



WILDLIFE MANAGEMENT ADVISORY COUNCIL (NWT)

August 3 2012

Eli Nasogaluak
EIRB Environmental Assessment Coordinator
107 Mackenzie Road, Suite 204
Box 2120
Inuvik, NT X0E 0T0

Dear Mr. Nasogaluak:

As requested in today's granular resources teleconference, WMAC is providing further clarification to the Developer with respect to WMAC's requirements listed below concerning granular resources for the Inuvik-Tuktoyaktuk Highway (ITH):

1. The cumulative ecological effects expected from the development of borrow pits and their associated infrastructure (roads, etc.) on Barren-ground Caribou and Grizzly Bear populations and habitat (especially eskers) up to 50 years following road construction within an expanded cumulative effects study area, that is both more realistic and scientifically anchored to the actual spatial requirements of both species in the ISR, rather than the insufficient cumulative effects study area outlined in the Developer's EIS.

- Borrow pits and their access roads etc. have additional ecological effects on caribou and grizzly bears above and beyond those of the ITH itself (e.g. impacts on esker bear denning sites). They should therefore be included within a cumulative effects assessment of the project.
- As identified by WMAC in previous posted documents, the 10 year temporal boundary adopted by the Developer in the EIS is both insufficient and scientifically weak for a project of this magnitude. Given that the EIRB has requested granular resource projections over 50 years, and indicated during the teleconference that the life of the project extends well beyond that of the construction phase, WMAC believes it completely appropriate that the important wildlife resources of the ISR be given the same consideration.
- As identified by WMAC in previous posted documents, the spatial boundary described by the Developer for the cumulative effects assessment in the EIS is vague and arbitrary at best. Like the temporal boundary, it should incorporate, among other things, the life history characteristics (e.g. home and population ranges) of the Valued Ecosystem components (VECs) under consideration, in this case caribou and grizzly bears, as well as other existing and proposed human developments (see below).

2. In combination with the borrow pits, their associated infrastructure, and the ITH itself, the cumulative effects of these and all other existing and proposed developments within this expanded cumulative effects study area, especially the Mackenzie Gas Project, the Parsons Lake Gas Field development and the expansion (expected to occur over the next three to five years) of infrastructure for the supply of natural gas to the town of Inuvik.

- As identified by WMAC in previous posted documents, the dismissal of existing and proposed developments within the Developer's cumulative effects assessment is mistaken. There is substantial scientific literature to show both direct and indirect effects of linear developments on caribou and grizzly bears, and the population ranges of these VECs overlap most, if not all, of the existing and proposed human developments in the region if the spatial boundary of the assessment was properly defined. With respect to proposed developments, the question is not whether or not they will occur, but what are the likely effects should they occur over the next 50 years.

During the teleconference, WMAC was asked why the required information was needed and to what use it would be put. Simply stated:

- A cumulative effects assessment is required under the Project's Terms of Reference.
- WMAC believes that the cumulative effects assessment provided in the Developer's EIS is seriously flawed, mainly due to the poor choice of temporal and spatial boundaries.
- The information requested is intended to strengthen the Developer's cumulative effects assessment so that WMAC, EIRB, and others may make informed decisions about the level of sustainability of the Project, and hence what further steps may be necessary to minimize its overall impact should it proceed (e.g. worst case scenario, mitigation, remediation, monitoring, etc.).

WMAC is also awaiting a response from the Developer as to whether the above requested information and other information as detailed in the EIRB letter 'EIRB Decision and Reasons in Response to Developer's Request for Ruling', 16 July 2012, will be provided in advance of the technical hearings so as to allow adequate time for its review.

Yours truly



Alex Bradley, Resource Biologist
(on behalf of the chair, Larry Carpenter)
WMAC (NWT)