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May 17, 2013

Bernard LaRochelle
Project Officer
Northern Projects Management Office

VIA EMAIL

Dear Mr. LaRochelle,

Re: NICO Project (EA0809-004) YKDFN comments on proposed modification to Measure 8 in the Report of EA

YKDFN reviewed the GNWT's response of May 1st, 2013 (posted to the registry on May 8th) regarding their request to modify Measure #8 from the Fortune Report of Environmental Assessment (REA). We wish to submit the following comments.

YKDFN understands that the GNWT is seeking modifications to the Measure to better ensure clarity of responsibility and define the scope of the cumulative effects monitoring and management in question. The GNWT appears to agree with the intent behind the measure – that this project will contribute to cumulative effects and it must be managed. However, they state that the “GNWT believes highly prescriptive conditions should be avoided unless they are technically justified and essential for environmental protections”.

Above all, the YKDFN does not wish to see the intent of this Measure softened so far as commitments are concerned. To change the wording of the Measure so that subsequent action becomes merely suggested rather than required of the GNWT and the Project is not acceptable. That being said, the YKDFN does not oppose wording that gives additional certainty to the intent of the Board or provides additional context towards implementation.

More specifically, when it comes to the GNWTs concepts for working at various levels to provide feedbacks to Wildlife Effects Monitoring Programs (WEMPs) and Wildlife & Wildlife Habitat Protection Plans (WWHPPs), YKDFN wants to be reassured that proposed modifications to Measure 8 will not stop at simply the establishment of these programs, but that the crux of the Measure remains mandatory implementation of wildlife monitoring and management. YKDFN would like to see the Measure require timelines to be established and adhered to, but agree that those timelines can be developed collaboratively.

When it comes to specific response frameworks, project-specific or regional (like GNWTs proposed PSRF and CERF) YKDFN wishes to remain a party to ongoing discussions. As

traditional land users and harvesters, it is important that the long-term needs and goals of YKDFN members are voiced and accommodated. YKDFN has strong traditions in wildlife management practices and is opposed to one-size fits all management of the caribou herds upon which we rely. Our Land & Environment Department will continue to engage on behalf of YKDFN regarding regional planning and wildlife working groups, but continue to enact our Section 35 rights as necessary to protect the harvesting rights of our members.

Mahsi Cho,



Chief Edward Sangris
YKDFN, Dettah