



Mackenzie Valley Environmental Impact Review Board
Box 938, 5102-50th Avenue, Yellowknife, NT X1A 2N7

Date: Monday July 8, 2002
From: Joe Acorn, Environmental Assessment Officer
Pages: 6 including these 3 cover pages
File: EA02-002 WesternGeco Mackenzie River 2D Seismic Program

Subject: Letter from the Gwich'in Renewable Resource Board

Please see the attached letter that the Gwich'in Renewable Resource Board (GRRB) submitted to the Review Board. The letter provides the GRRB's comments on the proposed Mackenzie River 2D Seismic Program.

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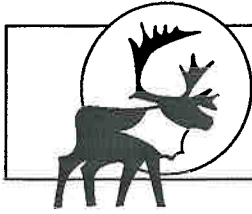
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June 25, 2002

Comments on Application to Access Gwich'in Lands

Activity: Western Geco - Marty Swagar: Mackenzie River 2D Seismic Program
Reference File: 5475.03.10

The Gwich'in Renewable Resource Board (GRRB) **DISAGREES** with the proposed Mackenzie River 2D Seismic Program. Due to the extent of concerns with this application we have divided our comments into sections; Application to Access Gwich'in Lands, Community Consultations, Environmental Impact Assessment, and Western Geco's Acoustic and Fish Monitoring Program.

Application to Access Gwich'in Lands

The application was incomplete and with errors as follows.

- pg 1 - start dates and finish dates are the same.
- pg 2 - missing information regarding the estimated duration the proposed activity will be over areas in which Gwich'in have sub-surface rights.
- throughout application - multiple references to the document Environmental Impact Assessment, yet this critical document was not provided to each Gwich'in Renewable Resource Council (RRC).

Note to GTC: pg 5. - under the section Gwich'in Tribal Council, it states that the application was '*Accepted*' by Kim Brown. Does this indicate that she '*received*' the application or that she '*approved*' the application? This should be clarified.

Community Consultations

We feel that although Western Geco representatives held public meetings in each Gwich'in Community, the efforts to inform the communities were insufficient. Individual visits to each RRC and the GRRB would have been appropriate given the extent of the project and that Western Geco is "committed to working closely with all interested parties....." (page 2 of the Application to Access Gwich'in Settlement Lands).

Environmental Impact Assessment

The GRRB has many of the same concerns that were reported by the Department of Fisheries & Oceans (DFO) and the Fisheries Joint Management Committee (FJMC) regarding the EIA (Appendix 1). Rather than re-listing all of the numerous comments reported by other parties we refer to them as concerns of ours as well. However, we have additional concerns as follows:

Potential Impacts

- the EIA does not include any reference to potential impacts on aquatic invertebrates. Although invertebrates are easily overlooked, they do provide a major food source for many fish species and should be considered.
- Similarly, the EIA does not afford much consideration to aquatic vegetation. This is both a source of food and shelter for fish and invertebrates.
- The likelihood of impacts to the above 2 comments is probably not significant, but have any studies been performed on these topics? The EIA states that operations can proceed in only 2 meters of water. At this depth potential impacts are increased.
- Pg 84 - it is not realistic to assume that the environmental monitors can adequately detect all potential environmental conflicts.
- Pg 87 – can we assume that ramping up will ensure the safety of aquatic mammals (muskrat, beaver, mink)?
- Pg 91 – EIA states operations will maintain a distance of 250 m from nesting raptor species – what if there is not a 250 m buffer to move into, for example, if the waterway is not wide enough? Will operations cease?

Traditional Harvesting

- pg 100/101 – how will the use of a community liaison and the use of environmental monitors minimize potential impacts to fish harvesting and local traffic? It is unclear whether the harvesters will be requested to cease or adjust their activities, or if the seismic operation will adjust to others. EIA states ‘.. nets could be replaced quickly..’ but also that there will be ‘.. extensive efforts to avoid areas containing nets’.
- Pg 101 – conflicts with local river traffic. It is unclear whether seismic operations will be adjusted or if traditional harvesters in boats will be requested to move (as with tourist traffic).

Proposed Acoustic and Fish Monitoring Program

We are encouraged to see the development of an acoustic and fish monitoring program to be performed prior to the full scale seismic program. At this time we have a draft of the proposed monitoring program. The draft proposal is insufficient to provide the information required to address potential impacts on fish. We refer to the comments by DFO for more details of the potential concerns with the test monitoring program (Appendix 2). Further, we feel the test program could benefit from expanding to include information on reactions of aquatic mammals, waterfowl, and possibly aquatic invertebrates.

Western Geco requests that permission be granted to continue with the proposed seismic operations immediately upon completion of the test program. We understand the financial incentive to do this, but feel that this is not likely as it will take time to revise the test program, conduct the program, analyze the data, submit a report, and allow time for interested parties to review and comment on the findings. We are more supportive of a study that is well thought through and analyzed sufficiently without the pressure of a time deadline for this summer.

The GRRB has disagreed with the application for the Mackenzie River 2D Seismic Program, as it stands, but feel that the development of the new monitoring program is a positive step forward. We look forward to seeing a revised proposal for the Acoustic and Fish Monitoring Program.

Thank you for allowing us to review this application!

Robert Charlie
Chairperson