

NORTH SLAVE MÉTIS ALLIANCE

PO Box 2301 Yellowknife, NT X1A 2P7



October 31 , 2008

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

Attn: Paul Mercredi
Email: pmercredi@mveirb.nt.ca

Re: Yellowknife Gold Project, 2008 Project Description Report and scoping comments.

Please find below the North Slave Métis Alliance's (NSMA's) questions and comments on the YGP 2008 Project Description Report followed by our comments on the scoping of the environmental assessment for Tyhee NWT Corporation's proposed Yellowknife Gold Project.

Project Description Report:

- ∞ References to RWED should be replaced with ENR (Environment and Natural Resources) and ITI (Industry, Tourism and Investment).
- ∞ We would like more information about the quantities of cement, explosives, road salt/chemicals, cyanide, fuels, etc. to be transported annually along road and stored on site.
- ∞ We'd like to see more discussion of the access road. Who will be responsible for the construction, care, maintenance and operation of the winter access road? Who will be monitoring the winter access road? What are the existing guidelines for construction/maintenance and closure of a winter road in the NWT? Where will the material needed for road construction and maintenance come from? How much clearing is required and what methods will be used?
- ∞ We'd like to see more detail on why the project is needed, and how local residents would realistically expect to benefit. How many local Aboriginal people will be hired to work on this project? Has an assessment be completed to ensure the availability of workers required? Has Tyhee NWT Corp. identified northern contractors to support the proposed development? If so, what contractors have been researched and/or selected?
- ∞ References have been made to responsible environmental practices in the north, so we would like to see the environmental performance records for Tyhee Development Corp., its contractors and personnel. Has there been any incidence of non-compliance? Will there be a person on-site responsible for environmental protection/compliance at all times?
- ∞ We'd like to know how Thyee NWT Corp. and/or staff respond should someone be fishing, hunting or trapping on the land outlined in the report.
- ∞ We'd like additional detail on how Tyhee intends to include Aboriginal knowledge and enable meaningful involvement in plans. to achieve DFO's No Net Loss strategy?
- ∞ There is mention of the inclusion of Burbot in the Aquatic Resources study but no reference to habitat suitability for Burbot in the report. How suitable are the reference lakes for Burbot habitat?
- ∞ Data from fish tissue metal analysis could be shown better with graphs showing measured amount of metals and the restrictive consumption level set by Health and Welfare Canada.
- ∞ We would like more discussion of how Tyhee NWT Corp. mining activities impact the further contamination of the lakes referred to in the PDR? How will they add to the cumulative impacts

on the Yellowknife River, the drinking supply for the city of Yellowknife? How will they add to the cumulative impacts of metals on fish?

- ∞ What are future plans for the TCA (Winter Lake) with regard to Reclamation/ Restoration? How will wildlife (birds) be protected from entering the TCA (i.e. for other wildlife - drinking if tailing are subaqueous)? What effects will TCA discharge have on Narrow Lake and subsequent lakes all the way to Yellowknife River?

Scope of Environmental Review / Terms of Reference for Developers Assessment Report:

In general, the TOR developed previously is still suitable. The document should be reviewed to ensure that the additional waste rock, work force, road traffic, use of chemicals, and the additional length of time the lands will be unsuitable for other uses, are adequately considered. As well, the terms of reference would benefit from adding the following:

- ∞ A requirement to address non-renewable resource depletion in the context of unsettled aboriginal claims as part of the socio-economic assessment, as an opportunity cost to the aboriginal peoples who lack the capacity to develop their own resources.
- ∞ A statement endorsing the “user-pay” and “full cost accounting” principles of sustainable development, in addition to the precautionary principle, and definitions provided.
- ∞ An explicit requirement that socio-economic and cultural research (as well as biophysical research) must be conducted in accordance with accepted ethical guidelines. The ethics of conducting research involving Aboriginal individuals, their communities, or their resources should specifically be mentioned.

Thank you for the opportunity to comment.



Sheryl Grieve
Environmental Manager
lands@nsma.net

CC. Hugh R. Wilson – Tyhee NWT Corp. hugh_r_wilson@hotmail.com