



CITY OF YELLOWKNIFE  
OFFICE OF THE MAYOR

May 29, 2020

VIA ELECTRONIC MAIL to [admin@gmob.ca](mailto:admin@gmob.ca)

Giant Mine Oversight Body (GMOB)  
P.O. Box 1602  
5014-50<sup>th</sup> Avenue  
Yellowknife, NT X1A 2P2

Attention: Dr. Kathleen Racher,

Dear Dr. Racher:

**RE: 2019 Giant Mine Oversight Body (GMOB) Annual Report**

The City of Yellowknife (the “City”) has reviewed the Giant Mine Oversight Board’s 2019 Annual Report (the “Report”), with particular focus on the three recommendations specifically addressed to the City. I can assure you that the City takes comments from GMOB quite seriously and as such the City deems it critical to respond to GMOB’s recommendations to clarify administrative responsibilities. The City anticipates that this response will limit expectations in terms of the City’s response to the recommendations in the Report, as well as aid in the drafting of future recommendations, so that GMOB does not inadvertently advocate for the City to accept obligations beyond its mandate. The City submits that clearly defined recommendations from GMOB would enable Parties to address issues in an effective and diligent manner, resulting in an improved response that benefits all residents.

**Increase City Involvement**

**RECOMMENDATION 2019-3**

**Directed to: Mayor and Council, City of Yellowknife**

**GMOB recommends that the City of Yellowknife continue to improve its ability to fully engage in aspects of the Project affecting residents of Yellowknife.**

The City agrees that full engagement on the Project is imperative to ensure maximum benefit for our residents. However, while the City gladly works with the Project wherever possible to improve communications, the onus for making residents aware of “the many implications of the Project” rests with the Project itself. Respectfully, it is not the City’s duty to fulfill the Project’s role as developer and landowner.

The City has been, and continues to be, active at numerous venues relating to the Project, including twelve distinct working groups, task forces or specific initiatives. Given this level of participation, it is unclear what additional steps or improvements the City can make to more “fully engage in aspects of the Project affecting residents of Yellowknife”. The City submits that this recommendation is misplaced – the City is a leading voice at Project related venues.

The recommendation features two additional aspects related to proactive messaging and specific areas for action:

1) *Proactive Messaging*

GMOB's mandate includes a requirement to "conduct communications activities with the public". If GMOB has determined that a communication gap exists, the City is amenable to working collaboratively with GMOB and the Parties to address any residual uncertainties.

2) *Areas for Action*

In anticipation of the Report's release, the City requested that GMOB provide direction on specific areas where the City could improve its involvement. The City agrees that involvement in the areas noted in Recommendation 2019-3 are critical and as such we have taken action as follows:

- (i) *Traffic Congestion* – The City has made continued requests for preparation of a traffic management plan (TMP). During bi-lateral meetings and the water licence process the Project committed to preparation of a TMP and the City anticipates a draft TMP by January 2021.
- (ii) *Socio-economic* – The City has led the response to Socio-Economic Impacts at the Socio-Economic Working Group and Advisory Board, urging the Project to develop a long overdue implementation plan for the Socio-Economic Strategy that was released in 2016. This is an area for much greater collaboration between GMOB and the City as we would appreciate additional participation of the expertise found within GMOB.
- (iii) *Public Information* – The City has noted and acknowledged GMOB's previous (and renewed) recommendation regarding the availability of City submissions or involvement. Addressing this recommendation is a priority in the City's 2020-21 workplan related to the Project. Unfortunately, the obligations and workload associated with the water licence and land use permit process delayed this work. I can advise that the City plans to host a dedicated and specific webpage within [www.yellowknife.ca](http://www.yellowknife.ca) that will outline the City's past and ongoing actions related to the Project. Planning work on this initiative started in 2019-20 and substantial work on developing and populating the new page commenced subsequent to conclusion of the water licence hearing.

### **Offsite Legacy Contamination Issues**

#### **RECOMMENDATION 2019-7**

**Directed to: Minister and Deputy Minister, CIRNAC; Minister and Deputy Minister, ENR; City of Yellowknife; YKDFN; NSMA.**

**As in 2016, 2017 and 2018, GMOB recommends that the federal, territorial, municipal and Indigenous governments work together and finally resolve off-site contamination issues. These issues include public health and environmental concerns, land use planning, safety measures to reduce potential exposure, and other remediation, management and planning concerns.**

GMOB notes that it "believes that both the territorial and federal governments are responsible for resolving the off-site toxic legacy". While the City is willing to be involved in the development of a strategy and action plan to deal with issues that affect public health, safety and quality of life, the City has little authority to "resolve off-site contamination" nor compel the GNWT or CIRNAC to act. To date, the City has not been formally invited or involved in any of the activities of the Interdepartmental Legacy Contaminants Committee referenced in this recommendation. It should be noted that the City is willing to participate if the opportunity arises, as we are with

respect to communications, health effects studies, and the stress study. The City will continue to advocate for the benefit and safety of its citizens at every occasion.

#### Land Use Planning

##### RECOMMENDATION 2019-8

**Directed to: Minister and Deputy Minister, CIRNAC; Minister and Deputy Minister, ENR; City of Yellowknife; YKDFN; NSMA.**

**GMOB recommends that by 2025 the federal, territorial, municipal and Indigenous governments jointly develop and approve a land use plan for the Giant Mine site post-remediation. In addition to addressing post-remediation uses of the site, the land use plan should incorporate related aspects of the long-term care plan.**

The City is pleased that GMOB has publicly expressed support for land use planning for the Giant Mine site post-remediation. The City has raised concerns regarding proper land use planning for the site for years, and although the City cannot initiate this work on its own, we are eager to participate in a process that addresses future potential land uses. As with public communication, land use constraints and land use planning are central to GMOB's execution of the mandate outlined in the Environmental Agreement. The City looks forward to GMOB's aide in this initiative, particularly as GMOB evaluates how the project integrates short, medium and long-term land-use constraints and land use objectives.

In conclusion, the City thanks GMOB for its vigilance and continued work on the Project. Similar to GMOB itself, we are generally constrained to working with the responsible authorities. Nonetheless, our hope is to collectively arrive at structural and policy changes that will see greater opportunity for our citizens and businesses.

The City appreciates the opportunity to comment on the Report. We would be happy to discuss our comments in further detail.

Sincerely,



Rebecca Alty  
Mayor

DM #612013