

VIA EMAIL AND FAX

JUN 22 2018

Grand Chief George Mackenzie  
Tłı̨chǫ Government  
PO Box 412  
YELLOWKNIFE, NT, X0E 0Y0

Dear Grand Chief Mackenzie:

**Consultation on proposed modifications to measures in the Report of Environmental Assessment and Reasons for Decision for the GNWT's proposed Tłı̨chǫ All-Season Road Project (EA1617-01)**

On March 29, 2018, the Mackenzie Valley Environmental Impact Review Board (Review Board) released the Report of Environmental Assessment and Reasons for Decision (Report of EA) for the Tłı̨chǫ All- Season Road Project (Project). The Review Board recommended the Government of the Northwest Territories' (GNWT), as led by the Department of Infrastructure, proposed Project be approved, subject to the implementation of 23 measures and developer commitments.

The GNWT is appreciative of the on-going collaborative nature of our relationship with the Tłı̨chǫ Government. As you know, the responsible ministers exercising their decision-making authority have reviewed the Report of EA and have decided to consult with the Review Board to modify three measures related to boreal caribou (attached). We understand that that the Tłı̨chǫ Government is entering a concurrent consult to modify process with the Review Board on five measures of concern to your government. The responsible ministers are supportive of the modifications the Tłı̨chǫ Government has suggested.

As noted above, responsible ministers are consulting with the Review Board on three measures related to boreal caribou. We are providing this second opportunity for the Tłı̨chǫ Government to advise the responsible ministers of whether the proposed modifications to the three measures have any adverse impact on your established Treaty rights, recognizing that the Tłı̨chǫ Government has previously informed responsible ministers that they have no concern with the proposed modifications. The GNWT and the Government of Canada are seeking the Tłı̨chǫ Government's response to the following questions:

- Are there any specific activities or components of the modification(s) to the measure(s) you identify as having the potential to adversely impact your established Treaty rights?
- If so, please specify the nature of any and all concerns regarding potential adverse impacts resulting from the modification(s) to the measure(s), and which established Treaty rights you see as being potentially impacted, in your response letter; and
- Please specify what modification(s) to the measure(s) you would recommend to address the potential adverse impact.

The responsible ministers note that the Review Board is intending to provide parties to the environmental assessment, including the Tłıchǫ Government, with an additional consultation opportunity through a review and discussion of the proposed modifications. In addition to responding to this letter, the GNWT and the Government of Canada encourage your participation in the consultation opportunity the Review Board provides.

It is important to note that to date no final decisions have been made regarding the Review Board's recommendation in the Report of EA. If there are any further changes to the wording of the measures currently proposed by responsible ministers, the responsible ministers will consult with the Tłıchǫ Government on the proposed final wording of the measures prior to rendering a final decision. Your continued input is important for informing the responsible ministers' decisions relating to the Project.

Please provide any written comments directly to the GNWT's Project Assessment Analyst, Darren Campbell, via email at [darren\\_campbell@gov.nt.ca](mailto:darren_campbell@gov.nt.ca), by July 23, 2018. If you have any questions regarding the process, please email them to Darren or contact him by phone at 867-767-9180 ext. 24024. Alternatively, you can contact Melissa Pink, Manager, Project Assessment Branch, at [Melissa\\_Pink@gov.nt.ca](mailto:Melissa_Pink@gov.nt.ca) or 867-767-9180 ext. 24021.

Sincerely,



**Kate Hearn**  
Assistant Deputy Minister  
Planning and Coordination  
Department of Lands  
Government of the Northwest Territories



**Adrian Paradis**  
A/ Director-General  
Northern Projects Management Office  
Canadian Northern Economic  
Development Agency  
Government of Canada

- c: **Mr. Gary Bohnet, Principal Secretary, Office of the Premier of the Northwest Territories**
- Mr. Mike Aumond, Secretary to Cabinet/Deputy Minister, GNWT Executive and Indigenous Affairs**
- Mr. Allan Cash, Deputy Secretary to Cabinet and Assistant Deputy Minister**
- Mr. Willard Hagen, Deputy Minister, GNWT Department of Lands**
- Dr. Joe Dragon, Deputy Minister, GNWT Department of Environment and Natural Resources**
- Mr. Mark Hopkins, Director General, Natural Resources and Environment Branch, Indigenous and Northern Affairs Canada**
- Mr. Patrick O'Neill, Director General, Explosive Safety and Security Branch, Natural Resources Canada**
- Mr. Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board**

VIA EMAIL AND FAX

JUN 22 2018

Grand Chief Herb Norwegian  
Dehcho First Nations  
P.O. Box 89  
FORT SIMPSON NT X0E 0N0

Dear Grand Chief Norwegian,

**Consultation on proposed modifications to measures in the Report of Environmental Assessment and Reasons for Decision for the GNWT's proposed Tłıchǵ All-Season Road Project (EA1617-01)**

On March 29, 2018, the Mackenzie Valley Environmental Impact Review Board (Review Board) released the Report of Environmental Assessment and Reasons for Decision (Report of EA) for the Tłıchǵ All- Season Road Project (Project). The Review Board recommended the Government of the Northwest Territories' (GNWT), as led by the Department of Infrastructure, proposed Project be approved, subject to the implementation of 23 measures and developer commitments as written in the Report of EA.

The purpose of this letter is to let you know that the responsible ministers exercising their decision-making authority have reviewed the Report of EA and have decided to consult with the Review Board to modify three measures related to boreal caribou. The Tłıchǵ Government is also entering a concurrent consult to modify process on separate measures with the Review Board. The proposed modifications to the measures from responsible ministers and the Tłıchǵ Government are attached.

As noted above, the responsible ministers are consulting with the Review Board on three measures related to boreal caribou and the Tłıchǵ Government are consulting with the Review Board on five measures. This is an opportunity for Dehcho First Nations to advise the responsible ministers whether the proposed modifications to the eight measures have any adverse impact on your asserted or established Aboriginal and/or Treaty rights. The GNWT and the Government of Canada are seeking your response to the following questions:

.../2

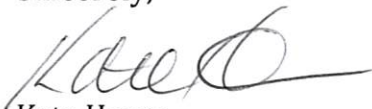


- Are there any specific activities or components of the modification(s) to the measure(s) you identify as having the potential to adversely impact your asserted or established Aboriginal and/or Treaty rights?
- If so, please specify the nature of any and all concerns regarding potential adverse impacts resulting from the modification(s) to the measure(s), and which asserted or established Aboriginal and/or Treaty rights you see as being potentially impacted, in your response letter; and
- Please specify what modification(s) to the measure(s) you would recommend to address the potential adverse impact.

It is important to note that to date no final decisions have been made regarding the Review Board's recommendation in the Report of EA. If there are any further changes to the wording of the measures currently proposed for modification, the responsible ministers will consult with Dehcho First Nations on the final proposed wording of the measures prior to rendering a final decision. Your input is important for informing the responsible ministers' decisions relating to the Project.

Please provide any written comments directly to the GNWT's Project Assessment Analyst, Darren Campbell, via email at [darren\\_campbell@gov.nt.ca](mailto:darren_campbell@gov.nt.ca), by July 23, 2018. If you have any questions regarding the process, please email them to Darren or contact him by phone at 867-767-9180 ext. 24024. Alternatively, you can contact Melissa Pink, Manager, Project Assessment Branch, at [Melissa\\_Pink@gov.nt.ca](mailto:Melissa_Pink@gov.nt.ca) or 867-767-9180 ext. 24021.

Sincerely,



Kate Hearn  
Assistant Deputy Minister  
Planning and Coordination  
Department of Lands  
Government of the Northwest Territories



Adrian Paradis  
A/ Director-General  
Northern Projects Management Office  
Canadian Northern Economic  
Development Agency  
Government of Canada

**c:**

**Mr. Gary Bohnet, Principal Secretary, Office of the Premier of the Northwest Territories**

**Mr. Mike Aumond, Secretary to Cabinet/Deputy Minister, GNWT Executive and Indigenous Affairs**

**Mr. Allan Cash, Deputy Secretary to Cabinet and Assistant Deputy Minister**

**Mr. Willard Hagen, Deputy Minister, GNWT Department of Lands**

**Dr. Joe Dragon, Deputy Minister, GNWT Department of Environment and Natural Resources**

**Mr. Mark Hopkins, Director General, Natural Resources and Environment Branch, Indigenous and Northern Affairs Canada**

**Mr. Patrick O'Neill, Director General, Explosive Safety and Security Branch, Natural Resources Canada**

**Mr. Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board**

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Sambaa K'e Dene Band  
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West Point First Nation  
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Chief Gerald Antoine  
Łíídlıı Kúę First Nation  
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Pehdzéh Kí First Nation  
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Chief Joachim Bonnetrouge  
Deh Gah Got'ie Band  
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FORT PROVIDENCE NT X0E 0L0

President Clifford McLeod  
Fort Providence Métis Local  
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FORT PROVIDENCE NT X0E 0L0

Chief Lloyd Chicot  
Ka'a'gee Tu First Nation  
P.O. Box 4428  
HAY RIVER NT X0E 1G3

VIA EMAIL AND FAX

JUN 22 2018

President Garry Bailey  
Northwest Territories Métis Nation  
P.O. Box 720  
FORT SMITH NT X0E 0P0

President Ken Hudson  
Fort Smith Métis Nation  
P.O. Box 720  
FORT SMITH NT X0E 0P0

President Trevor Beck  
Hay River Métis Council  
10 Industrial Drive  
HAY RIVER NT X0E 0R6

President Arthur Beck  
Fort Resolution Métis Council  
P.O. Box 137  
FORT RESOLUTION NT X0E 0M0

Dear Presidents:

**Consultation on proposed modifications to measures in the Report of Environmental Assessment and Reasons for Decision for the GNWT's proposed Tłıchǫ All-Season Road Project (EA1617-01)**

On March 29, 2018, the Mackenzie Valley Environmental Impact Review Board (Review Board) released the Report of Environmental Assessment and Reasons for Decision (Report of EA) for the Tłıchǫ All- Season Road Project (Project). The Review Board recommended the Government of the Northwest Territories' (GNWT), as led by the Department of Infrastructure, proposed Project be approved, subject to the implementation of 23 measures and developer commitments as written in the Report of EA.

The purpose of this letter is to let you know that the responsible ministers exercising their decision-making authority have reviewed the Report of EA and have decided to consult with the Review Board to modify three measures related to boreal caribou. The Tłıchǫ Government is also entering a concurrent consult to modify process on separate measures with the Review Board. The proposed modifications to the measures from responsible ministers and the Tłıchǫ Government are attached.

.../2



As noted above, the responsible ministers are consulting with the Review Board on three measures related to boreal caribou and the Tłı̨chǫ Government are consulting with the Review Board on five measures. This is an opportunity for the Northwest Territories Métis Nation to advise the responsible ministers whether the proposed modifications to the eight measures have any adverse impact on your asserted Aboriginal rights. The GNWT and Canada are seeking your response to the following questions:

- Are there any specific activities or components of the modification(s) to the measure(s) you identify as having the potential to adversely impact your asserted Aboriginal rights?
- If so, please specify the nature of any and all concerns regarding potential adverse impacts resulting from the modification(s) to the measure(s), and which asserted Aboriginal rights you see as being potentially impacted, in your response letter; and
- Please specify what modification(s) to the measure(s) you would recommend to address the potential adverse impact.

It is important to note that to date no final decisions have been made regarding the Review Board's recommendation in the Report of EA. If there are any further changes to the wording of the measures currently proposed for modification, the responsible ministers will consult with the Northwest Territories Métis Nation on the final proposed wording of the measures prior to rendering a final decision. Your input is important for informing the responsible ministers' decisions relating to the Project.

Please provide any written comments directly to the GNWT's Project Assessment Analyst, Darren Campbell, via email at [darren\\_campbell@gov.nt.ca](mailto:darren_campbell@gov.nt.ca), by July 23, 2018. If you have any questions regarding the process, please email them to Darren or contact him by phone at 867-767-9180 ext. 24024. Alternatively, you can contact Melissa Pink, Manager, Project Assessment Branch, at [Melissa\\_Pink@gov.nt.ca](mailto:Melissa_Pink@gov.nt.ca) or 867-767-9180 ext. 24021.

Sincerely,



Kate Hearn  
Assistant Deputy Minister  
Planning and Coordination  
Department of Lands  
Government of the Northwest Territories



Adrian Paradis  
A/ Director-General  
Northern Projects Management Office  
Canadian Northern Economic  
Development Agency  
Government of Canada

c:

Mr. Gary Bohnet, Principal Secretary, Office of the Premier of the Northwest Territories

Mr. Mike Aumond, Secretary to Cabinet/Deputy Minister, GNWT Executive and Indigenous Affairs

Mr. Allan Cash, Deputy Secretary to Cabinet and Assistant Deputy Minister

Mr. Willard Hagen, Deputy Minister, GNWT Department of Lands

Dr. Joe Dragon, Deputy Minister, GNWT Department of Environment and Natural Resources

Mr. Mark Hopkins, Director General, Natural Resources and Environment Branch, Indigenous and Northern Affairs Canada

Mr. Patrick O'Neill, Director General, Explosive Safety and Security Branch, Natural Resources Canada

Mr. Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board

VIA EMAL AND FAX

President Bill Enge  
North Slave Metis Alliance  
PO Box 2310  
YELLOWKNIFE, NT X0E 0Y0

JUN 22 2018

Dear President Enge:

**Consultation on proposed modifications to measures in the Report of Environmental Assessment and Reasons for Decision for the GNWT's proposed Tłıchǰ All-Season Road Project (EA1617-01)**

On March 29, 2018, the Mackenzie Valley Environmental Impact Review Board (Review Board) released the Report of Environmental Assessment and Reasons for Decision (Report of EA) for the Tłıchǰ All-Season Road Project (Project). The Review Board recommended the Government of the Northwest Territories' (GNWT), as led by the Department of Infrastructure, proposed Project be approved, subject to the implementation of 23 measures and developer commitments.

The purpose of this letter is to let you know that the responsible ministers exercising their decision-making authority have reviewed the Report of EA and have decided to consult with the Review Board to modify three measures related to boreal caribou. The Tłıchǰ Government is also entering a concurrent consult to modify process on separate measures with the Review Board. The proposed modifications to the measures from responsible ministers and the Tłıchǰ Government are attached.

In response to the March 29, 2018 letter from the GNWT and the Government of Canada, the North Slave Métis Alliance responded noting difficulty in drawing conclusions regarding whether your concerns had been fully addressed. You also noted the Review Board found potential significant adverse impacts to boreal caribou.

As noted above, responsible ministers are consulting with the Review Board on three measures related to boreal caribou and the Tłıchǰ Government are consulting with the Review Board on five measures. This is an opportunity for the North Slave Métis Alliance to advise the responsible ministers of whether the proposed modifications to the eight measures have any adverse impact on your asserted Aboriginal rights. The GNWT and

.../2

the Government of Canada are seeking the North Slave Metis Alliance's response to the following questions:

- Are there any specific activities or components of the modification(s) to the measure(s) you identify as having the potential to adversely impact your asserted Aboriginal rights?
- If so, please specify the nature of any and all concerns regarding potential adverse impacts resulting from the modification(s) to the measure(s), and which asserted Aboriginal rights you see as being potentially impacted, in your response letter; and
- Please specify what modification(s) to the measure(s) you would recommend to address the potential adverse impact.

The responsible ministers note that the Review Board is intending to provide parties to the environmental assessment, including the North Slave Métis Alliance, with an additional consultation opportunity through a review and discussion of the proposed modifications. In addition to responding to this letter, the GNWT and Government of Canada encourage the North Slave Métis Alliance to participate in the consultation opportunity the Review Board provides.

It is important to note that to date no final decisions have been made regarding the Review Board's recommendation in the Report of EA. If there are any further changes to the wording of the measures currently proposed, the responsible ministers will consult with the North Slave Métis Alliance on the final proposed wording of the measures prior to rendering a final decision. Your continued input is important for informing the ministers' decisions relating to the Project.

Please provide any written comments directly to the GNWT's Project Assessment Analyst, Darren Campbell, via email at [darren\\_campbell@gov.nt.ca](mailto:darren_campbell@gov.nt.ca), by July 23, 2018. If you have any questions regarding the process, please email them to Darren or contact him by phone at 867-767-9180 ext. 24024. Alternatively, you can contact Melissa Pink, Manager, Project Assessment Branch, at [Melissa\\_Pink@gov.nt.ca](mailto:Melissa_Pink@gov.nt.ca) or 867-767-9180 ext. 24021.



Sincerely,



**Kate Hearn**  
**Assistant Deputy Minister**  
**Planning and Coordination**  
**Department of Lands**  
**Government of the Northwest Territories**



**Adrian Paradis**  
**A/ Director-General**  
**Northern Projects Management Office**  
**Canadian Northern Economic**  
**Development Agency**  
**Government of Canada**

- c: **Mr. Gary Bohnet, Principal Secretary, Office of the Premier of the Northwest Territories**
- Mr. Mike Aumond, Secretary to Cabinet/Deputy Minister, GNWT Executive and Indigenous Affairs**
- Mr. Allan Cash, Deputy Secretary to Cabinet and Assistant Deputy Minister**
- Mr. Willard Hagen, Deputy Minister, GNWT Department of Lands**
- Dr. Joe Dragon, Deputy Minister, GNWT Department of Environment and Natural Resources**
- Mr. Mark Hopkins, Director General, Natural Resources and Environment Branch, Indigenous and Northern Affairs Canada**
- Mr. Patrick O'Neill, Director General, Explosive Safety and Security Branch, Natural Resources Canada**
- Mr. Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board**



JUN 22 2018

VIA EMAIL AND FAX

President Clem Paul  
Mountain Island Métis  
P.O. Box 11051  
YELLOWKNIFE NT X1A 3X7

Dear President Paul:

**Consultation on proposed modifications to measures in the Report of Environmental Assessment and Reasons for Decision for the GNWT's proposed Tłı̨chų All-Season Road Project (EA1617-01)**

On March 29, 2018, the Mackenzie Valley Environmental Impact Review Board (Review Board) released the Report of Environmental Assessment and Reasons for Decision (Report of EA) for the Tłı̨chų All-Season Road Project (Project). The Review Board recommended the Government of the Northwest Territories' (GNWT), as led by the Department of Infrastructure, proposed Project be approved, subject to the implementation of 23 measures and developer commitments as written in the Report of EA.

The purpose of this letter is to let you know that the responsible ministers exercising their decision-making authority have reviewed the Report of EA and have decided to consult with the Review Board to modify three measures related to boreal caribou. The Tłı̨chų Government is also entering a concurrent consult to modify process on separate measures with the Review Board. The proposed modifications to the measures from responsible ministers and the Tłı̨chų Government are attached.

As noted above, the responsible ministers are consulting with the Review Board on three measures related to boreal caribou and the Tłı̨chų Government are consulting with the Review Board on five measures. This is an opportunity for Mountain Island Métis to advise the responsible ministers whether the proposed modifications to the eight measures have any adverse impact on your asserted Aboriginal and/or Treaty rights. The GNWT and Canada are seeking your response to the following questions:

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- Are there any specific activities or components of the modification(s) to the measure(s) you identify as having the potential to adversely impact your asserted Aboriginal and/or Treaty rights?
- If so, please specify the nature of any and all concerns regarding potential adverse impacts resulting from the modification(s) to the measure(s), and which asserted Aboriginal and/or Treaty rights you see as being potentially impacted, in your response letter; and
- Please specify what modification(s) to the measure(s) you would recommend to address the potential adverse impact.

It is important to note that to date no final decisions have been made regarding the Review Board's recommendation in the Report of EA. If there are any further changes to the wording of the measures currently proposed for modification, the responsible ministers will consult with Mountain Island Métis on the final proposed wording of the measures prior to rendering a final decision. Your input is important for informing the responsible ministers' decisions relating to the Project.

Please provide any written comments directly to the GNWT's Project Assessment Analyst, Darren Campbell, via email at [darren\\_campbell@gov.nt.ca](mailto:darren_campbell@gov.nt.ca), by July 23, 2018. If you have any questions regarding the process, please email them to Darren or contact him by phone at 867-767-9180 ext. 24024. Alternatively, you can contact Melissa Pink, Manager, Project Assessment Branch, at [Melissa\\_Pink@gov.nt.ca](mailto:Melissa_Pink@gov.nt.ca) or 867-767-9180 ext. 24021.

Sincerely,



Kate Hearn  
Assistant Deputy Minister  
Planning and Coordination  
Department of Lands

See Distribution List

**Distribution List:**

**Mr. Gary Bohnet, Principal Secretary, Office of the Premier of the Northwest Territories**

**Mr. Mike Aumond, Secretary to Cabinet/Deputy Minister, GNWT Executive and Indigenous Affairs**

**Mr. Allan Cash, Deputy Secretary to Cabinet and Assistant Deputy Minister**

**Mr. Willard Hagen, Deputy Minister, GNWT Department of Lands**

**Dr. Joe Dragon, Deputy Minister, Department of Environment and Natural Resources**

**Mr. Mark Hopkins, Director General, Natural Resources and Environment Branch, Indigenous and Northern Affairs Canada**

**Mr. Patrick O'Neill, Director General, Explosive Safety and Security Branch, Natural Resources Canada**

**Mr. Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board**



VIA EMAIL AND FAX

JUN 22 2018

Chief Edward Sangris  
Chief Ernest Betsina  
Yellowknives Dene First Nation  
PO Box 2514  
YELLOWKNIFE, NT X1A 2P8

Dear Chief Sangris and Chief Betsina:

**Consultation on proposed modifications to measures in the Report of Environmental Assessment and Reasons for Decision for the GNWT's proposed Tłıchǰ All-Season Road Project (EA1617-01)**

On March 29, 2018, the Mackenzie Valley Environmental Impact Review Board (Review Board) released the Report of Environmental Assessment and Reasons for Decision (Report of EA) for the Tłıchǰ All- Season Road Project (Project). The Review Board recommended the Government of the Northwest Territories' (GNWT), as led by the Department of Infrastructure, proposed Project be approved, subject to the implementation of 23 measures and developer commitments.

The purpose of this letter is to let you know that the responsible ministers exercising their decision-making authority have reviewed the Report of EA and have decided to consult with the Review Board to modify three measures related to boreal caribou. The Tłıchǰ Government is also entering a concurrent consult to modify process on separate measures with the Review Board. The proposed modifications to the measures from responsible ministers and the Tłıchǰ Government are attached.

As noted above, responsible ministers are consulting with the Review Board on three measures related to boreal caribou and the Tłıchǰ Government are consulting with the Review Board on five measures. This is an opportunity for the Yellowknives Dene First Nation to advise the responsible ministers whether the proposed modifications to the eight measures have any adverse impact on your asserted or established Aboriginal and/or Treaty rights. The GNWT and the Government of Canada are seeking the YKDFN's response to the following questions:

- Are there any specific activities or components of the modification(s) to the measure(s) you identify as having the potential to adversely impact your asserted or established Aboriginal and/or Treaty rights?
- If so, please specify the nature of any and all concerns regarding potential adverse impacts resulting from the modification(s) to the measure(s), and which asserted or established Aboriginal and/or Treaty rights you see as being potentially impacted, in your response letter; and
- Please specify what modification(s) to the measure(s) you would recommend to address the potential adverse impact.

The responsible ministers note that the Review Board is intending to provide parties to the environmental assessment, including the YKDFN, with an additional consultation opportunity through a review and discussion of the proposed modifications. In addition to responding to this letter, the GNWT and the Government of Canada encourage the Yellowknives Dene First Nation to participate in the consultation opportunity the Review Board provides.

It is important to note that to date no final decisions have been made regarding the Review Board's recommendation in the Report of EA. If there are any additional changes to the wording of the measures, the responsible ministers will consult with the Yellowknives Dene First Nation on the final proposed wording of the measures prior to rendering a final decision. Your continued input is important for informing the responsible ministers' decisions relating to the Project.

Please provide any written comments directly to the GNWT's Project Assessment Analyst, Darren Campbell, via email at [darren\\_campbell@gov.nt.ca](mailto:darren_campbell@gov.nt.ca), by July 23, 2018. If you have any questions regarding the process, please email them to Darren or contact him by phone at 867-767-9180 ext. 24024. Alternatively, you can contact Melissa Pink, Manager, Project Assessment Branch, at [melissa\\_pink@gov.nt.ca](mailto:melissa_pink@gov.nt.ca) or 867-767-9180 ext. 24021.

Sincerely,



Kate Hearn  
Assistant Deputy Minister  
Planning and Coordination  
Department of Lands  
Government of the Northwest Territories



Adrian Paradis  
A/ Director-General  
Northern Projects Management Office  
Canadian Northern Economic  
Development Agency  
Government of Canada

c:

Mr. Gary Bohnet, Principal Secretary, Office of the Premier of the Northwest Territories

Mr. Mike Aumond, Secretary to Cabinet/Deputy Minister, GNWT Executive and Indigenous Affairs

Mr. Allan Cash, Deputy Secretary to Cabinet and Assistant Deputy Minister

Mr. Willard Hagen, Deputy Minister, GNWT Department of Lands

Dr. Joe Dragon, Deputy Minister, GNWT Department of Environment and Natural Resources

Mr. Mark Hopkins, Director General, Natural Resources and Environment Branch, Indigenous and Northern Affairs Canada

Mr. Patrick O'Neill, Director General, Explosive Safety and Security Branch, Natural Resources Canada

Chief Louis Balsillie Deninu K'ue First Nation

Chief Darrell Boucher-Marlowe, Łutselk'e Dene First Nations

Chief Edward Sangris, Yellowknives Dene First Nation

Chief Ernest Betsina, Yellowknives Dene First Nation

Annie Boucher, Executive Director, Akaitcho Territory Government

Mr. Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board





JUN 22 2018

VIA EMAIL AND FAX

Chief Darrell Boucher-Marlowe  
Łutselk'e Dene First Nations  
P.O.Box 28  
ŁUTSELK'E NT X0E 1A0

Dear Chief Boucher-Marlowe:

**Consultation on proposed modifications to measures in the Report of Environmental Assessment and Reasons for Decision for the GNWT's proposed Tłıchų All-Season Road Project (EA1617-01)**

On March 29, 2018, the Mackenzie Valley Environmental Impact Review Board (Review Board) released the Report of Environmental Assessment and Reasons for Decision (Report of EA) for the Tłıchų All-Season Road Project (Project). The Review Board recommended the Government of the Northwest Territories' (GNWT), as led by the Department of Infrastructure, proposed Project be approved, subject to the implementation of 23 measures and developer commitments as written in the Report of EA.

The purpose of this letter is to let you know that the responsible ministers exercising their decision-making authority have reviewed the Report of EA and have decided to consult with the Review Board to modify three measures related to boreal caribou. The Tłıchų Government is also entering a concurrent consult to modify process on separate measures with the Review Board. The proposed modifications to the measures from responsible ministers and the Tłıchų Government are attached.

As noted above, the responsible ministers are consulting with the Review Board on three measures related to boreal caribou and the Tłıchų Government are consulting with the Review Board on five measures. This is an opportunity for Łutselk'e Dene First Nations to advise the responsible ministers whether the proposed modifications to the eight measures have any adverse impact on your asserted or established Aboriginal and/or Treaty rights. The GNWT and the Government of Canada are seeking your response to the following questions:

.../2



- Are there any specific activities or components of the modification(s) to the measure(s) you identify as having the potential to adversely impact your asserted or established Aboriginal and/or Treaty rights?
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It is important to note that to date no final decisions have been made regarding the Review Board's recommendation in the Report of EA. If there are any further changes to the wording of the measures currently proposed for modification, the responsible ministers will consult with Łutselk'e Dene First Nations on the final proposed wording of the measures prior to rendering a final decision. Your input is important for informing the responsible ministers' decisions relating to the Project.

Please provide any written comments directly to the GNWT's Project Assessment Analyst, Darren Campbell, via email at [darren\\_campbell@gov.nt.ca](mailto:darren_campbell@gov.nt.ca), by July 23, 2018. If you have any questions regarding the process, please email them to Darren or contact him by phone at 867-767-9180 ext. 24024. Alternatively, you can contact Melissa Pink, Manager, Project Assessment Branch, at [Melissa\\_Pink@gov.nt.ca](mailto:Melissa_Pink@gov.nt.ca) or 867-767-9180 ext. 24021.

Sincerely,



Kate Hearn  
Assistant Deputy Minister  
Planning and Coordination  
Department of Lands

See Distribution List

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**Mr. Allan Cash, Deputy Secretary to Cabinet and Assistant Deputy Minister**

**Mr. Willard Hagen, Deputy Minister, GNWT Department of Lands**

**Dr. Joe Dragon, Deputy Minister, GNWT Department of Environment and Natural Resources**

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**Mr. Patrick O'Neill, Director General, Explosive Safety and Security Branch, Natural Resources Canada**

**Chief Louis Balsillie Deninu K'ue First Nation**

**Chief Darrell Boucher-Marlowe, Łutselk'e Dene First Nations**

**Chief Edward Sangris, Yellowknives Dene First Nation**

**Chief Ernest Betsina, Yellowknives Dene First Nation**

**Annie Boucher, Executive Director, Akaitcho Territory Government**

**Mr. Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board**



JUN 22 2019

VIA EMAIL AND FAX

Chief Louis Balsillie  
Deninu K'ue First Nation  
P.O. Box 1899  
FORT RESOLUTION NT X0E 0M0

Dear Chief Balsillie:

**Consultation on proposed modifications to measures in the Report of Environmental Assessment and Reasons for Decision for the GNWT's proposed Tłı̨chų All-Season Road Project (EA1617-01)**

On March 29, 2018, the Mackenzie Valley Environmental Impact Review Board (Review Board) released the Report of Environmental Assessment and Reasons for Decision (Report of EA) for the Tłı̨chų All-Season Road Project (Project). The Review Board recommended the Government of the Northwest Territories' (GNWT), as led by the Department of Infrastructure, proposed Project be approved, subject to the implementation of 23 measures and developer commitments as written in the Report of EA.

The purpose of this letter is to let you know that the responsible ministers exercising their decision-making authority have reviewed the Report of EA and have decided to consult with the Review Board to modify three measures related to boreal caribou. The Tłı̨chų Government is also entering a concurrent consult to modify process on separate measures with the Review Board. The proposed modifications to the measures from responsible ministers and the Tłı̨chų Government are attached.

As noted above, the responsible ministers are consulting with the Review Board on three measures related to boreal caribou and the Tłı̨chų Government are consulting with the Review Board on five measures. This is an opportunity for Deninu K'ue First Nations to advise the responsible ministers whether the proposed modifications to the eight measures have any adverse impact on your asserted or established Aboriginal and/or Treaty rights. The GNWT and Government of Canada are seeking your response to the following questions:

- Are there any specific activities or components of the modification(s) to the measure(s) you identify as having the potential to adversely impact your asserted or established Aboriginal and/or Treaty rights?

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- If so, please specify the nature of any and all concerns regarding potential adverse impacts resulting from the modification(s) to the measure(s), and which asserted or established Aboriginal and/or Treaty rights you see as being potentially impacted, in your response letter; and
- Please specify what modification(s) to the measure(s) you would recommend to address the potential adverse impact.

It is important to note that to date no final decisions have been made regarding the Review Board's recommendation in the Report of EA. If there are any further changes to the wording of the measures currently proposed for modification, the responsible ministers will consult with Deninu K'ue First Nations on the final proposed wording of the measures prior to rendering a final decision. Your input is important for informing the responsible ministers' decisions relating to the Project.

Please provide any written comments directly to the GNWT's Project Assessment Analyst, Darren Campbell, via email at [darren\\_campbell@gov.nt.ca](mailto:darren_campbell@gov.nt.ca), by July 23, 2018. If you have any questions regarding the process, please email them to Darren or contact him by phone at 867-767-9180 ext. 24024. Alternatively, you can contact Melissa Pink, Manager, Project Assessment Branch, at [Melissa\\_Pink@gov.nt.ca](mailto:Melissa_Pink@gov.nt.ca) or 867-767-9180 ext. 24021.

Sincerely,



Kate Hearn  
Assistant Deputy Minister  
Planning and Coordination  
Department of Lands

See Distribution List

**Distribution List:**

**Mr. Gary Bohnet, Principal Secretary, Office of the Premier of the Northwest Territories**

**Mr. Mike Aumond, Secretary to Cabinet/Deputy Minister, GNWT Executive and Indigenous Affairs**

**Mr. Allan Cash, Deputy Secretary to Cabinet and Assistant Deputy Minister**

**Mr. Willard Hagen, Deputy Minister, GNWT Department of Lands**

**Dr. Joe Dragon, Deputy Minister, GNWT Department of Environment and Natural Resources**

**Mr. Mark Hopkins, Director General, Natural Resources and Environment Branch, Indigenous and Northern Affairs Canada**

**Mr. Patrick O'Neill, Director General, Explosive Safety and Security Branch, Natural Resources Canada**

**Chief Louis Balsillie Deninu K'ue First Nation**

**Chief Darrell Boucher-Marlowe, Łutselk'e Dene First Nations**

**Chief Edward Sangris, Yellowknives Dene First Nation**

**Chief Ernest Betsina, Yellowknives Dene First Nation**

**Annie Boucher, Executive Director, Akaitcho Territory Government**

**Mr. Mark Cliffe-Phillips, Executive Director, Mackenzie Valley Environmental Impact Review Board**



## **PROPOSED MODIFICATIONS TO MEASURES FOR THE Tłıchǵ ALL-SEASON ROAD PROJECT**

### **Measure 6-1: Implementation of the *Recovery Strategy for the Boreal Caribou in the NWT*, and required range plans, for boreal caribou affected by the Project**

**6-1 - Part 1:** The responsible ministers agree with the Mackenzie Valley Environmental Impact Review Board (Review Board) that range plan(s) for boreal caribou in the North Slave region should be completed in a timely manner and acknowledge that the Review Board issued measure 6-1 in part because of the Review Board's concerns with the absence of range plans. As it is implied in the Report of Environmental Assessment (Report of EA) for the Tłıchǵ All-season Road (the Project) that range plans could address many of the Review Board's concerns, it is important that the implementation of measure 6-1 reflects the existing co-management system within which the Government of the Northwest Territories (GNWT) must work. In order to do so, the responsible ministers are suggesting modifications to measure 6-1.

The first modification clarifies that a range plan will be developed for the North Slave portion of the NT1 boreal caribou range, as the boreal caribou range does not overlap with the entirety of the North Slave region. GNWT recognizes that the measure calls for developing and implementing range plans in other regions where boreal caribou may experience impacts from the project, and the GNWT is committed to doing so.

The completion of range plan(s) will require collaboration and endorsement by Indigenous Governments and organizations (IGOs) and renewable resource boards. The GNWT cannot guarantee the outcome or the timing for completion of this necessary co-management process; therefore, the modifications are being proposed to reflect that completion of a range plan prior to the Project being opened for public use cannot be guaranteed by the GNWT. An achievable objective within the GNWT's control is the completion and submission of a range plan for the North Slave portion of the NT1 range for review under section 12.5.1 of the Tłıchǵ Agreement prior to the Project being opened for public use.

The third modification is intended to reflect that GNWT-ENR does not have the sole authority for land management decisions. The proposed modifications reflect that

land and habitat management in the North Slave region is a shared responsibility between the GNWT, the Tłıchǫ Government, and the federal government.

As indicated above, the GNWT feels strongly that the development and establishment of any threshold for undistributed boreal caribou habitat within the North Slave region must respect established co-management processes and the Tłıchǫ Agreement. This is the underlying basis for the GNWT's proposed modifications in the third paragraph. While the 65% undisturbed habitat threshold established by Environment and Climate Change Canada (ECCC) under the federal *Species at Risk Act* applies to the NT1 range as a whole, it does not legally apply on a regional basis. Regional disturbance thresholds for different portions of the NT1 range must be determined and agreed to through established NWT co-management processes. While ECCC is a key player in that determination, ECCC does not have an approval authority in that regard. Modifications to the measure are proposed to reflect that determination of an undisturbed habitat threshold for the North Slave portion of the range will occur through those existing co-management processes, while also ensuring engagement with ECCC during that process.

**6-1 - Part 2:** A modification is being proposed by responsible ministers to Measure 6-1, Part 2 in order to avoid requiring that certain elements be included in range plans that are more appropriately addressed by implementation of the *Recovery Strategy for the Boreal Caribou in the NWT* (the "NWT Recovery Strategy") and vice versa (the proposed modifications has "and" replaced by "or" in the first sentence of Part 2 of the measure). Boreal caribou range plans are intended to focus on the management of natural and human habitat disturbance, whereas the NWT Recovery Strategy for boreal caribou addresses a broader range of issues including boreal caribou population monitoring and research, and management of boreal caribou harvest. An implementation agreement for the NWT recovery strategy has already been signed by the Conference of Management Authorities (CMA) that outlines actions that CMA parties have agreed to implement over the next 5 years, many of which are captured in Measure 6-1, Part 2.

GNWT agrees with the requirement to monitor boreal caribou population trends and distribution, but notes that current monitoring methods used by GNWT to monitor boreal caribou population trends do not provide estimates of "abundance". The first bullet of the measure has been modified to reflect this.

The third bullet was modified to reflect the changes the Tłıchǵ Government have proposed to Measure 9-1 (which the GNWT has no concerns with) which clarifies that Aboriginal harvest monitoring and reporting programs will be voluntary, and therefore GNWT-ENR cannot guarantee that harvest monitoring and reporting information required by Measure 6-1, Part 2 will include Aboriginal harvesting.

The 7<sup>th</sup> bullet was modified to reflect that disturbance thresholds will be set on a regional basis and uses language that is consistent with the proposed wording in Part 1 of Measure 6-1 to reflect that GNWT will work to the greatest extent possible to manage habitat disturbance within each range planning region to established thresholds, recognizing that GNWT does not have ultimate control over fires.

<b>Measure 6-1, Part 1 current wording with problematic aspects highlighted and underlined</b>	<b>Proposed revised wording (highlighted in yellow)</b>
<b>6-1, Part 1 - Develop and implement range plans</b>	<b>6-1, Part 1 - Develop and implement range plans</b>
<p>The GNWT-ENR will develop and implement a range plan for boreal caribou (tǫdzı) in the North Slave region, as required by the <i>Recovery Strategy for the Boreal Caribou in the NWT</i>. The GNWT-ENR will also develop and implement a range plan for any other region where boreal caribou (tǫdzı) may experience impacts related to the Project.</p> <p>The range plan(s) will be developed collaboratively with Aboriginal groups and co-management partners. <u>The range plan(s) will be completed before the Project is opened for public use.</u></p>	<p>The GNWT-ENR will develop and implement a range plan for boreal caribou (tǫdzı) in the North Slave <b>portion of the NT1 range</b>, as required by the <i>Recovery Strategy for the Boreal Caribou in the NWT</i>. The GNWT-ENR will also develop and implement a range plan for any other region where boreal caribou (tǫdzı) may experience impacts related to the Project.</p> <p>The range plan(s) will be developed collaboratively with Aboriginal groups and co-management partners. <b>GNWT-ENR will complete and submit a range plan for the North Slave portion of the NT1 range to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłıchǵ Agreement</b> a minimum of 90</p>



<p>The GNWT-ENR will manage the amount of undisturbed habitat in the North Slave region to achieve the National Recovery Strategy recommended threshold for critical habitat, or a threshold proposed by the GNWT-ENR and approved by Environment and Climate Change Canada.</p>	<p>days before the Project is opened for public use.</p> <p>GNWT will work with the Tłıchǫ Government, and other relevant Aboriginal and federal land management authorities to achieve the National Recovery Strategy recommended threshold for critical habitat to manage, to the greatest extent possible, the amount of undisturbed habitat in the North Slave portion of the NT1 range to a threshold proposed by the GNWT-ENR, following engagement with Environment and Climate Change Canada and consultation with applicable Aboriginal groups, and approved in accordance with chapter 12 of the Tłıchǫ Agreement.</p>
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<b>Measure 6-1, Part 2 current wording with problematic aspects highlighted and underlined</b>	<b>Proposed revised wording (highlighted in yellow)</b>
<p><b>6-1, Part 2: Information and adaptive management requirements</b></p> <p>For the area identified by the range plan(s) in measure 6-1, part 1 the following must be included in the development and implementation of the <i>Recovery Strategy for the Boreal Caribou in the NWT</i> <u>and</u> range plan(s):</p> <ul style="list-style-type: none"> <li>• monitoring of population trends, abundance and distribution;</li> </ul>	<p><b>6-1, Part 2: Information and adaptive management requirements</b></p> <p>For the area identified by the range plan(s) in measure 6-1, part 1 the following must be included in the development and implementation of the <i>Recovery Strategy for the Boreal Caribou in the NWT</i> <b>or</b> range plan(s):</p> <ul style="list-style-type: none"> <li>• monitoring of population trends, <b>abundance</b> and distribution;</li> </ul>

- determination of population thresholds and triggers to inform adaptive management;
- harvest monitoring and reporting including Aboriginal harvesting and non- Aboriginal hunting;
- determining sustainable harvest levels;
- identifying critical habitat;
- ongoing habitat disturbance monitoring;
- setting and meeting critical habitat objectives for each range; and,
- monitoring predator populations including densities, movements and predation rates.<sup>1</sup>

Monitoring will meet the requirements of Appendix C. GNWT-ENR will work with the developer to adaptively manage Project impacts on boreal caribou (t̥ɔdʒɪ) (following guidance in Appendix B).

- determination of population thresholds and triggers to inform adaptive management;
- harvest monitoring and reporting including Aboriginal harvesting and non- Aboriginal hunting;
- determining sustainable harvest levels;
- identifying critical habitat;
- ongoing habitat disturbance monitoring;
- an approach to setting and, to the greatest extent possible, managing habitat disturbance thresholds for each range planning region; and,
- monitoring predator populations including densities, movements and predation rates.<sup>1</sup>

Monitoring will meet the requirements of Appendix C. GNWT-ENR will work with the developer to adaptively manage Project impacts on boreal caribou (t̥ɔdʒɪ) (following guidance in Appendix B).

**Measure 6-2: Temporary no-hunting corridor for boreal caribou (t̥ɔdʒɪ)**

The responsible ministers agree with the Review Board that there is a need to determine sustainable harvest levels for boreal caribou in the North Slave region, and that measures to ensure harvest is sustainable are implemented, to the fullest extent required. Such actions may include, but not be limited to, a no hunting corridor along the road.



Established processes under the NWT *Wildlife Act* and the Tłı̨chǫ Agreement should be respected and used to first determine sustainable harvest levels, and then propose management actions, to the greatest extent required, to ensure that harvest remains within sustainable levels. Processes for considering and implementing harvest restrictions are laid out in the NWT *Wildlife Act* and regulations, and are done using a collaborative process that involves the full engagement and consultation with renewable resource boards and IGOs. The process to impose harvest restrictions is based on the demonstration of a conservation or safety concern that would support the need for management actions. Measure 6-2 as currently worded pre-supposes a need to implement a specific management action, without an assessment of sustainable harvest levels in the region and if required, without allowing the WRRB to review and make a determination on a management proposal. The GNWT is committed to undertaking this work and implementation of the measure would be legally binding in this regard. The responsible ministers are of the strong opinion that the co-management process, foundational to wildlife management in the NWT, be respected.

Reference to the implementation of the *Recovery Strategy for Boreal Caribou in the Northwest Territories* has been removed. There are established processes under the NWT *Species at Risk Act* to guide the implementation of the recovery strategy. The Conference of Management Authorities (which consists of renewable resources boards established under land claims, Tłı̨chǫ Government, GNWT and Government of Canada) develops consensus agreements respecting the implementation of management plans and recovery strategies. The recommended conservation and recovery approaches and the Management Authorities' intent to undertake them constitute the Consensus Agreement Respecting Implementation of the Recovery Strategy for Boreal Caribou in the Northwest Territories (2017)<sup>1</sup>. The GNWT works with other management authorities to implement the actions under the Consensus Agreement and has intended to work with co-management boards to define sustainable harvest levels (Action 2.2.1).

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[http://www.nwt-species-at-risk.ca/sites/default/files/consensus\\_agreement\\_boreal\\_caribou\\_implementation\\_nov2417\\_signed.pdf](http://www.nwt-species-at-risk.ca/sites/default/files/consensus_agreement_boreal_caribou_implementation_nov2417_signed.pdf)

Measure 6-2 current wording with problematic aspects highlighted and underlined	Proposed revised wording (highlighted in yellow)
<p><b>6-2 - Temporary no-hunting corridor for boreal caribou (t̥d̥z̥ı)</b></p>	<p><b>6-2 - Determine sustainable harvest levels for boreal caribou (t̥d̥z̥ı) and implement measures to ensure harvest is sustainable if required</b></p>
<p>To mitigate significant adverse impacts from the project on boreal caribou (t̥d̥z̥ı), the GNWT-ENR and T̥ch̥q̥ Government will submit a wildlife management proposal under section 12.5.1 of the T̥ch̥q̥ Agreement to the Wek'èezhì Renewable Resources Board.</p> <p><u>The proposal will establish a temporary no-hunting corridor to reduce the take of boreal caribou (t̥d̥z̥ı) along the Project route. Only individuals exercising section 35 rights will be allowed to harvest boreal caribou (t̥d̥z̥ı) in this corridor.</u></p> <p><u>The corridor will be established prior to the road being opened to the public. At a minimum, this hunting restriction will remain in place until the <i>Recovery Strategy for Boreal Caribou in the Northwest Territories</i> is fully implemented in the area of the range plan(s) required by measure 6-1, and sustainable harvest levels for the North Slave region are determined.</u></p>	<p>To mitigate significant adverse impacts from the project on boreal caribou (t̥d̥z̥ı), the GNWT-ENR, <u>in collaboration with Aboriginal groups and in accordance with the requirements of the T̥ch̥q̥ Agreement</u>, will determine sustainable harvest levels for boreal caribou in the North Slave portion of the NT1 range prior to the road being opened to the public.</p> <p><u>In that same period, if current harvest levels are determined to exceed sustainable levels, management action will be undertaken in conjunction with the T̥ch̥q̥ Government.</u></p> <p><u>If harvest levels are observed to increase beyond sustainable levels once the road is opened to the public, GNWT-ENR and the T̥ch̥q̥ Government will submit a wildlife management proposal under section 12.5.1 of the T̥ch̥q̥ Agreement to the Wek'èezhì Renewable Resources Board for the timely implementation of any measures necessary to ensure boreal caribou harvest in the region is kept within sustainable levels.</u></p>



	Such measures may include the establishment of a no-hunting corridor along the Project route.
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**Measure 6-3: Habitat offset and restoration plan**

The responsible ministers agree with the Review Board’s determination that the developer should offset boreal caribou habitat that is effectively lost because of disturbance from the Project. As with Measures 6-1 and 6-2, Measure 6-3 as currently worded pre-supposes any determination by the WRRB, without allowing them to undertake their due process. Again, the responsible ministers are of the strong opinion that the co-management process, foundational to wildlife management in the NWT, be respected.

The proposed modifications will require that an appropriate offset area be determined by the developer in collaboration with the Tłı̨chǫ Government and the Wek’èezhì Renewable Resources Board (WRRB) and in consultation with Environment and Climate Change Canada (ECCC), Yellowknives Dene First Nation and North Slave Métis Alliance.

Modifications are also being proposed in order to allow sufficient time for the developer to collaborate and consult with required parties on a draft offsetting plan. Responsible ministers do not see this as problematic, as the draft plan will still be submitted prior to the start of construction and will be, in all likelihood, implemented prior to the opening of the road for public use.

<b>Measure 6-3 current wording with problematic aspects highlighted and underlined</b>	<b>Proposed revised wording (highlighted in yellow)</b>
<b>6-3 - Habitat offset and restoration plan</b>	<b>6-3 - Habitat offset and restoration plan</b>
The developer will offset effective boreal caribou (t̨q̨dzı) habitat lost because of disturbance from the Project. <u>The offset</u>	The developer will offset effective boreal caribou (t̨q̨dzı) habitat lost because of disturbance from the Project. The offset

calculation will, at a minimum, be based on the area of the right of way with a 2500 m buffer on each side.

The developer, with the involvement of GNWT-ENR, will prepare and implement a habitat offset plan. This plan will describe how the required habitat offset area (calculated as set out above) will be achieved. In preparing the plan, the developer will collaborate with Tłıchǫ Government and the Wek'èezhì Renewable Resources Board, and consult with the following participants to this environmental assessment:

- Environment and Climate Change Canada;
- Yellowknives Dene First Nation; and,
- North Slave Métis Alliance.

The developer will make funding available to the parties to support this consultation and collaboration. The developer will submit a draft and a final plan as described below. Once approved, the developer will operate in accordance with the plan.

The developer will submit a draft plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłıchǫ Agreement, a minimum of 90 days prior to commencement of construction. The developer will submit the final habitat offset plan to the Wek'èezhì Renewable Resources Board

calculation will, at a minimum, be based on the area of the right of way with a 2500 m buffer on each side.

The developer, with the involvement of GNWT-ENR, will prepare and implement a habitat offset plan. This plan will describe how the required habitat offset area will be determined and how it will be achieved. In preparing the plan, the developer will collaborate with Tłıchǫ Government and the Wek'èezhì Renewable Resources Board, and consult with the following participants to this environmental assessment:

- Environment and Climate Change Canada;
- Yellowknives Dene First Nation; and,
- North Slave Métis Alliance.

The developer will make funding available to the parties to support this consultation and collaboration. The developer will submit a draft and a final plan as described below. Once approved, the developer will operate in accordance with the plan.

The developer will submit a draft plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłıchǫ Agreement, prior to commencement of construction. The developer will submit the final habitat offset plan to the Wek'èezhì Renewable Resources Board for review under

for review under section 12.5.1 of the Tłıchǫ Agreement, as soon as possible, and no later than 90 days prior to public use of the road. This final plan will include, at a minimum:

- the goals and objectives of the plan;
- a discussion on the expected effectiveness of mitigations and offsets;
- a decision framework to prioritize restoration areas, mitigations, and offsets,
- including references to the research on which the decision framework was based;
- a discussion of how any proposed mitigations or offsets align with the Recovery Strategy for the Boreal Caribou in the NWT and range plans;
- details of proposed ways to offset habitat disturbance including restoration sites, mitigation measures, offsets, forest fire fighting policies, or habitat management approaches;
- a description of the spatial scale of the proposed offset, the habitat quality and type, site specific restoration activities, and any challenges;
- a timeline for offsetting;
- a quantitative and qualitative assessment of the total area of boreal caribou habitat proposed for restoration and the timeframe required for restoration;
- a summary of consultation feedback that was integrated into

section 12.5.1 of the Tłıchǫ Agreement, as soon as possible, and no later than 90 days prior to public use of the road. This final plan will include, at a minimum:

- the goals and objectives of the plan;
- a discussion on the expected effectiveness of mitigations and offsets;
- a decision framework to prioritize restoration areas, mitigations, and offsets, including references to the research on which the decision framework was based;
- a discussion of how any proposed mitigations or offsets align with the Recovery Strategy for the Boreal Caribou in the NWT and range plans;
- details of proposed ways to offset habitat disturbance including restoration sites, mitigation measures, offsets, forest fire fighting policies, or habitat management approaches;
- a description of the spatial scale of the proposed offset, the habitat quality and type, site specific restoration activities, and any challenges;
- a timeline for offsetting;
- a quantitative and qualitative assessment of the total area of boreal caribou habitat proposed for restoration and the timeframe required for restoration;
- a summary of consultation feedback that was integrated into the draft and final plans;
- a description of any Traditional



the draft and final plans;

- a description of any Traditional Knowledge that was considered in the development of the plan, and how it was incorporated; and,
- a description of any resources provided to Aboriginal groups to support their involvement in the drafting of the final plan, and for any involvement in the implementation of the plan.

Knowledge that was considered in the development of the plan, and how it was incorporated; and,

- a description of any resources provided to Aboriginal groups to support their involvement in the drafting of the final plan, and for any involvement in the implementation of the plan.

#	Measure Title	Measure Description	Proposed Modification	Rationale
2	Measure 5-2: Tłchq monitoring, engagement and reporting of adverse health and well-being impacts	<p>5-2, Part 1: Tłchq monitoring of adverse health and well-being impacts</p> <p>The Tłchq Government and Community Government of Whatì, with the support of the developer, and in collaboration with the Tłchq Community Services Agency, will establish and implement a framework to monitor and evaluate health and well-being impacts associated with the road, and will adaptively manage health and well-being impacts as described in Measure 5-1 and following guidance in Appendices B and C, for each year of construction and for a minimum of ten years of operations.</p> <p>Following ten years of Project operations, the Community Government of Whatì and Tłchq Government in collaboration with the developer, will re-evaluate the need for, and frequency of, monitoring, engagement, reporting and adaptive management.</p> <p>If the monitoring of harvest success rates and availability of country foods in Whatì (in Measure 5-1, Part 1, above) indicates a declining trend in harvest success and the consumption of country foods, the Tłchq Government and the Community Government of Whatì will develop and implement a strategy to improve availability of country foods for those most affected.</p>	<p><b><u>Tłchq Government proposed modification:</u></b></p> <p>5-2, Part 1: Tłchq monitoring of adverse health and well-being impacts</p> <p>The Tłchq Government, Government of the Northwest Territories, Tłchq Community Services Agency and Community Government of Whatì, with the support of the developer, <del>and in collaboration with the Tłchq Community Services Agency,</del> will establish and implement a framework to monitor and evaluate health and well-being impacts associated with the road, and will adaptively manage health and well-being impacts as described in Measure 5-1 and following guidance in Appendices B and C, for each year of construction and for a minimum of ten years of operations.</p> <p>Following ten years of Project operations, the</p>	<p>The GNWT is the responsible authority for monitoring and evaluating health and well-being. They should be added, not simply as a collaborator, but as a government that has a duty to participate in monitoring.</p> <p>With respect to the wording regarding country foods, it is quite strict as well as being unclear. It could be read to require that the Tłchq Government take action if there were decrease in country foods. For example, it could be interpreted to require providing financing to families for loss of country food access. The intent seems to be that there should be a planning approach set in motion if there is a demonstrated declining trend, in which case the Tłchq Government is quite comfortable with developing a strategy. The language should be refined to provide further clarity and reduce the potential for misinterpretation.</p>

			<p>Community Government of Whatì, Government of the Northwest Territories, Tłı̨chų Community Services Agency and Tłı̨chų Government in collaboration with the developer, will re-evaluate the need for, and frequency of, monitoring, engagement, reporting and adaptive management.</p> <p>If the monitoring of harvest success rates and availability of country foods in Whatì (in Measure 5-1, Part 1, above) indicates a declining trend in harvest success and the consumption of country foods, the Tłı̨chų Government and the Community Government of Whatì will develop and implement a strategy to address the decline of country foods to improve availability of country foods for those most affected.</p>	
2 Part 2	Public Engagement	<p>5-2, Part 2: Public engagement</p> <p>The Tłı̨chų Government and Community Government of Whatì, with the participation of the developer, the P3 operator and the Tłı̨chų Community Services Agency, will meet with the residents of Whatì at least once per year to discuss:</p> <p>a) priority health and well-being impacts at the individual, family and community level related to the Project;</p>	<p><b><i>Tłı̨chų Government proposed modification:</i></b></p> <p>5-2, Part 2: Public engagement</p> <p>The Tłı̨chų Government, Government of the Northwest</p>	<p>We have added the GNWT and the TCSA as directly accountable in this measure. Our reasons for this addition and change are twofold: first, there are many programs and mitigations that fall to the GNWT and TCSA, and second,</p>

		<p>b) the effectiveness of programs or mitigations used to address these impacts; and,  c) the need to adjust programs or implement additional mitigations.</p>	<p>Territories, Tłchq Community Services Agency and Community Government of Whatì, with the participation of the developer and the P3 operator <del>and the Tłchq Community Services Agency</del>, will meet with the residents of Whatì at least once per year to discuss:  a) priority health and well-being impacts at the individual, family and community level related to the Project;  b) the effectiveness of programs or mitigations used to address these impacts; and,  c) the need to adjust programs or implement additional mitigations.</p>	<p>these two parties have always been a part of public reporting in the communities. As partners to this effort, it makes good sense to have the both the GNWT and the TCSA also reporting to the public.</p>
2, Part 3	Reporting	<p>5-2, Part 3: Reporting  The Tłchq Government and Community Government of Whatì, with the support of the developer, will prepare and make publicly available an annual progress report on their efforts to mitigate impacts on health and well-being to the Community of Whatì. The report will describe engagement, current management and plans for future adaptive management.  The findings of the report will be presented to the residents of Whatì, provided to the Whatì Inter-Agency Committee and provided to the Tłchq All-Season Road Corridor Working Group (see Measure 14-3).</p>	<p><b><u>Tłchq Government proposed modification:</u></b>  5-2, Part 3: Reporting  The Tłchq Government, Government of the Northwest Territories, Tłchq Community Services Agency and Community Government of Whatì, with the support of the developer, will prepare and make publicly available an annual progress report on</p>	

			<p>their efforts to mitigate impacts on health and well-being to the Community of Whatì. The report will describe engagement, current management and plans for future adaptive management. The findings of the report will be presented to the residents of Whatì, provided to the Whatì Inter-Agency Committee and provided to the Tłıchų All-Season Road Corridor Working Group (see Measure 14-3).</p>	
6	Measure 5-6 Include Behchokq in accident response planning	The Government of the Northwest Territories will develop and implement an effective ground ambulance and highway rescue action plan along the road that will be designed in collaboration with the Tłıchų Government, Community Government of Whatì, and Community Government of Behchokq.	<p><b><i>Tłıchų Government proposed modification:</i></b> The Government of the Northwest Territories will develop and implement an effective ground ambulance and highway rescue action plan along the road that will be designed in collaboration with the Tłıchų Government, Tłıchų Community Services Agency, Community Government of Whatì, and Community Government of Behchokq.</p>	We propose to add the TCSA because the TCSA is partly responsible for the provision of an emergency health response solution. We believe this should be developed between TCSA and the GNWT, in consultation with the Community Government of Whatì and Behchoko Community Government.
8	Measure 6-1: Implementation	6-1, Part 1: Develop and implement range plans The GNWT-ENR will develop and implement a range plan for boreal caribou	<b><i>Tłıchų Government supports GNWT proposed modification</i></b>	There is a concern associated with timing, which is clearly identified in the GNWT rationale, which has been filed



	of the Recovery Strategy for the Boreal Caribou in the NWT, and required range plans, for boreal caribou affected by the Project	<p>(t̄odz̄ı) in the North Slave region, as required by the Recovery Strategy for the Boreal Caribou in the NWT. The GNWT-ENR will also develop and implement a range plan for any other region where boreal caribou (t̄odz̄ı) may experience impacts related to the Project. The range plan(s) will be developed collaboratively with Aboriginal groups and co-management partners. The range plan(s) will be completed before the Project is opened for public use.</p> <p>The GNWT-ENR will manage the amount of undisturbed habitat in the North Slave region to achieve the National Recovery Strategy recommended threshold for critical habitat, or a threshold proposed by the GNWT-ENR and approved by Environment and Climate Change Canada.</p>		<p>separately.</p> <p>The GNWT has proposed a modification to this measure, which the T̄ıch̄q̄ Government has reviewed and supports.</p>
		<p>6-1, Part 2: Information and adaptive management requirements</p> <p>For the area identified by the range plan(s) in measure 6-1, part 1 the following must be included in the development and implementation of the Recovery Strategy for the Boreal Caribou in the NWT and range plan(s):</p> <ul style="list-style-type: none"> <li>- monitoring of population trends, abundance and distribution;</li> <li>- determination of population thresholds and triggers to inform adaptive management;</li> <li>- harvest monitoring and reporting including Aboriginal harvesting and non-Aboriginal hunting;</li> <li>- determining sustainable harvest levels;</li> <li>- identifying critical habitat;</li> <li>- ongoing habitat disturbance monitoring;</li> <li>- setting and meeting critical habitat objectives for each range; and,</li> <li>- monitoring predator populations including densities, movements and predation rates.</li> </ul> <p>Monitoring will meet the requirements of Appendix C. GNWT-ENR will work with the developer to adaptively manage Project impacts on boreal caribou (t̄odz̄ı) (following guidance in Appendix B).</p>	<b><i>T̄ıch̄q̄ Government supports GNWT proposed modification</i></b>	<p>This is not a measure that is consistent with our understanding of the T̄ıch̄q̄ Agreement.</p> <p>The T̄ıch̄q̄ Government is concerned that there is a requirement for aboriginal harvest monitoring. The GNWT is suggesting that there be a voluntary reporting approach, which is acceptable.</p> <p>The GNWT has proposed a modification to this measure, which the T̄ıch̄q̄ Government has reviewed and supports.</p>
9	Measure 6-2: Temporary no-	To mitigate significant adverse impacts from the project on boreal caribou (t̄odz̄ı), the GNWT-ENR and T̄ıch̄q̄ Government will submit a wildlife management	<b><i>T̄ıch̄q̄ Government supports GNWT proposed</i></b>	The T̄ıch̄q̄ Government refers to the NWT <i>Wildlife Act</i> and the T̄ıch̄q̄

	<p>hunting corridor for boreal caribou (t̄qdzı)</p>	<p>proposal under section 12.5.1 of the T̄chq̄ Agreement to the Wek'èezhì Renewable Resources Board. The proposal will establish a temporary no-hunting corridor to reduce the take of boreal caribou (t̄qdzı) along the Project route. Only individuals exercising section 35 rights will be allowed to harvest boreal caribou (t̄qdzı) in this corridor.</p> <p>The corridor will be established prior to the road being opened to the public. At a minimum, this hunting restriction will remain in place until the Recovery Strategy for Boreal Caribou in the Northwest Territories is fully implemented in the area of the range plan(s) required by measure 6-1, and sustainable harvest levels for the North Slave region are determined.</p>	<p><i>modification</i></p>	<p>Agreement, both of which should be used first to determine sustainable harvest levels, following which management actions can be established, to the extent required, to ensure that harvest remains within sustainable levels.</p> <p>The GNWT has proposed a modification to this measure, which the T̄chq̄ Government has reviewed and supports.</p>
10	<p>Measure 6-3: Habitat offset and restoration plan</p>	<p>The developer will offset effective boreal caribou (t̄qdzı) habitat lost because of disturbance from the Project. The offset calculation will, at a minimum, be based on the area of the right of way with a 2500 m buffer on each side.</p> <p>The developer, with the involvement of GNWT-ENR, will prepare and implement a habitat offset plan. This plan will describe how the required habitat offset area (calculated as set out above) will be achieved. In preparing the plan, the developer will collaborate with T̄chq̄ Government and the Wek'èezhì Renewable Resources Board, and consult with the following participants to this environmental assessment:</p> <ul style="list-style-type: none"> <li>- Environment and Climate Change Canada;</li> <li>- Yellowknives Dene First Nation; and,</li> <li>- North Slave Métis Alliance.</li> </ul> <p>The developer will make funding available to the parties to support this consultation and collaboration. The developer will submit a draft and a final plan as described below. Once approved, the developer will operate in accordance with the plan.</p> <p>The developer will submit a draft plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the T̄chq̄ Agreement, a minimum of 90</p>	<p><i>T̄chq̄ Government supports GNWT proposed modification</i></p>	<p>There is a concern associated with timing, which is clearly identified in the GNWT rationale, which has been filed separately.</p> <p>The GNWT has proposed a modification to this measure, which the T̄chq̄ Government has reviewed and supports.</p>

		<p>days prior to the commencement of construction. The developer will submit the final habitat offset plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłı̨chǫ Agreement, as soon as possible, and no later than 90 days prior to public use of the road. This final plan will include, at a minimum:</p> <ul style="list-style-type: none"> <li>- the goals and objectives of the plan;</li> <li>- a discussion on the expected effectiveness of mitigations and offsets;</li> <li>- a decision framework to prioritize restoration areas, mitigations, and offsets, including references to the research on which the decision framework was based;</li> <li>- a discussion of how any proposed mitigations or offsets align with the Recovery Strategy for the Boreal Caribou in the NWT and range plans;</li> <li>- details of proposed ways to offset habitat disturbance including restoration sites, mitigation measures, offsets, forest fire fighting policies, or habitat management approaches;</li> <li>- a description of the spatial scale of the proposed offset, the habitat quality and type, site specific restoration activities, and any challenges;</li> <li>- a timeline for offsetting;</li> <li>- a quantitative and qualitative assessment of the total area of boreal caribou habitat proposed for restoration and the timeframe required for restoration;</li> <li>- a summary of consultation feedback that was integrated into the draft and final plans;</li> <li>- a description of any Traditional Knowledge that was considered in the development of the plan, and how it was incorporated; and,</li> <li>- a description of any resources provided to Aboriginal groups to support their involvement in the drafting of the final plan, and for any involvement in the implementation of the plan.</li> </ul>		
13	Measure 8-1: Integrated Fisheries Management Plan	<p>Fisheries and Oceans Canada and the Tłı̨chǫ Government, with the support of the developer, will develop and implement an Integrated Fisheries Management Plan for fisheries in the project area. This will prevent significant adverse impacts from additional fishing pressure that will likely result from increased access via the Project.</p> <p>In designing the plan, Fisheries and Oceans Canada and the Tłı̨chǫ Government</p>	<p><b><u>Tłı̨chǫ Government proposed modification:</u></b></p> <p>Fisheries and Oceans Canada and the Tłı̨chǫ Government, with the support of the developer, will develop and</p>	<p>The Tłı̨chǫ Government has consulted with the Fisheries and Oceans Canada, and understands that an Integrated Fisheries Management Plan is a significant undertaking. We believe that the concern that underlies this measure</p>

	<p>will engage the Wek'èezhì Renewable Resources Board, the Community of Whatì and other affected Aboriginal groups. Fisheries and Oceans Canada and the Tłchq Government will submit the plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłchq Agreement.</p> <p>As part of this plan, Fisheries and Oceans Canada and the Tłchq Government, along with the above organizations, will complete the following work:</p> <p>a) Complete work to understand baseline fishery and harvest conditions. This work will include, at a minimum:</p> <ul style="list-style-type: none"> <li>i. assessing yield and harvest;</li> <li>ii. identifying management issues;</li> <li>iii. establishing fisheries objectives; and,</li> <li>iv. clarifying management and stewardship arrangements.</li> </ul> <p>b) Design and implement, with support of the developer, mitigation to prevent or manage project impacts (which may include a regulatory and compliance plan).</p> <p>c) Design and implement monitoring plans, meeting the requirements of Appendix C.</p> <p>d) Design and implement an adaptive management plan (following guidance in Appendix B). Fisheries and Oceans Canada and the Tłchq Government will provide opportunity for the working group (required by Measure 14-3) and other interested parties to review and comment on this plan.</p>	<p>implement an <del>Integrated</del> Fisheries Management Plan for fisheries in the project area. This will prevent significant adverse impacts from additional fishing pressure that will likely result from increased access via the Project.</p> <p><del>In designing the plan, Fisheries and Oceans Canada and the Tłchq Government will engage the Wek'èezhì Renewable Resources Board, the Community of Whatì and other affected Aboriginal groups</del> <b>will be engaged.</b> Fisheries and Oceans Canada and the Tłchq Government will submit the plan to the Wek'èezhì Renewable Resources Board for review under section 12.5.1 of the Tłchq Agreement.</p> <p><del>As part of this plan, the following work will be completed: Fisheries and Oceans Canada and the Tłchq Government, along with the above organizations, will complete the following work:</del></p> <p>a) Complete work to</p>	<p>relates to over fishing, which the Tłchq Government believes will be adequately managed if there is a Fisheries Management Plan. We suggest removing the word “Integrated” so as not to confuse the tools that are needed in this context. An Integrated Fisheries Management Plan requires that there be a full stock assessment completed, which requires substantial assignment of resources, personnel, and time. A stock assessment is not required to manage the fisheries in the manner that is required or anticipated by the governments.</p> <p>The Tłchq Government also requires the removal of the requirement for the TG to consult with “other affected aboriginal groups.” This is properly the role of Fisheries and Oceans Canada.</p>
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			<p>understand baseline fishery and harvest conditions. This work will include, at a minimum:</p> <ul style="list-style-type: none"> <li>i. assessing yield and harvest;</li> <li>ii. identifying management issues;</li> <li>iii. establishing fisheries objectives; and,</li> <li>iv. clarifying management and stewardship arrangements.</li> </ul> <p>b) Design and implement, with support of the developer, mitigation to prevent or manage project impacts (which may include a regulatory and compliance plan).</p> <p>c) Design and implement monitoring plans, meeting the requirements of Appendix C.</p> <p>d) Design and implement an adaptive management plan (following guidance in Appendix B). Fisheries and Oceans Canada and the Tłchq Government will provide opportunity for the working group (required by Measure 14-3) and other interested parties to review and comment on this plan.</p>	
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14	<p>Measure 9-1: Monitoring harvest and managing wildlife to maintain successful harvest</p>	<p>9-1, Part 1: Aboriginal harvest monitoring and reporting program</p> <p>To mitigate impacts on Aboriginal harvesters and to effectively inform management of wildlife populations in the area of the Project, GNWT-ENR will work together with the Tłıchǫ Government and Wek'èezhì Renewable Resources Board to develop and implement an Aboriginal harvest monitoring and reporting program.</p> <p>The harvest monitoring and reporting program will:</p> <ul style="list-style-type: none"> <li>a) focus on boreal caribou, barren-ground caribou and moose population trends in areas accessed by winter roads and trails from the Project;</li> <li>b) be community-based and involve collaboration between Tłıchǫ Government and the developer;</li> <li>c) involve Traditional Knowledge holders and harvesters in monitoring wildlife harvesting trends; and,</li> <li>d) report on wildlife harvesting numbers and trends from monitoring checkpoints and/or other harvest monitoring methods annually to the Tłıchǫ Government, Wek'èezhì Renewable Resources Board, GNWT-ENR and other wildlife comanagement partners.</li> </ul> <p>The developer will fund this harvest monitoring and reporting related to the project. The harvest monitoring will meet the requirements of Appendix C.</p>	<p><b><u>Tłıchǫ Government proposed modification:</u></b></p> <p>1, Part 1: Aboriginal harvest monitoring and reporting program</p> <p>To mitigate impacts on Aboriginal harvesters and to effectively inform management of wildlife populations in the area of the Project, GNWT-ENR will work together with the Tłıchǫ Government and Wek'èezhì Renewable Resources Board to develop and implement a <b>non-mandatory</b> Aboriginal harvest monitoring and reporting program.</p> <p>The harvest monitoring and reporting program will:</p> <ul style="list-style-type: none"> <li>a) focus on boreal caribou, barren-ground caribou and moose population trends in areas accessed by winter roads and trails from the Project;</li> <li>b) be community-based and involve collaboration between Tłıchǫ Government and the developer;</li> <li>c) involve Traditional Knowledge holders and</li> </ul>	<p>The Tłıchǫ Government has significant concerns that this measure could potentially be read to require a mandatory aboriginal harvesting program.</p> <p>Chapter 10 of the Tłıchǫ Agreement confers broad rights on the Tłıchǫ with respect to harvesting. The Tłıchǫ have a rights to harvest all species of wildlife throughout Mowfi Gogha De Niitlee at all times of the year (10.1.1(a)); to employ any method of harvesting and possess and use any equipment for harvesting (10.2.1); to possess and transport harvested wildlife anywhere in Canada (10.4.1); etc. These rights are subject only to “limitations prescribed by or in accordance with the Agreement” (10.1).</p> <p>Mandatory harvest reporting by Tłıchǫ harvesters could constitute an impairment of the broad and largely unfettered right to harvest that the Tłıchǫ have under the Agreement. Mandatory harvest reporting imposed by the Review Board in the context of the TASR EA is not a limitation “prescribed by or in accordance with” the Tłıchǫ Agreement.</p>
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			<p>harvesters in monitoring wildlife harvesting trends; and,</p> <p>d) report on wildlife harvesting numbers and trends from monitoring checkpoints and/or other harvest monitoring methods annually to the Tłıchǫ Government, Wek'èezhì Renewable Resources Board, GNWT-ENR and other wildlife co-management partners.</p> <p>The developer will fund this harvest monitoring and reporting related to the project. The harvest monitoring will meet the requirements of Appendix C.</p>	<p>If this were revised to a voluntary program, which is our proposal, then the Tłıchǫ Government anticipates no conflict.</p>
15	Measure 9-2: Cultural sensitivity in work camps and communities	To mitigate the Project's impact on Tłıchǫ culture and well-being of Tłıchǫ residents, the developer will require that the P3 operator has culturally appropriate and specific policies in accordance with those set out by the Tłıchǫ Government, GNWT departments and federal government. The P3 operator will have policies and programs in place for employee cultural orientation, developed by the Tłıchǫ Government, for all non-Tłıchǫ residents, including awareness of special cultural norms and practices.	<p><b><i>Tłıchǫ Government proposed modification:</i></b></p> <p>To mitigate the Project's impact on Tłıchǫ culture and well-being of Tłıchǫ residents, the developer will require that the P3 operator has culturally appropriate and specific policies in</p>	<p>The key concern here is the use of the term "residents", which could confer on camp workers rights to harvest in the region that were never anticipated or considered in the negotiation of the Tłıchǫ Agreement.</p> <p>We therefore propose changing "residents" to "workers", so as not to</p>

			<p>accordance with those set out by the Tłıchǫ Government, GNWT departments and federal government. The P3 operator will have policies and programs in place for employee cultural orientation, <del>developed</del> <b>approved</b> by the Tłıchǫ Government, for all non-Tłıchǫ <b>workers</b> <del>residents</del>, including awareness of special cultural norms and practices.</p>	<p>suggest these harvesting rights are conferred on temporary workers.</p> <p>Further, the Program development should be responsibility of the developer, to be approved by the Tłıchǫ Government – not developed by the Tłıchǫ Government.</p>
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