



Inuvialuit Land Administration

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RE: Inuvialuit Land Administration's Comments on the Draft Terms of Reference

After reviewing the draft TOR, the ILA is largely satisfied with its contents. The ILA believes the TOR will be a thorough blueprint for the EIS, but we would like to have the following changes implemented:

3. Guidance on the Preparation of the EIS

The draft TOR states that the EIS is to be submitted in English. The ILA recommends that the executive summary of the EIS be made available in Inuvialuktun as well, given that many elders in both Inuvik and Tuktoyaktuk are only fluent in Inuvialuktun.

The ILA also suggests that Indian and Northern Affairs Canada (INAC) be included in the list of recipients of printed copies of the EIS.

6.1 Route Alignment Alternatives

The ILA would like to see a more thorough discussion of the three routes. Specifically;

Safety

The ILA would like the Developer to clearly state what makes the Preferred Alignment safer than the other routes. This should include identifying which parts of the alternate routes are dangerous and why, how many dangerous areas are present in each of the three routes, how much additional risk is posed by these dangerous features compared to the Preferred Alignment, what mitigations can be put in place to alleviate these additional risks and what the cost of these additional risk mitigation features would be. An analysis of the number and type of accidents on the Dempster Highway and their causes may be useful for quantifying the additional risk.

Maintenance Cost

The ILA would like information about the possible maintenance costs associated with the three routes and their causes, given that the Developer has stated that the Preferred Alignment will have lower maintenance costs.

Community Perception and Concern

The ILA would like the Developer to discuss how the three alignments are perceived by Inuvik and Tuktoyaktuk community members. Specifically; what are the stated concerns and perceived advantages of each route?

Off-Road Access

One of ILA's major concerns is that the highway could lead to increased off-road travel adjacent to the route. Specifically, the ILA does not want to see tundra damage from off-road travel or off-road parking of vehicles. The ILA requests that all alignments be examined in terms of their potential for off-road travel. A discussion on possible controls and mitigations could be useful.

6.2 Scope of Project Components and Activities

The ILA would like to see that all three Routes be discussed in this section since each will have a unique project footprint.

The ILA appreciates the opportunity to provide comments on the draft TOR. If there are any questions or concerns, please feel free to contact me.

John Fraser

*Inuvialuit Land Administration
Chief Land Administrator*