

June 17, 2022

Chuck Hubert, Senior Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
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Email: chubert@reviewboard.ca

Via Email
chubert@reviewboard.ca

Re: Concerns with the Tłıchq Highway Corridor Working Group

Mr. Hubert:

On June 13, 2022, Wek'èezhì Renewable Resources Board (WRRB) staff attended the Tłıchq Highway Corridor Working Group (CWG) in Whatì. The meeting briefly discussed updates to ongoing management and monitoring plans as well as some CWG members' concerns. At the end of the meeting, the CWG was told by the Government of the Northwest Territories, Department of Infrastructure (INF) that the CWG will not entertain topics not specifically on the agenda, including topics that may impact a private contract that INF holds to maintain the Tłıchq Highway.

The WRRB was alarmed by these comments as they are contrary to the requirements and intent of the CWG, outlined in the *Report of Environmental Assessment and Reasons for Decision GNWT Tłıchq All-Season Road Project* (Report of EA). Section 14.4.5 states that "information and discussion of the Working Group will help the developer improve its management of the Project, to adaptively reduce or avoid impacts that are otherwise likely." In *Closing Arguments from the Government of the Northwest Territories for the Tłıchq All-Season Road Environmental Assessment*, the GNWT declares that the CWG "will provide advice on monitoring and mitigation results that will inform adaptive management." These commitments are additionally listed in the CWG's Terms of Reference (TOR). None of the references to the CWG in the Report of EA limit the CWGs ability to function by mandating rigid adherence to an agenda.

The WRRB believes that the sharing of Tłıchq Knowledge is a key pillar in allowing the CWG to adaptively manage impacts of the Tłıchq Highway. Inviting Tłıchq Elders to participate in each meeting is a requirement of the CWG, set out in Measure 14-3 of the Report of EA. The WRRB values and relies on this participation. The Board cautions that if discussion off an agenda is not allowed, the CWG cannot function as designed.

The WRRB has valued the CWG as a venue for discussion, reporting, and investigation, as it was originally designed. The Board believes it is inappropriate for the GNWT to limit discussion, especially discussion that may impact a contract between the GNWT and a private company. Contract management issues the GNWT may have are not the mandate of the CWG and should not limit its effectiveness. The WRRB would like to see the CWG remain as it was designed - encouraging discussion between members and the sharing of Tłchq Knowledge, which informs adaptive management.

Sincerely,

A handwritten signature in black ink that reads "Jody Pellissey". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Jody Pellissey
Executive Director

Cc Joseph Judas, Chair
Wek'èezhì Renewable Resources Board

Tammy Steinwand-Deschambeault, Director, Culture and Lands Protection
Department of Culture and Lands Protection, Tłchq Government

Violet Camsell-Blondin, Manager, Lands Regulation
Department of Culture and Lands Protection, Tłchq Government

Jon Posynick, Manager, Environmental Affairs
Government of the Northwest Territories, Department of Infrastructure