



June 28th, 2013

Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
Box 938, 5102-50th Ave
Yellowknife, NT X1A 2N7

Re: GNWT Department of Transportation Environmental Scoping Document

In January 2013 the Government of the Northwest Territories Department of Transportation (GNWT DOT) developed an *Environmental Scoping Document* in anticipation of an environmental assessment (EA) or environmental impact review (EIR) for the proposed Mackenzie Valley Highway (MVH). The Gwich'in Tribal Council's focus is on the 180 kilometre portion that will traverse the Gwich'in settlement Area.

The document is based on the 800+ page *Project Description Report for the Construction of the Mackenzie Valley Highway Gwich'in Settlement Area, NT*. It gives a thorough account of anticipated environmental consequences and impacts on wildlife, though it does, at times, seem to give somewhat slight regard to some issues. However, given that the MVH project is so strongly supported and greatly anticipated by most, if not all stakeholders, it is understandable that DOT seeks to assist if not expedite the pre-construction process.

After reviewing the document, comments are few but they are as follows:

- Little mention is made of the input on routing from Gwich'in Participants, especially the Gwich'ya Gwich'in in Tsiigehtchic.
- For the identification of Gwich'in cultural and heritage sites, it is unclear the extent of the Gwich'in Social and Cultural Institute (GSCI) participation.
- There is an implied conflict between the Mackenzie Valley Fibre Optic Line (MVFOL) and the MVH. To explain; in the interest of minimising the environmental footprint, the MVFOL is to follow the same route as the MVH. If current schedules hold true, the MVFOL will be constructed before the MVH. If for a moment, we reference the current construction of the Inuvik to Tuktoyaktuk Highway, it has been clearly stated that the installation of a fibre line up to Tuktoyaktuk would only occur after the construction of the highway due to the "high likelihood of damage to the line as a result of road construction". Hence, if the MVFOL is to be installed before the MVH, does this same likelihood of damage to the fibre line exist as a result of the MVH construction? This may appear to be purely an infrastructure question, but the two projects are framed, as stated above, within the context of minimising the environmental footprint.

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- The last set of public meetings held in the Gwich'in Settlement Area communities was in March 2011. There is no mention of further public consultation.
- There is no mention of the type of merge at kilometre 1509 where the MVH meets the Dempster Highway. Will there be a stop sign, merging lane, something else? Though seemingly trivial, it could be a safety issue.

If you have any questions, please do not hesitate to contact John Ritchie, Lands and Resources Technical Advisor at jritchie@gwichin.nt.ca or 867-777-7914.

Sincerely yours,



President Robert A. Alexie
Gwich'in Tribal Council

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GSCI
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