



WILDLIFE MANAGEMENT ADVISORY COUNCIL (NWT)

07 February 2012

Elizabeth Snider
Chair, Environmental Impact Review Board

Dear Elizabeth:

I am writing you with respect to the recent decision of the Environmental Impact Review Board (EIRB), in their letter of 20 December 2011 to the Proponent (aka the Developer) of the project: HAMLET OF TUKTOYAKTUK, TOWN OF INUVIK AND GNWT - CONSTRUCTION OF THE INUVIK TO TUKTOYAKTUK HIGHWAY, NORTHWEST TERRITORIES; to move the review of this project to the technical review stage.

The WMAC (NWT) has a number of concerns with the fact that the EIRB has moved to the technical review stage as defined in its "Guidelines (April 15, 2011) without having accepted the Developer's Environmental Impact Statement (EIS) as a final and complete document and without having completed the "conformity review" as describe in the "Guidelines." We are concerned that the failure to complete the conformity review prior to the commencement of the technical review stage compromises the purposes of the latter. We understand that the intent of the conformity review is to result in a complete and final environmental impact statement as submitted and accepted by a panel of the EIRB.

We understand that the purpose of the technical review is to address detailed and technical questions - often questions of clarification - regarding assessment methodology, the interpretation of data, the assessment of impacts and the adequacy of mitigation measures, and, importantly, the rationale for significance judgments about impacts. An EIS that is incomplete and deficient for the purposes of technical review severely compromises the conduct of such a review, especially when significant data gaps remain.

We are particularly concerned that the EIRB has provided no documented reasons or rationale for its decision to proceed to the technical review stage with the Developer's draft EIS, and without having completed the conformity review and made the determination that the EIS is acceptable and final.

We are requesting that the EIRB provide written reasons to the WMAC (NWT) that explain the Board's decision to proceed to the technical review stage for this project, in the absence of a final accepted EIS from the Developer.

Yours truly

Larry Carpenter
Chair, WMAC (NWT)

Cc: Eli Nasogaluak, EIR Coordinator, EIRB, eirb@jointsec.nt.ca