

Comment Form for Draft Guidelines

Please submit comments in this Excel spreadsheet.

Page	Section	Comment
3	1.3	Refer to the Environmental Assessment Best Practice Guide . . . As an Environment Canada publication rather than CWS
3	1.3	Add a footnote or reference at the back for where to find the Environmental Assessment Best Practice Guide . . .
4	1.3 (bulletin 3)	Change "Component Ministers under SARA . . . " to " The federal government . . . "
4	1.3 (bulletin 3)	Remove reference to GNWT legislation - out of place here
5	Table 1	Is this table for indicating the at risk categories possible under the different groupings or the at risk categories that should be considered during EA? This is unclear and makes a different as to whether categories such as extirpated should be included.
5	2.1	This whole section does not flow. Needs to be re-worked. Perhaps even break out the SARA section.
5	2.2	This section seems to be simply a repeat of page 6. This section could be combined with the previous section.
10	3.2 (Steps 4 & 5)	Needs to be clear that the government wildlife management agencies will help the screeners decide as to whether there are adverse effects and in the development of mitigation and monitoring
10	3.2 (Steps 4 & 5)	Needs to be clear that the monitoring program is focussed on impacts related to the project and, for larger projects, the project's contribution to cumulative effects. We don't expect proponents to undertake regional baseline monitoring for SAR (that is a government responsibility_.
11	3.2 (Step 6)	Although the original intent of the guidelines was to help preliminary screeners, the guidelines have also evolved into advice for developers. Given that, it may be useful to move section 4 on developer's role to before the screener's role.
15	4	It may be useful to clearly indicate early in the document the roles and responsibilities of various parties in EIA (proponents, screeners, review board, wildlife agencies etc.). Some of this is given elsewhere in the document, but it might be more clear if this is given upfront. For SAR to be adequately addressed in EA, all parties must fulfill their responsibilities. It's a joint job.

Although EC would like SAR mitigation and monitoring to be part of permit conditions, this may not always be possible. The Land and Water Boards have told us that their regulations do not allow them to have specific wildlife permit conditions (although they can have conditions to protect wildlife habitat). Also, developer's commitments are mentioned but it is unclear as to what happens if the developer does not follow its commitments. This section may need some more work to make sure that all potential

13 3.4 tools for regulators to ensure mitigation and monitoring are done are identified.

In most cases, if there is no further overlap with SAR range then no further actions are needed. However, there could be the very unusual situation where this is not true (e.g., baseline data on species presence in area is lacking or project outside of range but connects diseased and non-diseased populations of animals). Reword to "further actions regarding species at risk are unlikely to be necessary".

15 4 (Step 1) Add the booklet "Species at Risk in the Northwest Territories" available at

21 Table B.1 www.nwtwildlife.com

21 Table B.1 Delete CWS SAR website and the mapping website. This has been combined with the SARA registry