

December 16, 2009

Gary Bohnet
Deputy Minister of Environment & Natural Resources
Government of the Northwest Territories
Box 1320
Yellowknife, NT X1A 2L9

Dear Mr. Bohnet

Since October 2007, the Mackenzie Valley Environmental Impact Review Board (the Review Board) has been conducting an environmental assessment of the Taltson Hydroelectric Expansion Project, proposed by the Dezé Energy Corporation. This environmental assessment is nearing its conclusion and the Review Board has scheduled a public hearing on the matter for January 14-15, 2010. The parties to the assessment have submitted their final technical reports and will be presenting their conclusions to the Review Board at this hearing.

During the technical sessions held on Oct 1, 2 and 5, 2009, the Department of Environment and Natural Resources (ENR) raised concerns related to potential impacts to caribou resulting from the Taltson Hydroelectric Expansion Project and related activities. The two main concerns were:

- the potential effects of transmission line construction and operation on caribou behaviour and movements, and
- the potential impacts on caribou populations from increased access and mortality by hunters.

Other parties have also raised concerns about potential impacts on caribou, notably the First Nations and Metis groups that have been participating in this environmental assessment.



ENR submitted a report dated November 30, 2009 that describes several meetings held with representatives of the developer. These meetings included discussions about the developer's assessment of potential impacts to caribou, particularly:

- not considering the potentially relevant data on the Beverley herd from the 1980s
- the legitimacy of applying a boreal caribou model to barren-ground herds
- not reflecting the relevance of the burns described in the GNWT burn database when evaluating caribou habitat

While the meeting report indicates topics of discussion, it does not offer a summary of the discussion or the results of the meeting. Without further information, it is difficult to understand whether the issues raised in the technical session have been resolved to the satisfaction of all parties involved.

The Review Board also identified information gaps in respect to the potential impacts of the proposed development on caribou. Filling these gaps would assist the Review Board in making a determination on the significance of potential impacts to caribou. The gaps identified are as follows:

1. A summary of the discussions and results from the meetings referenced in the report from November 30, 2009, including attendees and any caribou experts involved.
2. ENR's views on how the developer's proposal to reduce access will effectively mitigate increased access and related caribou mortality.
3. ENR's views on the effects of increases in hunting pressures on the herds in the development area, resulting from reduced harvest of caribou herds elsewhere in the NWT and how this may combine with other impacts from the development on caribou.
4. ENR's assessment that the cumulative effects on caribou with respect to this development in combination with all other human activities will not cause a significant impact. This would include a consideration of the developer's approach to measuring and evaluating cumulative effects in comparison to ENR's and whether, in ENR's view, this makes a difference in the strength of the developer's conclusions. The potential of induced development would also be a consideration.



It would be appreciated if ENR would assist the Review Board by providing additional information regarding the information gaps identified above. It would also be appreciated if this information could be received by the Review Board prior to the public hearing on January 14-15, 2010, so all parties can benefit.

In addition, the Review Board would appreciate the presence of an ENR caribou biologist at the hearing who is prepared to speak to the matter and answer questions if required during the public hearing.

Thank you for your assistance in this matter.

Regards,

A handwritten signature in blue ink, appearing to read "Vern Christensen".

Vern Christensen

Executive Director