

# **NORTH SLAVE MÉTIS ALLIANCE**

**PO Box 2301 Yellowknife, NT X1A 2P7**



October 13, 2016

Ruari Carthew  
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Dear Mr. Carthew,

RE: EA1617-01 Tlicho All-season Road Draft Terms of Reference and Adequacy Statement

Following the technical scoping session on August 24, 2016, the Mackenzie Valley Environmental Impact Review Board (the "Board" or "MVEIRB") distributed Notice of Proceeding on September 19. The Notice of Proceeding outlined the process for producing a Terms of Reference ("ToR") for the Tlicho All-season Road project ("TASR" or the "Project"). On September 23, the Board distributed the draft ToR and Adequacy Statement for public review.

North Slave Métis Alliance ("NSMA") has expressed its concerns respecting the Project's impact on NSMA and its members' Aboriginal rights since it was first informed of the Project in mid-2015. NSMA's specific concerns and record of communication with the project proponent can be found on Wekeezhii Land and Water Board ("WLWB") and MVEIRB's Public Registries.

With above in mind, the NSMA reviewed the draft ToR and Adequacy Statement and provide following comments for the Board's consideration:

- NSMA is pleased to find that concerns we raised during WLWB's preliminary screening are considered and identified in the ToR and/or Adequacy Statement, including:
  - Heritage and cultural resources specifically relevant to NSMA<sup>1</sup>
  - Thorough investigation of cumulative effects<sup>2</sup>, including efficacy of mitigation options
- At this time, NSMA has no further item we wish to add to the draft ToR. NSMA trusts that, should additional concerns arise in the future, the Board will consider "all potentially

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<sup>1</sup> PR#47 p.16

<sup>2</sup> PR#47 p.8 NSMA notes a small error in PR#47: "The Review Board is satisfied with the developer's approach to the first step...: determining which past, present or reasonably foreseeable future developments...(PR#7, PDR Section 9)" The quoted "first step" is in fact the "second step" in PR#7, PDR Section 9, where the Proponent describes "four basic steps" of cumulative effects assessment.

*significant impacts that may result directly or indirectly from the developer's proposed project*<sup>3</sup>, whether the concern is identified in the ToR or not.

Should you have any questions regarding NSMA's comments, please contact Shin Shiga, regulatory analyst: [shin.shiga@nama.net](mailto:shin.shiga@nama.net) or (867) 873-6762.

Thank you for the opportunity to review the draft ToR and Adequacy Statement. NSMA looks forward to continuing to participate in this Environmental Assessment proceeding.

Sincerely,



Shin Shiga  
Regulatory Analyst

CC:

Marck Cliffe-Phillips, Executive Director, MVEIRB  
Michael Conway, Regional Superintendent, GNWT-DoT

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<sup>3</sup> PR#46 p.10