



OFFICE OF THE  
MAYOR

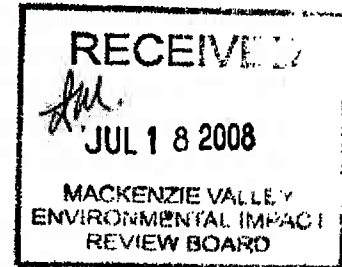
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July 18, 2008

DELIVERED

Mackenzie Valley Environmental Impact Review Board  
5102-50<sup>th</sup> Avenue  
P.O. Box 983  
Yellowknife, NT X1A 2N7



Attention: Tawanis Testart

Dear Ms. Testart:

**RE: EA0809-001 – Giant Mine Remediation  
Issue Scoping – Prioritization of Issues**

The City of Yellowknife (the “City”) would like to thank the Mackenzie Valley Environmental Impact Review Board (“MVEIRB” or the “Board”) for the opportunity to participate in the recent scoping sessions held at the Tree of Peace Friendship Center. The sessions were successful in identifying the range of concerns that participants have regarding the project.

The City appreciates that the Board is working to focus the scoping of the assessment for the Giant Mine Remediation Project by emphasizing aspects which warrant the most attention. The City believes that all issues raised at the scoping sessions held in June 2008 are important and need to be covered in the Developer’s Assessment Report. However, the City does understand that there may be an opportunity for efficiency with regard to aspects of the project that are of a routine nature.

While the City believes that all aspects of the proposed project must be reviewed and evaluated, it does feel that certain aspects of the proposed project require a higher level of scrutiny than others. As a result, the City has chosen to highlight the areas it feels the Board should grant the most attention.

The topics that the City wishes to emphasize include public health and safety, the long-term financial costs of maintaining the project, alternatives to the current plan, land quantum for the City, the standard of remediation, the need for independent monitoring of the site and the effects of global warming. Each of these topics is discussed in more detail in the following paragraphs.

**THE CITY OF YELLOWKNIFE**

**Ms. Testart  
July 18, 2008**

**Page 2**

**Public Health and Safety**

Due to the fact that the Giant Mine Site is located within the municipal boundaries of the City and is in close proximity to people and wildlife, the City is quite concerned about the safety of its residents and its effects on the health of City residents over the longer term. The City submits that it is of the utmost importance that the proponent establish, implement and coordinate with the City a number of provisions and protocols during the various stages of the remediation process to address these concerns.

There is a need for a comprehensive emergency measures plan for the remediation process, including clear definition of the responsibilities of the respective authorities (including the City's obligations, if any); communications plan; mass scale evacuation procedures; and the necessary capacities, resources (i.e. type and quantity of equipment, materials and other consumables) and training of responsible authorities. The Board's review process should consider this issue as within the scope of identified interests.

The emergency response scenario protocol for a large scale human evacuation must be discussed and developed in cooperation with the City. The City's role, responsibilities and resource implications with respect to a large scale human evacuation scenario need to be determined. The City needs to be informed of and in agreement with what its roles and responsibilities would be in such a scenario. Additionally, the procedures for accessing external resources from the Department of National Defense (DND) and other capable providers (i.e. City of Edmonton) must be addressed by the proponent.

The potential risks to human health associated with the demolition, transportation and waste management of a variety of known, and potentially undocumented/unknown, hazardous materials (including asbestos and a variety of toxic chemicals) within existing buildings and surface infrastructure need to be managed through a comprehensive demolition, waste transportation and management plan.

The discharge of both treated water (within the Water License standards) and potentially untreated water (from surface flooding), from Baker Creek, has been identified as a potential concern given the proximity to the Giant Mine Public Boat Launch, water based recreational activities (swimming, jet skiing, water skiing), harvesting of fish for consumption from Yellowknife Bay and berries and plants along the adjacent shoreline, and the City's proposed integrated parks, trails and open space plan. The potential public health risk and associated liabilities necessitate appropriate action, including the use of sectional fencing and/or appropriate signage.

Additionally, the City is currently exploring drawing water from Great Slave Lake for community supply and as such is greatly concerned with any possible contamination as a result of the proposed project as it could limit the options of the City in this regard.

**Ms. Testart  
July 18, 2008**

**Page 3**

### **Long-term Financial Costs**

As the proposed remediation plan will continue indefinitely, the City is concerned about the cost of operating and maintaining the proposed project for an indeterminable amount of time. Specifically, who will be responsible for the ongoing costs and will the proponent be required to post a bond to ensure that the proper funding is readily available? The City does not want to be responsible for any of the maintenance costs for this proposed method of remediation, nor for any costs required to address potential emergency situations.

### **Alternatives to the Current Plan**

The City recognizes that the proposed method of addressing the arsenic contamination at the Giant Mine Site may be the most viable alternative at the present time. However, the City requests that the MVEIRB consider the fact that as technology changes there may be a better way to solve the problem in the future. Therefore, the City submits that it would be appropriate for the Board to obtain a commitment to ongoing research and ensure that money is set aside to assess and implement viable alternatives that may become available in the future.

### **Land Quantum**

The Giant Mine Site encompasses an area of some 851 ha, representing some 6.2% of the total municipal boundary area of 13,660 ha (136.6 km square including land and water) or some 8.3% of the total municipal land area (10,297 ha).

Subject to the proposed remediation approach and standard, and ultimately what may be approved by the responsible regulatory agencies, there are potentially certain zones where it may not be possible or feasible to remediate the land to a productive state.

The functional removal of the Giant Mine lands represents a significant reduction of the City's land quantum. This represents a substantial economic opportunity cost to the City. There needs to be a discussion with regard to mitigating this through some type of compensation or changes to municipal boundaries or remediation of certain parcels of land to a residential standard to maintain a comparable land quantum and effective property tax base.

### **Standard of Remediation**

The proposed remediation plan purports to remediate the contaminated lands to an industrial standard. The City submits that the Board must review the plan to determine if it is feasible to remediate portions of the land to a higher standard. As mentioned above, the affected lands are located within the municipal boundary and therefore affect the land base of the City significantly.

**Ms. Testart  
July 18, 2008**

**Page 4**

**Independent Monitoring**

As the proponent is also a part of the government department that is responsible for approving the plan and water license, the City deems that it would be appropriate for the Board to ensure that the implementation of the plan and maintenance of the site is monitored by an independent entity.

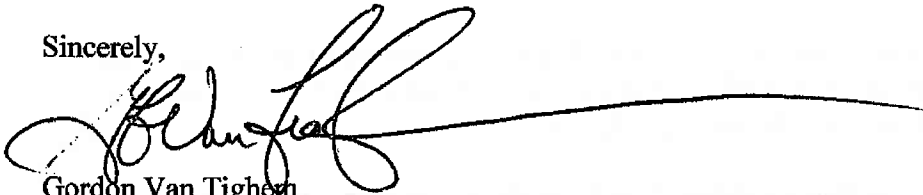
**Effects of Global Warming**

The City believes that the Board should pay particular attention to the effects that global warming may have on the proposed remediation plan. An integral part of the 'Frozen Block Method' depends upon the ground at the Giant Mine Site remaining frozen and as global warming progresses, the stability of this system could be jeopardized.

We hope that these comments are of assistance to the Board in determining the scope of the assessment. We look forward to participating in the hearings on July 22 and 23, 2008 at the Explorer Hotel in Yellowknife, NT.

Please do not hesitate to contact me if you have any further questions or comments regarding the foregoing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gordon Van Tighem', with a long horizontal flourish extending to the right.

Gordon Van Tighem  
Mayor

GVT/klp

PC Doc's # 148603