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MACKENZIE VALLEY
ENVIRONMENTAL IMPACT
REVIEW BOARD

Review and Comments

On the

New Shoshoni Ventures Ltd. Consolidated

Goldwin Ventures Inc.

and

North American General Resources Corporation

Developer Assessment Reports

Prepared for:

Mackenzie Valley Environmental Impact Review Board

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Land and Environment Committee

Dettah Northwest Territories

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1 Introduction

The Mackenzie Valley Environmental Impact Review Board ("Board" or "Review Board") is preparing for a public hearing on the proposed developments in the Drybones Bay and Wool Bay areas. In anticipation of the hearings, the Board wants to identify key issues that merit public discussion. Procedurally, the Board has asked parties to let it know if there is enough information, of sufficient quality, on the questions included in the Board's Terms of Reference (ToR), for the Board to proceed to a hearing. The Board has set a tentative public meeting date should it find there is enough information to proceed to a hearing. The Board, of course, reserves the right to postpone the proposed hearing if it finds there is insufficient and/or inadequate information to proceed.

The YKDFN submission begins with a review of the Consolidated Goldwin Ventures Incorporated EA, is followed by a review of the New Shoshoni Ventures Ltd. EA, and concludes with the review of the North American General Resources Corporation EA.

1.1 Submission of Yellowknives Dene Evidence

The Yellowknives Dene First Nation is pleased to provide the following submission for the Board's consideration. The YKDFN will submit to the Board under confidential cover letter, before the public hearing the following reports:

1) *Archaeological Overview Assessment of Mineral Exploration and Aggregate Extraction in the Vicinity of the Drybones Bay, Great Slave Lake, Northwest Territories.*

2) Preliminary Report on the Cultural and Historical Resources of the Drybones and Wool Bay Areas.

3) Government of the Northwest Territories (GNWT), Department of Resources Wildlife and Economic Development, Wildlife and Wildlife Related Activities in the Wool and Drybones Bay areas, and Great Slave Lake. July 2003.

4) A section of the traditional knowledge map used for negotiations with the government of Canada.

5) Indian and Northern Affairs, Government of Canada, Drybones Bay Trip Report from Environmental and Conservations Division (Request for the report has been made to INAC).

The YKDFN encourages the Board to aggregate the detailed preliminary information from the reports once submitted for its findings, decisions, and recommendations. That is, the Board will be free to discuss the reports and its contents in general terms (e.g. the density, quantity and quality of valued socio-cultural evidence, general geographic distribution of the evidence, and the contribution of the evidence to evaluating the significance of impacts). The YKDFN will provide the Board guidance on appropriate use of the confidential evidence when the documents are submitted.

The YKDFN is confident that ongoing field research will provide further proof of the enduring and vital importance of the Drybones and Wool Bay areas and the shoreline of Great Slave Lake.

2 Substantiating Yellowknives Dene Concerns

2.1.1 YKDFN Valued Components of the Environment (VEC)

Community knowledge and values regarding the Wool and Drybones Bay areas was unanimous at the April 3 and 4, 2003 public meeting by Yellowknives Dene membership.

The membership collectively agreed that the Drybones and Wool Bay areas are very important to the Yellowknives Dene. The Bays provide important sources of plants, animals, flora and fauna used for nutritional purposes. The bays are also great places to harvest birds and berries. In addition, the Bays and their surrounding environs are popular camping areas providing important social functions such as picnicking and community / family gathering. Some YKDFN members identified the areas as valuable sources of firewood. There are active traplines near, or at the Bays. The areas have extensive burial grounds and several interviewees suggest protecting the areas from development.

The Yellowknives Dene agreed on the VECs specific to the Wool Bay and Drybones Bay areas on April 3, 2003. The bays and environs are:

1. Culturally vital (many residents grew up and spent summers in the areas, and continue to actively use the areas).
2. Spiritually significant (site identified by YKDFN)
3. Numerous grave sites at the bays and along the shoreline

4. Actively used for hunting
5. Actively used for fishing
6. Historic village at Wool Bay
7. Actively used for trapping (Leo A. Bettsina for example)
8. Actively used for berry picking
9. Site of Bald eagles (raptors) nesting areas
10. Actively used camping and campground areas
11. Actively used goose hunting areas
12. Actively used duck hunting areas
13. The bays are ecologically unique because they are the largest bays on the shoreline and provide a unique microclimate and unique ecosystems.
14. The unique habitat makes it excellent for wildlife
15. Very sheltered bays are regularly used during lake travel
16. Drybones Bay is a main artery of current and traditional trails
17. The trail to Patrick Charlo's starts at Drybones Bay (Patrick Charlo)
18. Good places for picking medicinal plants
19. Main boat moorage on windy days, (security, shelter and safety)
20. Wool Bay and Dry Bones bay are the birthplace of many current residents of Dettah and Ndilo.
21. Significant impact on Treaty rights and alienation of current access to the land.

2.1.2 2003 Wool and Drybone Bay Field investigation

2.1.2.1 Background

To support of the assertions made by Yellowknives Dene membership, the Yellowknives Dene Land and Environment Committee sponsored, funded, and provide support resources for a two and one half week field camp at Drybones and Wool Bays. Elders that grew up at Drybones Bay and Wool Bay directed the effort of two archaeologists a biologists and resource management officer from the Government of the Northwest Territories (GNWT) Department of Resources, Wildlife and Economic Development (RWED).

The purpose of the fieldwork was to collect baseline information, baseline Traditional Knowledge information and to enable the parties to share their respective knowledge in the area where the developments were proposed. For example the field work revealed a previously undocumented seasonal migration of moose. RWED biologists had the opportunity to meet and speak with Dene who described the seasonal movements. The field sessions were open to all the parties and companies.

The Yellowknives Dene want to ensure that there is sufficient quality baseline information about the areas that are potentially affected before the Review Board makes any decisions. The Yellowknives Dene also wants to make sure there is no doubt about assertions made from the outset of the licence application process, that the areas proposed for development are of immeasurable value. The Yellowknives have consistently said the areas are part of a living history that contains a rich story of the historical and contemporary lives of the North and of Yellowknives Dene.

2.1.2.2 Method

The first phase of the fieldwork consisted of three days of surveys around the coast of Drybones Bay and in interior areas likely to contain socio-cultural value. The second phase focused on the area around Wool Bay and the proposed development areas. The third phase focused on select areas at Drybones Bay to confirm and augment previous work.

The survey fieldwork was not exhaustive, and there is no doubt, once having reviewed the Yellowknives Dene reports, of the need for more extensive fieldwork before any exploration work is undertaken.

On July 14, 2003 Dene Elders: Baillargeon, Mike Francis, Modeste Sangris, Therese Sangris, Eddie Sikyea, and Helen Tobie, assisted by Lawrence Goulet, Morris Martin, Adeline Mackenzie, and Margaret Martin traveled with Callum Thomson (Archaeologist with Thomson Heritage Consultants, Calgary) and Randy Freeman (Historical Geographer with DownNorth Consulting, Yellowknife) to Drybones Bay.

A base camp was set up at a site on the south side of the bay where New Shoshoni Ventures Ltd. had previously established a camp. From July 15 through on July 18, elders guided Thomson and Freeman to various locations in Drybones Bay, on Burnt Island, on Beniah Islands and to Jackfish Cove. Callum Thomson returned to Calgary on the afternoon of July 18 and Randy Freeman continued the work of recording and documenting sites. From July 18 to July 21 elders revealed additional sites in Drybones Bay and guided Mr. Freeman to view sites in Moose Bay and on the north shore of the large bay north Matonabbee Point.

During the afternoon of July 18 camp was moved to an island in the Wool Bay area and work continued, until the afternoon of July 23, documenting sites on and around the small island where drilling is planned for this winter. On July 23, the group returned to Dettah.

From August 5 to 7, a return trip was made to Drybones Bay. Present were Lawrence Goulet, James Sangris, Paul Mackenzie, Randy Freeman and four youth from the YKDFN Land and Environment program. The purpose of this trip was to attempt to locate a previously reported but unrecorded gravesites. A number of additional sites were also recorded during this phase of the study.

An additional day trip was made to Drybones Bay on August 14 to provide staff of the l Department of Indian and Northern Affairs (INAC) with a first hand look at the area. Helicopter tours of the bay and surrounding areas, along with a running commentary by Randy Freeman, revealed not only the number and density of sites recorded during previous visits but also, by flying over the area where exploration work is currently taking place southeast of Drybones Bay, showed the impact that exploration can have on the land.

By viewing the Drybones Bay area from the air, it was possible to see additional sites that were not recorded, and to identify areas where additional sites are likely present. The head of Drybones Bay is one such area. It is a large flat or gently sloping sand and/or gravel plains similar to others in the area where both habitation and burial sites have been found. The sandy area to the south of the head of Drybones Bay is rumoured to contain a gravesite. A drill site, where trees and brush had been cleared from the land, was easily visible. In the area north of the head of the bay, where Robinsons Trucking Limited may one day extract sand and gravel, an archaeological site was visible from the air and it is possible that additional habitation and/or gravesites will be found within the area.

2.1.3 Key Findings

The fieldwork completed under the direction of the Dene elders, recorded, and documented by professional archaeologists confirms the existence of at least 64 valued areas representing pre-historic, historic, and contemporary periods. These initial findings are merely a preliminary quantification of the areas' resources. There is still much work to do to ensure the lives and the stories of those that came before us are not lost. Development has impacted one site already.

2.1.4 Concluding Observations

This background demonstrates that the collection of traditional knowledge and field information can be done relatively quickly, and collaboratively. It also shows the recalcitrance of the companies. The companies could have accepted the socio-cultural value of the Bays and respected Yellowknives Dene knowledge of their lands, and

attempted to resolve issues constructively during IMA[1] pre-consultations. They chose not to. The companies could have constructively responded to issues brought up at the April 3 meeting and tried to find mutually acceptable solutions. They chose not to. They could have participated in the Yellowknives Dene sponsored fieldwork. They chose not to.

The Yellowknives Dene First Nation recognizes that EAs in the past have lacked sufficient baseline information, as demonstrated most recently in the De Beers EA. To avoid similar issues, the Yellowknives took it upon themselves to sponsor a rapid traditional knowledge and socio-cultural assessment. The rapid assessments provided a wealth of traditional knowledge, ecological knowledge, and will provide the Review Board with baseline evidence and information from which to base its EA decisions.

3 Yellowknives Dene Review of Company Developers Assessment Reports (DAR)

This section of the submission examines the company DAR deficiencies and provides requested information items in an attempt to address outstanding issues, and find possible mitigation measures. This will ensure the Review Board has sufficient, quality information to proceed to hearings and ultimately to decisions.

3.1 Consolidated Goldwin Ventures Inc.

3.1.1 General Comments

The Consolidated Goldwin Ventures Inc (Consolidated) DAR does not contain any field compiled baseline information. Consolidated provides little factual evidence to support its assertions throughout the document. Information provided is superficial, unreferenced, and subjective. Impacts on inland pond/fish habitat used for exploration drilling may fail to meet Department of Fisheries and Oceans (DFO) information requirements.

Consultation information is inaccurate and misleading with respect to communications with YDKFN representatives and its consultant. Consolidated's research, communication

[1] Interim Measures Agreement between Canada and the Akaitcho Treaty 8 requires pre-consultation on water licence and land use proposals before formal permits and licence submissions are made to regulatory agencies.

and typographical and presentation efforts in the report and at the April 3 public meeting suggest disregard for the Review Board's EA process. Consolidated provides impact assessment conclusions without showing how they are arrived at using standard EA methodology of applying impact assessment criteria to identified VEC impact receptors. In most instances the EA dismisses potential impacts outright without providing any reasonable basis for doing so.

The spatial and temporal impacts of the proposed development are not discussed in the context of VECs. The DAR does not provide enough information of adequate quality for any reasonable person to arrive at similar conclusions. Consolidated's EA does not meet the minimum professional requirements necessary for such documents.

It is unreasonable to use the Consolidated Goldwin Ventures Inc. DAR for environmental assessment purposes. Even if supplemented with information from regulators, the Yellowknives Dene, and other parties during the course of the EA proceeding, Consolidated does not demonstrate the willingness or capacity necessary to undertake its proposed development in a manner that protects the environment, the public interest, or Aboriginal people.

3.1.2 Detailed comments

Page 1 Introduction

Consolidated suggests that its development is a preliminary mineral exploration project similar to others that have been previously approved. However, Diamond exploration proceeds differently from other mineral exploration in that it moves from preliminary to advanced exploration very quickly given the nature of the diamond resource (in kimberlite). The proponent is asserting similarity to other developments but not providing a basis for justifying the assertion. Evidence is needed to justify the developer's conclusion.

Clarification and Information Requested

1. What other "similar" projects is Consolidated comparing its proposed developments to?
2. What other diamond exploration work has consolidated undertaken in the Northwest Territories.

Page 3 Corporate History

The company asserts its satisfactory corporate standing since the 1980's and the expertise of its directors. However, that assertion lacks information about what projects the company worked on in the Yukon, and British Columbia. Without this information, there is no way for the Yellowknives Dene First Nation to contact First Nations and local governments near these projects to obtain their opinions of the company.

Information Required

1. Résumé of the principal author of the Development Assessment Report.
2. The role of Glen McDonald, Abby Farrage and David Williams in the Consolidated's environmental management responsibilities and field operations planned by Consolidated.

Page 4 Organizational Structure

Consolidated's David Williams is directly overseeing Mr. Laurence Stephenson. Mr. Williams is also a director of Consolidated. The Yellowknives Dene wants to ensure that the consultants and the directors have sufficient professional and personal liability insurance coverage in the event it is required.

The Yellowknives Dene are taking early steps to ensure that the company allocates sufficient resources to environmental management and environmental liability management. There is also uncertainty if the directors are responsible for any accident or malfunction, which is not discussed in the EA, and what capacity the company has to deal with unforeseen events.

Information Request

1. Please provide the Review Board existing insurance coverage information regarding the Consolidated's board of directors.
2. Please have Consolidated's consultants provide the Review Board proof of professional insurance and the nature and extent of its coverage.
3. Please inform the Board how much money Consolidated has to use for bonding purposes.
4. Please have Mr. Laurence Stephenson's summarize his previous exploration work experience in the Northwest Territories.
5. Please provide the Review Board reference names and contact information of First Nation(s) Mr. David Williams and Mr. Laurence Stephenson have been involved with in their exploration and consulting work.

6. Please provide references names and contact information of First Nation(s) Consolidated has actively engaged in their exploration work in Canada.

Page 4 Environmental Performance Record

Consolidated indicates it has an exemplary environmental performance record. Evidence to substantiate the assertion is necessary. This will also provide the Board a greater degree of certainty regarding the proponent's management and environmental capacity to undertake the work.

Information Requested

1. Please summarize the exploration programs Consolidated and Mr. Stephenson have previously licenced and bonded in the last 5 years. Please include the name of the regulatory authority requiring the bonding.
2. Certification that Consolidated is an ISO 14000 registered company.

Page 5 Access Roads, Camps and Drill Sites

Consolidated states that "The other potential drill sites areas were located in areas that the First Nations have identified as having no significance to their "trails" which in most instance pass at least 500 metres distant to the drill site areas."

Information Requested

1. The name of the individual and/or the First Nation source that indicated Consolidated's other drill sites were in areas that had no significance to trails.

Page 7 Waste Management

Consolidated states it will dispose its on-land drill program cuttings "in a suitable natural depression on the property land area." The Board should make sure that the cuttings do not affect the environment. In the wintertime, the snow covers up most of the land so it is difficult to identify a suitable depression for the drill cuttings.

Information Requested

1. Please inform the Review Board how Consolidated will determine where to put drill cuttings on land, in the winter, if snow covers up the land, and it cannot see natural drainage ways or smaller water bodies.

Page 7 Water Use

Consolidated states its inland drill program will withdraw water from a "small unnamed pond located adjacent to the drill site. Water will be re-circulated thereby reducing the quantity required to about 25,000 litres per hole." In total this brings water consumption of 50,000 litres or about 11,000 imperial gallons. That is enough water to fill a pond 28'x12'x4'6" full of water. The Board may want to make sure that what ever is living in the pond is not significantly impacted by the water use.

Information Requested

1. The volume of water used as a proportion of the total volume of the water body.
2. The anticipated reduction in the depth of the unfrozen area of the inland water body as measured from the under surface of the ice cover.
3. Inform the Review Board if there are any fish in the inland water body.
4. Alternative sources of water for the inland drill program if Consolidated cannot use water from the unnamed inland lake.

Page 9 Regulatory Regime

The Department of Fisheries and Oceans may have to issue a letter of direction regarding the use of water from the unnamed inland lake. Consolidated may also need a Northwest Territories business licence.

Information Requested

1. Please inform the Board if Consolidated requires a letter of direction from DFO regarding use of water from an unnamed inland pond.
2. Please inform the Board if Consolidated requires a NWT business licence to operate in the NWT.

Page 10 Issues Resolution

Consolidated suggests it will continue communicating with the YKDFN before starting its exploration activities. The company also intends to advise regional First Nation communities regarding its application that is currently in EA and of Consolidated's desire to consult on planned exploration activities in and around Drybones Bay and area. It seems that advising First Nations of planned work constitutes consultation. For clarity, the Board should know what Consolidated means by consultation and what it commits to doing in the future.

Information Required

1. Please provide the Review Board Consolidated's definition of "consultation with First Nations" as it applies in the NWT.
2. Please inform the Board if providing advice about planned exploration or mining work constitutes adequate consultation.
3. What is Consolidated committing to with regard to on-going meaningful consultation with First Nations in the NWT, and the YKDFN in particular?
4. What resources is Consolidated prepared to allocate to its consultation efforts. Please be specific.

Page 10 and 11 Issues Resolution Table

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
Culturally vital (many residents grew up and spent summers in the areas, and continue to actively use the areas).	The proponent suggests the proposed program will not affect the area many people still consider home. The Proponent may not appreciate that culture is more than one important site of artefacts in a museum. The Drybones and Wool Bay areas are themselves the culturally important elements and everything that they mean and represent.	Impact conclusion is not supported with an adequate EA methodology or logical analysis based on evidence. The EA does not use apply EA methodology to determine, assessing and evaluate project impacts. This is a significant issue throughout the analysis.	Information Required Will Consolidated meaningfully consult with the YKDFN, and change its project as recommended to make sure the Yellowknives Dene valued cultural resources are not affected?
Spiritually significant (site identified by YKDFN)	A preliminary Archaeological and Traditional Knowledge study identified significant resources likely impacted by the proposed development.	Impact assessment conclusions are not supported with sound environmental assessment methodology. Consequently, conclusions are highly subjective and unreliable. Proponent presumes a relatively small impact	Information Required Will Consolidated meaningfully consult with the YKDFN, and change its project as recommended to make sure the Yellowknives Dene valued cultural resources are not affected?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
		footprint results in negligible impacts. That is not the case. Valued cultural sites already disturbed by development.	
Numerous grave sites at the bays and along the shoreline	A preliminary Archaeological and Traditional Knowledge study identified significant resources likely impacted by the proposed development.	Impact conclusions are not supported with acceptable EA methodology or practice. Consequently, results are highly subjective unsubstantiated, and unreliable. The proponent presumes a relatively small impact footprint results in negligible impacts. That is not the case. Valued cultural sites already disturbed by development.	<u>Information Required</u> Will Consolidated meaningfully consult with the YKDFN, and change its project as directed to make sure the Yellowknives Dene valued cultural resources are not affected?
Actively used for hunting	Consolidated concludes no hunting impacts but only includes the footprint of the drill as an impact source.	Consolidated provides no EA methodology or baseline information. The lack of acceptable EA methods and	<u>Information Required</u> Is the proponent prepared to work with the YKDFN and RWED to develop

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
	There are other impacts possible from other project components that remain accounted.	any primary or secondary source data about the environment results in highly subjective, unreliable and unacceptable conclusions. The YKDFN can just as easily assert overwhelming impacts to wildlife. Without some level of consistent acceptable EA methodology and baseline information from primary and secondary sources there is no way for the proponent to draw reasonable conclusions.	suitable wildlife impact mitigations before starting the drill program?
Actively used for Fishing	Consolidated concludes no impacts to aquatic life/fish but only includes the footprint of the drill as an impact source. There are other impacts possible from other project components that remain accounted.	Consolidated provides impact conclusions without acceptable EA methodology or use of primary and secondary source information. Consequently, results are highly subjective unsubstantiated, and unreliable.	<u>Information Required</u> Is the proponent prepared to work with the YKDFN, DFO, and EC to develop suitable wildlife impact mitigations before starting the drill program?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
		The YKDFN can just as easily assert overwhelming impacts to fish. Without some level of baseline, work there is no way for the proponent to draw reasonable conclusions.	
Historic village at Wool Bay	N/A	N/A	N/A
Actively used for trapping (Leo A. Bettsina for example)	Trapping happens in the winter and contrary to the proponent's conclusion, there is a temporal and spatial overlap with YKDFN trapping activities.	Consolidated provides a flawed impact conclusion because it presumes trapping does not happen in the winter. That is incorrect and demonstrates a general lack of information about the YKDFN.	Information Required Is the proponent prepared to work with the Yellowknife Dene Land and Environment Committee to find ways of avoiding impacts to trappers?
Actively used for Berry picking	Consolidated knows where it is undertaking its drilling program and therefore it can easily avoid impacting berry picking areas by flagging those areas now before winter to ensure they are avoided.	It appears the proponent is not taking simple practical steps in the summer time, like flagging berry picking areas near its proposed drilling program, to ensure they are not disturbed in the wintertime work.	Information Required -- Is the proponent prepared to work with the Yellowknife Dene Land and Environment Committee to identify and flag berry-growing areas to ensure they are avoided during the drilling program?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
Site of Bald eagles (raptors)	Consolidated's on land drill program will likely require some brushing and possibly tree cutting. Eagles nest in trees. Therefore eagles could be indirectly impacted by the proposed development	EA requires the development of impact hypothesis linked to project activities that impact the environment. Consolidated has not used applied standard EA assessment methods in its analysis throughout its DAR. The DAR provides impact assessment results that lack credibility. It appears the proponent believes a wintertime program addresses all possible project impacts. Over reliance on that train of logic is unreliable if the assumptions are untested as evidenced by berry picking, trapping and hunting issues.	Information Required Is the proponent prepared to work with the Yellowknife Dene Land and Environment Committee and Environment Canada to identify and flag important waterfowl and raptor nesting areas?
Actively used camping and campground areas	Yellowknives Dene members have camps out at the Drybones and Wool Bay areas and contrary to Consolidated's	The proponent concludes a winter program results in no environmental impacts. This is unrealistic and an unreliable	Information Required Will the proponent work with the YKDFN to identify and protect all known

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
	conclusion, they will be impacted by the development.	way to conduct EAs.	and desirable camp areas from disturbance and compensate existing camp owners for the nuisance.
The bays are ecological unique because they are the largest bays on the shoreline and provide a unique microclimate and unique ecosystems.	The proponent has not attempted to define areas in the bays that have significant ecological value.	The delineation of valuable ecological habitat and micro-habitats is possible. With some effort during the summer of 2003, it would have been possible to identify these important areas.	Information Required Is the proponent willing to help government and the YKDFN delineate valuable ecological habitat and micro-habitats at before starting its drilling program or undertaking any land based drilling?
The unique habitat makes it excellent for wildlife	The size of Drybones bay and its combination of its ecological attributes makes it an attractive place for wildlife. However, disturbing it may dislocate wildlife and diminish the areas appeal for wildlife.	Drybones Bay is small comparatively speaking but is very important to wildlife and people that hunt, trap wildlife. Because the Drybones and Wool Bays are comparatively small when compared to Great Slave Lake, they are that much easier to disturb. That is why care needs to be taken during all phases of exploration work to ensure the special habitat is left intact in the event no mine	Information Required Is the proponent willing to consult with the YKDFN and take its advice on ways to minimize impacts to the wildlife of the area before proceeding with its development?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
		proceeds.	
Good places for picking medicinal plants	Brushing and clearing drill sites can impact medicinal plants.	Consolidated could have taken practical steps after the April 3 public meeting this spring and participated in this summers baseline program at Drybones Bay to identify areas that had good medicinal plants. It chose not to.	Information Required Will Consolidated take steps to avoid impacts to medicinal plants by going out to Drybones Bay with knowledgeable YKDFN members to locate and protect medicinal plant areas?
Wool Bay and Dry Bones bay are the birth place of many current residents of Dettah and Ndilo	The value of Drybones Bay to the Yellowknives Dene does not reside in one place, object, or environmental feature. Its value lies in the cultural memory is provides.	The YKDFN is concerned that perhaps the proponent does not appreciate just how important the Drybones and Wool Bay areas are to the Yellowknives Dene and that incremental disturbance and alternation of the area is somehow acceptable. As previously stated, the two areas in themselves are part of the cultural identity and any impacts however small are significant to the YKDFN.	Information Required Is the proponent willing to contribute to the full collection of historical and Traditional Knowledge information from the Drybones area in order to preserve its cumulative historical and cultural value?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
		Before anything, changes in these areas, the cultural memory and meaning of these important places must be preserved for future generations through appropriate Traditional Knowledge, archaeological and historical research, documentation and communication to Dene and Non-Dene.	
Significant impact on Treaty rights and alienation of current access to the land.			Information Required Is the proponent prepared to enter into an agreement with the Yellowknives Dene in order to ensure the Yellowknives Dene lands are not alienated form ongoing treaty negotiations?
Forest Resource Impacts	The proponent commits to conducting the drilling program in a "good workman like way" to avoid cutting		Information Required Please inform the Board what a "good workman like way" means.

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
	trees.		
Sound Impacts on Wildlife	Sound travels further in the winter then it does in the summer.	Can the proponent futher reduce the noise generated by the development? Are noise reduction options provided by the proponent?	Information Required Will the proponent work with the YKDFN to find ways of mitigating project noise?
Improved Access	Improved access of any type inevitably results in increased hunting pressures. The proponent suggests this is not the case.	More people at Drybones Bay results in more land disturbance, more hunting, and more indirect impacts. The more impact there is, the more the cultural value of the area is diminished or irreparably lost.	Information Required Will the proponent work with the YKDFN to actively manage vehicle access, traffic, and hunting along the proposed winter road?

Page 12 Assessment Boundaries

The proponent provides assessment boundaries for the proposed development but does not provide assessment boundaries for the VECs included in the scope of the assessment. VEC boundaries are scoped based on the potential spatial and temporal diffusion of project impacts.

Information Requested

1. The EA methodology used by the proponent.
2. List of VECs selected by the proponent.
3. Temporal and spatial extent of likely impacts on the VECs selected.
4. The criteria used by the proponent to determine the significance of the impact on the VECs.
5. The level of uncertainty the proponent has with conclusions provided for each VEC.

Page 12 Subsistence and Traditional Land Use and Page 21 Cultural and Heritage Resources

The proponent references the Yellowknives Dene mapping project and concludes based on it that "no traditional land or any subsistence use was noted on the map or raised during the meeting" with respect to Consolidated's proposed drilling program. Consolidated then concludes there are no culturally important or heritage sites identified in the areas where Consolidated proposes to drill and that "the trap lines and travel routes identified on the community map were observed not to be located in the vicinity of the proposed program."

Information for the Review Board

The sweeping conclusions arrived at by the proponent after having viewed a small portion of the map briefly demonstrates why the YKDFN need to manage the use and interpretation of its information.

Respectful use of the Yellowknives Dene mapping information would have at least included calling the YKDFN to determine if the mapping information could be used. Consolidated did not do this.

Respectful use of the mapping information by Consolidated would have included a phone call to see if its interpretation of the information was correct. Consolidated did not do this.

The proponent provides inaccurate conclusions based on faulty interpretation of map information, and ignores its own information in it DAR that shows an existing trail not 500 meters from proposed drill locations. This raises serious concerns about the reliability and credibility of the EA report for the Board's purposes.

Consolidated's conclusion that "no traditional land or any subsistence use was noted on the map or raised during the meeting" with respect to Consolidated's proposed drilling program is in error.

The Yellowknives submit statements made by Yellowknives Dene at the YKDFN sponsored public meeting on April 3, 2003 as evidence to show that Consolidated's claim is inaccurate. The meeting was recorded and the Yellowknives will make the recording available if requested.

> *"We are concerned about the potential impact on our land and local trappers. They get many furs from the area and others do as well. There is also cabin out in front of the drill sites. The Prince of Wales Heritage Centre does not have 100% knowledge of the historical information of the area. We can tell you what is there. If you disturb spiritual sites, you will be approached and removed.*
>
> *You have been over there for a while, but this is the first time I have seen you come into the community. We have rights and this is our homeland you are operating on. We continue to use those trails near Moose Bay and Drybones Bay. There are spiritual sites, archaeological sites, and a number of burial sites, old villages. This is an important area. There are archaeological sites off the Wool Bay. You will have a significant Impact on the Land."* Fred Sangris April 2, 2003
>
> *"There are many grave sites around. You will destroy the gravesites. You must pay for that. We can't just sit back as you take over the land. You have to inform Chief and council about what you are doing. You have to tell the community. You can't treat us like tied up dogs. We need to talk to and respect each other. People lived there before and you can't treat us*

like this. You are destroying everything on our land. We can't drink our water and eat our fish. You only want the money from our land. You have to tell our community what you are doing on our land" Mr. Paper April 2, 2003.

"I used to trap and hunt at Wool Bay and Drybones Bay area. There are many grave sites at the areas also. There are lots of elders' trails. The previous mining companies never consulted us. This is our land. Drybones Bay and Wool Bay, that is where the hunt and trap. At Wool Bay I raised all my kids there. I have a house there. Its where I raised my kids. They say when the mine is finished it will all be put it back. I don't think so. Those places are also good fishing places. There is muskrat and moose down there. Wool and Drybones Bay is our trapping place. Those places are our back yard without consulting. This will be a big impact on us. Our people have been impacted but they did not get anything from it. We have experience with what has happened to our land with mines. I can see fore myself. She said she was concerned about her children and her children's children." Judy Charlo April 2, 2003.

"We used to set nets out there in the Wool Bay and Drybones Bay. Doing work on the water will impact the water, maybe doing it inland is better, but not on the lake. We should have more meetings like the one tonight. We can't just make a decision with one meeting. We need to consider this more." Isadore Tsetta April 2, 2003

"I used to go trapping and canoeing with those elders over there. If there is mining everything will be different. Maybe we should tell him how people use to live around there in the area. Mining companies say nice things but the possibilities, but..... The stories told say that Dettah down to Drybones Bay, there were tents all the way down. This was the stories they use to tell. Last year he and Stan, were out there, with a D-10 and a Cat and Drill. Its important that YKDFN get sufficient notice in advance. If I found something in your back yard you would want to get paid for that. For us Drybones Bay and Wool bay is like our "national park" there is moose, muskrat, beaver and lots of animals down there. As a kid, when I traveled down that way the elders showed me where all the graves where. That area use to be a village (Drybones) bay. There is an old stove made

out of rocks down there to. We can't stop you. Today we are suffering in different ways." James Yellowknives Dene Member, April 2, 2003.

Statements made by Yellowknives Dene Membership at the April 4 Afternoon Meeting Session.

- *There are quite a few wolverines in the area. In fact, there have been cut lines made on either side of a trap line. They put in a main line then put off wing lines. Baseline and grid lines basically. They do this to take magnetic readings.*

- *The site preparation for the drilling will disturb the area and cause habitat damage for the ducks and wild grasses. The wet lands will be impacted, and the drill cuttings are going to be back into the wetlands and impact the muskrat.*

- *Around Wool Bay there is an old Village there, near where they plan to drill out on ice. People are noticing that there is lots of traffic going towards Wool and Drybones Bay.*

- *They will be drilling at least 30 holes if all the land use permits are approved. The land use permits document what the proponents are proposing. "That information exists and we should have it."*

- *It seems that the way trees are being knocked that they do not care for what they are doing, or the regulations.*

- *The land use permits are for about two years and they require community consultation before they can go there to work. All the things they have done so far show a lack of respect for the people of the YKDFN. Any future work has to have more consultation here. Rachel noted Diamonds North was issued a permit before the community consultation.*

- *They should come and see us first before they go to the museum. The museum only knows about the larger graveyard sites and has told them there is basically nothing there, or has given them a limited amount of information. Our concern is your hunting, trapping and fishing rights.*

- *Where will we take our kids out in the spring, summer and fall to hunt moose there? What about if the muskrat habitat is disturbed? What about the ducks? It is*

close to our community! We do not want our kids to go too far to learn how to hunt. Rocher River is too far away but the Wool and Drybones Bay areas are close to town and are good for teaching purposes for hunting and trapping.

The cumulative result of Consolidated's actions raises doubts about the reliability company's EA information and conclusions, the sincerity of the proponent's commitments, and its ability to respectfully integrate Yellowknives Dene Traditional Knowledge into its operations. Consolidated has provided the Board with inaccurate information and distorted conclusions based on inappropriate use of Yellowknives Dene property.

3.1.3 Conclusion

Consolidated appears to have put few resources into preparing its DAR. Its consultation efforts are lacking, its reporting is inaccurate and misinforming. Little effort was taken to understand the environment and the people of the area that could be impacted. The proponent provides little confidence its impact predictions are accurate, or that it is willing or able to work with its Aboriginal stakeholders. The DAR lacks important primary and secondary information and provides no material basis from which to draw conclusions of significance.

3.2 New Shoshoni Ventures Ltd.

3.2.1 General Comments

The New Shoshoni Ventures Ltd. (Shoshoni) DAR is virtually identical to the Consolidated Goldwin Ventures Inc. DAR – and equally unreliable for EA purposes. The Yellowknives Dene First Nation concludes that the Shoshoni DAR is altogether inadequate for environmental assessment purposes and that the Board's use of its conclusions is patently unreasonable.

The Shoshoni EA does not contain any field compiled baseline information lacks evidence to support its assertions, and provides superficial, unreferenced, and subjective impact analysis. The Yellowknives Dene will submit to the Board factual baseline evidence, carefully documented and verified by independent professionals.

Consultation information is inaccurate and misleading with respect to communications with YDKFN representatives and its consultants.

Shoshoni's research, communication, typographical and presentation efforts suggest disregard for the Review Board's EA process.

Shoshoni provides impact assessment conclusions without showing how it came to those conclusions using standard EA criteria. In most instances, the EA dismisses potential impacts outright without justification.

There is no discussion of the spatial and temporal distribution of impacts. The DAR also does not consider how the VECs listed in the attachment to this report will react to the project impacts. The DAR does not provide enough information, of adequate quality, to take an informed decision. Shoshoni's EA does not meet the minimum professional requirements necessary for such documents.

It is patently unreasonable to use the Shoshoni DAR for environmental assessment purposes. Even if supplemented with information from regulators, the Yellowknives Dene, and other parties during the course of the EA proceeding, Shoshoni does not demonstrate the willingness or capacity necessary to undertake its proposed development in a manner that protects the environment, the public interest, or Aboriginal people.

3.2.2 Detailed Comments

Page 3 Corporate History

Shoshoni indicates it has successfully operated exploration projects in British Columbia (BC) and the Yukon (YT). Shoshoni provides Glen Macdonald as evidence of the company's good standing. The YKDFN want to contact other communities and First Nations to obtain their impressions and views of Shoshoni.

Information Requested

1. Please describe the nature and location of projects Shoshoni operated in BC and the YT.
2. Please provide the names of the community and First Nation nearest the respective exploration projects.
3. Please provide the Review Board Mr. Macdonald's resume and his role in the proposed development.

Page 4 Organizational Structure

The company's Board of directors are managing Max Braden and Laurence Stephenson who are the main contact persons for the development. The Yellowknives Dene wants to

ensure that the consultants and the directors have sufficient professional and personal liability insurance coverage in the event it is required.

The New Shoshoni Ventures Ltd. Financial Statements Years Ended February 28, 2002 And February 28, 2001 balance sheet shows the company with $154,350 in assets. The November 30, 2002 New Shoshoni Ventures Ltd. unaudited Balance Sheet shows the company with $343,628 in assets. (http://www.newshoshoni.com/fina/2003jan29ifr.pdf)

The Yellowknives Dene are taking early steps to ensure that the company allocates sufficient resources to environmental management and environmental liability management. There is also uncertainty if the directors are responsible for any accident or malfunction, which is not discussed in the EA, and what capacity the company has to deal with unforeseen events.

Information Request

1. Please provide the Review Board existing insurance coverage information regarding the Shoshoni board of directors.
2. Please have the Shoshoni consultants provide the Review Board proof of professional insurance and the nature and extent of its coverage.
3. Please inform the Board how much money Shoshoni has to use for bonding purposes.

Page 4 Environmental Performance Record

Shoshoni indicates it has never had a problem conducting its exploration programs in an environmentally responsible manner and that Shoshoni's consultant has been involved in projects in Canada and the United States that have never resulted in forfeiture of bonding.

The Yellowknives Dene appreciate the statements made by the proponent but would prefer to have evidence to substantiate these claims. This is important because Shoshoni provides an excerpt of an inspection report in its DAR that shows violations of Land Use Permit Conditions. This raises concerns about the willingness and capacity of the proponent to undertake its proposed development.

On February 25, 2003, Clint Ambrose, Resource Management Officer with the South Mackenzie District of INAC prepared an Inspection report of Land Use Permit N1999C0104. An excerpt of this report is included in Shoshoni's EA. Mr. Ambrose wrote the following.

"*Another drill program was being completed southeast of Drybones Bay that the Inspector was not aware of prior to the commencement of the operation. This is unacceptable as per condition #5 and #7 of your land use permit and in the future, the Inspector must be made aware of all activities under your permit.*" INAC, South Mackenzie District Office, February 25, 2003.

Information Requested

1. Please summarize the exploration programs Shoshoni and Mr. Stephenson have previously licenced and bonded in the last 5 years. Please include the name of the regulatory authority requiring the bonding.
2. Certification that Shoshoni is an ISO 14000 registered company.
3. Is Shoshoni willing to have an independent environmental consultant manage and audit its proposed development?

Page 5 Access Roads, Camps and Drill Sites

Shoshoni indicates that "potable water is pumped from the lake through an insulated, heated as required, poly-line, will be stored in a dry in a holding tank. Greywater will be dispersed through an insulated heated as required, poly-line to an outfall at a sump of suitable capacity."

The YKDFN has visited the Smith camp referred to above and are concerned about the volume of greywater that will be created, and its likely impacts on Great Slave Lake. The rationale is that in the wintertime, the grey water is going to accumulate at the outfall where it freezes. Over the 8-10 weeks of the program there is going to be a significant accumulation of frozen grey water. When all the grey water melts, it will likely drain toward Great Slave Lake because of the areas topography and rocky geography. Greywater includes wash water from showers, baths, dish cleaning, and washing. If all this water enters Drybones Bay it could have significant localized impacts.

Information Required

1. Please provide an analysis of the total amount of greywater likely generated from the proposed development.
2. Provide the Review Board site data relevant to the location of the greywater sump outfall. This should include the following information:

a. The final dispersion of the effluent, demonstrating how the soil can accept the amount of water that will be generated, treated and discharged.
b. If soil treatment is not planned: (and this is the likely scenario at the Drybones Bay area), the type of water storage planned, its location, and any particular management needed to ensure acceptable aquatic and/or terrestrial impacts.

Page 7 Waste Management

Shoshoni states it will dispose its on-land drill program cuttings "in a suitable natural depression on the property land area.". The Board may want to make sure that the cuttings do not affect the environment. In the wintertime, the snow covers up most of the land so it is difficult to identify a suitable depression for the drill cuttings.

Information Requested

1. Please inform the Review Board how Shoshoni decides where to put drill cuttings on land, in the winter, if snow covers up the land and it cannot see natural drainage ways or smaller water bodies.
2. Is Shoshoni willing to identify and flag a suitable location to place drill cuttings with the YKDFN before snowfall?

Page 7 Water Use

Water required for most of the exploration-drilling program will be obtained from the area of Drybones Bay. Water will be re-circulated thereby reducing the quantity required to about 25,000 litres per hole. Shoshoni plans on drilling up to 10 holes in each of three different areas for a total of 30 holes. This works out to 750,000 litres of water or 165,000 imperial gallons (http://www.pool-information.com.au/metric.htm). That is enough water to fill 6 1/2 ponds 40'x20'x4'6" full of water. This amount of used water with drill cuttings will be "disposed of at an on land in a safe benign manner."

The Board should make sure that when the frozen water with drill cuttings melts that the soils are not adversely impacted, and that as the water draining into Great Slave Lake, does not cause additional impacts to either terrestrial or aquatic habitats.

Information Requested

1. The total volume of water at each of the three development areas that will be put onto land.

2. The impact of the disposed water on wildlife as it is being disposed.
3. The impact of the disposed water, once it water melts, on the environment.
4. Method of selecting the water disposal location at each of the drill sites given winter/early spring conditions.

Page 9 Regulatory Regime

Drilling on ice and use of water from inland water bodies may require a letter of direction from the Department of Fisheries. Shoshoni may also need a Northwest Territories business licence.

Information Requested

1. Please inform the Board if Shoshoni requires a letter of direction from DFO regarding on ice drilling.
2. The location of inland water bodies that Shoshoni's may use for alternative sources of water for drilling purposes.
3. Please inform the Board if Shoshoni requires a NWT business licence to operate in the NWT.

Page 10 Consultation

Shoshoni outlines what it calls "consultation efforts" over a five-month period. The Yellowknives Dene does not consider the proponent's effort to be true consultation. The demonstrated efforts do not even meet the minimum threshold of discussion.

The proponent misrepresents communication with the YKDFN consultant and relies on the YKDFN to plan, arrange, and pay the cost of public meetings, to facilitate the distribution of the proponent's information, and to initiate public and Aboriginal consultation. Shoshoni has no material basis for suggesting it has even initiated consultations.

Information Requested

1. Please provide the Review Board Shoshoni's definition of "consultation with First Nations" as it applies in the NWT.
2. What is Shoshoni committing to with regard to on-going meaningful consultation with First Nations in the NWT in general, and specifically, the YKDFN?
3. What resources is Shoshoni prepared to allocate to its consultation efforts. Please be specific.

4. What other First Nations has Shoshoni consulted with in the NWT and in Canada within the last three years – five years.
5. Pleases inform the Review Board what Shoshoni understands its role to be in the consultation and communication process with First Nations during EA.
6. Pleases inform the Review Board what Shoshoni understand governments role to be in the consultation and communication process with First Nations during EA.

Page 11 and 12 Issues Resolution Table

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
Culturally vital (many residents grew up and spent summers in the areas, and continue to actively use the areas).	Proponent suggests proposed program will not affect the area many people still consider home. The Proponent does not understand that the entire Wool and Drybones Bay areas, and the islands and land in between, are vitally important to the identity of Yellowknives Dene. Any impact however small without the consent of Yellowknives Dene is a significant impact on the YKDFN as a uniquely identifiable culture, with defined cultural representation demonstrated at the Wool and Drybones Bay areas.	EA requires the development of impact hypothesis linked to project activities that impact the environment. Consolidated has not used applied standard EA assessment methods in its analysis throughout its DAR. The DAR provides impact assessment results that lack credibility.	Information Required Will Shoshoni meaningfully consult with the YKDFN, and change its project as recommended to make sure the Yellowknives Dene valued cultural resources are not affected? Is Shoshoni prepared to wait one winter season before initiating its drill program in order to establish a working relationship with the YKDFN and to obtain appropriate baseline information? Has Shoshoni retained cultural anthropologists or other social science professionals in the preparation of its DAR? If not, is it willing to work with the YKDFN to learn about the cultural importance of the areas including but not limited to undertaking appropriate cultural baseline work?
Spiritually significant (site	A preliminary Archaeological	Impact conclusions are not	Information Required

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
identified by YKDFN)	and Traditional Knowledge study identified significant resources likely impacted by the proposed development.	supported with a logical analysis based on evidence. It is a "best guess" impact hypothesis that is unsubstantiated. Proponent presumes a relatively small impact footprint results in negligible impacts. That is not the case. Valued cultural sites already disturbed by development.	Will Shoshoni meaningfully consult with the YKDFN, and amend its project as requested to make sure the Yellowknives Dene valued cultural resources are not affected? Will Shoshoni accept a 100-metre minimum no-development buffer around archaeological sites?
Numerous grave sites at the bays and along the shoreline	A preliminary Archaeological and Traditional Knowledge study identified significant resources likely impacted by the proposed development.	Impact conclusions are not supported with a logical analysis based on accepted EA practice. Shoshoni provides no EA methodology, nor any baseline data, or secondary source evidence. Shoshoni has not met the minimum acceptable standards of EA practice. Proponent presumes a	<u>Information Required</u> Will Shoshoni meaningfully consult with the YKDFN, and change its project as directed to make sure the Yellowknives Dene valued cultural resources are not affected? Are Shoshoni staff and directors willing to consider cross-cultural camps to familiarize themselves with Yellowknives Dene lifestyles and culture?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
		relatively small impact footprint results in negligible impacts. That is not the case. Valued cultural sites are already disturbed by development. Therefore, the YKDFN believe significant impacts have already occurred.	
Actively used for hunting	Shoshoni concludes no hunting impacts but only includes the footprint of the drill as an impact source. There are other impacts possible from other project components that remain accounted. For example, road access enables vehicle movements and this allows hunters that would not otherwise be able to hunt in the area.	Shoshoni provides an impact conclusion without evidence to substantiate the conclusion of no net impact on wildlife. The YKDFN can just as easily assert overwhelming impacts to wildlife. Without some level of baseline knowledge, there is no way for the proponent to draw reasonable or convincing conclusions.	Information Required Is the proponent prepared to work with the YKDFN and RWED to develop suitable wildlife impact mitigations before starting the drill program? Is the proponent prepared to work with the YKDFN in a winter wildlife-monitoring program? Is the proponent prepared to work with the YKDFN in a winter road hunter-monitoring program?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
Actively used for Fishing	Shoshoni concludes no impacts to fish but only includes the footprint of the drill as an impact source. There are other impacts possible from other project components that remain accounted.	Shoshoni provides an impact conclusion without any proof to suggest it is the right conclusion. Shoshoni is asking the Review Board and the YKDFN to trust its judgement. The YKDFN can just as easily assert overwhelming impacts to fish. Without some level of baseline, work there is no way for the proponent to draw reasonable conclusions.	Information Required Is the proponent prepared to work with the YKDFN to develop suitable wildlife impact mitigations before starting the drill program?
Actively used for trapping (Leo A. Bettsina for example)	Trapping happens in the winter and contrary to the proponent's conclusion, there is a temporal and spatial overlap with trapping activities.	Shoshoni provides a flawed impact conclusion because it presumes trapping does not happen in the winter. That is incorrect and demonstrates a general lack of information about the YKDFN lifestyles and practices	Information Required Is the proponent prepared to work with the Yellowknife Dene Land and Environment Committee to find ways of avoiding impacts to trappers?
Actively used for Berry picking	Shoshoni generally knows where it wants to undertake its	It appears the proponent is not taking simple practical steps in	Information Required

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
	drilling program. Shoshoni and the YKDFN can identify good berry areas near the proposed drill program before the snow comes to make sure they are avoided in the winter.	the summer time, like flagging berry picking areas near its proposed drilling program, to ensure they are not disturbed in the wintertime work.	Is the proponent prepared to work with the Yellowknife Dene Land and Environment Committee to identify and flag berry-growing areas to ensure they are avoided during the drilling program?
Site of Bald eagles (raptors)	Shoshoni's drill program will require vegetation disturbance. Eagles nest in trees. Therefore eagles could be indirectly impacted by the proposed development	EA requires thinking about the project, and what it does that could impact the environment. It means looking at possible project impact "pathways" to "VECs" and assessing the nature of impacts based on generally accepted evaluation criteria. It appears the proponent believes a wintertime program addresses all possible project impacts. Over reliance on that train of logic is unreliable if the assumptions are untested as evidenced by berry picking, trapping and hunting issues.	<u>Information Required</u> Is the proponent prepared to work with the Yellowknife Dene Land and Environment Committee and Environment Canada to identify and flag important waterfowl and raptor nesting areas?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
Actively used camping and campground areas	Yellowknives Dene members have camps out at the Drybones and Wool bay areas and contrary to Shoshoni's conclusions, they are impacted by the development.	The proponent concludes a winter program results in no environmental impacts. The camps are used in the winter and could be impacted.	Information Required Will the proponent work with the YKDFN to identify and protect all known and desirable camp areas from disturbance and compensate existing camp owners? Will the proponent consult with existing camp users in the development area to determine how to best mitigate project impacts e.g., noise, debris, tree cutting, visual disturbance and nuisances?
Drybones Bay is ecologically special because it is one of the largest bays on the shoreline of Great Slave Lake, and provides a unique microclimate and unique ecosystems.	The proponent has not attempted to define areas in the bays that have significant ecological value.	The delineation of valuable ecological habitat and micro-habitats is possible. With some effort during the summer of 2003 it would have been possible to identify these important areas.	Information Required Is the proponent willing to help government and the YKDFN delineate valuable ecological habitat and micro-habitats before starting its drilling program or undertaking any land based drilling?
The unique habitat makes it	The size of Drybones bay and	Drybones Bay is unique	Information Required

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
excellent for wildlife	its ecological attributes makes it an attractive place for wildlife. However, disturbing it may dislocate wildlife and diminish the areas appeal for wildlife.	because of its size and configuration. It is also very important to wildlife and people that hunt, trap and otherwise use wildlife. Because of Drybones' disproportionate importance along the shoreline of Great Slave Lake, impacts are also magnified in value. Therefore, care needs to be taken during all phases of exploration work to ensure the special habitat is left intact in the event no mine proceeds.	Is the proponent willing to consult with the YKDFN and take its advice on ways to minimize impacts to the wildlife of the area before proceeding with its development?
Good places for picking medicinal plants	Brushing and clearing drill sites can impact medicinal plants.	Shoshoni could have taken practical steps after the April 3 public meeting this spring and participated in this summer's baseline program at Drybones Bay to identify areas that had good medicinal plants. It chose not to.	<u>Information Required</u> Will Shoshoni take steps to avoid impacts to medicinal plants by going out to Drybones Bay with knowledgeable YKDFN members to locate and protect medicinal plant areas?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
Wool Bay and Dry Bones bay are the birth place of many current residents of Dettah and Ndilo	The value of Drybones Bay to the Yellowknives Dene does not reside in one place, object, or environmental feature. Its value lies in the cultural memory is provides.	The YKDFN is concerned that the proponent does not appreciate how important the areas are to the Yellowknives Dene and that incremental disturbance and alternation of the Yellowknives Dene culture is acceptable. It is not. Before anything, changes in these areas, the cultural memory and meaning of these important places must be preserved for future generations.	Information Required Is the proponent willing to contribute to the full collection of historical and Traditional Knowledge information from the Drybones area in order to preserve its cumulative historical and cultural value?
Significant impact on Treaty rights and alienation of current access to the land.			Information Required Is the proponent prepared to enter into an agreement with the Yellowknives Dene in order to ensure the Yellowknives Dene lands are not alienated form ongoing treaty negotiations?
Forest Resource Impacts	The proponent commits to		Information Required

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
	conducting the drilling program in a "good workman like way" to avoid cutting trees.		Please inform the Board what a "good workman like way" means.
Sound Impacts on Wildlife	Sound travels further in the winter then it does in the summer.	Can proponent futher reduce the noise generated by the development? Are noise reduction options provided by the proponent?	Information Required Will the proponent work with the YKDFN to find ways of mitigating project noise impacts? Is the proponent prepared to use equipment and machinery that is less noisy?
Improved Access	Improved access of any type inevitably results in increased hunting pressures. The proponent suggests this is not the case.	More people at Drybones Bay results in more land disturbance, more hunting, and more indirect impacts are. The more impact there is, the more the cultural value of the area is diminished or irreparably lost.	Information Required Will the proponent work with the YKDFN to actively manage vehicle access, traffic, and hunting along the proposed winter road?

Page 13 Assessment Boundaries

Shoshoni provides assessment boundaries for the proposed development but does not provide assessment boundaries for the VECs included in the scope of the assessment. VEC boundaries are typically scoped based on the potential spatial and temporal diffusion of project impacts.

Information Requested

1. The environmental impact assessment background and knowledge of the DAR author.
2. The EA methodology used by the proponent.
3. Scope of project impacts considered in the EA.
4. List of VECs selected by the proponent.
5. Temporal and spatial boundaries selected for VECs.
6. The impacts likely to occur to the VECs.
7. The criteria used by the proponent to determine the significance of the impact on the VECs.
8. The level of uncertainty the proponent has with conclusions provided for each VEC.

Page 13 Subsistence and Traditional Land Use and Page 21 Cultural and Heritage Resources

The proponent references the Yellowknives Dene mapping project and concludes based on it that "no traditional land or any subsistence use was noted on the map or raised during the meeting" with respect to Shoshoni's proposed drilling program. Shoshoni concludes there are no culturally important or heritage sites identified in the areas where Shoshoni proposes to drill, and that "the trap lines and travel routes identified on the community map were observed not to be located in the vicinity of the proposed program."

Information for the Review Board

The sweeping conclusions arrived at by the proponent after having briefly viewed a small portion of the map demonstrates why the YKDFN want to manage the use and interpretation of its written and mapped knowledge.

Respectful use of the Yellowknives Dene mapping information would have at least included calling the YKDFN to determine if the mapping information could be used. Shoshoni did not do this.

Respectful use of the mapping information by Shoshoni would have included a fax of phone call to see if its interpretation of the information was correct. Shoshoni did not do this.

By drawing inaccurate conclusions based on inappropriate interpretation of map information raises concerns about the reliability and credibility of the EA report for the Board's purposes and the willingness and ability of the proponent to protect of the social, cultural and economic well-being of Yellowknives Dene.

Shoshoni's conclusion that "no traditional land or any subsistence use was noted on the map or raised during the meeting" with respect to Shoshoni's proposed drilling program is in error.

The Yellowknives submit statements made by Yellowknives Dene at the YKDFN sponsored public meeting on April 3, 2003 as evidence to show that Shoshoni's claim is inaccurate and The meeting was recorded and the Yellowknives will make the recording available if requested.

> *"We are concerned about the potential impact on our land and local trappers. They get many furs from the area and others do as well. There is also cabin out in front of the drill sites. The Prince of Wales Heritage Centre does not have 100% knowledge of the historical information of the area. We can tell you what is there. If you disturb spiritual sites, you will be approached and removed.*
>
> *You have been over there for a while, but this is the first time I have seen you come into the community. We have rights and this is our homeland you are operating on. We continue to use those trails near Moose Bay and Drybones Bay. There are spiritual sites, archaeological sites, and a number of burial sites, old villages. This is an important area. There are archaeological sites off the Wool Bay. You will have a significant Impact on the Land."* Fred Sangris April 2, 2003

"There are many grave sites around. You will destroy the gravesites. You must pay for that. We can't just sit back as you take over the land. You have to inform Chief and council about what you are doing. You have to tell the community. You can't treat us like tied up dogs. We need to talk to and respect each other. People lived there before and you can't treat us like this. You are destroying everything on our land. We can't drink our water and eat our fish. You only want the money from our land. You have to tell our community what you are doing on our land" Mr. Paper April 2, 2003.

"I used to trap and hunt at Wool Bay and Drybones Bay area. There are many grave sites at the areas also. There are lots of elders' trails. The previous mining companies never consulted us. This is our land. Drybones Bay and Wool Bay, that is where the hunt and trap. At Wool Bay I raised all my kids there. I have a house there. Its where I raised my kids. They say when the mine is finished it will all be put it back. I don't think so. Those places are also good fishing places. There is muskrat and moose down there. Wool and Drybones Bay is our trapping place. Those places are our back yard without consulting. This will be a big impact on us. Our people have been impacted but they did not get anything from it. We have experience with what has happened to our land with mines. I can see fore myself. She said she was concerned about her children and her children's children." Judy Charlo April 2, 2003.

"We used to set nets out there in the Wool Bay and Drybones Bay. Doing work on the water will impact the water, maybe doing it inland is better, but not on the lake. We should have more meetings like the one tonight. We can't just make a decision with one meeting. We need to consider this more." Isadore Tsetta April 2, 2003

"I used to go trapping and canoeing with those elders over there. If there is mining everything will be different. Maybe we should tell him how people use to live around there in the area. Mining companies say nice things but the possibilities, but..... The stories told say that Dettah down to Drybones Bay, there were tents all the way down. This was the stories they use to tell. Last year he and Stan, were out there, with a D-10 and a Cat and Drill. Its important that YKDFN get sufficient notice in advance. If I found something in your back yard you would want to get paid for that.

For us Drybones Bay and Wool bay is like our "national park" there is moose, muskrat, beaver and lots of animals down there. As a kid, when I traveled down that way the elders showed me where all the graves where. That area use to be a village (Drybones) bay. There is an old stove made out of rocks down there to. We can't stop you. Today we are suffering in different ways." James Yellowknives Dene Member, April 2, 2003.

Statements made by Yellowknives Dene Membership at the April 4 Afternoon Meeting Session.

- *There are quite a few wolverines in the area. In fact, there have been cut lines made on either side of a trap line. They put in a main line then put off wing lines. Baseline and grid lines basically. They do this to take magnetic readings.*

- *The site preparation for the drilling will disturb the area and cause habitat damage for the ducks and wild grasses. The wet lands will be impacted, and the drill cuttings are going to be back into the wetlands and impact the muskrat.*

- *Around Wool Bay there is an old Village there, near where they plan to drill out on ice. People are noticing that there is lots of traffic going towards Wool and Drybones Bay.*

- *They will be drilling at least 30 holes if all the land use permits are approved. The land use permits document what the proponents are proposing. "That information exists and we should have it."*

- *It seems that the way trees are being knocked that they do not care for what they are doing, or the regulations.*

- *The land use permits are for about two years and they require community consultation before they can go there to work. All the things they have done so far show a lack of respect for the people of the YKDFN. Any future work has to have more consultation here. Rachel noted Diamonds North was issued a permit before the community consultation.*

- *They should come and see us first before they go to the museum. The museum only knows about the larger graveyard sites and has told them there is basically*

nothing there, or has given them a limited amount of information. Our concern is your hunting, trapping and fishing rights.

- *Where will we take our kids out in the spring, summer and fall to hunt moose there? What about if the muskrat habitat is disturbed? What about the ducks? It is close to our community! We do not want our kids to go too far to learn how to hunt. Rocher River is too far away but the Wool and Drybones Bay areas are close to town and are good for teaching purposes for hunting and trapping.*

3.2.3 Conclusion

The overall comment arising from the review of Shoshoni's EA is that the YK Dene First Nation doubt 1) the reliability of the EA information and conclusions provided, 2) the sincerity of the proponent's commitments, 3) the proponent's ability to respectfully integrate and apply environmental knowledge into its operations. Shoshoni has provided the Board with inaccurate information and distorted conclusions based on inappropriate use of Yellowknives Dene intellectual property.

3.3 North American General Resources Corporation (North's)

3.3.1 General comments

The YKDFN reviewed North's DAR and believes it provides a reasonable description of the proposed development and a reasonable overview of the area potentially affected. The communications record is good. North's DAR relies exclusively on secondary source material and provides generalized impact predictions that may not hold true for North's proposed development site. The YKDFN is pleased to see North's commitment to "work with the community to ensure compatibly" of land uses. This is a positive step in the development of a respectful working relationship.

3.3.2 General Comments

There are no general comments at this time regarding North's DAR submission.

3.3.3 Specific Comments

Page 21 - 24 Issues Resolution Table

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
Culturally vital (many residents grew up and spent summers in the areas, and continue to actively use the areas).	Proponent suggests proposed program will not affect the area many people still consider home. The Proponent perceives culture purely from a use value perspective and fails to accommodate intrinsic values associated with cultural values.	Impact conclusion is not supported with site specific information. This weakens the reliability of the conclusion. It is also not right to say there are not going to be impacts to culture because the development is in the winter. Dene used the area in the winter also.	Information Required Has North retained cultural anthropologists or other social science professionals in the preparation of its DAR? If not is it willing to work with the YKDFN to learn about the cultural importance of the areas including but not limited to undertaking appropriate cultural baseline work?
Spiritually significant (site identified by YKDFN)	A preliminary Archaeological and Traditional Knowledge study identified significant resources likely impacted by the proposed development.	baseline information is not provided to support Impact conclusions. The proponent also does not appear to understand how the areas are spiritually significant the YKDFN. The Proponent presumes a relatively small impact	Information Required Will North accept a 100-metre minimum no-development buffer around archaeological sites?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
		footprint results in negligible impacts. That is not the case. Valued cultural sites already disturbed by development.	
Numerous grave sites at the bays and along the shoreline	A preliminary Archaeological and Traditional Knowledge study identified significant resources likely impacted by the proposed development.	There is insufficient baseline information for the proponent to make reasonably accurate predictions. North provides unproven impact hypothesis that are not linked to any baseline data, or secondary source evidence. This is unacceptable EA practice. Proponent presumes a relatively small impact footprint results in negligible impacts. That is not the case. Valued cultural sites are already disturbed by development. Therefore, the	<u>Information Required</u> Are North's staff and directors willing to consider cross-cultural camps to familiarize themselves with Yellowknives Dene lifestyles and culture?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
		YKDFN believe significant impacts have already occurred.	
Actively used for hunting	North concludes no hunting impacts but only includes the footprint of the drill as an impact source. There are other impacts possible from other project components that remain accounted. For example, road access enables vehicle movements and this allows hunters that would not otherwise be able to hunt in the area.		<u>Information Required</u> Is the proponent prepared to work with the YKDFN and RWED to develop suitable wildlife impact mitigations before starting the drill program? Is the proponent prepared to work with the YKDFN in a winter wildlife-monitoring program? Is the proponent prepared to work with the YKDFN in a winter road hunter-monitoring program?
Actively used for Fishing	North concludes no impacts to fish but only includes the footprint of the drill as an impact source. There are other impacts possible from other project components that		<u>Information Required</u> Is the proponent prepared to work with the YKDFN and RWED to develop suitable wildlife impact mitigations before starting the drill program?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
	remain accounted.		
Historical Village of Wool Bay	The study completed by the YKDFN identifies several important cultural areas near the Historical Wool Bay area and on the nearby islands.	The Wool Bay village represents a region of land use associated with the former village. Care needs to be taken to understand and learn the history of the area and of the village before information is lost to development and disturbance	Information Required Will North undertake a detailed heritage and Traditional Knowledge review of the Wool Bay area with the YKDFN?
Wool Bay and Dry Bones bay are the birth place of many current residents of Dettah and Ndilo	The value of Wool Bay to the Yellowknives Dene does not reside in one place, object, or environmental feature. Its value lies in the cultural memory is provides and the cultural heritage that lies in and on the ground.	Before anything, changes in these areas, the cultural memory and meaning of these important places must be preserved for future generations.	Information Required Is the proponent willing to contribute to the full collection of historical and Traditional Knowledge information from the Wool Bay area in order to preserve its cumulative historical and cultural value?
Sound Impacts on Wildlife	Sound travels further in the winter then it does in the summer.	Can proponent futher reduce the noise generated by the development? Are noise reduction options provided by the proponent?	Information Required Will the proponent work with the YKDFN to find ways of mitigating project noise impacts?

YKDFN Valued Socio-economic and Environmental Component	Comment	Concerns	Remaining Questions
			Is the proponent prepared to use equipment and machinery that is less noisy?
Improved Access	Improved access of any type inevitably results in increased hunting pressures. The proponent suggests this is not the case.	More people at Wool Bay results in more land disturbance, more hunting, and more indirect impacts. The more impact there is, the more the cultural value of the area is diminished or irreparably lost.	Information Required Will the proponent work with the YKDFN to actively manage vehicle access, traffic, and hunting along the proposed winter road?

3.3.4 Conclusion

The North DAR provides a reasonably good overview of the environment potentially impacted by the proposed development. A reasonable description of North's proposed development fits in well with the environmental description and enables the reader to develop a level of confidence that the predictions are also reasonable.

The issues resolution section requires more detailed knowledge of the environment of the area proposed for development. North lacks this baseline information and consequently is unable to provide reasonable resolution of the issues identified in the DAR. In the absence of adequate baseline information the Review Board will need to consider the application of appropriate mitigation, management and monitoring measures to attenuate public concern and to ensure that the socio-cultural and environmental resources of the area are not individually or incrementally impacted.

ATTACHMENT ONE
Yellowknives Dene First Nation Meeting

April 4, 2003
Start time: 1:00 PM
Stop time: 4:40 PM
Location: YKDFN Public Meeting Hall
About 30 people in attendance.
Rachel Ann Crapeau facilitated the community session.

Rachel Ann described the locations where the proponents wanted to drill. Lawrence, a member of the Yellowknives Dene Land and Environment Committee provided a debriefing of what he observed at the sites. He described the location of the main ice road to Drybones Bay and the cat-cut road coming off the main ice road into the swamps.

Lawrence also described the trailer that is being used to house the drilling equipment and the various locations where the trailer was moved. He noted there was a tight grid pattern of cut lines, and many skidoo trails. He also showed the location of several staking posts and several survey lines around a gravesite to mark it out. They are also running tight survey grids at Drybones Bay. The Land and Environment Committee used a GPS to locate the various disturbances and the various targets that companies were preparing for drilling. They identified 10 targets with just one company. Each company has at least 8 to 10 targets. There are also 4-5 targets south of Wool Bay. Lawrence said it was important to stay on top of them all the time. "I urge you to go see for yourself" "there is a lack of respect for the land" "right now its not bad" North of the shoreline there are many new survey lines cut and many people are doing their lines and claims. There is daily helicopter traffic out there.

Q: Did they go down to the gravesites at cabin Islands? There is a cemetery up on the hill there. Does their road disturb the graves?
A: N/A

General Discussion Following Lawrence's Presentation

- There are quite a few wolverines in the area. In fact, there have been cut lines made on either side of a trap line. They put in a main line then put off wing lines. Baseline and grid lines basically. They do this to take magnetic readings.

- The site preparation for the drilling will disturb the area and cause habitat damage for the ducks and wild grasses. The wet lands will be impacted, and the drill cuttings are going to be back into the wetlands and impact the muskrat.

- Around Wool Bay, there is an old Village there, near where they plan to drill out on ice. People are noticing that there is lots of traffic going towards Wool and Drybones Bay.

- They will be drilling at least 30 holes if all the land use permits are approved. The land use permits document what the proponents are proposing. "That information exists and we should have it."

- It seems that the way trees are being knocked that they do not care for what they are doing, or the regulations.

- The land use permits are for about two years and they require community consultation before they can go there to work. All the things they have done so far show a lack of respect for the people of the YKDFN. Any future work has to have more consultation here. Rachel noted Diamonds North was issued a permit before the community consultation.

- They should come and see us first before they go to the museum. The museum only knows about the larger graveyard sites and has told them there is basically nothing there, or has given them a limited amount of information. Our concern is your hunting, trapping and fishing rights.

- Where will we take our kids out in the spring, summer and fall to hunt moose there? What about if the muskrat habitat is disturbed? What about the ducks? It is close to our community! We do not want our kids to go too far to learn how to hunt. Rocher River is too far away but the Wool and Drybones Bay areas are close to town and are good for teaching purposes for hunting and trapping.

What Should Chief and Council tell the Mackenzie Valley Land and Water Board?
Rachel Ann informed the participants that Chief and Council can order an environmental assessment, and get more information before any development occurs, especially if there might be cultural, social, and traditional economic impacts, and if areas of spiritual significance could be impacted. "The things that keep peoples minds strong."

Rachel Ann Crapeau: What happens if they find more diamond pipes? They are junior companies looking for diamonds that will look for a larger corporation to develop the mines. If it changes on us what will we do?

Ernie: The Wool and Drybones Bay areas are really good moose hunting areas, so a moose survey of the areas is needed before anything happens. "Maybe it is important to get a work on surveys now before development proceeds to much further." "A Moose, muskrat, beaver, ducks, and wetlands surveys should be done before work advances much further." It is like insurance to make sure nothing bad happens. The mineral activity continues all the way down to François River. There are at least four projects, each with many targets they want to drill and investigate.

"Even the low flying helicopters and planes are doing airborne surveys and they are disturbing the animals. They run long grids using the magnetic search techniques."

Chief Darrel Beaulieu: described the venture capital and exploration business and how the web of relationships works from the junior companies, to the government, to regulations, to the larger players. Chief Beaulieu also gave a brief example of how the regulatory process works. He noted that Dene government is left out of the loop. We have to do something, to develop our own process of land management to augment what government currently is currently doing. Darrell noted the nature of mining is risk, and there is risk throughout the process and the regulatory process is one component of that risk. "We need to develop our list of what we want and of how we are going to base our decisions on." "We have to manage it and it's the bottom line, because over the years they have done it, they have screwed it up."

The Yellowknives Dene Membership discussed the importance of Wool Bay and Drybones Bay areas. Their significant value was attributed to the following:

22. Culturally important
23. Spiritually significant (site identified by YKDFN)
24. Grave sites at the bay and along the shoreline
25. Hunting
26. Fishing
27. Historic village at Wool Bay
28. Trapping (Leo A. Bettsina for example)
29. Berry picking
30. Bald eagles (raptors)
31. Camp ground

32. Goose hunting
33. Duck hunting
34. Ecological unique being the largest bays on the shoreline and provide a unique microclimate and unique ecosystem.
35. Very sheltered bay used during lake travel
36. Drybones Bay is a main artery of current and traditional trails
37. Good places for picking medicinal plants
38. The unique habitat makes it excellent for wildlife
39. Trail (Patrick Charlo). The trial to his area starts at Drybones Bay
40. Main park for boats on windy days, (security, shelter and safety)
41. Wool Bay and Dry Bones bay are the birth place of many current residents of Dettah and Ndilo
42. Will result in an impact on Treaty rights and their access to the land.

Valued ecosystem components included:

1. Raptors,
2. moose,
3. muskrat,
4. fish,
5. beaver,
6. water,
7. wildlife habitat,
8. grasslands.

The membership also noted that moose are already being impacted because of the low flying planes and helicopters.

Impact on forest resources

Members cited that there were impacts to forest resources with all the trees getting knocked down for trails, drilling and ground magnetic surveys.

Sound effects on wildlife

There were questions about how sound impacted wildlife, and how a relatively pristine area could be changed by the year round sound.

Impact on inland streams

Members wondered how the current work programs would impact the main streams flowing into Drybones Bay and what would happen to the lake and the surrounding wetlands if the major arteries into Great Slave Lake from Drybones Bay were impacted.

Cumulative Impacts

Membership expressed serious concern about the cumulative impacts from the exploration activities. "If five companies get permission, then other companies see the door open and move forward with their applications and this will result in cumulative impacts."

Cumulative Impacts of Improved Access

Improved winter road access to the areas will open up new lands, and this is an added impact. Then there are associated impacts. Outfitters will add small camps because there is a winter road. "The open door effect" that will result in increased traffic that results in increased garbage, noise and general nuisances. Impacts that were not there before the ice winter road. If the road cannot be controlled there will be an impact including additional cabin construction. Cabin construction that is unmanaged and uncontrolled. The Snowmobile association is marking trails and opening the land up to more and more people and this is also causing an impact. Trails are being overtaken by other users.

"Need signs to let people know this is Akaitcho Lands. "You are entering Akaitcho Lands" We need rules in place to manage lands. Need visible rules."

Cumulative Impact Valued Ecosystem Components

Members reiterated that they were very concerned about what might happen to the moose, muskrat, beaver, fish, water and wildlife habitat, beavers, bald eagles (raptors), plants, trees, grasslands, wetlands for the ducks.

There was discussion about a land freeze on the areas to protect them from development.

Cumulative Archaeological and Heritage Impacts

Members wanted the PWHC notified that its information is incomplete and that they should note that in all communications

Members noted that the fishermen at Wool Bay will be pushed out write to DFO about water and fisheries issues.

There is a suggestion to have a community survey to determine whether people want mining or not. Rachel Ann discussed going house to house about getting a petition signed against the development.

In two weeks Chiefs of Dene Nation will be meeting to discuss things so it is an opportunity to present the issues to broader community.

Chief Darrel Beaulieu said we need to compile and consolidate all the existing information that the YKDFN currently has.