

June 27, 2003

Sherry Sian
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board *
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Government of the Northwest Territories
Comments of Terms of Reference for Consolidated Goldwin Ventures EA-03-002

Dear Ms Sian

The Government of the Northwest Territories (GNWT) has reviewed the draft Terms of Reference (ToR) provided by the Mackenzie Valley Environmental Impact Review Board for Consolidated Goldwin Ventures EA-03-002. Our comments are:

Item B-4

The GNWT recommends that the proponents provide an Environmental Performance Record for the project partners, as per item B-1

Item C-2

The GNWT recommends that proponents describe the altitude above ground and the duration of the flights, as this information is critical for understanding the nature of disturbance from flights.

Item K-1

The following term in the draft ToR may create a conflict for proponents and jeopardize archaeological resources and our commitments to northern peoples:

Item K-1 Local Resources: Identify archaeological and other heritage resources as well as sites or areas of cultural significance in or near the project area. Provide a map and table to depict the proximity of these resources to over ice access routes.

The GNWT's concerns are that Item K1 asks for a map depicting archaeological resources in relation to access routes and project footprint. Maps submitted are public documents and may be placed on a public record, and as such have the potential to threaten archaeological sites. In order to protect archaeological sites, the Prince of Wales Northern Heritage Centre (PWNHC) has requested all land regulators not to require proponents to show where they are located. The Mackenzie Valley Impact Review Board (MVEIRB) has adhered to this request in environmental assessments conducted in the past under its auspices.

Furthermore, the PWNHC releases archaeological data to proponents via a license agreement which legally binds the proponent to present the data only in certain ways. Requiring proponents to depict the data through the Terms of Reference would result in proponents being forced to contravene the terms of the license agreement.

GNWT Recommendation:

If the MVEIRB requires map(s) for the archaeological resource, the GNWT requests that archaeological sites be presented at a scale **no smaller** than 1:2,000,000 **and** that locations be randomized. This is in keeping with the terms of the PWNHC license agreement and would not place the proponent in a conflicting position.

Sincerely

Gavin More
Manager, Environmental Assessment

Cc Tom Andrews – PWNHC