



Parks Canada Parcs Canada

145 McDermot Ave.
Winnipeg, MB
R3B 0R9

March 10, 2010

Mr. Vern Christensen
Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
Box 938, 5102-50th Ave
Yellowknife, NT X1A 2N7

Re: Taltson Hydroelectric Expansion Project – EA0708-007

Dear Mr. Christensen:

Parks Canada has reviewed the responses to our Request for Ruling (February 18, 2010) received by the Mackenzie Valley Environmental Impact Review Board (the Board). We acknowledge the support from many interested parties for our Request.

We note that Dezé Energy Corporation (Dezé) does not support the Request for Ruling. We will respond briefly to their comments in the order and format that they were submitted to the Board.

Provide Additional Routing/Construction options

Dezé submits that there is no authority for the Board to order a proponent to alter its application in the manner we sought in our Request.

In Parks Canada's opinion, the proposed Reliance Adjustment route will likely cause significant impacts on the wilderness experience and visual experience of future visitors to the proposed national park reserve on the East Arm of Great Slave Lake. In requesting other routing or construction options, we are requesting mitigation. This request is consistent with the Terms of Reference section 5.3.3 (a) "mitigation options to deal with predicted impacts". In Parks Canada's opinion the ruling is within the Board's authority under Rule 15 and Rule 12 of the Rules of Procedure. Furthermore, this information is required for the Board to identify measures to prevent significant adverse effects (*Mackenzie Valley Resource Management Act* s. 128(b)(ii)).

Evaluation of Reliance Adjustment

Dezé disagrees with the Parks Canada submission that the evaluation of the adjustment is inadequate, and that the effects assessment in the Developers Assessment Report is largely applicable to the Reliance Adjustment. Dézé makes reference to its earlier statement that "...there are no outstanding environmental concerns that could impede the Project crossing the Lockhart River at any point between Artillery Lake and Maufelly Point, although surveys and studies will be required to confirm the most suitable mitigation for the crossing point selected. The remaining issues are cultural, spiritual and aesthetic."



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Parks Canada would like to point out that the *Mackenzie Valley Resource Management Act* defines an impact on the environment to include "...any effects on the social and cultural environment..." (Section 111(1)). Therefore, we believe that outstanding "cultural, spiritual and aesthetic" issues are indeed outstanding environmental concerns for the purpose of this assessment and that they must be carefully considered.

Finally, we note that other parties have also indicated that more evaluation of the Reliance Adjustment is required.

Thank you,

Sincerely,

Katherine Cumming
Acting Resource Conservation Manager

c.c. Alan Ehrlich, MVEIRB
Gordon Hamre, Parks Canada