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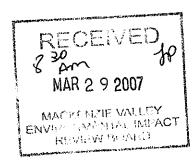
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March 28, 2007

**VIA FAX** 

Patrick Duxbury, M.Sc. Environmental Assessment Officer Mackenzie Valley Environmental Impact Review Board P.O. Box 938 5102 - 50 Avenue YELLOWKNIFE, NT X1A 2N7



Dear Sir:

RE: Yellowknives Dene First Nation Participation in the Sidon and Consolidated Goldwin Ventures Public Hearings

The Yellowknives Dene First Nation (YKDFN) is pleased to inform the Mackenzie Valley Environmental Impact Review Board (MVEIRB) that its representatives will be participating in the public hearings scheduled for April 3 and 4, 2007 for the Sidon International Resources Corp. -EA0506-006, and Consolidated Goldwin Ventures EA0506-005 environmental assessments. In preparation for the hearings the YKDFN submit the following.

## New Evidence

The Yellowknives Dene First Nation have previously placed a Traditional Knowledge map on the public registry for the subject environmental assessments and for the purposes of the forthcoming hearings. However, due to the confidential nature of the information therein, the Yellowknives Dene request the information be sealed and that the right of release to the public be managed such that a written request for its release be made to both the MVEIRB and the Yellowknives Dene; and that upon MVEIRB approval, that viewing of the map be permitted only in the MVEIRB office and that no reproductions in any form be permitted. For clarity, the YKDFN would like to follow the process used by the MVEIRB with respect to confidential information submitted with respect to the four environmental assessments listed below:

- Snowfield Development Corp Drybones Bay mineral exploration EA03-006 1.
- New Shoshoni Ventures Drybones Bay mineral exploration EA03-004 [2003]. 2.

- 3. North American General Resources Corp. Wool exploration drilling EA03-002
- 4. Consolidated Goldwin Ventures Drybones Bay Preliminary Exploration EA03-002 (2003).

## Presenters/Representation

The YKDFN will be represented by Ms. Rachel Ann Crapeau - Manager of the Land and Environment Committee, Mr. Isadore Tsetta - Elder, Mr. Luciano Azzolini - Consultant and myself, as legal Counsel. Mr. Tsetta and Ms. Crapeau will be presenting and speaking to the issues at the public hearings, and all YKDFN representatives intend to ask questions of the parties to the proceedings.

For information purposes, each household in Dettah and Ndilo was notified of the Sidon and Consolidated Goldwin hearings and there may be YKDFN members wishing to speak and provide verbal evidence during the public representation component of the hearings.

## Issues to be Addressed

The YKDFN presented some of the issues it would speak to at the pre-hearing conference held on March 14, 2006. The YKDFN intend to further address the following issues:

- The modified Environmental Assessment does not have the same degree of information that would normally be provided in a Developer's Assessment Report (DAR) thus making it difficult to respond to possible impacts of the project.
- The YKDFN was not provided enough information on the developments and their impacts on socio-economic and cultural environments thus making it difficult if not impossible to respond to the issues of primary concern to the YKDFN.
- 3. The hearing is possibly premature; the hearing could perhaps provide an opportunity for issues scoping for the preparation of Terms of Reference for a DAR, but there is not sufficient evidence/information on the record to make an informed decision at this stage.
- 4. The Information Request Responses received to date are not of sufficient quality compared to that which would be required in a DAR; they are insufficient in depth. Without adequate information, there is no basis for the YKDFN to provide reasoned responses to the MVEIRB.
- The quality of the EA is nowhere near the standard which the Review Board has conducted in the past and the lack of capacity by the Developer should not preclude the MVEIRB to undertake a good EA.
- 6. There has been a lack of consultation regarding the proposed developments. A record of consultation and what the consultation has generated in terms of modifications to the project is something that should be considered.
- There is insufficient baseline information on the areas in question and a lack of analysis about how the baseline conditions may be impacted by the proposed development (biological and physical elements).

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- 8. The Information Requests issued to better understand the impacts do not capture the breadth of issues that would be normally required in a DAR.
- 9. There is a lack of socio-economic analysis on the exploration programs. The YKDFN would like to raise the issue of use of the area, both present and past. This will include socio-economic values attributable to the proposed drilling areas from the perspective of hunting, trapping and fishing as per treaty rights.
- 10. There is no baseline information or analysis of the impact of the programs on cultural values. The YKDFN will bring evidence forward demonstrating use of the area and the value of the area from a cultural standpoint.
- 11. There are transportation issues that have not yet been referred to in the EA that are of concern to YKDFN.
- 12. Cumulative Effects have not been considered in either the information requests or in any other analysis. There are a number of developments occurring in the area in question. The cumulative effect of those numerous programs is of significant concern to the YKDFN.
- 13. There is insufficient baseline information available regarding cumulative effects to meaningfully discuss impacts except from an opinion standpoint.

The Yellowknives Dene First Nation would like to thank the MVEIRB for consideration of this submission and the previously supplied map and look forward to our continued participation in the Consolidated Goldwin and Sidon environmental assessments. We trust the information we have provided meets with your approval.

Yours truly.

GREG C. EMPSON
Legal Counsel for the Yellowknives
Dene First Nation Land and
Environment Committee

cc: Rachel Ann Crapeau, YKDFN cc: Jeanne Cadieux, CEO, Dettah