



June 1, 2009

Alan Ehrlich  
Senior Environmental Assessment Officer  
Mackenzie Valley Environmental Review Board  
Yellowknife, NT X1A

Dear Mr. Ehrlich:

**Fortune Minerals NICO project – Scoping Phase**

The following comments are submitted on behalf of the Wek'èezhii Renewable Resources Board (WRRB), to be considered during the scoping phase of the environmental assessment of Fortune Minerals NICO project. The WRRB has a mandate for wildlife, plant and forest management in Wek'èezhii and must apply the principles and practice of conservation in making its recommendations.

For initial recommendations on the issues to focus the assessment we refer you to our letter of February 20<sup>th</sup> 2009, submitted to the Wek'èezhii Land and Water Board during the preliminary screening. In addition, WRRB staff provide the following based on a review of materials to date and issues brought up at the scoping sessions in Behchokò, Gamètì and Whatì.

- Substantial concern has been expressed by Tłıchq citizens on the significance of water and the necessity to ensure water is safeguarded and protected from contaminants that might be released from the proposed mining operation. The linkages between water quality impacts in the project area and effects on fish and wildlife should be critically examined. In this regard, it will be important for the proponent to consider a worst case scenario with respect to an unexpected discharge, rain event, tailings breach or other extreme event that might in combination affect the water quality, fish and wildlife in the project area.
- The effect of the road on both the ecological and social environment has been consistently raised at community scoping sessions as an issue of concern. It seems fairly clear from the public record that upgrades to the current winter road are required by the project. The benefits of travel ease, lower transportation costs and increased connectivity among Tłıchq communities may be beneficial but the potential social cost must be adequately evaluated by the proponent.

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Roads also impact wildlife and wildlife habitat in a manner disproportionate to the amount of area they occupy on the landscape. Roads facilitate increased harvesting pressures, reduced access to habitat, fragmentation of wildlife populations, restriction of movements, influx of invasive species as well as effects on hydrology, erosion and dusting in adjacent areas. Assessment of these types of effects in combination with any mine related impacts will form the basis of a cumulative effects assessment for this project.

- The potential for contamination of land, water and wildlife from chemicals, during transport, storage, use and discharge has also been raised by Tłıchǫ citizens at community scoping sessions. The proponent has committed to conducting a risk assessment for wildlife exposure to chemicals. WRRB staff encourage the examination of multiple pathways of exposure including unforeseen events, human error and other minesites, current and historic, in this analysis.
- Lastly, it was apparent that there is substantial traditional and local knowledge on the land, water and wildlife in the project area. WRRB staff recognize that the proponent is engaging Tłıchǫ Government in designing a traditional knowledge study. We support continued engagement of the parties in this regard to develop an appropriate approach for Tłıchǫ directed traditional knowledge research for inclusion in the environmental assessment.

If you have any questions regarding these comments, please feel free to contact our office.

Sincerely,

Karin Clark  
Wildlife Management Biologist