not all GNWT programs and services are available across the entirety of the NWT.

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103	Chapter 9: Socio- Economic Impact Assessment	9.5.10.1	For those residents who are low income or on income assistance, their ability to participate in education and skills training opportunities that would make them eligible for certain employment opportunities may be limited by a lack of funds or necessary prerequisites (e.g., high school diploma)or with specialized training (e.g., in the trades). Additionally, those who are the parent in a lone parent household may also have particular barriers to participate in education, skills, training or employment opportunities unless additional supports are available (e.g., childcare, provision of a living allowance)	books and required materials, travel, living allowance and childcare"	Recommend adding information about ECE funding to eligible clients to support access to short-term skill development and upgrading programs	ECE -LDS	Yes	DAR has been revised to clarify GNWT support for accessing short-term skill and development, and upgrading programs.
104	Chapter 9: Socio- Economic Impact Assessment	9.5.10.4	Determination of Significance isn't clearly defined	In absence of residual effects, as outlined on section 9.5.10.3.1, the determination of significance should be qualified appropriately (not significant) rather than not qualifying it at all which could lead to confusion on the subsequent tables.	Recommend reviewing and clarifying. Also check sections to confirm consistency	INF-SID	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
105	Chapter 9: Socio- Economic Impact Assessment	9.6.2.1	Changes in the level of education are expected to be highly time sensitive in that the delivery of educational programming and training, and subsequent increases in education levels, will be realized at times relative to the Project's life cycle. For example, educational programming and training must be provided close to the start of the Project during the construction phase to adequately support the Project, and position community members to take advantage of employment opportunities. However, residents from Norman Wells and Tulita suggested that contractor training begin at least a year before construction	V2 Comment: "For some apprentice able trades (for example, Heavy Equipment Technician), training would need to start four years before needed on the project."	Recommend adding and revising section	ECE -LDS	Yes	DAR has been revised to provide added context on the interdependencies of training and employment, and detail on the training and employment plan that is part of the community readiness strategy.

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106	Chapter 9: Socio- Economic Impact Assessment	9.7	Mitigation of adverse effects on ability to participate in traditional economy activities	Page 9.105: "The GNWT will develop and implement a WMMP that includes measures related to maintaining dialogue with Indigenous communities about any adverse effects that the Project may have on wildlife that could in turn have an adverse effect on the ability of LAA and RAA communities to participate in activities associated with the traditional economy." This currently isn't in the WMMP and will need to be added. Agree that the WMMP should include measures related to mitigating adverse impacts on wildlife, but "maintaining dialogue with Indigenous communities about any adverse effects that the Project may have on wildlife that could in turn have an adverse effect on the ability of LAA and RAA communities to participate in activities associated with the traditional economy" should be addressed by a MVH corridor working group, similar to what we have for TASR.	Measures related to maintaining dialogue with Indigenous communities about any adverse effects that the Project may have on wildlife that could in turn have an adverse effect on the ability of LAA and RAA communities to participate in activities associated with the traditional economy should be included within the scope or the purpose a MVH Corridor Working Group similar to the one we have for TASR. The WMMP could reference the role of the Working Group in addressing this issue.	ECC-Wildlife	Yes	DAR has been revised to ensure alignment between measure related to maintaining dialogue with Indigenous communities, role of MVH working group and the WMMP.
107	Chapter 9: Socio- Economic Impact Assessment	9.8	Mitigations info missing	Table 9.18 - Change in 'public infrastructure and services' effect is missing mitigations for roadways, telecom, and electricity	Provide mitigation measures to cover all infrastructure mentioned under the Effect Name column	INF-SID	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
108	Chapter 9: Socio- Economic Impact Assessment	9.8.3.1	Clarification on effect pathway	"Temporary disruption to emergency and protective services (e.g increase workforce population and/or accidents during construction)". Also - the use of "Fly-in communities" when discussing LAA and RAA communities - this isn't used in other sections of the DAR.	This statement is not clear. The increased workforce is not the direct cause of the disruption, however, it is the reason for an increase in the demand of these services. Recommend rewording to "Increase demand of emergency and protective services (e.g increased workforce population and/or accidents during construction)"	INF-SID	Yes	DAR has been revised to include definition of "Isolated Community", and ensure consistency in use throughout.
109	Chapter 9: Socio- Economic Impact Assessment	9.8.3.2	Mitigations - emergency services during operations and maintenance	The highway design features and safety measures outlined in Chapter 25 (pages 25-27 to 25-28) and 27 (Summary of Commitments) as well as existing GNWT highway safety programming and services should be examined to consider whether they can be referenced and incorporated into section 9.8.3.2 as they are also intended to help mitigate an increase in traffic accidents and the associated socio-economic impacts.	Recommend this information be examined and included where appropriate.	ECC-PAB	Yes	DAR has been revised to ensure mitigations are appropriately referenced.
110	Chapter 9: Socio- Economic Impact Assessment	9.8.4.2	Obtain approval and agreement	Clarification on whether the referenced "agreement" is to include the fees for service, and associated costs for disposal of waste, and potable water services to be paid to the respective community governments for access to community public infrastructure.	Revise text.	MACA	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
111	Chapter 9: Socio- Economic Impact Assessment	9.8.4.3	Mitigation clarification	Section 9.8.4.2 says no mitigations were proposed (comment above). However, on the Project Residual Effect says that "even with the mitigations" and "Following the implementation of the proposed mitigation measures described in section 9.8.4.2" Both statements are contradictory because no mitigations were proposed	Recommend reviewing and addressing both sections, as well as the correspondent table should mitigations are included	INF-SID	Yes	DAR has been revised to eliminate ambiguity.
112	Chapter 9: Socio- Economic Impact Assessment	9.9.2.1.1	Consistency	Info presented in this section overlaps info documented in Chapter 6 and other chapters (Land ownership). Insert reference to those sections and confirm information is consistent. For example - the Dehcho Land Use Plan isn't mentioned in other sections (As its draft)	Confirm text is accurate	INF-SID	Yes	DAR has been revised to ensure consistency.
113	Chapter 9: Socio- Economic Impact Assessment	9.9.2.1	Additional info on TWG	Last paragraph talks about the minutes from Tłįchǫ Working Group - needs additional statement to say something like the GNWT is integrating lessons learned from this Working Group into the Project. Also - tourism will be increased in Wrigley with the connection of the road, revise text in paragraph to reflect.	Revise text.	INF-SID	Yes	DAR has been revised to provide additional context on learnings from Tłıcho Working Group, and clarify tourism is anticipated to increase in Wrigley.
114	Chapter 9: Socio- Economic Impact Assessment	9.9.3.1.2	clarification needed	The term "licensed tourism outfitters" is used. This is confusing two different things. There are "licensed tourism operators" and holders of "outfitter licenses" under the Wildlife act. Most wildlife outfitters would need both, but tourism operators would only need a "tourism operator license" unless they triggered the need for an outfitter license under the wildlife act.	use the word operator instead of outfitter in this context because of the term outfitter being associated with the Wildlife Act which is not the case here.	ITI	Yes	DAR has been revised to ensure appropriateness and consistency in the use of terms "Outfitters" and "Tourism Operators"
115	Chapter 9: Socio- Economic Impact Assessment	9.9.4.1.1	More information needed	Bear rock alignment option needs to be discussed in the second paragraph and a reference to the section in Chapter 5 where this is presented.	Revise Text	INF-SID	Yes	DAR has been revised to include additional reference to Bear Rock Alignment as suggested.
116	Chapter 9: Socio- Economic Impact Assessment	9.9.5.1.2	clarification needed	the last sentence of the second paragraph, blue highlighted should be Oil and Gas Rights and Mineral Rights	recommend adding oil and gas rights not just mineral rights when referring to development opportunities in both of these sectors	ITI	Yes	DAR has been revised as suggested to include Oil and Gas rights for potential development opportunities.

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117	Chapter 9: Socio- Economic Impact Assessment	9.9.5.1.2	Change in topic mid paragraph	the sentence "Thus far no information has been obtained on the possible influence of an operational all-season Project in the LAA on the forestry industry." is out of place in the middle of a paragraph about minerals.	Either the wrong industry is quoted here or it needs to be moved to its own section.	ΙΤΙ	Yes	DAR has been revised to distinguish forestry industry from mineral development.
118	Chapter 9: Socio- Economic Impact Assessment	9.13.3.1	Clarity	Why are there not more checkmarks on the effect - many of these projects are ongoing and would result in a change? This comment is appropriate for the other VC cumulative effects tables in the SEIA chapter. I am not sure why Canyon Creek is - because construction is completed.	Confirm and revise, if necessary	INF-SID	Yes	DAR has been revised to eliminate ambiguity.
119	Chapter 9: Socio- Economic Impact Assessment	9.15.1	Clarity	Considering the exception identified for the approach in the sentence below, is it correct to say the approach is non prescriptive? Or is it partially prescriptive? "2. At this point in the process, the approach to follow-up and monitoring is non-prescriptive (with the exception of the S. 8.15 'Mitigation Strategies and Associated GNWT Commitments', which contains a number of strategies / commitments directly relevant to monitoring and follow-up).		INF-SID	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
120	Chapter 9: Socio- Economic Impact Assessment	9.16.2.1	GNWT Departments	Include INF on all of the working groups mentioned in the mitigations.	Revise	INF-SID	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
121	Chapter 9: Socio- Economic Impact Assessment	9A.2	Reference to the SDMCLCA and DFSGA	Has an assessment been done to determine relevancy of the SMDLCA and Deline FSGA as a Regulatory or Policy Setting source that should be listed? The Deline Got'in Government, under the DFSGA, have regional and municipal type authorities and policies that may be applicable for being listed.	11 /	EIA-IMPL	Yes	DAR has been revised where appropriate to include references and ensure consistency and alignment with the SDMCLCA and the DFSGA.
122	Chapter 9: Socio- Economic Impact Assessment	Appendix Table 9A.1	Non-Traditional Land-Use	Bullet one is missing some nuance on the regulation of the subsurface both now and in the future once the MRA comes into force. The text provide regarding subsurface administration is misleading.	The text needs to be edited to reflect the realities of subsurface administration, including the PRA and the MRA (once in force)."	ІТІ	Yes	DAR has been revised to better reflect subsurface regulation and administration.
123	10. Caribou and Moose	Throughout the chapter	Barren-ground caribou	Considerably more information on relevant studies of barren-ground caribou should be included. References should be updated to include last population estimate for the Bluenose-East herd, most recent wolf management report from GNWT, and harvest limitations for Bluenose-East herd updated to 2019, including harvest limitation in NU as it also affects this herd. Summarize some of the recent management actions that have happened, like hearings under the WRRB, SRRB, and NWMB in 2016; the Deline community-based caribou management plan for the BNE herd; the Kugluktuk HTO community-based caribou management plan for this herd; the 4 years now of wolf reduction program in the N Slave region for the Bathurst and BNE herds	Summarize and/or refer to some of the recent management actions that have happened: - hearings under the WRRB, SRRB, and NWMB in 2016; - the Deline community-based caribou management plan for the BNE herd; - the Kugluktuk HTO community-based caribou management plan for this herd; - the 4 years now of wolf reduction program in the N Slave region for the Bathurst and BNE; - last population estimate for the Bluenose-East herd; - harvest limitations for Bluenose-East herd updated to 2019, including harvest limitation in NU as it also affects this herd.	ECC-Wildlife	Yes	DAR has been revised to include additional information about current monitoring and management actions for BNE caribou.
124	10. Caribou and Moose	n/a	WMMP Sub Working Group	Similar to the sub-working group proposed for the SEIA it is anticipated that there would be a WMMP Sub group if not others.	For discussion, would Section 10.8 and Chapter 23 be the place to mention and frame it out?	INF-SID	Yes	DAR was revised to include additional information on the MVH Community Working Group. Upon additional consideration language in DAR specific to the WMMP was deemed sufficient, no additional revision made.
125	10. Caribou and Moose		Who are "and other affected parties"?	1st para. 1st sentence - As the paragraph is geared to Indigenous interests, who are you referring to when you reference other affected parties that would not be captured by Indigenous Governments and Organizations. The last sentence lacks detail about who the GNWT has initiated consultation and what the purpose is for including this statement.	Suggest deleting 'other affected parties wherever referenced in Chapter. Provide more details around the consultation the GNWT has recently initiated.	EIA-IMPL	Yes	DAR has been revised to eliminate ambiguity and include a definition of "Affected Parties"
126	10. Caribou and Moose	10.1.4.1	Caribou and Moose LAA	"Based on the species distributions, the Caribou and Moose LAA adequately captures the Project's potential residual and cumulative effects interacting with the effects of other past, present, and reasonably foreseeable future projects." There is no citation or strong reasoning, in this Chapter nor elsewhere, for choice of 15km area around the highway alignment being the Caribou and Moose LAA. Agree that caribou and moose are far roaming and require a larger assessment area, however the choice in area merits a reference-supported rationale of the size choice.		ECC-Wildlife	Yes	DAR has been revised to provide clarification, and references as to reasoning for 15km buffer for Caribou and Moose with reference to 1) biology, 2) capturing ZOI, and 3) considerations of other boundaries.

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127	10. Caribou and Moose	10.1.2	Direct response needed to community recommendations - Consultation and Engagement	In the DAR, community participants expressed concerns about road and culvert vibrations effect on wildlife and requested that vibration levels be monitored before and after construction. It is understood that vibration monitoring will not be conducted (and may not be needed), however this community concern is not addressed directly in the DAR and may be perceived to be outstanding.	Provide a sentence directly addressing why vibration monitoring will not occur and/or under what circumstances it would be considered.	ECC-Wildlife	Partially	Upon additional consideration language in DAR was deemed sufficient, no additional revision made. WMMP will include measures to protect and monitor wildlife, including an adaptive management response.
128	10. Caribou and Moose	10.1.6	Application of Significance Definitions	Section 10.1.6 states: "The significance of the residual effect is rated as not significant or significant, based on the following: A significant adverse residual effect on caribou and moose is one that, following the application of avoidance and mitigation measures: 1) causes or further contributes to the exceedance of a conservation-based threshold; or, 2) threatens the long-term persistence or viability of caribou and moose populations in the Caribou and Moose LAA. If the second significance definition is to be used, what is the expected size of the population of boreal caribou and moose in the LAA? How big does such a population need to be to allow persistence? What level of change in the population would threaten long-term persistence/viability? (e.g for boreal caribou a minimum viable population of 100 individuals is sometimes used – check EC 2011 Science Assessment report for boreal caribou).	Define the expected populations of boreal caribou and moose in the LAA using existing information on the expected densities of these 2 species. The 2022 SARC status report for boreal caribou provides density estimates for the Dehcho and Sahtu regions, and expected moose densities could be derived from previous moose survey results. Refer back to these expected population sizes and minimum population size for needed for viability when determining significance of different residual effects using the 2nd criteria above. 1) Use the significance definitions provided in the DAR in significance determinations. Refer back to them explicitly when determining significance of different residual effects. 2) Assess the level of human, fire and total disturbance based on ECCC approach at the scale of the LAA, at baseline, and with application of the project. Use these residuals in the discussion of the significance determinations for indirect habitat impacts (because the 500 m buffer around human disturbance is included), and in the cumulative effects assessment. 3) Define the expected populations of boreal caribou and moose in the LAA using existing information on the expected densities of these 2 species. The 2022 SARC status report for boreal caribou provides density estimates for the Dehcho and Sahtu regions, and expected moose densities could be derived from previous moose survey results.		Partially	DAR revised to quantify direct and indirect effects in the habitat section (residual and cumulative). Description of the boreal caribou and moose populations in the LAA were determined using a different approach than proposed in the recommendation, as the regionally-specific information was not available.
129	10. Caribou and Moose	10.8.3	Barren-ground caribou	"It was determined that the current range of the barren-ground caribou of the Bluenose-East herd does not overlap with the Project and therefore barren-ground caribou were excluded from the assessment. It is acknowledged that future range shifts of the herd may result in project-related residual and cumulative effects (Section 10.8)."	· ·	ECC-Wildlife	Yes	DAR revised to include context that Barren-ground caribou surveys, currently conducted by the GNWT-ECC and other organizations, will continue to monitor the distribution, abundance, and population trends of the Bluenose-East herd, subject to periodic assessments and adjustments. Results from these surveys can be used to assess potential future overlap of their range with the Project.
130	10. Caribou and Moose	10.2.2.2	Barren-ground caribou harvest	"harvest by communities was reduced after public hearings in the Sahtu Region and other regions (SARC 2017) and is currently not well documented. As such, the implementation of harvest monitoring programs would assist in the understanding of the effects of harvest on barren-ground caribou." Because barren-ground caribou are removed from the assessment, there should be more detailed description of certainty/uncertainty of these effects. Fine to say there should be harvest monitoring, but specify where and when this knowledge gap can be addressed.	this effect. There is new wording added to the WMMP referring to monitoring but not specifically harvest monitoring	ECC-Wildlife	Yes	DAR has been revised to specify the WMMP will be designed to determine if the highway is resulting in a pattern or level of harvest mortality for moose and caribou that would suggest a conservation concern or need for additional harvest management actions.
131	10. Caribou and Moose	10.2.2.2	Barren-ground caribou	Wording in current DAR reads: "Indigenous harvest on the Bluenose-East herd increased in 2010 following a decrease in the Bathurst herd harvest; however, harvest by communities was reduced after public hearings in the Sahtu Region and other regions (SARC, 2017) and is currently not well documented." This is outdated information	comment related to this section	ECC-Wildlife	Yes	DAR was revised and updated to clarify that due to substantial declines observed in the Bluenose-East herd, and following processes laid out in land claim agreements, Indigenous harvest across the Bluenose-East herd's range has been restricted. In the Sahtú, the Délįnę community-based caribou plan approved after the 2016 public hearing includes a limit of 150 caribou (majority bull harvest). The new draft Déline plan includes a limit of 80 bulls. In Wek'èezhìı the current maximum harvest is 193 bulls and in Nunavut the limit is 170 (1:1 bull to cow ratio).

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132	10. Caribou and Moose	10.2.2.3.2	Calving areas for moose	Are the two islands mentioned defined as special harvesting areas in the land claim agreement?	Check if Windy Island or Four Mile Island are Special Harvesting Areas for moose in the Sahtú Dene and Métis Comprehensive Land Claim Agreement and reference if so. The land claim agreement doesn't name the special harvesting areas, rather describes their locations and gives them a number. https://www.rcaanc-cirnac.gc.ca/eng/1422041606383/1543258435604#sch ed7	ECC-Wildlife	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
133	10. Caribou and Moose	10.2.2.3.2	Outdated harvest data	The DAR states that "Annual harvest in the Mackenzie Valley region is moderate, (averaging approximately 6% of the studied populations - (e.g, this amounts to about 27 to 30 moose in a study area west of Norman Wells) due to low human occupation and limited access (Stenhouse et al., 1995; Veitch et al., 1995; Swallow et al., 2003) and appears to be within sustainable limits (Veitch et al., 1995). However, harvest can be higher locally where access is available (e.g, near communities, roads, and waterbodies; e.g, Brackett et al., 1985; Treseder and Graf, 1985; GNWT, 2022c). The population estimates and harvest data in these estimates were applicable at the time and both populations of moose and harvest have likely changed over time."		ECC-Wildlife	Yes	DAR revised as suggested to clarify population estimates and harvest data in these estimates were applicable at the time of original publication; both populations of moose and harvest have likely changed over time.
134	10. Caribou and Moose	10.3, Table 10.6	Interactions between Physical project activities and caribou and moose	"Employment and contracted goods and services activities are not expected to interact with the effects as there is no pathway for these activities to affect caribou and moose." Can INF explain what employment and contracted goods refers to (provide an example) so the reader can decide that there are no pathways for interactions? Employment and contracted goods are listed in table 10.6 as a physical activity - are we are talking about additional people hired and on site, larger camps and more noise and traffic(these would certainly have effects on moose and caribou)?	Please provide a definition and example of employment and contracted goods.	ECC-Wildlife	Yes	DAR has been revised to eliminate ambiguity around employment and contracted goods and services, specifically this category does not infer on-site activities. It is intended to reflect the administrative aspects of the project as a socio-economic interaction.
135	10. Caribou and Moose	10.3	Indirect disturbance	"During operations and maintenance, operation of, and activities at maintenance yards are not anticipated to result in a change in habitat as these activities will use existing disturbances." Response from INF/consultant: "no new direct habitat disturbance will occur and indirect habitat effects are captured through the presence and public use of the adjacent highway." Evidence was not provided in DAR.	Provide references and explanation to support this conclusion.	ECC-Wildlife	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
136	10. Caribou and Moose	10.3	Interactions between Project activities and caribou and moose	New wording: "Water withdrawal for dust control will occur at relatively large waterbodies with the ability to tolerate the effects of water withdrawal (i.e., with no noticeable changes in water quantity), which is not anticipated to result in a change in caribou and moose habitat." In order to demonstrate waterbodies can tolerate the effects of water withdrawal and to avoid having to quantify what a "relatively large" water body is a reference to the water license should be included in the wording.	Recommend the sentence be revised to "Water withdrawal for dust control will be regulated by a water license and will occur at relatively large waterbodies with the ability to tolerate the effects of water withdrawal (i.e., with no noticeable changes in water quantity), which is not anticipated to result in a change in caribou and moose habitat.	ECC-Wildlife	Yes	DAR revised as suggested to clarify water withdrawal for dust control will be regulated by a water license.
137	10. Caribou and Moose	10.4	Dust suppressants	Does the following statement mean not only water will be used? "Water only will be used for dust suppression, except as provided for in the GNWT Guideline for Dust Suppression." Calcium chloride and DL10 are approved dust suppressants in the Guidelines, which suggests that 'water only will be used' is misleading. Maybe better just to say the guidelines will be followed.	the GNWT Guideline for Dust Suppression; in most	ECC-Wildlife	No	Upon additional consideration language in DAR, the comment is considered addressed by Project team, no additional revision made.

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138	10. Caribou and Moose	10.4	Wildlife monitors	Table 10.7 - New wording in DAR: "Wildlife monitors will assess for the presence of wildlife in or near the PDA during project activities, in accordance with the WMMP." This wording still doesn't describe whether mitigations will occur. Explain what will happen when wildlife is present. Will a certain protocol be followed? Will activities stop? Deterrence attempted? Can refer to WMMPs for Diavik and Ekati for protocol examples.	Ideally reference specific mitigations in WMMP. Note, Wildlife monitors will assess for the presence of wildlife in or near the PDA during project activities and mitigation will occur in accordance with the approved WMMP.	ECC-Wildlife	Yes	DAR revised to provide additional context regarding mitigations in the WMMP when wildlife are present during project activities.
139	10. Caribou and Moose	10.4.2.2	Mitigation	Additional information required	Add a bullet to section 10.8.1 to commit GNWT to further exploring options for offsetting residual impacts of direct/indirect habitat loss for boreal caribou.	ECC-Wildlife	Yes	DAR revised to include GNWT commitment to further exploring options for offsetting residual impacts of direct/indirect habitat loss for boreal caribou.
140	10. Caribou and Moose	10.4.2.3	Direct loss of boreal caribou habitat	Predicted RSF values and the predictive RSF maps can change annually as fires age and areas become suitable again. There are also areas predicted to be "unsuitable" that boreal caribou are obviously using based on collar locations, which speaks to the fact that the RSF model predictions have uncertainty associated with them which is not reflected in predictive maps. The RSF model also likely overestimates the avoidance of the existing MVWR (and hence predicts low RSF values adjacent to it) because the RSF model did not distinguish between winter vs. all-season roads, and most of the collar data that went in to the model is from caribou in areas adjacent to all-season roads, so the RSF model in a sense treats the MVWR like an all-season road. This means the RSF model currently might underpredict suitable habitat near the MVWR, unless the predictive values are mainly driven by the underlying land cover types.	suitable habitat predicted by the RSF model, it is recommended to also present the direct and indirect habitat impacts to "unsuitable" habitat. Please also add further bullets to acknowledge sources of uncertainty and dynamic nature of the RSF model predictions (as described above) in Section 10.7.1. 1) Add in measures of direct "suitable" habitat loss for the Dehcho region to Table 10.8. 2) Add a new column(s) to Table 8 which includes the	ECC-Wildlife	Partially	DAR has been revised to use the terms "Selected" and "Avoided" instead of "Suitable" and "Unsuitable" in section 10.7.1 with reference to current conditions. Table 10.8 focuses on expected direct loss of "Selected" habitat, but does not present expected loss of "Avoided" habitat.
141	10. Caribou and Moose	10.4.2.3	Direct loss of moose habitat	It is not a conservative assessment to consider only Important Wildlife Areas (IWA's) as "suitable" moose habitat. The IWA boundaries are not necessarily precise, and while they may represent the "best" areas moose, it's very likely that there is suitable habitat outside of those areas. This is supported by the fact that the TDR shows there are observations of moose presence along most of the MVH alignment.	habitat impact to "unsuitable" moose habitat, and acknowledge in Section 10.7.1 that suitable moose habitat likely exists along the MVH alignment outside of	ECC-Wildlife	Yes	DAR has been revised to reflect that all habitat is considered moose, and categorized as either IWA, common, or transient. There is now no suggestion there is "unsuitable" habitat.
142	10. Caribou and Moose	10.4.2.3.1.4	Indirect disturbance	These two sentences seem contradictory: "The Project construction might exacerbate indirect habitat changes within the Caribou and Moose LAA by increasing the intensity and duration (i.e., year-round construction activities) of these indirect effects" and then "Indirect habitat alteration is unlikely to result in a measurable change in boreal caribou or moose habitat in the Caribou and Moose LAA and the effect (if present) is unlikely to alter the population viability or persistence of boreal caribou or moose within the Caribou and Moose LAA." Is there no measurable change because we aren't measuring loss of ecological function of habitat? How can the DAR say "Indirect habitat alteration is unlikely to result in a measurable change in boreal caribou or moose habitat in the Caribou and Moose LAA" if indirect habitat alteration is being evaluated qualitatively (table 10.2)?	habitat alteration is unlikely to result in a measurable change in boreal caribou or moose habitat in the Caribou and Moose LAA"	ECC-Wildlife	Yes	DAR has been revised to ensure indirect habitat effect is now quantified for both caribou and moose. Proportional to the Caribou and Moose LAA, the effect is very small for both selected and total habitat (using disturbance metrics).
143	10. Caribou and Moose	10.4.3.1	Changes in movement	This section describes in general terms how construction and operation of the road may affect movements of boreal caribou and moose, but no concrete examples from the literature are provided which could have identified a potential quantitative zone of influence for impacts on movement behavior. For example, Laurian et al. 2008 found that moose avoid areas up to 500 m from roads, but some moose used areas within 50 m perhaps due to presence of sodium-rich vegetation. Specific examples such as the one provided above are not provided in the DAR, but it seems like it should be possible to evaluate impacts to caribou and moose movements in a more quantitative fashion and to select a potential zone of influence to use in the assessment based on a more thorough review of available literature.	the expected magnitude of impacts to caribou and moose movements, and use them to define an expected zone of influence for use in a quantitative assessment of this impact pathway.	ECC-Wildlife	Yes	DAR has been revised to provide supporting literature for moose ZOI and includes a summary of reasonable ZOIs for defining the LAA (15 km boundary).

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144	10. Caribou and Moose	10.4.3.2. and 10.4.3.2	Changes in movement	The DAR does not discuss whether any areas of road cuts will be needed, or how the slope of embankments and the road profile will be designed in such a way so as not to impede the ability of wildlife to cross the road. Some sections of the TASR required cuts and steep embankments which created barriers to wildlife movements that didn't exist before. Will this be the case for the MVH?	Discuss whether construction of the MVH will require any areas of road cuts and steep embankments and how this may impact caribou and moose movements, and add any mitigation measures for this to Section 10.4.3.2	ECC-Wildlife	Yes	DAR revised to include summary of road embankment and road cut details. Engineering is not detailed enough to provide information or more specific information than provided. Assumptions that the road embankment are not a barrier added to "Assumptions" section. Cuts are in specific locations that may not interact with movement "corridors"
145	10. Caribou and Moose	10.4.3.3.1.2	Survey data for crossing and movement	Survey data does not indicate crossing or movement. Survey observations are a snapshot in time and should be considered "use" data at most. Observations on the winter road can be considered for crossing but this is anecdotal and biased at best. The only data that fits the bill is Stenhouse et al. 1995 and those moose were collared on the west side of the Mackenzie river and did not cross the river or the road.	Edit this sentence: "Based on the available survey and other observation data, moose may have been using and crossing the MVWR ROW for the past decades" Cannot infer if crossing did or did not happen from observations nearby.	ECC-Wildlife	Yes	DAR revised to clarify that observations suggest that the MVWR is not a complete barrier to moose movements, however, it's possible that there has been a reduction in movement compared to the habitat prior to the MVWR.
146	10. Caribou and Moose	10.4.3.3.1.2	Barrier to moose movement	"Incidental and random observations were recorded year-round, including during the use of the MVWR by the public during winter. These observations indicate that the MVWR did not act as a barrier to moose movements." Presence does not mean there is no barrier. Movement could be slowed, sped up, reduced. Moose might be approaching the road but 'bouncing back' and not crossing.		ECC-Wildlife	Yes	DAR revised to clarify that observations suggest that the MVWR is not a complete barrier to moose movements, however, it's possible that there has been a reduction in movement compared to the habitat prior to the MVWR.
147	10. Caribou and Moose	10.4.4.3.1.1.1	Collision Data	"Between 2009 and 2016, five vehicle collisions with boreal and/or barrenground caribou were recorded on Highways #1 and #7 in the Dehcho and South Slave regions" "the average annual daily traffic volume for Highways #1 and #7 ranged from 130 to 190 vehicles per day (with a mean value of 166 vehicles per day) and 30 to 80 vehicles per day"	Is there data pertaining only to the Dehcho? The south slave is connected to Alberta and has all paved highways, unlike the Project, which likely results in higher traffic flow and speeds. This can lead to a higher direct mortality risk. Disregard if data not available		Yes	Upon additional consideration and evaluation of the data for wildlife-vehicle collisions, language in the DAR was deemed sufficient. No revision made in the DAR.
148	10. Caribou and Moose	10.4.4.3.1	Mitigation for mortality risk	Page 10-62: "Access is expected to improve and habitat changes are expected to occur within the Caribou and Moose LAA during the construction phase; however, since harvesting will continue to be managed by the GNWT and the co-management boards, it is anticipated that any change in indirect mortality risk on moose due to increased harvest pressure or predation risk will remain within current harvest limits or the natural range of variability. Mitigation measures identified in Table 10.7 are expected to reduce the potential for indirect mortality, thereby reducing the residual effect of change in mortality risk during the construction phase. The residual effect of change in mortality risk via indirect pathways is not expected to alter the population viability or persistence of moose within the Caribou and Moose LAA."	Please clarify how existing harvest management will help to mitigate the pathway of increased predation risk for moose and caribou. Please describe the natural range of variability in predation mortality for boreal caribou and moose. Please describe how the mitigation measures in Table 10.7 address the predation risk/mortality impact pathway.	ECC-Wildlife	No	Upon additional consideration, it has been determined that additional clarification is not a requirement of the TOR. No additional revisions have been made.
149	10. Caribou and Moose	10.4.4.3.1.2.2	Harvest	The cited subsistence harvest of 75 moose in 2005 has not been mentioned previously and is not in line with the next sentence on annual moose harvest in the Mackenzie Valley.	Include reference to subsistence harvest in other areas.	ECC-Wildlife	No	Upon additional consideration language in DAR, the comment is considered addressed by Project team, no additional revision made.
150	10. Caribou and Moose	10.4.4.3.2.2.2	Harvest	2004/2005 harvest/hunting estimate isn't the most up-to-date information available.	Update numbers to the most recent numbers from ECC through harvest/hunting reports and communication with the Renewable Resource Officers. Not using most current data. TDR is not most current.	ECC-Wildlife	No	Upon additional consideration, it has been determined that the information provided satisfies the requirement of the TOR. No additional revisions have been made.
151	10. Caribou and Moose	10.4.4	Misrepresentation of GNWT authority and existing programs related to wildlife monitoring	"However, harvest will continue to be managed by the GNWT and the comanagement boards (i.e., the SRRB in the Sahtu Region as no comanagement board is established in the Dehcho Region), therefore it is anticipated that any change in mortality risk on boreal caribou due to increased harvest pressure or predation risk will remain within current harvest limits or the natural range of variability." It is being assumed that all increased harvest pressures will be mitigated by existing harvest management programs. There needs to be recognition that large enhancements will need to made to harvest programs (new staff hired, new funds allocated, monitoring and enforcement protocols applied) etc.	support any required design and implementation enhancements of described monitoring programs.	ECC-Wildlife	Yes	DAR has been revised to include "Existing monitoring programs can/will receive support early on to expand and modify them to address questions/provide more information about species near the Project. The programs will require long-term financial and staffing and resource commitment to obtain and analyze results."

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152	10. Caribou and Moose	10.4.5.3.1.1	Residual effect	"The potential for contaminants originating from project emissions during the construction phase, including dust, is anticipated to be too low to affect vegetation in the Caribou and Moose LAA (Volume 4, Chapter 18), and are therefore not anticipated to affect boreal caribou health." There is a strong assumption asserted about effects to caribou health in the above sentence. This assumption merits backing by a peer-reviewed source or strong quantifiable rationale. Neither are provided . Chapter 18 only characterizes possible effects of 'dust contaminants' on vegetation.	Provide references or other evidence to substantiate conclusion.	ECC-Wildlife	Yes	DAR revised to clarify the potential for contaminants originating from project emissions during the construction phase, including dust, is anticipated to be too low to affect vegetation in the Caribou and Moose LAA. If the vegetation is not affected, then it is unlikely to affect boreal caribou health.
153	10. Caribou and Moose	10.5.2.3.2	Disturbed Habitat %	"Across their NWT range, 35% of boreal caribou habitat has been disturbed, 28% from wildfires and 9% from anthropogenic sources (ECCC, 2020)"	Are these %'s correct? Further to comments by ECC - Wildlife, perhaps it would be good to include NT1 numbers and Caribou and Moose LAA numbers	INF-SID	Yes	DAR has been revised to include the disturbance values for Caribou and Moose LAA and the percentage's have been confirmed.
154	10. Caribou and Moose	10.7.1	Assumptions are habitat based	Assumptions made for this report are more than just habitat based. Majority of the data is >20 years old at this point and there is an assumption that harvest, population, and mortality have not/will not change overtime.	Many more assumptions to be added to this section. E.g. use of very old species observation/survey data	ECC-Wildlife	Yes	DAR has been revised to provide greater clarity on key assumptions and key uncertainties.
155	10. Caribou and Moose	10.7.2	Gaps in data	Gaps in moose movement, population and use are not addressed here. Data is over 20 years old and there has been little to no assessment with comparable surveys in the meantime. Gaps in current harvest and potential increases in harvest are also missing.	Add in gaps that acknowledge some species data to be very old.	ECC-Wildlife	Yes	DAR has been revised to provide greater clarity on data gaps associated with dated information.
156	10. Caribou and Moose	10.8	Misrepresentation of GNWT authority and existing programs related to wildlife monitoring	"The boreal caribou collar program, currently conducted by the GNWT-ECC, will continue to collect ongoing information on distribution, movements, and mortality, subject to periodic assessments and adjustments. Existing and newly collected data will be analyzed to obtain movement information to assist in determining adverse effects of the Project." "Survey programs, currently conducted by the GNWT-ECC, will continue to collect ongoing information on distribution, abundance, and population trends of moose, subject to periodic assessments and adjustments." "Barren-ground caribou surveys, currently conducted by the GNWT-ECC and other organizations, will continue to monitor the distribution, abundance, and population trends of the Bluenose-East herd, subject to periodic assessments and adjustments. Results from these surveys can be used to assess potential future overlap of their range with the Project." The above examples of broad wording overstate the current management authority and information GNWT has on wildlife in NWT. Current ECC monitoring schedules are meant to address an identified issue and have stated objectives, for the majority of the monitoring activities MVH was not contemplated when the activity was first contemplated.	Add wording to qualify that existing monitoring programs can/will receive support early one to expand and modify them to address questions/provide more information about species near the MVH, and that there is an understanding that it requires a long time financial and staffing commitment to obtain results from such programs.	ECC-Wildlife	Yes	DAR has been revised to include references to where incremental financial support will be required for implementation of proposed mitigations.
157	10. Caribou and Moose	10.8	harvest locations	"The ongoing collection of annual large game harvest success for all non- Indigenous hunters will be continued with adding details on harvest locations to determine if caribou and moose are harvested in proximity of the Project." As previously mentioned, obtaining harvest locations via the resident hunter surveys is not feasible.	Remove, "with adding details on harvest locations to determine if caribou and moose are harvested in proximity of the Project"	ECC-Wildlife	Yes	DAR has been revised to align harvest reporting with resident hunter surveys.
158	10. Caribou and Moose	10.8	Follow-up and monitoring - WMMP	It is strange that the only reference to the WMMP in the 'Follow-up and Monitoring' section only mentions monitoring of harvest. "The WMMP will be designed to determine if the highway is resulting in a pattern or level of harvest mortality for moose and caribou that would suggest a conservation concern or need for additional harvest management actions." The WMMP does a whole more than monitor harvest mortality. This section seems like the natural section to flesh out more details about wildlife monitoring that will go in the WMMP.		ECC-Wildlife	Yes	DAR has been revised better reflect linkages between monitoring and mitigation and the WMMP.
159	10. Caribou and Moose	10.8	Harvest	ECC assumes this bullet is referring to ECC's resident hunter survey, as non-residents are required to report harvest. Adding harvest locations to this survey is not feasible.	It is recommended that the ongoing collection of annual large game harvest success for all non-Indigenous hunters will be continued with adding details on harvest locations to determine if caribou and moose are harvested in proximity of the Project.	ECC-Wildlife	Yes	DAR has been revised to align harvest reporting with resident hunter surveys.

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160	10. Caribou and Moose	10.8	Monitoring	There are no current Indigenous harvest monitoring programs (with the objective of estimating total Indigenous harvest) that ECC is aware of along the LAA. The Sahtu Harvest Study ended in 2005 and the other cited harvest numbers were one offs.	There is some wording added to WMMP about possible Guardians monitoring, but not necessarily harvest monitoring.	ECC-Wildlife	Yes	DAR revised to clarify GNWT is open to further discussions with the Indigenous Guardians Programs to explore how best to implement it for the Project.
161	10. Caribou and Moose	Appendix 10A 3.2.2.3	Survey comparisons	States that surveys cannot be compared due to the different time of year they were conducted. These surveys cannot be compared largely due to the different survey methodologies that were used. Surveys in the 1990s used the Gasway block kriging method while the 2020 surveys used a distance sampling method. There are currently comparisons being conducted but there is a discrepancy with these methods that has not been accounted for yet.	Change to state that the methodologies limit comparisons not the timing of surveys.	ECC-Wildlife	Yes	DAR has been revised as suggested to clarify survey methodologies limit data comparisons and to incorporate additional references.
162	10. Caribou and Moose	Appendix 10A	Outfitter harvest	There is no outfitter harvest on the MVH footprint.	Remove outfitter regulations as they do not apply.	ECC-Wildlife	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made. However it is noted that no outfitter harvest management areas overlap with the LAA/RSA, so there is no outfitter harvest in the assessment area.
163	10. Caribou and Moose	10.2.2.1.1	Accuracy	Suggest avoiding wording "known as" the Pehdzéh Kí N'deh area. This may confuse a zone name with an area that has a different geographic scope. Suggest wording "the Project traverses an area north and west of Wrigley which is an area of ecological and cultural significance (DLUPC, 2006)	was a DRAFT and was not approved by GNWT or Canada. Suggest not referring to proposed zones in the	ECC-LUPU	Yes	Upon additional consideration, Pehdzéh Kí N'deh is an area of ecological and cultural significance referenced in the 2006 Draft DLUP, which is publically available. No additional revisions have been made.
164	11. Cultural and Traditional Land Use Including Harvesting	11.1.2	Purpose of sentence	Para 1, last sentence. The sentence lacks detail as to how, when, what type and who consultation has been initiated with. Without this info, the sentence does not provide any useful info.	Suggest deleting or clarifying sentence.	EIA-IMPL	Yes	DAR has been revised to provide additional context and clarification in regards to engagement and consultation efforts.
165	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2.1	Predator populations - IGO recommendations not really addressed	The DAR says "The GNWT will continue to implement existing wildlife monitoring programs consistent with its role as wildlife resource manager." This language does not directly respond to the recommendation.	Revise the wording for the response to the recommendation to "The GNWT will continue to implement existing wildlife monitoring programs consistent with its role as wildlife resource manager, but recognizes that new programs and additional resources may be required to address issues specific to the MVH project. GNWT will continue to refine the WMMP for this project throughout the EA process and is open to and interested in discussions with Indigenous Governments, Indigenous Organizations, and other affected parties community members on how best to incorporate their recommendations."	ECC-Wildlife	Yes	DAR has been revised to include references to where incremental financial support will be required for implementation of proposed mitigations, and additional collaboration is required to refine the WMMP.
166	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2.1	Prohibiting project personnel from hunting	Table 11.19: Please explain mitigations. No one should be able to hunt while on the job.	Project personnel that are working on the project that are not housed in work camps should also not be permitted to hunt while on the job.	ECC-Wildlife	Yes	DAR has been revised to clarify that project personnel will be restricted from harvesting during working hours and while housed in project work camps.
167	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2.1	Protection of calving habitat and wetlands, marshes and burn areas	Inaccurate mitigations.	Refer to relevant mitigations proposed in the WMMP instead.	ECC-Wildlife	Yes	DAR has been revised as suggested to eliminate ambiguity.
168	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2.1	Installing wildlife cameras	"Installation of wildlife cameras between Wrigley and Norman Wells to monitor potential effects of project construction (land disturbance, i.e., clearing) on wildlife migration (Dehcho First Nations, 2011)."	Revise the wording for the response to the recommendation to "The GNWT will continue to implement existing wildlife monitoring programs consistent with its role as wildlife resource manager, but recognizes that new programs and additional resources may be required to address issues specific to the MVH project. GNWT will continue to refine the WMMP for this project throughout the EA process and is open to and interested in discussions with Indigenous Governments, Indigenous Organizations, and other affected parties community members on how best to incorporate their recommendations."	ECC-Wildlife	Yes	DAR has been revised to include references to where incremental financial support will be required for implementation of proposed mitigations, and additional collaboration is required to refine the WMMP.
169	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2.1	Critical periods	Table 11.18 - "Vegetation clearing will be completed outside the migratory bird nesting period of May 4 to August 22" (table 11-18) "May 1 – Aug 31" (Appendix 20B) *Comment also in ch. 20	Appendix 20B shows critical periods for sensitive bird species. For most of these birds, the sensitive timing for nesting is May 1 to August 31. With that said, is it still safe to conduct vegetation clearing from May 1-3 and August 23-31? This is unclear	INF-SID	Yes	DAR has been revised to eliminate ambiguity and provide additional linkages to the WMMP.

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		VERSION OF THE DAR					ADDRESSED ? (YES/NO/PARTIALLY)	
170	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2.1	Avoiding moose pastures	Unclear how moose pastures have been considered in alignment routing.	Remove mitigation measure related to "known areas of plant collection", this is not really addressing the IGO recommendation. Provide further rationale for whether the alignment can be modified to avoid moose pasture areas. Section 5.2.3 (Project Design Chapter) states "The alignment routing corridor has been moved to the west as recommended and has been expanded in this area to accommodate a route alternative." The text in Chapter 5 and 11 should be consistent.		Partially	DAR has been revised to add clarity on where moose pasture avoidance has been incorporated into project design/routing. References to plant collection have been removed as suggested.
171	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2.1	Monitoring effects of vibrations on wildlife	The response to IGO recommendation is a mitigation measure, but does not address request to conduct monitoring.	Provide rationale for why effects of vibration cannot be monitored.	ECC-Wildlife	Partially	Upon additional consideration language in DAR was deemed sufficient, no additional revision made. WMMP will include measures to protect and monitor wildlife, including an adaptive management response.
172	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2.1	Response to IGO recommendation	Response to: "Monitoring wildlife (before and after Project construction and during operation) recommended by NWRRC (2023) and TRRC (2022) to identify change, specifically: - Monitor the (amount) of people coming into the community and using the road, which are not from the community - What type of people are using the road and coming into the community (i.e., locals, tourists, investors) - What is the purpose for using the road? (i.e., fishing/hunting access, camping access, visiting family) - Monitor types of wildlife, and abundance of wildlife coming into the community, as this has changed (existing conditions)"	Not all of these recommendations can be addressed by the WMMP, or are within the scope of a WMMP - for example monitoring the amount and type of people coming into the community. This would require a check station and some sort of voluntary survey that people would fill out. Who would operate the checkpoint? What authority would they have to stop vehicles and ask people to respond to survey questions? The only bullet that the WMMP might really address is the last one dealing specifically with wildlife. It will a require a new monitoring program that does not currently exist. Recommend clarify exactly which parts of the IGO recommendation we can address.		Yes	DAR has been revised to provide clarification towards additional collaboration required to refine the WMMP.
173	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2	Monitoring of invasive species	Is an invasive species monitoring program being proposed? Will surveys for invasive species conducted on other NWT public highways be extended to the MVH?	Remove reference to existing monitoring programs that do not actually address this issue. Clarify whether invasive species monitoring will take place along the MVH. Respond that understanding mechanisms of species range expansions such as for magpies and muskox is beyond the scope of this project unless a clear link can be made as to how the project would facilitate their expansion.	ECC-Wildlife	Yes	DAR has been revised to clarify which existing monitoring programs will continue, and explicitly confirm that invasive species monitoring is not proposed.
174	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2	Increased harvesting along the highway	Existing GNWT wildlife and harvest monitoring programs are not likely adequate to specifically address harvesting along the MVH.	Revise the wording for the response to the recommendation to "The GNWT will continue to implement existing wildlife monitoring programs consistent with its role as wildlife resource manager, but recognizes that new programs and additional resources may be required to address issues specific to the MVH project. GNWT will continue to refine the WMMP for this project throughout the EA process and is open to and interested in discussions with Indigenous Governments, Indigenous Organizations, and other affected parties community members on how best to incorporate their recommendations."		Yes	DAR has been revised to include references to where incremental financial support will be required for implementation of proposed mitigations, and additional collaboration is required to refine the WMMP.

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175	11. Cultural and Traditional Land Use Including Harvesting	11.4.2.2	Response to IGO recommendation	Response to recommendation: "The GNWT-ECC work with NWRRC (and other local Indigenous Governments, Indigenous Organizations and RRCs) to develop a conservation plan prior to construction, and that all companies working on the Project should be aware of the plan and work together to mitigate potential project effects on wildlife. This should include a specific management plan to monitor effects to caribou (I.e., noise, light, overharvesting) (Dehcho First Nations, 2011; SRRB, 2007; NWRRC, 2023)"	Revise the wording for the response to the recommendation to "The GNWT will continue to implement existing wildlife monitoring programs consistent with its role as wildlife resource manager, but recognizes that new programs and additional resources may be required to address issues specific to the MVH project. GNWT will continue to refine the WMMP for this project throughout the EA process and is open to and interested in discussions with Indigenous Governments, Indigenous Organizations, and other affected parties community members on how best to incorporate their recommendations."	ECC-Wildlife	Yes	DAR has been revised to include references to where incremental financial support will be required for implementation of proposed mitigations, and additional collaboration is required to refine the WMMP.
176	11. Cultural and Traditional Land Use Including Harvesting	11.1.1	MVRMA	Review sentence and adding additional information	Suggest adding the following sentence: "As outlined in the MVRMA, the SLUP, including amendments, requires approval of each of Sahtu Secretariat Incorporated, GNWT and Government of Canada"		Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
177	12. Air Quality	12.1.1.1	Change to Criteria Air Contaminants & Table 12.1	Comment carried over from DAR v2 review. Can INF/consultant confirm their statement "The average facility CAC emissions are the average of all facilities CAC emissions reported for the NWT for the past 3 years, from 2018 to 2020" on page 12-5 of the DAR? It is stated that the average facility CAC emissions are the average of all facilities CAC emissions reported for the NT for the past 3 years, from 2018 to 2020. This statement gives the false impression that the average is for all CAC emissions reported to the NRPI for the entire NT. In fact, the average is only part of NT's total emissions. Reviewing the NT's 2018-2020 NPRI data shows that the average of all facilities CAC emissions is way higher than those listed in Table 12.1.	Calculations suggest that the statement throughout the documents (Chapters 12, 23, and 26) reflecting that the average is of only those facilities CAC emissions that fall within the RAA of the project and reported for the NT from 2018 to 2020.		Yes	DAR has been revised to eliminate ambiguity and update latest reported NPRI values.
178	12. Air Quality	12.1.3.1	Clarity	"Carbon monoxide emissions are expected mainly from blasting activities during the project construction phase, and from road traffic during the operations and maintenance phase." The start of this paragraph mentions the common sources of CO. Then at the end of the paragraph blasting as a source is mentioned.	Clarify is Blasting is a source of CO.	INF-SID	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.
179	13. Noise	13.4	Blast mats		Provide a definition for "receptors sensitive to noise "or explain further what is meant here.	ECC-Wildlife	Yes	DAR has been revised to clarify that receptors sensitive to noise represents residences.
180	13. Noise	13.7.1	incorrect assumption	The assumption states "The traffic speed limit is assumed to be 50 kilometers per hour (km/h) in communities such as Wrigley." This may only apply to LAA community of Norman Wells. Within the communities of Tulita and Wrigley this is too fast.	Insert a sentence stating that speeds within communities are determined by local bylaws (they may be less than the 50 km /hr). Consultant to qualify why this assumption was made and add text to clarify.	INF-SID	Yes	DAR has been revised to clarify local community bylaws limit traffic speed and may vary.
181	15. Water Quantity	15.4.4.3	Excavation at borrow pits	This comment refers to the second paragraph under the Excavation heading. In order for permafrost to have low permeability and be confining (i.e. not conveying groundwater flow) it would need to be continuous in the area of the borrow pit and it would have to be protected enough to prevent thaw that could provide a conduit for groundwater flow from below the permafrost table.	Change wording to indicate that cones of depression would be limited as long as permafrost at a borrow site is continuous and can be protected from thaw.	ECC-Land Management and Administration, NTGS	Yes	DAR has been revised to clarify that discontinuous permafrost will affect bulk permeability and introduce anisotropy in a similar manner to fine-grained lenses in coarser-grained material; i.e., "reduce" the bulk permeability of the material and "reduce" the outward propagation of a cone of depression.
182	16- Water_sediment_quality	16	Inclusion of Ground Water Quantity	The Intro to this chapter talks about surface water quality, groundwater quality and sediment quality. In Section 16.1.3 we are introduced to groundwater quantity. Groundwater quantity is mentioned 18 times in the chapter and as the reader, it becomes very difficult to keep track. Especially with numerous references to Chapter 15 (Water Quantity).	Recommend including groundwater quantity in Chapter 15 to reduce confusion.	INF-SID	Yes	DAR has been revised to better differentiate between water "quantity" and groundwater "flow".
183	18. Vegetation and Wetlands	18.1.2	Inspection schedule	Document mentions "regularly inspecting" the site to control noxious/invasive weeds.	Could INF define what constitutes regular inspections, or please reference the applicable appendix/document to the specifics of how inspections are to be done, when, etc. There is no mention of what is meant by regular inspections.	ECC-Wildlife	Yes	Upon additional consideration language in DAR was deemed sufficient, no additional revision made.

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184	18. Vegetation and Wetlands	18.1.2/18.1.3	Wetlands	Table 18.1 states, "The alignment corridor deviates from the MVWR in areas of wetlands." 18.1.3 states, "Loss of wetland functions resulting from clearing, ground disturbance, or altering natural drainage patterns could also occur." Table 18.2 states, "clearing or infilling of wetlands"	It is confusing as to whether the MVH will go through wetlands or not. Recommend stating if wetlands will be avoided if possible (early on in this chapter)	INF-SID	Yes	DAR has been revised to clarify that wetlands cannot be fully avoided, effects will be reduced where possible.
185	18. Vegetation and Wetlands	18.4.4.3.1.1	Perennials	"Of the forb and graminoid SOCC potentially present in the RAA, 141 are perennial plants. These may be at greater risk of loss due to their longer life span."	Correlation here is not clear - why is there a greater risk to plants with a longer lifespan? Recommend clarifying	INF-SID	Yes	DAR has been revised to add clarification as to why plants with a longer lifespan are at greater risk.
186	19. Wildlife and Wildlife Habitat	19.2.2.1	Important Wildlife Areas	·	Cite the Important Wildlife Areas report (Wilson and Haas 2012) - available at https://www.ECC.gov.nt.ca/sites/ECC/files/221_public_no_appendix_c.pdf Where "Sahtu Rivers" IWA is discussed, specify/clarify that this is an important area for moose. The report refers to Bear Rock CZ as an IWA, however it is not. "Important Wildlife Areas" were designated in a specific report based on a certain methodology and criteria. It is confusing to lump Bear Rock CZ in with the IWAs, since its significance is quite different. Bear Rock CZ should be discussed as its own distinct area, not as an IWA. (Bear Rock IWA is identified as an IWA specifically for peregrine falcons, but that belongs in Chapter 20 about birds, not here. The IWA report only identifies it specifically regarding peregrine falcons. And its boundary is different than the Conservation Zone in the land use plan) The text should say that the LAA is located partly within three IWAs (not four)		Yes	DAR has been revised to clarify the location of Important Wildlife Areas in the Sahtu.
187	19. Wildlife and Wildlife Habitat	19.4	Vegetation	Table 19.9 - Closure and reclamation will promote re-establishment of vegetation ground cover. How will closure and reclamation promote re-establishment of vegetation ground cover? We acknowledge details will be provided in the EPP, however do not say "revegetate naturally". This is also an issue in Chapter 18	Replace "revegetate naturally" to "will be reclaimed"	ECC-Wildlife	Yes	DAR has been revised as suggested to replace "revegetate naturally" with "will be reclaimed"
188	19. Wildlife and Wildlife Habitat	19.4	Inconsistent	The mitigation measure is listed as "Excavated spoil material will be disposed of at least 30 m from the watercourse" By including the word spoil in this mitigation it implies that excavated material will not be used of again or will be disposed of. Excavated material will likely always be used again or stockpiled.	Recommend revising to have consistent phrasing when discussing this mitigation	INF-SID	Yes	DAR has been revised to use consistent phrasing for the mitigation throughout the DAR.
189	19. Wildlife and Wildlife Habitat	19.4.2.3.1	Residual effects	"Noise-related effects on some wildlife species have been reported to occur"; which species? This was clarified on page 19-46, but not on 19-39.	Specify species.	ECC-Wildlife	Yes	DAR has been revised to provide clarity and ensure consistency as suggested.
190	19. Wildlife and Wildlife Habitat	19.4.2.3.1.2	Grizzly Bear; Insufficient evidence to support assessments of residual effects and cumulative effects	"However, indirect habitat loss is expected to be low in magnitude (i.e., a measurable change in the abundance of grizzly bear in the LAA is not	Provide evidence	ECC-Wildlife	Yes	DAR has been revised to provide clarification that a measurable change in the abundance of Grizzly in the LAA is not anticipated due to the low magnitude residual effect.

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191	19. Wildlife and Wildlife Habitat	19.4.2.3.2.1	Operation and maintenance: little brown myotis	Little brown myotis sometimes use bridges as roosts, including maternity roosts. New bridges (or upgraded bridges) at water crossings along the highway could become habitat for little brown myotis. Some of the current bridges on the winter road may even be used as roosts already (they have not been surveyed). If bats are roosting in bridges, then there would need to be considerations to mitigate impacts of bridge construction as well as future maintenance/repair on the bats. Recent work by ECC in collaboration with Wildlife Conservation Society has documented bats roosting in several bridges in the southern NWT (and northern Alberta). This is unpublished data but a map of NWT bridges surveyed and the results has previously been shared with INF; You can see the bridges we surveyed and the results by turning on the '2022 results' layer: https://www.google.com/maps/d/u/0/edit?mid=1dYlnll2gXIVYN4_7uK-exgvmzLqyfNo&usp=sharing. In previous version of comments, sources were provided to develop BMPs for bats and bridges.	Consultant stated that information and mitigation measures will be included in the WMMP. This is not the case. Please include mitigations in the WMMP for the little brown myotis.	ECC-Wildlife	Yes	DAR has been revised to indicate existing bridges may be used as potential bat roosting sites. WMMP updated to include bat mitigation.
192	19. Wildlife and Wildlife Habitat	19.4.4.1.1	Construction - small mammals (and amphibians?)	ECC did not notice much mention of amphibians, such as wood frog or chorus frog, but think they would be subject to many of the same potential effects as the small mammals (e.g being crushed by equipment during construction, roadkill). Plus there could be pond habitat created in ditches or borrow pits that might be used by amphibians for breeding, with potential to be population sinks. And runoff, road salt, etc. could end up in their habitat.	Effects on amphibians could be expanded on more, rather than just including the word amphibian. Include consideration of impacts on amphibians. Possible resources: NWT Amphibians field guide - https://www.ECC.gov.nt.ca/sites/ECC/files/resources/amphibians_and_reptiles_field_guide_web.pdf Management Plan for Amphibians in the NWT - https://www.nwtspeciesatrisk.ca/sites/ECC-species-at-risk/files/nwt_amphibian_management_plan_2017_final_0.pdf	ECC-Wildlife	Yes	DAR has been revised to include additional consideration of amphibians with reference to CMA 2017.
193	20. Birds and Bird Habitat	Throughout the chapter	Insufficient evidence to support assessments of residual effects and cumulative effects	The data sources and methods for the area calculations of bird habitat loss are not provided.	Provide data sources and explain methods.	ECC-Wildlife	Yes	Upon further consideration assessment techniques included in DAR section 20.4.1 were deemed sufficient. No additional revisions were made.
194	20. Birds and Bird Habitat	20	Habitat	"Numerous bird species inhabit the Mackenzie Valley due to the widespread availability of wetlands, rivers, lakes, and forests."	Consider adding mountainous/rocky terrain as a reason why numerous bird species inhabit the Mackenzie Valley. This would also compliment table 20.10 (change in chapter 19 as well if changing here, i.e., Dall sheep, mountain goat)		Yes	DAR has been revised to include rock formations as bird species habitat.
195	20. Birds and Bird Habitat	20.1.3, Table 20.2	Insufficient evidence to support assessments of residual effects and cumulative effects	Table 20.1 includes potential effects on mortality risk but not reproduction / nesting.		ECC-Wildlife	No	Upon additional consideration, it has been determined that the information provided satisfies the requirement of the TOR. No additional revisions have been made.
196	20. Birds and Bird Habitat	20.4, Table 20.9	Critical periods	"Vegetation clearing will be completed outside the migratory bird nesting period of May 4 to August 22" (table 20-9) "May 1 – Aug 31" (Appendix 20B)	Appendix 20B shows critical periods for sensitive bird species. For most of these birds, the sensitive timing for nesting is May 1 to August 31. With that said, is it still safe to conduct vegetation clearing from May 1-3 and August 23-31? This is unclear		Yes	DAR has been revised to eliminate ambiguity and provide additional linkages to the WMMP.

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197	20. Birds and Bird Habitat	20.4	Bank swallow	The potential for bank swallows to nest in aggregate piles (e.g in quarries, gravel pits) should be addressed.	Address the possible creation of anthropogenic habitat for bank swallows, and how that habitat should be managed to avoid negative impacts so it doesn't become a population sink. ECCC has guidelines on this specific to bank swallows. Make specific reference to how piles will be maintained and monitored to discourage bank swallow presence.		Yes	Upon further consideration, the information provided regarding species specific mitigation for bank swallows in Table 20-9 was deemed sufficient to address comment. No additional revisions were made.
198	20. Birds and Bird Habitat	20.4.2.3.1.1	Wetlands	"Project routing necessarily avoids wetland habitats, mitigating direct and indirect habitat loss and alteration for waterbirds." (page 20-38) "A direct loss or alteration of habitat will occur within the PDA for construction activities that result in the removal of upland and wetland habitats" (page 20-32)	Recommend making it crystal clear what the plan is in regards to the MVH going through wetlands or not. 20-38 sounds like wetlands will be avoided, 20-32 says wetlands will be lost. See comment with the topic 'wetlands' in chapter 18, page 18-6	INF-SID	Yes	DAR has been revised to clarify that wetlands cannot be fully avoided, effects will be reduced where possible.
199	21. Biodiversity	All	DAR V2 comment not addressed	Recommendation from DAR V2 was indicated by INF/Consultant to have been addressed, but additional clarity is requested. Acknowledging that there will be direct and indirect effects on wildlife is not equivalent to providing concrete evidence/references to back up unsubstantiated claims. Limited references are included in chapter. ECC would like to see scientific evidence that proves there are no known effect of this type of disturbance/project on biodiversity (mainly wildlife and their habitat).	Please include references to back up unsubstantiated claims. It is really hard to believe there are no direct or indirect effects of the project on biodiversity when the majority of the chapter contains unsubstantiated claims.	ECC-Wildlife	Yes	DAR has been revised to include additional references and cross-references to Subject of Note Chapters to further substantiate findings of this chapter.
200	21. Biodiversity	21.2.1	DAR V2 comment not addressed	Recommendation from DAR V2 was indicated by INF/Consultant to have been addressed, but additional clarity is requested. Revegetation of disturbed habitat; "Closure and reclamation of the Mackenzie Valley Winter Road (MVWR) and temporary borrow sources/quarries, camps, and workspaces will, over time, return some habitat for vegetation" Although the statement is true, it is misleading to simply state that some disturbed habitat from the construction of the project will recover over time. In some cases, disturbed habitat will revegetate to some degree over time, but the real questions when talking about biodiversity and ecosystem integrity are: 1) will the vegetation community in the disturbed site recover similarly to the vegetation community in pre-disturbed conditions, and 2) will wildlife and/or species at risk use the revegetated disturbed site? For example, a quarry revegetates in 5 years with 100% grasses and forbs but historically it was a mesic mixed wood forest. By definition, the disturbed site did revegetate but the vegetation community is completely different from pre-disturbed conditions and wildlife/species at risk will not be able to utilize that area. Thus, on a biodiversity perspective, the "revegetated" disturbed habitat did not provide appropriate habitat for vegetation and wildlife; hence the disturbed still has an effect on biodiversity.	habitat for wildlife post-disturbance and how long it took for these disturbed sites to reach their appropriate vegetation community.		Yes	DAR was revised to address ECC concerns. Revised text includes " Closure and reclamation of the Mackenzie Valley Winter Road (MVWR) and temporary borrow sources/ quarries, camps, and workspaces will be reclaimed to promote re-establishment of vegetation (Chapter 18 - vegetation and wetlands), which is expected to provide potential wildlife habitat as vegetation communities become established over time. The ability for these areas to support wildlife species will vary with successional stage and species-specific habitat requirements."
201	21. Biodiversity	21.2.1	DAR V2 comment not sufficiently addressed	Recommendation from DAR V2 was indicated by INF/Consultant to have been addressed, but additional clarity is requested. Examples are provided, however it's not explained if these habitat loss percentages are significant losses to the respective species. Minor habitat loss for SAR & SOCC; "Habitat loss for SAR and SOCC is anticipated to be relatively low Direct habitat loss of around 1,200 ha may seem low on the landscape scale, but that may not be the case for species at risk or SOCC (species scale) that have a short range or use specific habitat types.	Provide evidence that habitat loss from the construction of the project will lead to minor habitat loss for species at risk and SOCC. Provide an example of a species with either a short range or specific habitat type and demonstrate that the direct loss of habitat from the project construction will not significantly impact the species.	ECC-Wildlife	Yes	DAR was revised to provide references to other sections of the DAR where the information requested in the recommendation column was addressed.

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202	21. Biodiversity	21.2.2	DAR V2 comment not sufficiently addressed	Recommendation from DAR V2 was indicated by INF/Consultant to have been addressed, but additional clarity is requested. Edge effects refer to the persistent change in the vegetation community (i.e., increase in species abundance and richness) occurring at the boundary between two or more habitats. The fact that "shrubs are softening the edges" is a by-product of the edge effect that occurred during the construction phase. Whether or not the shrubs were present prior to construction, its increase in abundance over time doesn't diminish the fragmentation and edge effects established during the construction phase, in fact, it is increasing the effect of fragmentation and edge effects.	Remove ", while over time these effects may be ameliorated as shrubs soften the edges," and match the wording included in Section 21.5.	ECC-Wildlife	(YES/NO/PARTIALLY) Yes	DAR was revised to remove ", while over time these effects may be ameliorated as shrubs soften the edges," and match the wording included in Section 21.5.
203	21. Biodiversity	21.3.2	DAR V2 comment not addressed	Recommendation from DAR V2 was indicated by INF/Consultant to have been addressed, but additional clarity is requested. Barrier to movement in operation and maintenance; "There are no known large-scale wildlife movement patterns or movement corridors within the LAA; wildlife in the LAA interact with the existing barrier that is presented by the MVWR; and while the Project will result in a small incremental increase in the size of the barrier, a notable change in wildlife movement is not anticipated" Although wildlife currently interacts with the existing barrier in the winter, a barrier to movement can occur to any species (but particularly for SAR and SOCC) with an increase in sensory disturbance from the highway when it is in operation and maintenance year-round (regardless of the width of the road). This should be acknowledged in this paragraph. An increase in sensory disturbance from traffic will create a notable change in wildlife movement as there are scientific evidence from multiple wildlife species across the NWT and elsewhere in Canada that they are negatively affected by road traffic.	Alberta.	ECC-Wildlife	Yes	DAR was revised to discuss the how increased traffic year-round and provide references requested in the recommendation column.
204	21. Assessment of potential effects on biodiversity	21.3.2	Wildlife mobility	The change in movement section doesn't encompass the full extent of changes that would occur	Recommend speaking to barriers the road will create for Moose/Caribou/wildlife - reference chapter 10, 19	INF-SID	Yes	DAR was revised to discuss the barriers the highway will create for wildlife. References to Chapters 10 and 19 incorporated into the text.
205	21. Biodiversity	21.5	Remove or reword sentence	DAR V3 (21-9) states that "over time edge effects may weaken due to regeneration (e.g, shrubs) along edges (Harper et al., 2005, 2015), vegetation maintenance activities within the ROW will only weaken edge effects temporarily due to periodic brushing/mowing." Edge effects refer to the persistent change in the vegetation community (i.e., increase in species abundance and richness) occurring at the boundary between two or more habitats; thus, the vegetation composition within the forest/peatland adjacent to the ROW and highway. The fact that "shrub regeneration are weakening the edges" is a byproduct of the edge effect that occurred during the construction phase. Whether or not the shrubs were present prior to construction, its increase in abundance over time doesn't diminish the fragmentation and edge effects established during the construction phase, in fact, it is increasing the effect of fragmentation and edge effects. Also, mowing the ROW will not "weaken edges effects", it will either have no effect on the forest edges or will promote additional recruitment of vegetation and invasive species.		ECC-Wildlife	Yes	DAR was revised in Section 21.5 per the recommendation, and text added to clarify the effects of maintained edges.
206	21. Biodiversity	21.5.1	DAR V2 comment not addressed	Edge effects refer to the persistent change in the vegetation community (i.e., increase in species abundance and richness) occurring at the boundary between two or more habitats. The fact that "shrubs are softening the edges" is a by-product of the edge effect that occurred during the construction phase. Whether or not the shrubs were present prior to construction, its increase in abundance over time doesn't diminish the fragmentation and edge effects established during the construction phase, in fact, it is increasing the effect of fragmentation and edge effects.	Remove " over time edge habitats along the PDA are expected to soften as shrubs grow" and match the wording included in Section 21.5.	ECC-Wildlife	Yes	DAR was revised to remove " over time edge habitats along the PDA are expected to soften as shrubs grow" and match the wording included in Section 21.5.

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207	22. Assessment of Potential Effects on Heritage Resources	22.1.2, Table 22.1 and thorough out chapter	Influence of consultation and engagement	The section does not clarify the interrelationship between consultation and engagement. Who is consulted verses who is engaged and how does it influence the information presented? Who are 'other affected parties', if they are not captured by IGs & IGOs?	Separate consultation and engagement activities. define or preferably remove the term 'and other affected parties'. If indigenous, already captured by IG/IGO term and if referencing non-indigenous interests, then explain how that interest would related to traditional or indigenous heritage resources.	EIA-IMPL	Yes	DAR has been revised to eliminate ambiguity and include a definition of "Affected Parties". Table 22.1.3 only shows feedback received during engagement as consultation with organizations were not completed prior to submission of the DAR.
208	22. Assessment of Potential Effects on Heritage Resources	22.1.4.1	Definition	"This is the alignment with a 5 km buffer on either side" The definition for Regional Assessment Area (RAA) is not clear - 5km buffer on either side of the LAA or the project area?	Recommend clarifying what the RAA straddles	INF-SID	Yes	DAR was revised to clarify the location of the RAA.
209	23. Compliance and Effects Monitoring	23	Commitment	"Final monitoring plans, as integrated into the respective management plans, will be submitted to regulatory agencies prior to construction,"	Recommend revising to: "Final monitoring plans, as integrated into the respective management plans, will be submitted per regulatory agencies requirements considering the outcomes of the EA and updated project information."	INF-SID	Yes	DAR was revised to integrate the proposed text as outlined in the recommendation column.
210	23. Compliance and Effects Monitoring	23.5	Revise frequency	"Reports from monitoring programs will be submitted annually to regulatory authorities and shared with interested Indigenous Governments, Indigenous Organizations, and other affected parties."	Recommend revising to: "Reports from monitoring programs will be submitted to regulatory authorities as required, and shared with interested Indigenous Governments, Indigenous Organizations, and other affected parties	INF-SID	Yes	DAR was revised to integrate the proposed text as outlined in the recommendation column.
211	24. Effects of the Environment on the Project	24.4.2	Baseline data collection	In my opinion the second point in this section overstates the knowledge of permafrost conditions, given that field data collection has not begun along the majority of the MVH corridor. I think baseline data collection at multiple locations along the proposed route is required in order to make more informed assumptions about geotechnical conditions in each mapped terrain unit. I believe that geotechnical investigations are planned along the route as part of the design phase of the project, and this creates opportunities to initiate baseline ground temperature monitoring at relatively low additional cost. I don't think it is a problem to indicate in this section that confidence will be improved by baseline data collection.	actual ground conditions for each mapped terrain unit along the length of the proposed corridor, and how these conditions change according to latitude for a given terrain unit. I think this can be achieved as part of the ground-truthing effort that is planned as part of the design phase.	ECC-Land Management and Administration, NTGS	Yes	DAR has been revised in include discussion of the additional data that will be collected during future design-related studies that will be completed prior to construction.
212	25. Accidents and Malfunctions	25.2	Regulatory & Policy Setting - lis of acts, regulations & policies	Suggested additions to the Regulatory & Policy Setting list, for consideration: Territorial	NWT Environmental Rights Act: This act recognizes the right of individuals to a healthy environment and promotes environmental protection. It may influence the environmental considerations and public consultation processes for highway construction projects. NWT Environmental Assessment and Review Process/Mackenzie Valley Resource Management Act: This process governs environmental assessments in the NWT and ensures that projects undergo appropriate environmental review to assess and mitigate potential impacts. NWT Environmental Protection Act: This act establishes a framework for environmental protection, pollution prevention, and management of environmental impacts. It may require assessment and mitigation of environmental impacts during highway construction. NWT Waters Act: This legislation manages the use and protection of water resources in the NWT, including the regulation of water withdrawals and impacts on water bodies during construction.		Yes	DAR has been revised to include the suggested references provided.

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213	25. Accidents and Malfunctions	25.2	Regulatory & Policy Setting - list of acts, regulations & policies	Suggest being clear that this is not meant to be a comprehensive list, and that the regulatory environment might change before/during construction. Consider adding something like this to the end of this section:	In addition to these, other regulations related to land use, zoning, and transportation may apply. Please note that regulations and legislation can change or be updated over time, so it is important to consult with local authorities and legal professionals to review the most current regulations and requirement for highway construction in the Deh Cho and Sahtu Regions as this project progresses.	INF Policy	Partially	DAR has been revised to indicate "In addition to these, other regulations related to land use, zoning, and transportation may be applicable to planning for and responding to accidents or malfunctions over the life of the Project". The second portion of the proposed language was not included in the DAR. Upon additional consideration language in DAR was deemed sufficient, no additional revisions were made.
214	25. Accidents and Malfunctions	25.8.2.7	Caribou and Moose significance	25.8.2.7 describes the definition of significance for wildlife (ch. 19) and birds (ch. 20), but does not mention anything specifically about caribou and moose (ch. 10). 25.8.2.8 describes the definition of significance for the other KLOI (ch. 11).	Recommend including the definition of significance for caribou and moose, if it is different than that of wildlife, and stating if explosions/fires would have a significant impact on it or not		Yes	DAR revised to include the definition of significance for caribou and moose (Chapter 10), wildlife and wildlife habitat (Chapter 19), as well as for birds and bird habitat (Chapter 20).
215	26. Cumulative Effects Summary	26.1.2, Table 26.1	Use of term 'other affected parties'	It is not clear who 'other affected parties are and why they would be lumped together with Indigenous groups?	delete reference to 'affected parties' when referencing consultation/engagement activities with Indigenous organizations	EIA-IMPL	Yes	DAR has been revised to eliminate ambiguity and include a definition of "Affected Parties"
216	26. Cumulative Effects Summary	26.2.1	CEA & Induced Development	It is stated in Chapter 26 that: "The GNWT's Business Case for the Project promotes the Project as opening new resources to the benefits of Canadians. This suggests that at some time in the future, the completed highway may incentivize further development in the Mackenzie Valley that may be limited by seasonal access." Section 1.2 of the DAR also refer the MVH's role in supporting resource exploration, development and production. It is acknowledged that it is difficult to predict future development; however, given that induced development is one of the goals of this Project it is important to include potential induced development in the cumulative effects assessment. A scenario-based analysis should be used to address this gap. Holroyd et al., (2007)1 provides examples of where scenario analyses have been used in the past and speak to the advantages and limitations of conducting scenario analysis. The Terasen Pipelines (Trans Mountain) example may be of interest to INF, where ALCES (A Landscape Cumulative Effects Simulator) was used, "providing reasonable estimates of likely indicator trends, the range of likely responses and the key factors affecting these changes at a regional scale." While this report focuses on the use of scenario analysis in the Mackenzie Gas Project review, a scenario analysis, tailored to the scope of the MV highway, would provide a more robust and defensible cumulative effects assessment. ECC suggests that such a scenario analysis would be useful for the MVH DAR. [1] Holroyd, P., Grant, J., and D. Simon. (2007) Scenario Analysis: A Best Practice Approach to Assessing the Cumulative Impacts of the Mackenzie Gas Project, The Pembina Institute, https://www.pembina.org/reports/Submission-ScenarioAnalysis-MGProject.pdf		ECC-CIMP	No	Upon additional consideration language in DAR was deemed sufficient, no additional revision made. A scenario based approach to the evaluation of cumulative effects was not a specific requirement outlined in the Terms of Reference.
217	Chapter 27	27.3.1	Duration of the WMMP	This section states "A Wildlife Management and Monitoring Plan (WMMP) will be developed and implemented. The WMMP will contain detailed monitoring and mitigation measures to be implemented for the duration of the construction and operations of the Project." The duration of the WMMP post-construction has not been determined.	Suggest to add, "Duration of the WMMP for the project operations phase will be determined through further discussions during the EA."	ECC-Wildlife	Yes	DAR has been revised to incorporate text provided by ECC.
218	27. Developer's Commitments	27.3.1	Table 27.2 Commitments	The last commitment listed on page 27.14 states "Organic topsoil will be left in place to retain a protective layer during the construction of the road to limit permafrost degradation and protect the soils from erosive factors of water." Without a qualifier such as "to the extent possible" this commitment will not be achievable as it is known that removal of topsoil will be required in some instances during Project construction.		ECC-PAB	Yes	DAR has been revised to include "to the extent possible".

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219	27. Developer's Commitments	27.3.1	Table 27.2 Commitments	The second commitment listed on page 27-15 states "Sediment control measures will be used at all new watercourse crossings." Can INF/Consultant Section 5.4.6 of the Project Descriptions also states that "some work will be required around existing bridges to tie the new embankment to these existing bridges." This commitment should be updated to ensure that sediment control measures are implemented for all activities related to watercourse crossings.	Recommend this commitment be updated to include "and during work around existing bridges"	ECC-PAB	Yes	DAR has been revised to include broader wording for erosion and sedimentation control.
220	27. Developer's Commitments	27.4	No reference to areas outside of the Sahtu	"In areas designated in the Sahtu Land Use Plan"	Update to include, or other by Impacted Indigenous Government and Organizations?	INF-SID	Yes	DAR has been revised as per recommendation provided by INF.
221	Permafrost Protection Plan	1	Distinguishing between effects of the highway and effects of climate change on permafrost	Permafrost along the project alignment is thawing and will continue to thaw as a result of climate change. Suggest that the GNWT consider wording such as "The primary goal of this PPP is to prevent or mitigate project-induced permafrost degradation and to present maintenance-level mitigation". The first line in section 2 is more specific.	Review wording for consistency with section 2, paragraph 1.	ECC-Land Management and Administration, NTGS	Yes	DAR has been revised to integrate text provided by ECC.
222	Permafrost Protection Plan	5	"Excavation of watercourse crossing and drainage structures" bullet point.	There is a site on the Inuvik to Tuktoyaktuk Highway that tested three different culvert designs. The contact is TetraTech Consulting (Calvin van Buskirk). That evaluation is ongoing, but results should be reviewed and potentially incorporated into designs for culverts on the MVH. Use culvert designs that allow for the installation of pipes that can be connected to a steam truck, for thawing ice plugs that could develop in the culverts in winter. Another option is heated cables that lie in the culverts, and can be connected to a power source to initiate culvert thaw ahead of spring freshet.		ECC-Land Management and Administration, NTGS	Yes	DAR has been revised to provide additional information on the integration of learnings from other projects. Additional information provided in the Table in Appendix A.1 regarding the removal of blockages from culverts to maintain flow and fish passage.
223	Permafrost Protection Plan	5	Threshold ground ice content in borrow pit.	If material is to be quarried, transported, and placed during a single winter, it will be important to identify a maximum allowable ground ice content for the embankment, and a way to estimate ground ice content during excavation.	Contained in comment.	ECC-Land Management and Administration, NTGS	Yes	DAR has been revised to include ice content reporting and adherence to the PPP.
224	Permafrost Protection Plan	6	Permafrost equilibrium	When insulation is lost, and especially if permafrost is thaw-sensitive, it can take a long time before equilibrium is re-established. Thermal erosion and resulting subsidence can occur over a wide area before equilibrium returns, which could affect the embankment.	Text in PPP should reflect that finding a new equilibrium can mean a disturbance to road infrastructure.	ECC-Land Management and Administration, NTGS	Yes	DAR has been revised to address concerns related to changes in the thermal regime over time.
225	Permafrost Protection Plan	8	Second bullet in section 8, about maintaining culverts	Winter monitoring will be important too. If baseflow in streams continues after air temperature goes below zero, culverts can begin to freeze the water until they are completely blocked by ice. Monitoring in winter can catch ponding that could flow over roads in early winter due to this process, and also identify culverts that will need to be unblocked before spring thaw.	Winter monitoring should be incorporated in the culvert maintenance plan.	ECC-Land Management and Administration, NTGS	Yes	DAR has been revised to include winter monitoring as part of the culvert maintenance plan.
226	Permafrost Protection Plan	8	In Table 8.1, potential effects can be part of a monitoring program	The effects here (e.g increase in mean seasonal temperatures, increasing AL thickness, etc.) are some of the key things to monitor as part of a monitoring program, even outside of the context of climate change. Most of the effects here need to be quantified so that we will know whether they are occurring. For example, a specific change in ground temperature above pre-road conditions could be a good threshold for mitigation measures.	conditions determined through fieldwork, and	Management and Administration, NTGS	Yes	DAR has been revised in to include thermal monitoring as a component of the additional geotechnical studies that will be completed prior to finalizing the road design. This revision is in Section 5.2.4 of the DAR. Section 9.1 of the Permafrost Protection Plan outlines additional information on ground temperature monitoring that will be completed as part of the Project.
227	Permafrost Protection Plan	9.1	Baseline monitoring	The reference here is to the Prohibition Creek Access Road monitoring. ECC considers that it would be very important to install thermistors in boreholes (as part of geotechnical work) during winter along the full MVH corridor. Key sites could include past fire disturbances, main vegetation communities, main terrain areas mapped, and riparian terrain. This would result in a baseline temperature record several years in duration before road construction. A clear idea of baseline (Pre-road) conditions would aid the development of monitoring thresholds.		ECC-Land Management and Administration, NTGS	Yes	DAR has been revised in to include thermal monitoring as a component of the additional geotechnical studies that will be completed prior to finalizing the road design. This revision is in Section 5.2.4 of the DAR.
228	Permafrost Protection Plan	9.2	Precipitation trends	Trends in precipitation, including at the seasonal level, would be important to monitor. This can affect the movement of water and how it interacts with a road, including during winter. Snowpack has a strong influence on ground temperature, and repeat snow surveys at specific sites in late winter should be implemented.	Compile precipitation and snow data and analyze with air temperature data. It will be important that this includes snow data	ECC-Land Management and Administration, NTGS	Yes	DAR has been revised to incorporate ongoing monitoring of ground and air temperatures. Additional monitoring will be implemented as needed through the Adaptive Management.

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229	Permafrost Protection Plan	10	Ground temperature monitoring offset from road location	It is good that ground temperature cable installation is also planned at locations offset from road, as indicated in the second-last bullet of Adaptive Management	NA	ECC-Land Management and Administration, NTGS	Yes	DAR has not be revised as the comment did not request additional information be inserted.
230	Permafrost Protection Plan	Table A.1	Final bullet, row 1, column 3	Provide the source or reference for the proposed threshold.	Provide rationale for 10 cm minimum packed snow depth.	ECC-Land Management and Administration, NTGS	Yes	DAR included reference to the Northern Land Use Guidelines Roads and Trails in Section 12 of the Permafrost Plan. No other changes were made.
231	Permafrost Protection Plan	Table A.1	First bullet, third row, third column.	It would be valuable to have a simple operating procedure that can be used to make decisions about when to stop quarrying at a certain site, according to the amount of ice being encountered.	Please see comment.	ECC-Land Management and Administration, NTGS	Yes	DAR has not be revised to address comment as this was not a requirement of the TOR.
232	Permafrost Protection Plan	Table A.1	Second-last bullet, row 4, column 3.	Thermistors should be connected to data loggers to ensure that temperature measurements are not biased towards certain seasons, which can happen if readings are taken manually by people going to sites.	Data loggers should be used to record temperature measurements from thermistors.	ECC-Land Management and Administration, NTGS	Yes	DAR includes information on the ground temperature monitoring that will be completed as part of the Project in Section 9.1 of the Permafrost Protection Plan.
233	Permafrost Protection Plan	Table A.1	Third bullet, row 2 on this page, column 3	Delineating catchments to the road (the areas that contribute water to the streams or riparian tracks to be crossed by the culvert) should include considerations of the water storage capacity (lakes or ponds) in the catchments. Small catchments, or those where water storage would mainly be in the soil rather than water bodies, may not require the same number or size of culverts as bigger catchments that can continue to supply baseflow after air temperature (and culvert temperature) are below zero.	See comment, and review performance of culverts along other highways in permafrost. This is an area of my own research, and I can help link highway design personnel with relevant work.	ECC-Land Management and Administration, NTGS	Yes	DAR has not be revised to address comment as this was not a requirement of the TOR. INF will incorporate input from SME's as design on the project advances to incorporate learnings from other projects.
234	Permafrost Protection Plan	Table A.1	Bullet 7, row 2 on this page, column 3.	Can you confirm that the hydrology assessment will be part of the EA or some future planning process?	NA	ECC-Land Management and Administration, NTGS	Yes	DAR includes the findings of the hydrology assessment in Section 15 (Appendix 15 A and 15B). Site-specific information will be obtained for each proposed culvert crossing location prior to finalizing culvert design during the regulatory phase of the project.
235	Volume 5 - Incinerator Management Plan	1.2	Roles and Responsibilities	This section notes the Contractor Project Manager is responsible to report incineration incidents to the GNWT. It is not clear what 'incineration incidents' mean and it should also be specified who this contact would be.	include. Would this be potential	ECC-EPWM	Yes	DAR has been revised to reflect that the Contractor Project Manager is responsible for the completion and distribution of reporting to the GNWT. The GNWT is responsible for liaising with government agencies, Indigenous Governments and Indigenous Organizations (as required).
236	Volume 5 - Incinerator Management Plan	2.4	Breakdown Contingency	The revised section does not include information on what counts as short-term and long-term with respect to incinerator breakdown.	The Plan should clarify what time period is short-term and long-term when there is a breakdown. In the version that was submitted, it has not been specified.	ECC-EPWM	Yes	DAR has been revised to include a definition of short term (up to several weeks) and long term (more than several weeks) in Section 2.4 of the Incinerator Management Plan.
237	Volume 5 - WMMP	4.1	Bear safety training missing	Bear safety training missing; some environmental monitors should receive specific bear response training (for example for the use of deterrents)	Add bear safety training to list in Section 4.1	ECC-Wildlife	Yes	DAR has been revised to incorporate the requirement for a wildlife awareness program, which includes prevention measures for wildlife safety (e.g. bear safety).
238	WMMP - V1.0 May 2023	4.4	Windrow	Any info regarding windrow design in order to allow wildlife movement? Sounds like a lot of vegetation will be removed to widen the ROW and to access quarry/borrow sources. Refer to 'Northern Land Use Guidelines - Pits and Quarries' for details. Not sure if the sentence "Construction and quarry development activities will adhere to the applicable recommended setbacks and timing restrictions for wildlife outlined in the WMMP, where possible." is meant to cover this, but further detail can be provided	Recommend adding info about windrow design	INF-SID	Yes	DAR has been revised to include information on windrows in Section 4.4.
239	Volume 5 - WMMP	4.4	Wildlife setbacks and timing restrictions	Add in cross-reference to Appendix C of the WMMP	Change bullet to: "Construction and quarry development activities will adhere to the applicable recommended setbacks and timing restrictions for wildlife outlined in the WMMP, where possible."	ECC-Wildlife	Yes	DAR has been revised to include a cross reference to Appendix C of the WMMP.
240	Volume 5 - WMMP	4.5	Response procedures for bear dens	What will happen if monitors identify a bear den within recommended setback distances? Specifics of measures to deal with nests are provided, but not for dens.	Add a section or SOP for how suspected or known bear dens will be protected. Or insert a reference to Section 5.1.3 - Pre-Construction surveys, which include bear den surveys.		Yes	DAR includes references to the completion of pre-construction surveys in section 4.5 and in Section 5.1.3. SOP on Bear Occurrences, which includes discussion of buffer zones near bear dens, is provided in Appendix D of the WMMP.
241	Volume 5 - WMMP	4.7	Deterrence procedures for bears	This section should also include a description of deterrent procedures for bears or reference to an Appendix with an SOP for bear deterrence procedures.	Add content for bear deterrence procedures.	ECC-Wildlife	Yes	DAR has been revised to include Bear Occurrence Procedures Manual as Appendix D of the WMMP.

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242	Volume 5 - WMMP	5.1.4	Pre-blast surveys	On-foot/truck surveys within 500 m radius of blast sites is proposed, consistent with the approach used for TASR. However staff from the TASR project reported that these surveys were very labor intensive and almost never (1 instance) detected wildlife in the 500 m radius. The contractor for TASR expressed interest in using drones as a more efficient means of conducting the searches, but this was never pursued. It would be worth at least testing on a trial basis, and pursued further if it appears to be more effective.		ECC-Wildlife	Yes	DAR has been revised to include potential application of unmanned aerial vehicles to support pre-blast surveys.
243	Volume 5 - WMMP	5.1.5	Wildlife incident reporting	Some types of wildlife incidents (e.g wildlife mortality) must be reported as soon as possible or within 24 hours, as stipulated by the Wildlife Act and Wildlife General Regulations. Project staff must be made aware of what types of wildlife incidents require immediate reporting to GNWT-ECC.	NWT" document available at: https://www.gov.nt.ca/ecc/en/statutory-requirements-		Partially	DAR has been revised to include a reference to the Wildlife General Regulations. Supplemental information requested in the comment (e.g. More detail about which types of incidents need to be reported immediately, and to whom they must be reported) will be provided in the final WMMP submitted for the Project.
244	Volume 5 - WMMP	5.2.3	Boreal caribou collar analysis	This section focuses on evaluating the influence of the existing MVWR on boreal caribou movements, but needs to be expanded to also then compare and contrast the impact of the MVH on movements relative to the existing impact of the MVWR which is the more important question. Please note that collars deployed along the MVWR collect locations every two hours, not hourly.	Add a section describing how impacts of the MVH on caribou movements will be compared to impacts of the current MVWR.	ECC-Wildlife	Yes	DAR has been revised to include "Ongoing collar-based monitoring during project construction and operations will compare boreal caribou movement data analyzed in relation to the MVWR with movement analysis to be conducted in relation to the Project."
245	Volume 5 - WMMP	5.2.4	Moose surveys	Current survey programs are not adequate to monitor impacts of the MVH on moose distribution or abundance. Current programs will need to be adapted and expanded to achieve this objective. Additional resources will be required.		ECC-Wildlife	Yes	DAR has been revised to outline that the GNWT-ECC will need to adapt and expand current moose survey programs to detect changes in distribution and abundance of moose along the MVH, subject to the availability of resources.
246	Volume 5 - WMMP	5.2.5	Barren-ground Caribou Surveys	Survey information will be used to develop further information on the distribution of Bluenose-East and other barren ground caribou herds.	Add that current collar-based monitoring of the Bluenose-East and other barren ground caribou herds will help to detect whether their annual distribution shifts and starts overlapping with the LAA.	ECC-Wildlife	Yes	DAR has been revised to reflect current collar-based monitoring of the Bluenose-East and other barren ground caribou herds will help to detect whether their annual distribution shifts and starts overlapping with the LAA.
247	Volume 5 - WMMP	5.2.9	Wildlife Health Monitoring	GNWT responses to engagement feedback are often repetitive/generic answer. The purpose of this table was to "bookend" the comments provided during engagement and should be specific responses.	Add "GNWT-ECC also records indices of health during collar deployment on boreal and barren-ground caribou" and "These existing programs contribute to monitoring wildlife health at regional scales".	ECC-Wildlife	Yes	DAR has been revised to include "GNWT-ECC also records indices of health during collar deployment on boreal and barren-ground caribou" and "These existing programs contribute to monitoring wildlife health at regional scales".