

PR - Imperial Geotech
EA03-007



Indian and Northern
Affairs Canada

Affaires indiennes
et du Nord Canada

Environment & Conservation
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May 4, 2004

Alan Ehrlich
Senior Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
P.O. BOX 938
YELLOWKNIFE NT X1A 2N7

Dear Mr. Ehrlich:

Re: Comments on the Draft Terms of Reference and Work Plan for the Environmental Assessment of the Imperial Oil Resources Ventures Ltd. Deh Cho Geotechnical Program

Thank you for the opportunity to comment on the Draft Terms of Reference (ToR) and Work Plan for the Environmental Assessment (EA) of the Imperial Resources Ventures Ltd. (IORVL) Deh Cho Geotechnical Program.

The December 22, 2003 comments from the South Mackenzie District of the Department of Indian Affairs and Northern Development (DIAND) to the Mackenzie Valley Land and Water Board (MVLWB), concerning terms and conditions to be attached to an eventual land use permit and water license for the proposed development, remain valid.

The concerns identified in the Water Resources Division's December 19, 2003 Information Request were answered to the Division's satisfaction in IORVL's January 15, 2004 response. DIAND suggests that the ToR direct IORVL to explicitly incorporate all commitments made in this response into the Developer's Assessment Report (DAR). The commitments regarding sumps, stream crossings, and water withdrawals are of particular interest to DIAND. The direction in Section F - Public Consultation provides a good model for incorporating commitments made during the screening process to communities and other parties into the environmental assessment process.

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DIAND suggests that the following requirement be added to Section I - Physical and Biological Environment:

Soil and Overburden - Describe the restoration and/or stabilization measures proposed to limit erosion and potential sedimentation issues during thaw for areas where soil and overburden are excavated and removed and where trees are cleared. Describe the restoration and/or stabilization measures proposed for sites determined to be inappropriate for the pipeline.

DIAND suggests clarifying the usage of the term "species at risk" in Section I-4, SARA. Is the term defined as a species on Schedule I of the federal *Species at Risk Act* as of a particular date, as a species determined to be at risk by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) as of a particular date, or in some other way?

DIAND has no comments on the proposed workplan.

If you require clarification on these comments please do not hesitate to contact me by phone at 867-669-2590 or by email at sealel@inac-ainc.gc.ca.

Sincerely,



Lorraine Seale
Environmental Scientist

cc: Eric Yaxley, Senior Environmental Scientist



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DIAND comments on 102vL draft TOR + workplan.

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 8:30 am UP.
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