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Veronica Chisholm
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Yellowknife, NT X1A 3S8

February 13, 2014

MV2005C0032
MV2005L2-0015

Re: Gahcho Kue Project Winter Access Road 2014 Caribou Monitoring

Dear Ms. Chisholm,

Below you will find general and specific comments from our technical specialist, LGL Limited, in regard to the Gahcho Kue Winter Access Road 2014 Caribou Monitoring draft technical memorandum update that was distributed on February 7, 2014. The update identifies four main components to the monitoring approach:

- Wildlife Sightings Log;
- Winter Access Monitoring;
- Behavioural Monitoring; and
- Distribution Monitoring.

As is typically with environmental impact assessments (EIA), the monitoring required after environmental assessment approvals are achieved must be conducted to determine if the predicted effects in the EIA are accurate and to determine if the mitigation measures being employed are effective. We understand that some of this monitoring is in response to the early works authorized under exploration permits, but the monitoring approach should be developed under the auspices that it will be carried forward into the mine construction and operational phases. The mitigation measures identified in the Wildlife and Wildlife Habitat Protection Plan that relate to activities on the winter road include:

- all wildlife will have the right-of-way on roads;
- speed limits will be established and enforced; and
- drivers will be warned with signage and radio when caribou are moving through an area.

At this point we have several questions and comments related to these mitigation measures:

1. What does "all wildlife will have the right-of-way on roads" actual mean? If wildlife are present on the road does this mean that all traffic will stop and remain stopped until wildlife leave the road? When

wildlife leave the road and are on the banks of the road, will traffic be allowed to resume or will wildlife be afforded a buffer area around the road that is considered part of their right-of-way?

2. The mitigation relating to speed limits should identify what the actual speed limits are under normal conditions and when wildlife are present in the vicinity of the road. Mitigation that states vehicles will be told to "slow down" is too vague and drivers must be told to slow down to a certain speed to ensure the consistent implementation of the mitigation.

In general, additional information is required in the methods sections for the various monitoring components as some items and requirements are too vague in their wording. Also, The Action Levels for the monitoring components state that all observations are reported to the Environmental Coordinator daily. The only responses identified are that the Environmental Coordinator will distribute the information as necessary and that vehicle drivers will be informed to slow down if wildlife are in the area. It is not identified how the information obtained from this monitoring will be used to determine whether the mitigation measures being employed are effective. This is valuable information that needs to be collected and reported so that effects to caribou are minimized in 2014 and that effective planning can be initiated for future years.

At this point, no other mitigation measures have been identified. We were informed at the information session on February 5, 2014 that standard operating procedures for winter road activities were being reviewed in response to the mortality event that occurred on February 1, 2014. We expect to be updated on the results of this review and to be notified if additional mitigation options will be employed as a result.

Specific comments on sections of the draft technical memorandum update are provided below. If you have specific questions regarding the information in this letter please contact our Technical Specialist, Marc d'Entremont at mdentremont@lgl.com or 250-656-0127.

Sincerely,



Chief Louis Balsillie

cc. Willard Hagen, Chair MVLWB
Linda Vanden Berg, LVB Strategic Negotiations and Research
Marc d'Entremont, LGL Limited