



***Independent Environmental Monitoring Agency***

P.O. Box 1192, Yellowknife, NT X1A 2R2 ▪ Phone (867) 669 9141 ▪ Fax (867) 669 9145  
Website: [www.monitoringagency.net](http://www.monitoringagency.net) ▪ Email: [monitor1@yk.com](mailto:monitor1@yk.com)

August 1, 2014

Elissa Berrill  
Regulatory Specialist  
Wek'èezhii Land and Water Board  
#1-4905 48th Street  
Yellowknife NT  
X1A 3S3

Dear Ms. Berrill

**Re: Comments on Misery Power Line Additional Information (W2014I001)**

The Agency has had an opportunity to review the additional information Dominion Diamond Ekati Corp. (DDEC) submitted to the Wek'èezhii Land and Water Board for the proposed Misery Power Line.

The additional technical information on the design and construction of the power line is helpful in understanding what the potential impacts may be. DDEC has also done a better job documenting its community engagement around this proposal and we look forward to more detailed engagement records in the future.

The Agency cannot support the company's assessment of potential impacts given the selective use of studies provided and the illogical interpretation of data presented. There has been little effort to use existing data from its own or related monitoring programs (e.g., an analysis of caribou collaring and aerial survey data, snow track surveys, the camera studies and other Wildlife Effects Monitoring Program data). DDEC has not used data from the Snare power line in an appropriate way to objectively evaluate the potential impacts of the Misery Power Line. We had expected much better from the company.

The Agency is also concerned with the lack of detail on the construction and post-constructed monitoring programs. There is no information presented on the thresholds of triggers with appropriate actions or responses (including work stoppages) during the construction phase. There are no details on post-construction monitoring. We recommend, at a minimum, for there to be a clear post-construction monitoring program that feeds back into adaptive management. This could become a condition of a land use permit and the company would have some time to put something together for the review and approval of interested parties. The Agency is prepared to work with DDEC in

designing an appropriate program that detects deflection of caribou movements better than the current camera study design, through the use of additional cameras or other methods.

We would be pleased to discuss these comments with your staff, DDEC and others to ensure sound environmental management at Ekati.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Ross". The signature is fluid and cursive, with the first letter of the first name being a large, stylized 'W'.

Bill Ross  
Chairperson

cc. Society Members

Robert Overvold, Manager, Environment and Communities, DDEC