

February 18, 2010

Attention: Alan Ehrlich & Martin Haefele

Mackenzie Valley Environmental Impact Review Board
Yellowknife, NWT, Canada

Re: Dezé Energy Corp.'s new proposed alternate route through the Reliance area for the Taltson Hydroelectric Expansion Project Transmission Line

Dear Alan Ehrlich,

My name is Justine Crowe and I am a Biologist with the Aquatics Division of Golder Associates Ltd. in Yellowknife. I am writing the Mackenzie Valley Environmental Impact Review Board (MVEIRB) solely as a private citizen of Canada, a resident of Yellowknife, someone who has developed a deep spiritual connection with the Reliance area, and *not* on the behalf of the company that I work for. I want to make it clear that I was never directly involved in the Environmental Impact Assessment (EIA) research and reporting process through Golder Associates Ltd., and this letter represents my personal thoughts and opinions alone and not that of my employer.

I will begin by stating that I am not opposed to the Taltson Hydroelectric Expansion Project, but I am extremely opposed to the new proposed route of the transmission line to extend past Reliance following the peninsulas between Charlton Bay and McLeod Bay. I believe that it is very important to invest in the mining sector in the Northwest Territories and to invest in greener energy sources. A reliable source of hydroelectricity to the diamond mines is a great investment in the north and to the economic viability of the mines. In addition, by expanding the energy capacity of the existing Taltson hydroelectric station, Dezé Energy Corp. has avoided further destruction of pristine environment that could have resulted from a new hydroelectric facility. My main concern, however, is that the new proposed route has not undergone adequate consultation or cultural/environmental impact assessment studies, in order for it to even be put on the table as an alternate route.

I have developed a strong spiritual and environmental connection with the Reliance area over the past years. My common law partner, Mr. Spencer Decorby, has a long term lease on a cabin property in Charlton Bay on the point across from Belle Isle. I have also spent a lot of time at Mr. Ray Decorby's cabin on Fairchild Point over the past years. The Decorby family has been coming to Reliance for several decades and know the rest of the Reliance "community" very well. They also have a very deep spiritual connection with the area, and they consider these visits as a family tradition, a tradition that we hope to keep alive for generations to come.

The Reliance “community” is not the only one who has a deep spiritual connection with this area. The Lutsel K’e Dene First Nation (LKDFN) have expressed their concerns about the social, spiritual, cultural, and environmental impacts that would be associated with a transmission line passing through the East Arm of Great Slave Lake and over the Lockhart River. Just as the LKDFN people have traditional and spiritual connections to these areas, so do other residents of the Northwest Territories who frequent the area every year. Interests in these areas are very similar, yet slightly different, but all involved parties should be receiving the same amount of attention towards their concerns, which does not appear to be the case.

There is a serious lack of adequate public consultation that has come about with the new proposed transmission line route through Reliance. Dezé Energy Corp. has been involved in a lengthy consultation process regarding the original Taltson Hydroelectric expansion project for over a year. Now that the LKDFN have expressed their opposition to the route over the Lockhart River, Dezé Energy Corp. has quickly attempted to quietly sneak in a new proposed route through Reliance without undergoing the proper public consultation process that all Northwest Territories residents are entitled to. It is obvious that this new route is causing significant public concern by several parties, and according to section 128(1)c of the Mackenzie Valley Resource Management Act (MVRMA) we are entitled to a “normal” public consultation process. The fact that there is only a two week window for the public to express their concerns about the new proposed route is unacceptable and unfair, and it might even be illegal. Two weeks is not an appropriate amount of time for the public to even become aware of what is going on, and much less be able to collect their thoughts and submit their opinions to the board.

The first step of the three-stage EIA process in the NWT, is the preliminary screening process. The second step of the EIA process is the Environmental Assessment (EA) stage, which is where the Taltson Hydroelectric Expansion Project is now. The EA, conducted by the MVEIRB, is a detailed examination of the potential adverse effects on the environment (social, cultural, economic, and biophysical) and the potential for public concern. A two week period for the public to express their concerns on the new proposed Reliance route will not allow the MVEIRB sufficient time to acquire enough information to make an informed decision of whether or not to proceed to the next stage. If this project does make it to the third step, an Environmental Impact Review (EIR), then it needs to take into account that there is significant public concern, and extensive public hearings or even a Federal EA could follow.

One of the things that makes the NWT’s environmental impact assessment process unique and a step above other Canadian province’s EA systems is it’s attention to public concerns and it’s attention to Traditional Ecological Knowledge (TEK). The EIAs in Canada’s North are also unique in that they not only incorporate Valued Ecosystem

Components (VECs), but they go beyond the ecological and physical components to include effects on people, their society, their culture, and their economy. These are referred to as Valued Ecosystem and Cultural Components (VECCs) and Valued Social or Economic Components (VSCs) and are extremely important to the northern territories because of the strong presence of remote communities throughout the land. Over a year ago the Taltson Hydroelectric Expansion Project went through the public consultation process in communities that were thought to be affected by the transmission line, but why was the small settlement of Reliance not consulted prior to the new proposed route? It is my understanding that people in the Reliance area were never consulted until recently when the new route was proposed a few weeks ago. Once again, this ignores the MVRMA's commitment to address VECCs and VSCs, and further diminishes the developer's commitment to truly do its part in addressing the public during the EA process.

The Reliance area, and more specifically the water between Maufelly Point and Fairchild Point, is an extremely important ecological area. Due to high flow rates from the Lockhart River, this area has long periods of open water compared to all other areas of Great Slave Lake, making it a wildlife haven. It is also an important transition point from below the tree line to the barren lands. The proposed transmission line route across this bay could have adverse effects on migratory bird populations, specifically Geese which are known to use this area for several weeks during migration in May. Other animals are present in the area including grizzly bears, wolves, foxes, etc. This is an extremely important area for Lake Trout populations as well. The waters of Charleton Bay are world renown for their healthy Lake Trout and Arctic Grayling populations. This is an area of high flow, and thus an important feeding ground for fish. Construction processes off of Maufelly Point could result in adverse effects on the fish populations, therefore, a full environmental impact assessment of this new route should be conducted. Even if a plan is set in place to put the transmission line underwater, detailed studies are required by law to appropriately assess the effects that this could have on fish. Small bodied fish are known to be more sensitive to noise, and since this is an important fish feeding ground, this could indirectly affect more economically viable fish species such as trout and grayling. Unless Dezé Energy Corp. can provide a solution to potential fish habitat loss or fish spawning ground loss, both during the construction phase and during operation of the transmission line, there is no reason why this new proposed route should be able to go ahead without the proper environmental impact assessment studies in place. Once again, the MVEIRB cannot complete the EA process unless the developer has provided them with the appropriate information to do so.

The Reliance area is not only an important area environmentally, a transmission line through here would also affect several other things such as:

- Disturbance of the Reliance Aerodrome (has Transport Canada been contacted?);
- Historical significance of Reliance and the close proximity to Historical Old Fort Reliance;
- Passing through a proposed National Park – The new proposed Reliance route is out in the open, I doubt that Parks Canada will support this route either;
- Spiritual and traditional significance of the area to native and non-native people all over the NWT and surrounding communities;
- Ecotourism will be directly affected – people frequent Reliance all year round, not only to enjoy fishing, but to enjoy the beautiful aesthetics of the region; and
- Negative affect on Trophy Lodge business.

Several other public parties have also expressed their concern about the long term economic viability of the Taltson Hydroelectric Expansion Project, and more specifically, with the proposed routes (over the Lockhart River or through the Reliance area). These routes only take into account the short term benefits of supplying the diamond mines with greener energy, however, the mines have a limited life. It is probably expected that new mines will eventually pop up in the area in the future potentially making this an economically attractive project, but there is no guarantee for this. It would make more sense to go along the alternate route along the existing highway to the west of Great Slave Lake. This way, Dezé Energy Corp. would significantly cut costs associated with building a transmission line through untouched land, such as carving a new road system and extensive helicopter use during construction. It would also avoid spiritual and traditional areas, a proposed national park, AND other permanent communities, including Yellowknife, could benefit from the electrical power along the way. A grid could be created once the line reaches Yellowknife that would also act as a booster station for the line to continue up towards the mines.

The other four proposed routes that Dezé Energy Corp. had originally put in place during their initial EIA process have not really been considered. Why would they propose a new route at the last minute, rather than falling back on one of their other alternate routes that have supposedly also undergone a proper EIA? The fact that this new proposed route through Reliance was even brought to the table this late in the game is extremely concerning, and seems like a last attempt by the developer to sneak through the EA process and cut construction costs at the same time.

I have a very special connection to the Reliance area, and I feel that it is important for people to have the proper opportunity to express their views and opinions on what they would like to see happen to this place. I want to continue to visit Reliance, and be able

February 18, 2010

to continue to experience the spiritual and deep appreciation that I have for this land. It would be a shame to see such an ecologically and historically unique area be altered for the wrong reasons, and for reasons that do not take into account the views of northerners that also have a special connection with the area.

Sincerely,

Justine Crowe, B.Sc.