

NORTH SLAVE METIS ALLIANCE

PO Box 340 Yellowknife, NT X1A 2N3



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

Oct 9, 2003



Attn: Sherry Sian

Re: Regional Cumulative Effects Study for Drybones Bay and Wool Bay

Dear Sherry,

Having briefly reviewed the Regional Cumulative Effects Study for Drybones Bay and Wool Bay (RCES) forwarded Sept 26, 2003 and the subsequent comments forwarded Oct 1, 2003 the NSMA would like the following comments and concerns added to the public registry.

Consultation

The NSMA have not been adequately consulted on the exploration projects proposed. The NSMA do not have the resources or the capacity within our organization to review and comment on the extensive amount of materials passed during these three EAs and CEA. As a result, the NSMA have not been able to assess the impacts these proposed exploration programs will have on the NSMA people or culture should Drybones Bay and Wool Bay prove economically feasible for full-scale mine development. The Developers, Government of Canada and the Government of the Northwest Territories have the duty to consult with the NSMA. Consultation has not occurred during this process. Furthermore, the NSMA have not been provided any funds to secure our own consultants to aid our understanding of how these proposed projects will impact the NSMA community and North Slave Metis rights. Consultation must take place and it must be meaningful. This is not consultation.

Traditional Knowledge

There has been a continued blatant disregard for the history and knowledge Aboriginal Peoples and communities hold about the land and waters in and around Drybones and

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Wool Bay. The Board has not show any interest in recording Traditional Knowledge about the area.

The NSMA have, on more than one occasion, requested the directly affected communities, developers, Review Board and relevant government agencies conduct an extensive site visit and consultation session to review and discuss issues Aboriginal communities have with the proposed development (NSMA letters dated July 31, 2003, Sept 2, 2003). Instead the Board has relied on their own contractor's inference of Traditional Knowledge and the North Slave Metis culture. This was a task the contractor was unable to complete. To use the Consultant's (Gartner Lee Ltd.) own words in the Regional Cumulative Effects Study, "What is lacking is the input of the traditional users of the Regional Study Area, Traditional Knowledge and further scoping of the whole relationship between social, cultural and heritage resources." However, the contractor somehow was able to concluded that the Board can ignore this lack of consultation, lack of use of Traditional Knowledge and meager understanding of the NSMA's culture and continue to use the decision-making tool as developed.

How useful a tool is a Cumulative Effects study that does not take into consideration Aboriginal concerns about cultural survival, spiritual needs and intrinsic values? How useful is a Regional Cumulative Effects study that does not help answer the ultimate question, 'What are the cumulative social and cultural impacts to Aboriginal People should development occur within the culturally significant areas of Drybones and Wool Bay?' This is of serious concern to the NSMA. Only poor decisions come from an incomplete decision-making tool.

As a result, the NSMA request the Regional Cumulative Effects Study not be used as a decision-making tool during these proceedings until the NSMA have been consulted on the information within the document and have the opportunity to provide Traditional Knowledge as insight into the cumulative effects of the proposed developments.

Land Use Planning

One of the Board's guiding principles is the protection of the social, cultural and economic well-being of residents and communities in the Mackenzie Valley. Without a Land Use Plan in place as guidance the Board must make decisions that will ultimately shape the rate and extent of development in the North Slave Region. As a member of the Steering Committee for the Cumulative Effects Assessment and Management Framework (CEAMF) the NSMA knows land use planning is a long-term initiative that if worked at its' current pace will not be complete for five or more years. Until DIAND and the CEAMF Steering Committee have researched and approved a Land Use Plan for this region the MVEIRB must examine all developments with an exceptional level of scrutiny to compensate for this lack of land use planning. This is an extremely important position the MVEIRB has been put in considering the rapid rate of mineral exploration currently being conducted in the North Slave Region.

The North Slave Region and the North Slave Metis People cannot afford to allow development to continue at its' current pace for five years without the MVEIRB upholding their principle to protect the social and cultural well-being of the residents and communities of the region. Already development in the North Slave Region has eroded the access Metis people have to culturally significant sites.

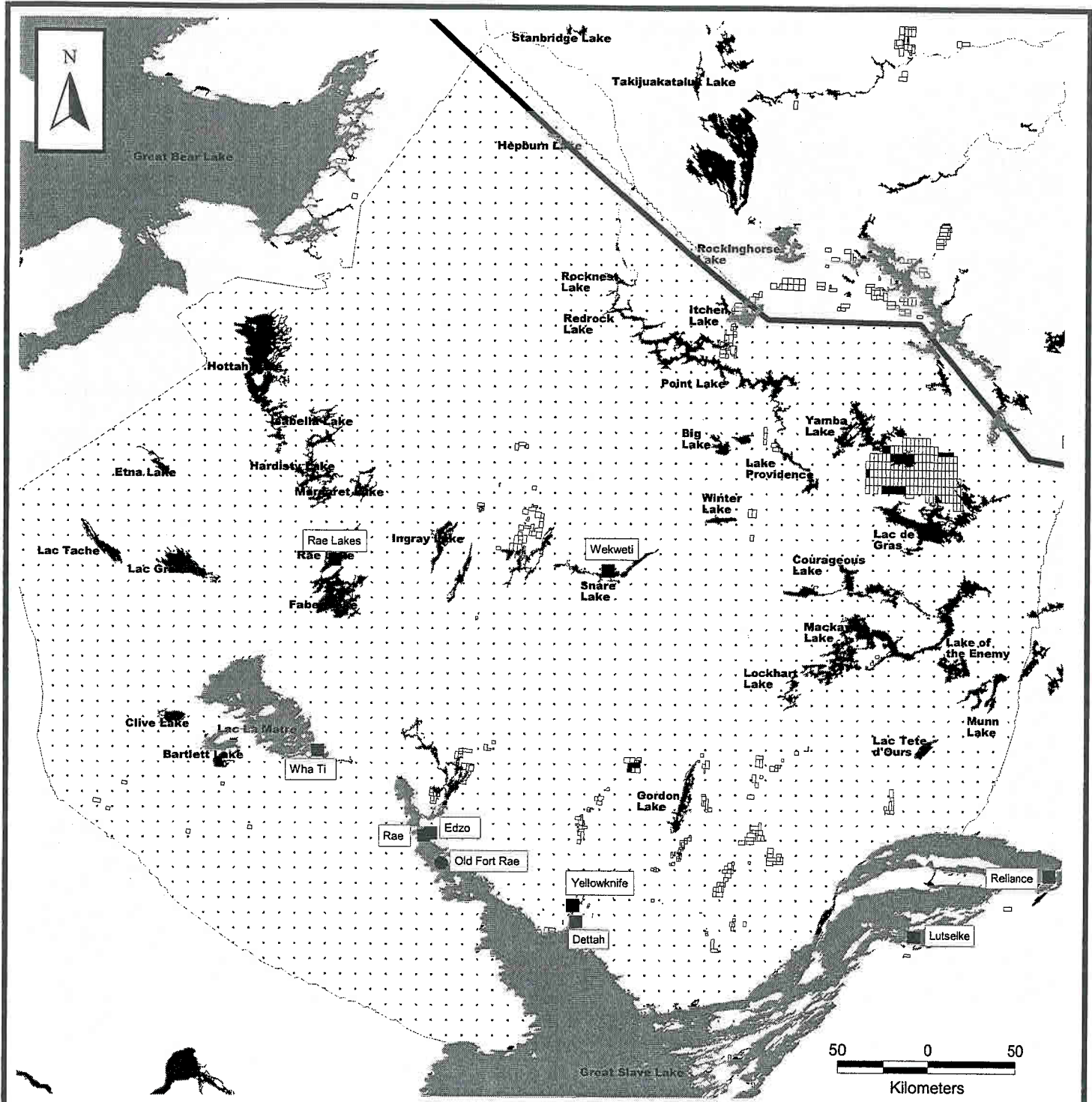
To help illustrate how fast mineral development is occurring in the NSMA's traditional land use area we have provided three maps of the North Slave Region: Map 1 shows the extent of mineral claim staking that had taken place from 1930-1990; Map 2 shows the extent of mineral claim staking from 1990-1999; Map 3 illustrates the current extent of mineral claims staked in the North Slave Region.

Please take the time to compare the three maps provided. What is shown is a dramatic increase in mineral claim staking. The MVEIRB must consider the cumulative impact of allowing mineral development to continue at this exceptionally rapid rate. What will the Cumulative impacts on the environment and Aboriginal Peoples be should development continue to occur at this rate? Can the North Slave region sustain this rate of exploration and development? Is the current rate of exploration and development sustainable?

Exploration Companies Want a Return on Their Capital Investments in Drybones and Wool Bay

The MVEIRB has looked at the applications by New Shoshoni Ventures, North American General Resources Corporation and Consolidated Goldwin Ventures purely as exploration projects. This is an unfair assessment of what is actually proposed. As exploration companies are allowed to explore in culturally significant areas they become further entrenched and established in these areas and ultimately need to see a return on their investments. The MVEIRB must take this into consideration when allowing mineral exploration in culturally significant areas when a Land Use Plan is not in place. The MVEIRB has heard repeatedly from Aboriginal groups that the Drybones and Wool Bay areas are culturally and spiritually significant. One can only speculate a Land Use Plan will reflect this. How entrenched will the MVEIRB allow exploration companies to become in these areas? How much money will the MVEIRB encourage exploration companies to spend before the scope of EAs are changed to reflect what 'exploring for diamonds' truly means?

Without a Land Use Plan in place the MVEIRB has been put in a position where they have to balance the environment, public concern and the economy. The NSMA request the MVEIRB not disillusion exploration companies and allow them to explore in areas Aboriginal Peoples have deemed culturally and spiritually significant. The MVEIRB may be creating or enabling a situation where exploration and development companies lose

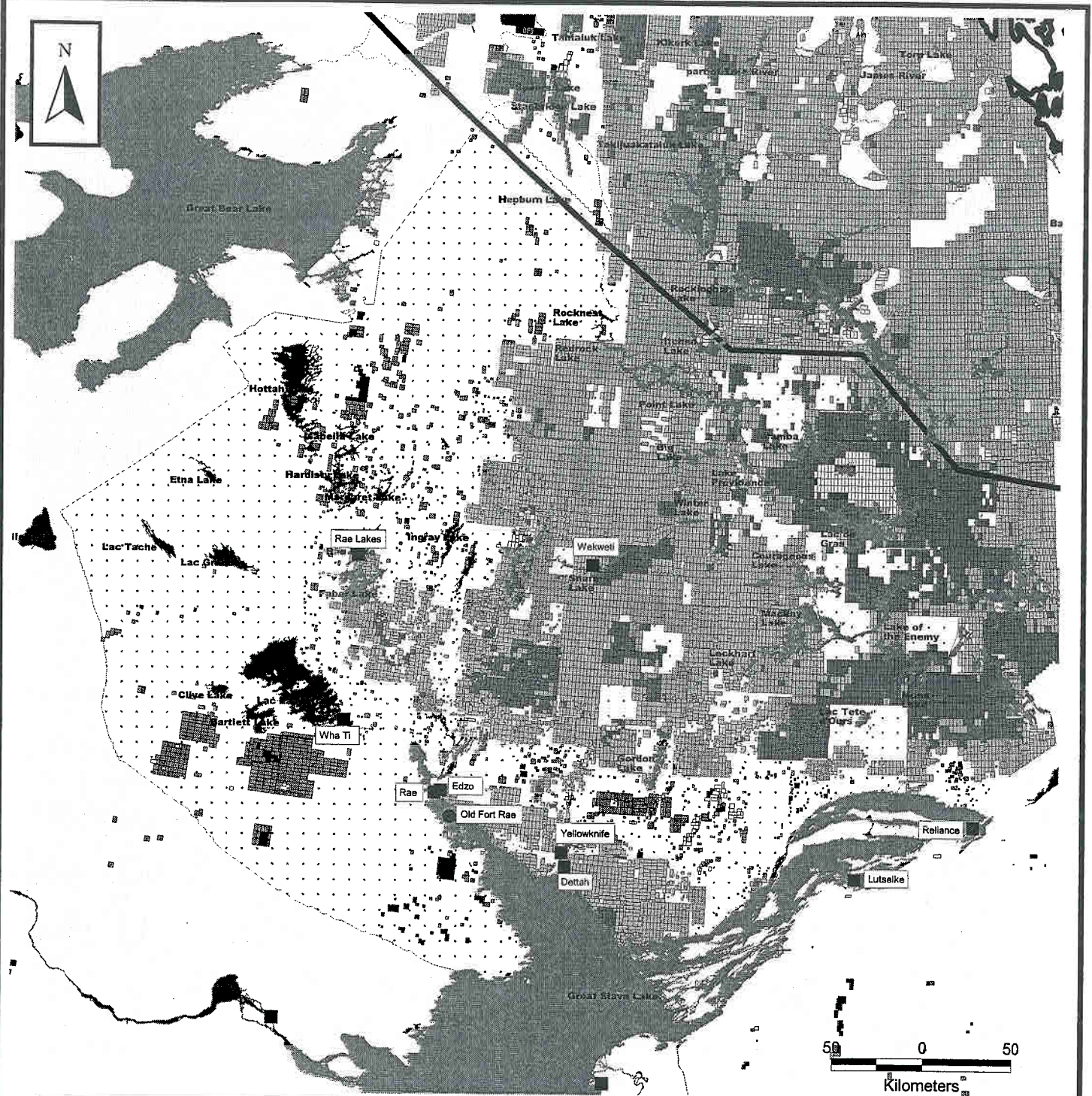


Map 1: Mineral Claims Staked from 1930-1989

- | | | | |
|--------------------------|----------------|----------|---|
| Mineral Claims 1930-1989 | ■ Community | — Rivers | ⋯ North Slave Region |
| ■ Active | ● Old Fort Rae | ■ Lakes | ▭ Nunavut/ Northwest Territories Border |
| □ Lapsed | | | |



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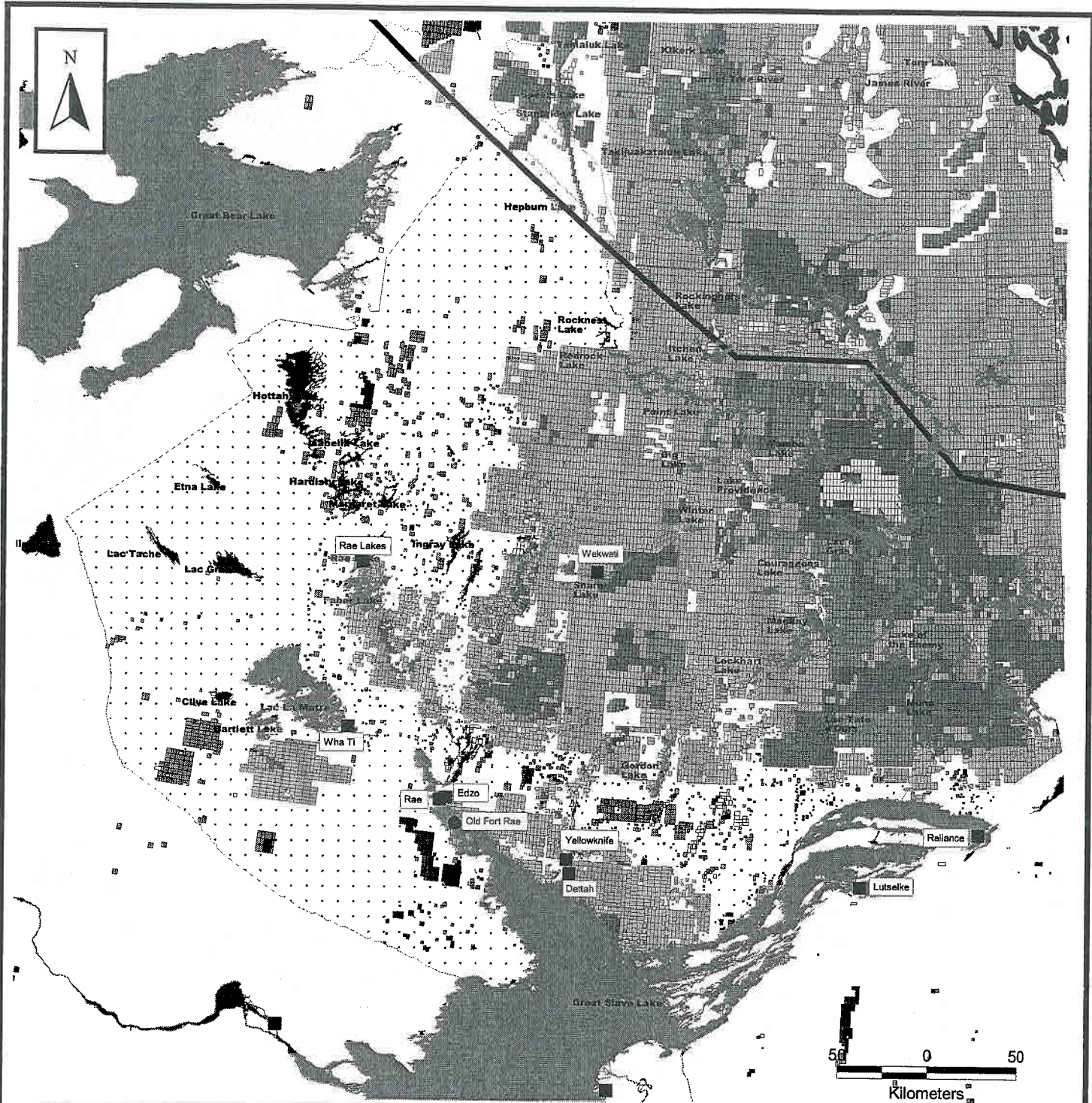


Map 2: Mineral Claims Staked from 1990-1999

- | | | | |
|--------------------------|----------------|----------|---|
| Mineral Claims 1930-1989 | ■ Community | — Rivers | □ North Slave Region |
| ■ Active | ● Old Fort Rae | ■ Lakes | ▭ Nunavut/ Northwest Territories Border |
| □ Lapsed | | | |
| Mineral Claims 1990-1999 | | | |
| ■ Active | | | |
| ■ Lapsed | | | |



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Map 3: Mineral Claims Staked from 2000-Present

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|------------------------------|----------------|----------|---|
| Mineral Claims 1930-1989 | ■ Community | ▨ Rivers | □ North Slave Region |
| ■ Active | ● Old Fort Rae | ▨ Lakes | ▭ Nunavut/ Northwest Territories Border |
| □ Lapsed | | | |
| Mineral Claims 1990-1999 | | | |
| ■ Active | | | |
| ▨ Lapsed | | | |
| Mineral Claims 2000- Present | | | |
| ■ Active | | | |
| ▨ Lapsed | | | |



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confidence with investing in the North. The MVEIRB must realize this is not good for the economy or the people of this region.

To help illustrate this point the NSMA would like to know how much money do the exploration companies have invested in exploring the Drybones and Wool Bay areas? How much money will the exploration companies have lost should they not be allowed to develop mineral claims in the area five years from now when a Land Use Plan is put in place?

Rapid Exploration Right Now to Avoid Heavy Scrutiny Later

The NSMA are concerned Developers will use the lack of Land Use Planning to their advantage by exploring and developing claims at an escalating pace to ensure the upcoming Land Use Plan does not stonewall their projects.

As already shown on maps 1-3, mineral staking and exploration is extensive throughout the North Slave Region. Developers do not currently distinguish between developing mineral claims in areas of high or low cultural importance. The NSMA are extremely concerned that developers will use the current lack of land use planning to their advantage and push for exploration permits as quickly as possible because they know once Land Use plans are in place permits to explore in culturally significant areas will be far more difficult to obtain. This is of significant concern to the NSMA.

Without a Land Use plan in place the MVEIRB is the only avenue available to ensure cultural and spiritual areas are protected from development. The lack of land use planning is no excuse for allowing development to occur in culturally sensitive areas.

Development is Not Occurring at a Sustainable Rate

Development is not occurring at a rate that is sustainable for the Aboriginal communities that must adapt to changes. When culturally significant areas are developed without investigating the social and economic consequences it is the people that rely on the land who suffer. This is a vicious cycle that continues regardless of how vocal Aboriginal communities are against the pace of these developments. Aboriginal communities cannot afford another blow to their quality of life. If Drybones and Wool Bay are slated for development it is the Aboriginal people who use and value the area who will suffer while Southern developers benefit.

The report recently put out by the Conference Board of Canada, "Setting the Pace for Development: An Economic Outlook Report for the Northwest Territories," states the benefits of rapid development occurring in the North are not going to the people who need these benefits the most- namely Aboriginal Peoples. The rate of development is

actually hampering Aboriginal Peoples ability to adapt to change. While the benefits of development flows South Aboriginal Peoples suffer culturally, socially and spiritually. The NSMA have provided this report and the CBC North article for the MVEIRB to review and consider. How long can this pace of development continue before the MVEIRB realizes this is not sustainable and is hurting the Aboriginal Peoples of the North?

What Exploration or Development Will Occur if Diamonds Are Found?

There continues to be significant concern from the NSMA community about the cumulative Impacts of the exploration developments proposed. The NSMA's questions remain unanswered regarding the intentions of the developers should the mineral claims prove economically feasible to warrant full-scale mine development. In the Regionally Cumulative Effects Study the Developers did not have to give any further explanation of their intentions other than to state 'further exploration will occur'. What type of further exploration? Where will this additional exploration occur? What VECs will be impacted by these additional explorations?

Is There Significant Public Concern?

Yes, significant public concern remains for several reasons:

1. Aboriginal Peoples have not been consulted on these exploration projects.
2. Traditional Knowledge was not used to develop a Regional Cumulative Effects Assessment tool.
3. A Land Use plan has yet to be developed for the region; One that reflects the cultural, social, spiritual and economic needs and values of Aboriginal Peoples in the region.
4. Capital investments are being given higher priority than protecting irreplaceable cultural, social and spiritually significant areas.
5. The further exploration companies are allowed to explore, and the more intense their exploration programs, the further entrenched they become in developing an area.
6. The pace of development occurring in the region is not sustainable.
7. The NSMA's questions regarding the intentions to further explore and to what extent this exploration and development will continue in the Drybones and Wool Bay areas have remained unanswered by the Developers.

Request for a Full Environmental Impact Assessment

The NSMA have provided the MVEIRB with confidential evidence of intense Metis land use in the areas of Drybones Bay and Wool Bay. Without a Land Use Plan in place and

because of the poor outcome of the Regional Cumulative Effects Study the Board cannot determine if there will be a significant cultural or socio-economic impact from allowing mineral exploration in the Drybones and Wool Bay areas. However, having experienced it first hand, the North Slave Metis People can vouch for the cultural, social and economic burdens that come with development. As a result the NSMA request the Board conduct a further review of these projects to examine the significant cultural impacts that will arise should Drybones and Wool Bay be slated for mineral exploration and development.

I look forward to hearing from you on this matter.

Yours truly,

Kris Johnson
Land & Resource Coordinator

cc. Yellowknife Dene First Nation