

Alan Ehrlich

From: Alan Ehrlich
Sent: Wednesday, September 15, 2004 11:08 AM
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Subject: Information Requests- Round One

Hello All,

Attached are the Review Board's Information Requests regarding the Deh Cho Imperial Geotech EA. Most of these are directed to Imperial, with the exception of IR 1.9, which is directed to Sambaa K'e Dene Band. **Responses are required by Wednesday September 29th, 2004.**

Following this, parties will be invited to propose other Information Requests to the Board. Parties may wish to begin considering what Information Requests they wish to propose. A specific format will soon be circulated for parties to use when proposing Information Requests to the Board.

Regards,

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Geotech Final
Round 1 IRs Sept...

IR Number: 1.1
Source: Mackenzie Valley Environmental Impact Review Board
To: Imperial Oil Resources Ventures Ltd.
DAR Section: 2-1 Public Involvement
ToR Section: F. Public Consultation

Preamble

More information is required on a variety of points arising from Imperial's record of consultations with communities.

Request

In response to Lidlii Kue First Nation (June 4th), Imperial states that the bid process will have a specific component concerning Northern benefits.

- A. Describe the weighting that this will take in the evaluation, and the rationale for that weighting.**
- B. Why does Imperial feel this is sufficient?**

On July 16th, Imperial states to Ft Simpson Village Council and chamber of commerce that "Contracts for this program were made as small as possible while retaining efficiency".

- C. Elaborate in detail.**

Sambaa K'e Dene Band (July 24th 2003) expressed concerns about borrow pit locations near K'eotsee (Traynor Lake). Imperial committed to look for alternative granular resources with SKDB representatives, but was concerned that there may not be any. These sites are important to the program.

- D. How can Imperial change the project design if no alternative sites are found, and the community maintains that development in that area is unacceptable?**

IR Number: 1.2
Source: Mackenzie Valley Environmental Impact Review Board
To: Imperial Oil Resources Ventures Ltd.
DAR Section: 4.2 (p4-5) Setting- Vegetation: Rare Plants
ToR Section: I-4 Species at Risk

Preamble

Imperial states that “It is possible that there will be effects on localized populations or rare plants during the program. Although currently undetermined, effects are likely to be low in magnitude and not significant.”

Request

Considering that the effects have not been determined, and that access roads, camp locations and drill sites have not yet been surveyed for rare plants, clarify the reasoning behind the conclusion that the effect will be “low in magnitude and not significant”.

IR Number: 1.3
Source: Mackenzie Valley Environmental Impact Review Board
To: Imperial Oil Resources Ventures Ltd.
DAR Section: 3-1 Assessment Approach: Definitions and Method
ToR Section: 4.1 General Terms

Preamble

In Imperial's impact classification scheme, Moderate to high magnitude ratings are only related to "serious concern". Magnitude is not about the seriousness of concern. (The seriousness of concern is the Review Board's determination: The Review Board must determine whether the development will be a cause of significant public concern, and refer it to EIR if it will be, as per MVRMA s.128(1)(a)). Magnitude should measure degree of change from initial conditions. This is particularly relevant since Imperial's definitions of significance hinge on magnitude.

Request

- A. Redefine your impact predictions accordingly, and then re-assess all impacts using the revised criteria for significance.**

- B. The Board will base its determinations of significance on a broad consideration of impact magnitude, geographic extent, duration, frequency, probability, reversibility and confidence. In light of this, does Imperial wish to revise its predictions of significance?**

IR Number: 1.4
Source: Mackenzie Valley Environmental Impact Review Board
To: Imperial Oil Resources Ventures Ltd.
DAR Section: 5.2 (p.5-13) Camps: Personnel Policies
ToR Section: C-2 Camp Protocols; H-2: Social Impacts

Imperial states that “(a)ll camps and the program activities will be subject to the alcohol and drug policy for the program”. No description of policy details were included.

A. Please provide more detail on the drug and alcohol policy for the program.

Imperial states that “ (d)uring the leave period, workers will be returned to their place of hire or permanent residence”. No details of how workers will be returned were provided.

B. Please describe in detail how workers will be returned to their place of hire or permanent residence. Will they be transported there directly by Imperial, or does this include stop over time in communities *en route*?

Camp sites are located to reduce traffic through Deh Cho communities. Some sites have not yet been selected.

C . Please show how, for each camp, sites have been or will be located to reduce traffic through communities.

Imperial states that “Appropriate signage” will be posted at the camp security gate in order to reduce program effects on nearby communities.

D. Please describe what is on these signs, how this is expected to reduce effects on communities, and how effective this is expected to be.

IR Number: 1.5
Source: Mackenzie Valley Environmental Impact Review Board
To: Imperial Oil Resources Ventures Ltd.
DAR Section: 5.2 (p.5-11) Biophysical Impacts-Camps
ToR Section: E-1 Alternatives

Preamble

Imperial states that the camp location for the Deh Cho South work area has not yet been selected, but it is expected to be in the vicinity of Enbridge right-of-way and the Trout Lake winter road. Kakisa has expressed concern about this. Further decisions and clarification about the location of the camp are required.

Request

- A. Please provide a map indicating preferred location of the Trout Lake road camp and alternative sites considered.**
- B. Describe the advantages and disadvantages of each area considered**
- C. Describe community concerns in detail related to each potential camp area.**
- D. Describe Imperial's criteria for deciding the final camp location.**

IR Number: 1.6

Source: Mackenzie Valley Environmental Impact Review Board

To: Imperial Oil Resources Ventures Ltd.

DAR Section: 8.4 (p. 8-15) Human Environment-

Terms of Reference Section: H-6 Protected and Withdrawn Areas

Preamble

Imperial states that "(c)learing temporary roads could increase access to Pehdzeh Ki Deh..." but fails to specify what exact impacts this would involve.

Request

A. Please provide a single map indicating 1) all work sites, 2) proposed and existing access, 3) candidate protected areas and 4) areas withdrawn by the Deh Cho Interim Land Withdrawals along the route.

B. Please provide a more detailed map showing Pehdzeh Ki Deh and all sites, proposed and existing access within and surrounding it.

C. What percentage increase in linear access (eg. roads, cut lines, seismic lines, etc.) does this program involve, relative to existing linear access in Pehdzeh Ki Deh and Edehzhie.

D. Please specify what exact impacts are predicted as a result of the increased access to Pehdzeh Ki Deh predicted by Imperial, and what further mitigation measures Imperial is prepared to apply to reduce impacts.

E. In Edehzhie, Imperial is limiting activities to within four kilometers of the pipeline right of way. Is Imperial planning to limit activities to within four kilometers of the proposed pipeline right-of-way in Pehdzeh Ki Deh? If not, please describe in detail what activities will be occurring more than four kilometers away from the right-of-way.

IR Number: 1.7

Source: Mackenzie Valley Environmental Impact Review Board

To: Imperial Oil Resources Ventures Ltd.

DAR Section: 9.5 (p. 9-14) Land Use Impacts; 8.1 (p 8-3) Economic Activity

ToR Section: H-6 Traditional Land Use

Preamble

Imperial states that it will locate new access in areas that reduce or avoid conflict with sensitive traditional hunting and fishing areas “to reduce program related impacts on traditional hunting and fishing areas....”. However, no details have been provided to describe these program-related impacts which Imperial is trying to mitigate.

Request

- A. Assess program related impacts on traditional hunting and fishing areas, according to the criteria requested in Terms of Reference section 4.1. Predictions of impacts to these areas should be quantitative if possible.**
- B. Specify and illustrate in which areas these impacts will occur.**
- C. In accounting for numbers of trappers, did Imperial consider that numbers of trappers are cyclic, and may be influenced by the variations in fur prices? Provide a consideration of this and project levels of trapping throughout the program. Update predicted impacts on trappers accordingly.**
- D. Clarify what consultations were conducted specifically with individuals that are current users of the land, and describe in detail any concerns raised.**
- E. Imperial plans to “review the findings (of the Sambaa K’e Traditional Knowledge Study) with the Sambaa K’e Dene Band to plan a program acceptable to both parties” (DAR p. 9-14). What will Imperial do if no common agreement is reached?**

IR Number: 1.8

Source: Mackenzie Valley Environmental Impact Review Board

To: Imperial

DAR Section: 6.1 (p. 6-3) Species at Risk

Terms of Reference Section: I-4 Species at Risk

Preamble

The only monitoring and follow-up for rare wildlife species described by Imperial consists of monitoring erosion and drainage. This is unlikely to recognize and remedy any disturbance of species at risk while the program is occurring.

Request

Beyond monitoring erosion and drainage, how will Imperial monitor and manage disturbances to rare wildlife species while the program is occurring?

IR Number: 1.9

Source: Mackenzie Valley Environmental Impact Review Board

To: Sambaa K'e Dene Band

DAR Section: 2.1 Public Involvement

Terms of Reference Section: H-4 K'eotsee / Traynor Lake

Preamble

SKDB concerns with development in the K'eotsee watershed have been raised several times. Much of this is due to concerns that are cultural in nature.

Request

To better enable the Review Board to understand your concern, describe *in detail* what it is about the K'eotsee watershed that is culturally significant, how important it is, and how the proposed activity by Imperial will affect the cultural value of the area.