

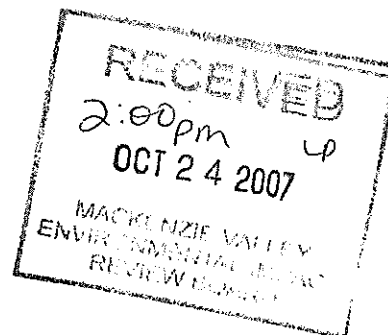


Akaitcho Interim Measures Agreement Implementation Office
NWT Treaty #8 Tribal Corporation

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RE: Comments on the conduct of environmental assessments in the upper Thelon Basin (EA0708-02, EA0708-03, EA0708-04, EA0708-05)

Mr. MacDonald:

In a letter to the MVLWB dated July 27, 2007, I articulated the Akaitcho Dene First Nation (AKFN) position regarding uranium exploration in the upper Thelon Basin. The position is that applications cannot be considered until the following take place:

- INAC acts upon the MVEIRB UR-Energy decision;
- The Crown fulfills its obligation to consult with the AKFNs regarding rights-based assertions in the upper Thelon Basin.

Positive action on the implementation of these matters will hopefully set a context for uranium exploration in the upper Thelon Basin, and is the only way any certainty or clarity will be injected into the regulatory framework in the region. Reviewing new applications in the absence of any direction from INAC is inefficient, wasteful of the public purse, and discouraging to the objectives of both industry and First Nations.

Fortunately, there seems to be some progress on this front. In his recent letter accepting the MVEIRB decision on UR-Energy, the Minister of INAC committed to developing a draft plan regarding the "long term context for land and resource management in the Thelon watershed". The development and implementation of this plan, in association with the AKFNs, will hopefully provide guidance on how applications for development in the region will be considered. Proceeding with application reviews in advance of the implementation of this plan will be confusing and likely prejudicial.

In the July 27 letter, I requested that further applications in the upper Thelon be put into abeyance until the MVEIRB UR Energy decision was acted upon. This request is even more relevant given INACs commitment to develop a broad management plan for the region. However, this does not seem to be possible due to the limitations of the MVRMA with regards to landscape considerations and s.35 Crown obligations. Consequently, we are in the somewhat absurd position of proceeding with four separate EAs that are virtually identical to UR-Energy in context, scope, and potential impact.

These EAs will undoubtedly result in the same issues and concerns being raised by the First Nations, aboriginal organizations, tourism industry, and the general public. It is an unnecessary burden to expect concerned parties to fully engage in these EAs when they will be simply repeating the messages articulated during UR-Energy. Therefore, the NWT Treaty #8 Tribal Corporation has the following comments pertaining to the conduct of the Uraivan and Bayswater EAs.

Evidence Transfer from the Public Record for UR-Energy

All relevant evidence from the UR-Energy public registry should be transferred to the public registry of each of the four EAs. From the perspective of the AKFNs, there is little or no difference between the UR-Energy, Uraivan, and Bayswater proposals.

Scoping

The scope of assessment should be generic among all four EAs, though some location-specific issues may be identified. It could be assumed that the preliminary screening results for these EAs and the results of the scoping exercise during UR-Energy are together adequate for the purpose of scoping these proposed projects.

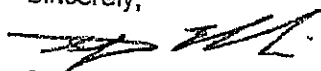
Gathering New Evidence

If all the relevant evidence from UR-Energy is transferred to each of these EAs, there should be little need for the gathering of new evidence. Evidence related to new site-specific issues, if there are any, should be elicited with Information Requests in order to save time and money for all.

Public Hearings

Assuming that the issues arising in these EAs will be very similar / identical to UR-Energy, there should not be any need for a public hearing. Again, most concerned parties have said what they have to say during UR-Energy, and they should not be required to repeat themselves. That being said, it is perhaps wise to wait until the gathering of new evidence is completed to determine whether a public hearing is necessary to deal with potential new issues that were not addressed during UR-Energy.

Sincerely,



Stephen Ellis – Akaitcho IMA Implementation Coordinator
NWT Treaty #8 Tribal Corporation

- c. Chief Adeline Jonasson – LKDFN
- A/Chief Louis Balsillie – DKFN
- Chief Fred Sangris – YKDFN (Ndi'o)
- Chief Eddy Sangris – YKDFN (Dettah)
- Florence Catholique – A/Wildlife, Lands and Environment Manager, LKDFN
- Rosie Bjornson – IMA Coordinator, DKFN
- Trish Merrithew-Mercredi – Regional Director General, INAC
- James Lawrance – Director, INAC
- Gabrielle Mackenzie-Scott – Chair, MVEIRB