

August 28, 2017

JoAnne Deneron, Chair c/o Mark Cliffe-Phillips Mackenzie Valley Environmental Impact Review Board 200 Scotia Centre, Box 938, 5102-50th Avenue Yellowknife, NT X1A 2N7

Via Email mcliffephillips@reviewboard.ca

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Re: Updated Work Plan – EA1617-01: Tłįchǫ All-Season Road

Ms. Deneron:

On August 25, 2017, the Mackenzie Valley Environmental Impact Review Board (MVEIRB) provided an updated work plan for EA1617-01: Tłįcho All-Season Road (TASR) (PR#165). The work plan is contingent upon the submission of the Wildlife Management and Mitigation Plan (WMMP) by the Government of the Northwest Territories (GNWT) on September 22, 2017. The MVEIRB has identified the review period of the WMMP as 2.5 weeks.

The Wek'èezhìı Renewable Resources Board (WRRB) is responsible for wildlife, plants, forests and protected areas in Wek'èezhìi. The Board makes decisions and recommendations on an ecosystemic basis using Tłicho Knowledge, science and expert opinion, as per Chapter 12 of the Tłicho Agreement. As one of its duties as a management authority, the Board provides recommendations on wildlife and wildlife habitat, including fish, during environmental assessment processes. The WRRB has participated as a Party throughout the TASR environmental assessment, most recently during the technical sessions in Behchokò. During the technical sessions, WRRB staff indicated that the Board required four weeks for review of the WMMP (PR#162). The WRRB believes 2.5 weeks is an unacceptable amount of time to review and comment on the WMMP. The draft Wildlife and Wildlife Habitat Protection Plan and the conceptual Wildlife Effects Monitoring Plan, which constitute the WMMP, are incomplete and have missing sections, such as the adaptive management section that remains as "to be completed"; therefore, the Board requires sufficient time for a thoughtful and detailed review. While it is recognized that maintaining the proposed schedule is crucial to the GNWT's construction phase, due to other commitments and limited staffing, the WRRB is unable to provide comments on the WMMP until October 23, 2017.

As well, the WRRB will have additional questions related to wildlife, fish, and Tłįcho knowledge. The Board's understanding is that, despite no second round of information requests, any questions to the GNWT or to a Party will have a similar expectation for response. The WRRB will forward its questions as soon as possible to allow the most time possible for thoughtful response.

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The WRRB is looks forward to continued opportunities to provide meaningful input for the TASR. If you have any questions, please contact our office at (867) 873-5740 or jpellissey@wrrb.ca.

Sincerely,

J. Grant Pryznyk

Chair

Cc Michael Conway, Superintendent, Infrastructure, GNWT Jessica, A/Manager, Culture and Lands Protection, Tłįchǫ Government