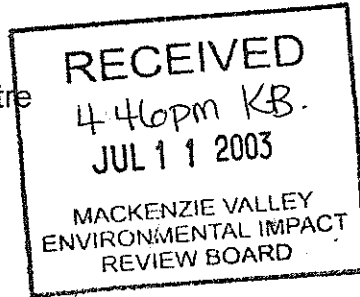


## FAX TRANSMISSION SHEET



Northwest Territories Resources, Wildlife and Economic Development

Policy, Legislation and Communications  
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**Date:** July 11, 2003

**To:** Sherri Sian  
Mackenzie Valley Environmental Impact Review Board

**Fax:** 766-7074

**This fax contains** 5 **page(s), including the cover sheet.**

**From:** Jason McNeill  
Environmental Assessment Officer  
Policy, Legislation and Communications  
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**Comments:**

Please see attached the GNWT's comments on the Drybones Bay cumulative effects study.

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Northwest  
Territories Resources, Wildlife and Economic Development

July 11, 2003

Sherri Sian  
Environmental Assessment Officer  
Mackenzie Valley Environmental Impact Review Board.  
PO BOX 938  
Yellowknife, NT X1A 2N7

VIA FACSIMILE

Dear Ms. Sian

**Mackenzie Valley Environmental Impact Review Board.**  
**Drybones Bay Cumulative Effects Report Terms of Reference.**

The Department of Resources, Wildlife and Economic Development (RWED) has reviewed the above Terms of Reference (TOR) and has the following comments and concerns regarding this report.

**Cumulative Effects – Drybones Bay Area**

Background. Page 2. Line 1. Suggest providing a geographic area (lat / long coordinates or landscape features delimiting area)

Purpose. Page 2. Last paragraph. The Terms of Reference for 3 projects are completed. Presumably any further proposed projects will use identical Terms of Reference. Presumably the paragraph is meant to reflect that the Board can use the CE information when considering the Developers Assessment Reports (DAR's) and Information Request (IR) Responses when preparing a determination report for existing and future proponents.

Overview. Page 3. First paragraph. The phrase "Strategic Environmental Assessment of..." is different than the title page of the document. Is this the more encompassing title?? I suggest that the titles be consistent.

Suggest changing the last sentence from "to understand the potential cumulative effects arising from the current ..." to "to understand the potential cumulative effects on Valued Ecological and Cultural Components (VECC's) arising from the current ...".



Cumulative Effects Model. Page 3. First Bullet. In considering uses, an area may have capability for uses but which are not currently undertaken. I suggest that the phrase "expected to operating (sic) or currently operating in the area..." be amended to read "currently operating or with potential to operate in the area..."

Second Bullet. While literature uses VECs and VECCs, it is possible to be more inclusive with social, cultural and environmental. If so, I suggest the term be capitalized and abbreviated as VSCECs to ensure the consultants are aware of the different understanding that the Board desires. In addition, the list of VSCECs should be expanded to include "subsistence values" to ensure that consultants are aware of the need for an "economic" analysis.

Fourth Bullet. No where in the cumulative effects model are the inclusion of 'spatial' and 'temporal' factors mentioned. Given the high potential for there to be differences at least between seasons the concepts of time and space should be incorporated.

Information Sources Page 3. Third Bullet. Not all potential departments are listed. I suggest the listed departments be deleted and that a reference be made to Appendix A. [Appendix A should then be expanded to be more inclusive (see below)].

Deliverables Page 4. There is no reference to Geographic Information Systems (GIS) or specifics for data sets that can be used in a GIS. As most consultants would create a geo-referenced database suited to expansion overtime, I suggest that this be a required product even if the MVEIRB does not currently have GIS capability internally.

As maps and data submitted through the environmental assessment process will become public documents and may be placed on a public record this requirement the effect may be increasing the vulnerability of archaeological sites by publicizing their locations. Furthermore, if the Prince of Wales Northern Heritage Centre releases archaeological data to consultants via a license agreement that legally binds the consultant to present the data only in ways that will not jeopardize archaeological sites.

If the MVEIRB requires map(s) for archaeological sites, we recommend that they be presented at a scale no smaller than 1:2,000,000 and that locations be randomized. The Mackenzie Valley Environmental Impact Review Board (MVEIRB) has adhered to this request in environmental assessments conducted in the past under its auspices.

Work Plan Page 5. Milestone Table. Their table and subsequent descriptive paragraph on page 6 indicates one focus group and site visit. Given the critical public concern, this is likely not enough. Secondly, inclusion of other parties

(particularly resource experts from wildlife in RWED and Canadian Wildlife Service) may greatly assist both the consultants as well as the Responsible Ministers in the later stages of the environmental assessment process, at least one workshop in each affected community on specific topics is recommended.

Quite possibly, a reduction in time with "interviews" of government or industry representatives could be made without losing information (i.e. the information could be gained by written submissions or through the community workshops). If dovetailed with community sponsored meetings, the consultants would save time organizing interviews and meetings.

Interviews with Government Departments. Page 6. It is apparent that there is a lack of information residing with government departments whereas there is considerable information with communities. The title of this could be expanded to include communities. Secondly, the value of obtaining biophysical information is to analyse, to project or model, to 'derive' new products. While overlays may be one useful technique in understanding or illustrating the interaction among variables, they are not the primary purpose of collecting biophysical information.

Design Impact Decision Tool and Draft Report. Page 6. Similarly, the use of data to make predictions is important and should be referenced in the second paragraph. Merely overlaying current vegetation maps with moose harvest, for example, does not help understand the capability changes and resultant moose population changes that may occur naturally.

Refine Impact Decision Tools and Report. Page 7. Again, the lack of GIS submission is noted.

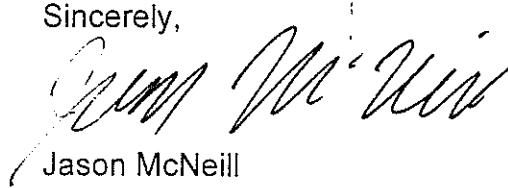
Table 2. Milestone Completion Timetable. Page 7. The timetable is out of sync with events. Presumably a new date for issue of the Final Terms of Reference and Contract Initiation Meeting will be July 14 or later.

Secondly, there is no review among the parties contributing to the report. The first occasion that the information will be heard will be the MVEIRB hearing. This is unusual in the sense that information is normally circulated to parties prior to hearings. It is also unusual if sensitive information is used, as typically the party owning the data would have an opportunity to review to avoid mis-use. I suggest there be consideration to a review step for the parties.

Appendix A. Page 8. In terms of GNWT agencies and contacts. The Prince of Wales is used by all proponents (although they lack information in this case) and the contact is Tom Andrews. For RWED, biological information is available from Suzanne Carriere, Ray Case, Dean Cluff and Raymond Bourget. Vegetation information is available through Ron Graff as indicated. Besides references from page 3, it is possible that Canadian Wildlife Service has migratory bird and waterfowl information.

Should you have any comments or concerns regarding the above, please contact myself at 920-8071.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason McNeill". The signature is written in a cursive style with a large initial "J" and "M".

Jason McNeill  
Environmental Assessment Officer  
Policy, Legislation Communication  
RWED, GNWT. \*