



INDEPENDENT ENVIRONMENTAL MONITORING AGENCY

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July 16th, 2001

Melody McLeod
Chair
Mackenzie Valley Land and Water Board
7th Floor – 4910 50th Avenue
Yellowknife, NT
X1A 2P6

Mackenzie Valley Land
& Water Board

File

JUL 17 2001

Application #

Copied To

MV2001F0032
MV2001L2-0004
MSIKLILBIReg

Dear Melody McLeod;

Re: **BHP's Application to Construct the Sable Haul Road (Applications MV2001L2-0004 & MV2001F0032)**

The Independent Environmental Monitoring Agency (the Agency) has reviewed the above mentioned land-use permit and water license applications and offers the following comments and recommendations for consideration by the Mackenzie Valley Land and Water Board (MVLWB).

The Agency's comments focus on two issues 1) physical aspects relating to the design of the road, and 2) issues relating to traffic management during construction and operation of the road.

In regards to the first issue, BHP Billiton has indicated that the road will follow a low profile as much as possible, the Agency supports this approach and recommends that sections of the road be flattened where it transects esker systems, or areas of habitat identified as migration routes for caribou. Baseline monitoring and the use of elders' traditional knowledge would be especially appropriate for identifying such areas.

In relation to the traffic management of the road, the Agency identified in our September 15th, 2001 submission to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) that "traffic should be considered a significant source of disturbance for caribou movements and distribution."

Below is text from our submission to the MVEIRB providing discussion and recommendations relating to road construction and operation:

"The Agency requested additional information¹ about traffic volume along the Sable Road. BHP estimates in its response that traffic by haul trucks will peak at 8.3 units per hour (198 one-way trips per day), and by other vehicles at about 1.3 units per hour (30 one-way trips per day). However, these figures are "averages" assuming a uniform distribution of traffic, 24 hours per day, 365 days per year. These rates average to 9.6 vehicles per hour. Obviously there will be daily and seasonal variations in traffic. BHP does not provide any estimates for

¹ Information Request "Impacts Road traffic on Caribou" IEMA; July 14th, 2000

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such variation. Also, BHP does not provide any estimation of traffic volume during road development.

"The literature cited by BHP (section 4.6.1.2) makes reference to effects of traffic volume on caribou movements and distribution when traffic exceeds 10 vehicles per hour or so. The yearly average traffic volume along the Sable road approaches such a threshold value."

Recommendation

The Agency recommends that the MVEIRB seek the following specific terms and conditions for vehicle operation in order to mitigate impacts on caribou movements and distribution;

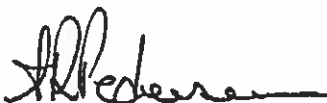
- traffic volume per day should be recorded and reported to regulatory agencies.
- traffic volume per day should not exceed a specific limit e.g. 200 one-way trips during caribou migration periods.
- road development should not take place during caribou migration periods (due to the high volume of traffic during construction).
- road design should be "low profile" as much as possible."

The Agency requests that the MVLWB consider our recommendation when establishing licence conditions.

One further area of concern is the impact of road development and operation to grizzly bears. The grizzly bear is a vulnerable species and is known to be highly sensitive to human disturbances. While it is currently uncertain to what extent the road construction and operation may displace grizzly bears, the Agency recommends that BHP Billiton provide support to the study of the Government of the Northwest Territories' Department of Resources, Wildlife and Economic Development, examining the displacement of grizzly bear.

Thank-you for your attention to our comments and recommendations, if you have any questions, please do not hesitate to contact us through our manager.

Sincerely,



Red Pedersen
Chair

Cc. Society Member
IACT Members