



June 11, 2012

File: S110

Chuck Hubert
Senior Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
P.O. Box 938
Yellowknife NT X1A 2N7

Dear Mr. Hubert:

Response to Yellowknives Dene Letter of June 4, 2012

De Beers is writing in response to the June 4, 2012 letter from the Yellowknives Dene First Nation (YKDFN) to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) regarding consideration of the Tibbitt-to-Contwoyto Winter Road (TCWR) in the Environmental Impact Review (EIR) process for the Gahcho Kué Project. In the YKDFN's letter, it suggests that impacts associated with the TCWR were not included in the Project assessment. De Beers Canada Inc. (De Beers) would like to provide the following clarification.

De Beers recognizes that:

- the Terms of Reference (TOR) require assessment of the use of the TCWR and De Beers has complied with the TOR;
- the TCWR is an existing development on the landscape (since 1982) and would remain so even if the Gahcho Kué Project (Project) was not developed; therefore, the incremental effects of the Project are only the additional traffic on the TCWR;
- traffic forecasts indicate that TCWR volume will remain within historic ranges with the addition of the Project (see Information Request TG-42); and
- the cumulative effects assessment considered all impacts related to the TCWR.



The Project-related effects associated with the TCWR were assessed in the Environmental Impact Statement (EIS; De Beers 2010), Technical Memos and responses to Information Requests. For example, effects to caribou from the TCWR have been assessed relative to:

- direct mortality (see EIS Section 7.4.2.2.3 and Information Request YKDFN 1.9);
- habitat loss and fragmentation (EIS Section 7.5.2.2);
- changes to habitat quality, and resulting effects to movement and behaviour (EIS Section 7.5.3.1.2 and Information Request YKDFN 1.13);
- access and harvest from the TCWR (EIS Section 7.5.5.1, Information Request YKDFN 1.12 and Technical Memorandums July 22, August 10 and December 15, 2011);
- traffic volume (EIS Section 7.7.2, Information Requests GKP 5, GKP 11, TG 42 and YKDFN 1.9);
- encounter rates of caribou with the TCWR (Information Request GKP 4); and
- follow-up monitoring (Information Requests TG 45 and YKDFN 1.14).

In summary, De Beers has thoroughly considered the entire TCWR in the EIS and supporting documents consistent with the TORs. Finally, De Beers has tabled three viable options for monitoring access along the section of winter road within its purview (De Beers 2012; EMMF). As a result, De Beers is confident that the TCWR, including monitoring options, has been comprehensively and thoroughly assessed.

Sincerely,

Veronica Chisholm
Permitting Manager

c: S. Ellis, Akaitcho IMA Implementation Office, Lutsel K'e NT
M. Tollis, Land & Environment, LKDFN, Lutsel K'e NT
R. Bjornson, Land & Environmentm, DKFN, Ft. Resolution NT
J. Lawrence, Crown Consultation Support Unit, AANDC, Yellowknife NT
Chief Edward Sangris, YKDFN, Yellowknife NT



References

- De Beers (De Beers Canada Inc.) 2010. Environmental Impact Statement for the Gahcho Kué Project. Submitted to the Mackenzie Valley Environmental Impact Review Board, December 2010.
- De Beers 2011 Regulatory Meetings – May to October 2011– Gahcho Kué Project Environmental Impact Review. Submitted to Mackenzie Valley Environmental Impact Review Board. November 2011.
- De Beers 2011 EIS Analysis Session Updates – Gahcho Kué Project Environmental Impact Review. Submitted to Mackenzie Valley Environmental Impact Review Board. December 2011.
- De Beers 2011 Gahcho Kué Panel Information Request Responses – Gahcho Kué Project Environmental Impact Review. Submitted to Mackenzie Valley Environmental Impact Review Board. April 2012.
- De Beers 2012 Tlicho Government - Information Request Responses – Gahcho Kué Project Environmental Impact Review. Submitted to Mackenzie Valley Environmental Impact Review Board. April 2012.
- De Beers 2012 Yellowknives Dene First Nation - Information Request Responses – Gahcho Kué Project Environmental Impact Review. Submitted to Mackenzie Valley Environmental Impact Review Board. April 2012.
- De Beers 2012 Environmental Monitoring and Management Framework (EMMF) – Gahcho Kué Project Environmental Impact Review. Submitted to Mackenzie Valley Environmental Impact Review Board. May 2012.

