



# Yellowknives Dene First Nation

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August 3<sup>rd</sup>, 2011

Richard Edjericon  
Chair, Mackenzie Valley Environmental Impact Review Board  
Box 938  
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Dear Mr. Edjericon:

## Re: Debagorski EA – Transfers to Registry (EA1112-001)

On July 19<sup>th</sup>, 2011, the Review Board issued a letter indicating what documents had been transferred to the Debagorski EA (EA1112-001). YKDFN believes that there has been an oversight – the Reports of Environmental Assessment for EAs 03-002, 03-003, 03-004, 03-006, 0506-005, 0506-006 were not transferred. While we believe that this is just an oversight, these documents are critical to understanding the impacts to this landscape. Furthermore, these documents represent the culmination of a great deal of hard work from all of the Parties, including the Review Board.

With this in mind, YKDFN would like to submit the following to the Registry:

- 1) EA03-002, February 10<sup>th</sup>, 2004:  
[http://www.reviewboard.ca/upload/project\\_document/EA03\\_002/Report\\_of\\_EA/REA\\_040211\\_CGV.pdf](http://www.reviewboard.ca/upload/project_document/EA03_002/Report_of_EA/REA_040211_CGV.pdf)
- 2) EA03-003, February 10<sup>th</sup>, 2004:  
[http://www.reviewboard.ca/upload/project\\_document/EA03\\_003/Report\\_of\\_EA/REA\\_040211\\_NAGR.pdf](http://www.reviewboard.ca/upload/project_document/EA03_003/Report_of_EA/REA_040211_NAGR.pdf)
- 3) EA03-004, February 10<sup>th</sup>, 2004:  
[http://www.reviewboard.ca/upload/project\\_document/1144786911\\_REA\\_040211\\_NSV.pdf](http://www.reviewboard.ca/upload/project_document/1144786911_REA_040211_NSV.pdf)
- 4) EA03-006, February 25<sup>th</sup>, 2004:  
[http://www.reviewboard.ca/upload/project\\_document/1305582664\\_Report\\_of\\_Environmental\\_Assessment\\_and\\_Reasons\\_for\\_Decision.pdf](http://www.reviewboard.ca/upload/project_document/1305582664_Report_of_Environmental_Assessment_and_Reasons_for_Decision.pdf)
- 5) EA 0506-005, November 30<sup>th</sup>, 2007:  
[http://www.reviewboard.ca/upload/project\\_document/1305583396\\_CGV\\_Report\\_of\\_Environmental\\_Assessment.pdf](http://www.reviewboard.ca/upload/project_document/1305583396_CGV_Report_of_Environmental_Assessment.pdf)
- 6) EA 0506-006, February 6<sup>th</sup>, 2007:  
[http://www.reviewboard.ca/upload/project\\_document/1305583414\\_Report\\_of\\_Environmental\\_Assessment\\_EA0506-006\\_Sidon.pdf](http://www.reviewboard.ca/upload/project_document/1305583414_Report_of_Environmental_Assessment_EA0506-006_Sidon.pdf)

Simply put, there is no valid reason to omit these decisions. The executive summary of these EAs, explains why they need to be on the registry:

*"Although this report addresses the proposed development of SDC, all these*

developments are closely related due to:

- similarities in the environmental setting for the proposed developments;
- the concurrent timing of the proposed developments;
- common environmental, social and cultural issues arising from the proposed developments;
- public concern about all developments in Wool and Drybones Bay area; and,

...

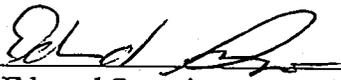
*Significant adverse cumulative impacts on culture of the YKDFN and First Nations and Métis will result from further development of this area. The individual contribution of SDC's development, although extensive, is not expected to be a significant contributor to these cumulative impacts as a result of the mitigation measures proposed by the developer.*" (Drybones EAR, p ii-iii)

This was selected from the Drybones EAR, but similar passages are found in each of the reports. None of these projects are completed in isolation; this is the seventh EA in this very small, but very important area. The inclusion of these reports will make the process easier and more efficient. Having a common starting point where determinations and impacts have already been assessed will mean that the EA can be undertaken in a timely manner, a key objective of the Board.

The Scope of Assessment notes that cumulative impacts are a central issue to be considered within this EA. Additionally, *Section 117(2)(a)* of the *Mackenzie Valley Resource Management Act* makes it plain that the Board is required to consider cumulative impacts in the Environmental Assessment. It is not clear to the YKDFN why this Board would choose to not include the five previous reports where determinations of significance and impacts were previously made. There has been no suggestion or evidence placed on the registry that suggests that the Board erred in its decisions. It seems redundant and wasteful to ignore the conclusions and evaluations of the significant impacts.

YKDFN requests that the Board include these decisions registry because of the important role they will play in assessing cumulative impacts. Omitting the previous determinations on the impacts and effects caused by developments cripples the board's ability to deliver an effective EA according to Part 5 of the *MVRMA*. Should the Board not agree, YKDFN will submit them to the registry as evidence.

Sincerely,

  
Chief Edward Sangris  
Yellowknives Dene First Nation (Dettah)

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