

Mackenzie Valley Environmental Impact Review Board

Box 938 , 5102-50th Avenue, Yellowknife, NT X1A 2N7

From: Sherry Sian Fax: (867) 766-7074

Phone: (867) 766-7063

Date: Sept. 30, 2003 Pages: 26 including this page

To: Distribution Fax:

CC: Bob Wooley

Re: Previous Comments on Draft Cumulative Effects Study (EA-03-002, EA-03-003, EA-03-004, NSV
EA-03-006)

NOTES:

For those of you wishing to see the complete compilation of comments on Gartner Lee's Draft Cumulative Effects Study, please see the following submissions.

This transmission may contain information that is confidential and privileged. It is intended solely for the use of the addressee and protected by legislation. If you have received this fax transmission in error, please call (867) 766-7050 (collect) and destroy any pages received. Thank you.

Todd Burlingame	Chair	(867) 766-7059TBurlingame@mveirb.nt.ca
Vern Christensen	Executive Director	(867) 766-7055VChristensen@mveirb.nt.ca
Kirsten Berg	Administration Assistant (casual)	(867) 766-7050 Secretary@mveirb.nt.ca
Bridgette Larocque	Finance & Administration Officer	(867) 766-7054BLarocque@mveirb.nt.ca
Karen MacArthur	Traditional Knowledge Coordinator	(867) 766-7060KMacArthur@mveirb.nt.ca
Sherry Sian	Environmental Assessment Officer	(867) 766-7063SSian@mveirb.nt.ca
Martin Haefele	Environmental Assessment Officer	(867) 766-7053MHaefele@mveirb.nt.ca
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Roland Semjanovs	Communications Officer	(867) 766-7051RSemjanovs@mveirb.nt.ca

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Fish Habitat Management
Suite 101, 5204-50th Avenue
Yellowknife, Northwest
Territories
X1A 1E2

Your file *Votre référence*

Our file *Notre référence*

SC02167
SC03002
SC03022
SC03031

September 17, 2003

Sherry Sian
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
Box 938, 5102-50th Avenue
Yellowknife, NT
X1A 2N7

RE: Draft Cumulative Effects Study (Draft CE Study) from Gartner Lee.

Dear Ms. Sian:

The Department of Fisheries and Oceans – Fish Habitat Management (DFO) received the Draft Cumulative Effects (CE) Study Report via fax on September 5, 2003. DFO notes that it also received via E-mail a revised Draft CE Study Report on September 12, 2003. DFO was not aware, until today that the E-mailed draft was different from the originally faxed version. Although we have not provided comments on the revised Draft CE Study Report, we understand that the remaining sections of the report (i.e. cumulative effects assessment) are forthcoming and we will have an opportunity to review the final draft of the CE study. The following comments are based on the September 5, 2003 Draft CE Study Report.

Generally, DFO found it difficult to review the report as presented. For the final draft, DFO assumes the maps and matrix will be properly labelled and better explained.

Section 4.3.5 Fish refers to a report but is not properly referenced or noted. The author should note whether the quotas are in pounds or kilograms. Also it is not clear whether these numbers are annual quotas and annual harvests. It is not clear why the author did not include a traditional use section given that cultural and heritage concerns have been raised. Clarification is required.

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Canada

included in the scope of assessment. It is not also clear if Diamonds North exploration work falls within the regional study boundary. It is suggested that a full listing of all past land use permits be obtained.

There appear to be some discrepancies within this report versus the information provided in the Developer's Assessment Reports (DAR). For instance, the Draft CEA Study mentions on page 27 and page 30 that large diameter casing will be utilized for on-ice drilling although this was not stated in the DARs. Clarification is required.

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I very quickly glanced at the revised Draft CE Study and noted on page 33, Table 7 – that the author should distinguish between quota (409 tonnes per annum or total between 1980-2002) versus actual harvest?

If you have any questions or require clarification, please call me at (867) 669-4912 or Dave Balint at (867) 669-4926.

Sincerely,

Elaine Blais

Elaine Blais

Area Habitat Biologist

Fish Habitat Management-Western Arctic Area

DB/EB

Cc: Julie Dahl, Habitat Chief, Western Arctic Area

Canada



Box 2514, Yellowknife, N.W.T. X1A 2P8

Detah Ph.: (867) 873-4307

(867) 873-8951

Fax: (867) 873-5969

September 17, 2003

Todd Burlingame
Chair, Mackenzie Valley Environmental Impact Review Board
Box 938, 200 Scotia Centre, (5102-50th Avenue),
Yellowknife, NT, X1A 2N7
Fax: (867) 766-7074

RE: Comments on the Draft Regional Cumulative Effects Study for Drybones Bay and Wool Bay (CE Study)

Dear Mr. Burlingame,

The Yellowknives Dene First Nation (YKDFN) is pleased to submit the following comments, without prejudice, regarding the draft regional cumulative effects study for the Drybones and Wool Bay areas.

Reasons for Referral to Environmental Assessment

The draft CE Study states the referrals were made based on concerns about potential cumulative effects to the area.


Issues

1. The reasons for referral are public concern and cumulative effects as shown by the excerpt (figure 1) of the Snowfield Development Corporation Mackenzie Valley Land and Water Board's (MVLWBs) referral to environmental assessment.
2. The CE study is incorrectly interpreting the MVLWBs reasons for referring the developments to environmental assessment. The CE study suggests "public concern about potential cumulative effects" as the only reason for referral. This is incorrect. The reasons for referral include:
 - a. Public concern caused by the proposed development.
 - b. The development might cause significant adverse (cumulative) environmental impacts.
 - c. Aboriginal interest that warrants further consideration before further action is taken.

**Snowfield Development Corporation, MV2003C0023 Referred
Diamond Exploration, Drybones Bay Area**

PRELIMINARY SCREENING DECISION	
<input checked="" type="checkbox"/>	Outside Local Government Boundaries
<input type="checkbox"/>	The development proposal might have a significant adverse impact on the environment, refer it to the EIRB.
<input checked="" type="checkbox"/>	Proceed with regulatory process and/or implementation.
<input checked="" type="checkbox"/>	The development proposal might have public concern, refer it to the EIRB.
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Preliminary Screening Organization
Mackenzie Valley Land and Water Board

Signature: 

June 18, 2003

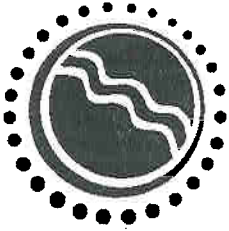
Figure Error! Bookmark not defined.: Source:
<http://www.MVLWB.com/2003html/MV2003C0023/MV2003C0023refer.pdf>

Planning Instruments

The CE Study introduction states that in the absence of planning instruments the Review Board must for every environmental assessment 117. (1) of a proposal for a development include a determination by the Review Board of the scope of the development, subject to any guidelines made under section 120 and (2), consideration of, (a) the impact of the development on the environment including the impact of malfunctions or accidents that may occur in connection with the development, and any cumulative impact that is likely to result from the development in combination with other developments.

Issues

1. The Review Board must consider the statutory provisions of S.117(2)(a) for every environmental assessment. It does not matter if there are any planning instruments in place.
2. Having planning instruments (plans) for the Drybones Bay and Wool Bay areas would not solve the environmental and cumulative issues. The Canada Mining Regulations C.R.C., c. 1516 state that mining exploration work can happen anywhere except:
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Your file *Votre référence*

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- g. The land owned or leased by Her Majesty, unless the grantee or lessee consents or is ordered to consent.

The existence of land use plans or other such documents cannot stop anyone from staking and exploring for minerals. Therefore, land use plans are not "the answer" to the cumulative impact and public concern issues raised by the YKDFN.

Yellowknives Dene First Nation Field Trip

The CE Study states the YKDFN were collecting information on archaeological and heritage resources at the Drybones Bay and Wool Bay areas over a 9 to 11 day period and that the study was conducted as a separate project and was "not related to the cumulative effects project."

Issues

1. Before the CE Study started, the YKDFN informed the Review Board that its consultants (GLL), government, and the proponents could work together and individually and independently prepare their respective reports.
2. The CE study and the fieldwork are related. The YKDFN maintained from the outset that the Review Board consultants could independently participate in the fieldwork and ask any questions of the elders and government representatives they wanted. Whether the Review Board or its consultants chose not take up the offer; that is a separate matter.
3. in a letter send to the Honorable Nault, Minister of Indian and Northern Affairs, the YKDFN state the following:
 - a. The YKFN provided a two and a half week field camp free to the Board's consultants. The Board decided two days of in-field research/consultation was sufficient.
 - b. The Board is ignoring Traditional Knowledge in the assessments and CEA study, even when it has a Traditional Knowledge coordinator on staff. The YKDFN has repeatedly offered to provide meaningful opportunities for the Board to incorporate Traditional Knowledge, but the Board has declined.
 - c. The YKDFN offered proponents and their consultants the opportunity of meeting with elders and scientists at our sponsored fieldwork at Drybones and Wool Bay. None of the proponents attended.

The concerns identified for Mr. Nault remain. The CE Study would have even better if the consultant stayed to the full length of time offered, and actively engaged the elders and scientists on the fieldtrip.

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The Review Board has a Traditional Knowledge coordinator on staff that could have worked with the YKDFN and the Review Board's consultant to help bring together the Consultant's fieldwork with the knowledge of the elders. This is an opportunity to try new ways of working together.

Use and Occupancy Identification

The CE Study indicates that Wool and Drybones Bays are within the traditional territory of the North Slave Métis Alliance.

Issues

1. The consultant has not completed the background research necessary to arrive at the conclusions provided. Therefore, until the consultant has the evidence needed to independently verify these assertions; it is reasonable to withhold making them.

General Comments

The CE study has many pages but little in the way of analysis. That is not good practice. Analysis of information for predictive purposes is necessary to frame the range of impacts on the environment anticipated by the proposed developments, and those developments in combination with other impacts on the environment.

Issues

1. Review of Developer's assessment reports is simply a repetition of what is already included in the DARs, unless it creates new knowledge by way of synthesis and analysis.
2. The CE Study does not include the VEC identified by the YKDFN.
 - a. Raptors,
 - b. moose,
 - c. muskrat,
 - d. fish,
 - e. beaver,
 - f. water,
 - g. wildlife habitat,
 - h. grasslands.
3. The membership also noted that moose are already being impacted because of the low flying planes and helicopters. This cumulative impact was not discussed in the CE Study.
4. The cumulative impact of improved access is not discussed or analyzed.
 - a. "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." Source: YKDFN Public Meeting April 4, 2003 on the Review Board's public record.

The results of the Review Board's first CE study are positive and challenging. The YKDFN have provided some constructive comments and criticism that will contribute to a better decision-making tool for the Board.

The YKDFN commend the Review Board on the CE Study initiative and encourage the Board to consider similar CE Study initiatives in the future.

Sincerely,



Chief Peter Liske - Dettah

C.c. Sherry Sian, Mackenzie Valley Environmental Impact Review Board
Yellowknife, NT. Fax: (867) 766-7074

Yellowknives Dene First Nations Legal Counsel, Edmonton, Alberta
Fax: (780) 424-5852

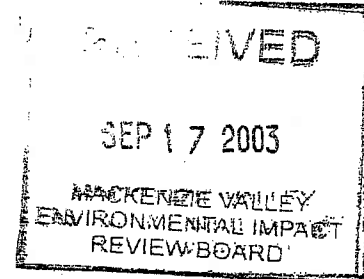
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Sherry Sian
Environmental Assessment Officer
Mackenzie Valley Environmental
Impact Review Board
P.O. BOX 938
YELLOWKNIFE, NT X1A 2N7

Your file - Votre référence

Our file - Notre référence

4.30 PM



Dear Ms. Sian:

Re: Comments on the Draft Regional Cumulative Effects Study for Drybones Bay and Wool Bay

Indian and Northern Affairs Canada, NT Region (INAC), has reviewed two versions of the Draft Regional Cumulative Effects Study for Drybones Bay and Wool Bay submitted by Gartner Lee Ltd. to the Mackenzie Valley Environmental Impact Review Board (Review Board). These versions were received by INAC on September 5th and Sept. 12th, 2003.

Please find below our comments on these draft materials. Due to inadequate time for review, these comments should be taken without prejudice to comments we may submit in future once we have had an adequate time period to review and assess the materials.

General comments on process

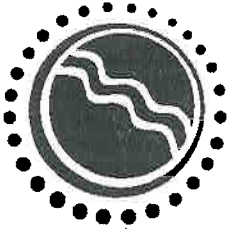
INAC has several concerns regarding the way the cumulative effects study has proceeded and how decisions and processes have been communicated to participants. This report, especially the analysis and recommendations sections should be completed and made available for review and comment prior to any public hearing on the proposed projects. This would ensure a transparent process for all participants. Comments in this letter will be restricted to the content of the two drafts reports. Our comments on process will be communicated in a separate letter to the Review Board.

Specific comments on report contents

1. Section 1. - Introduction: The first sentence states that "diamondiferous kimberlite has been found in the Drybones Bay and Wool Bay areas". This is not correct. In fact, diamondiferous kimberlite has only been found at Drybones Bay. Additional kimberlite has been found to the south and south east of Drybones Bay at Mud Lake, however it has not yet been proven diamondiferous. There is a significant distinction to be made

between the Drybones Bay area and the Wool Bay area which are approximately 20 km. apart and as of yet no kimberlite at all has been discovered in the Wool Bay area.

2. Section 3.1.3 – Sources: There is a wealth of available information that the contractor has not accessed which is pertinent to the study, including recent mineral exploration activities information which is available in the archives at the CS Lord Geoscience center, as well as information pertaining to the history of the Great Slave Lake commercial fishing industry, the Great Slave Lake transportation industry activities (both current and historical), as well as extensive commercial sport fishing and hunting activities and substantial recreational activity, including boating, camping, fishing and hunting. The contractor has not demonstrated taking advantage of these local information sources.
3. Section 3.2.2 and digital maps: The maps were not attached to the report and were only received on the afternoon of Sept. 15th. The methodology states that information collected was recorded as polygons and that this information included an indication of the relative importance of the area for each component. However the maps that were distributed show that information collected on land use, recreational activities, and biological resources and use have been recorded as lines, not polygons. Lines do not give as clear an indication of the area of importance as the size of the area cannot be calculated, and lines cannot be overlaid to determine overlap as effectively. Areas of overlap were originally mentioned as one of the deliverables by the contractor, however given the use of lines and the absence of a reference to a map showing areas of overlap in draft 2 (this was mentioned in draft 1) it seems that this information will not be provided. As well, there was no indication on these maps of the relative importance as previously mentioned.
4. Section 3.4 - Interviews with Industry Associations and Developers: This section mentions that interviews were conducted with the proponents and “information requests were made to Industry Association and other non-mining, industry operators that may have information about or currently utilize these areas”. The contractor has failed to document these efforts in the report. Copies of the actual interview questions used in sessions with industry associations, developers, and government officials should be supplied in an appendix to the report. A list of the questions asked of aboriginal groups and elders should also be supplied. Confidence in the thoroughness of the contractor’s work would be boosted by the addition of a list of people who the contractor tried to interview, and a list of those who were successfully contacted.
5. Section 3.4.2 - Information Recording: this section indicates that information gathered was recorded on maps, in written form and on a “Land Use Activities” map in points and polygons representing foot print size and zones of effects influence, however much of what has occurred in the recent past is not evident on the recently received maps.
6. Section 3.6.1 - Visual tools: We received only one map of each of the two areas whereas this section indicates a total of seven maps (three of each area and a combined overlap map). Where are the other maps? The second draft of the study drops item 4, a results map indicating areas of overlap between maps 1,2, & 3 for each area. Why?



Mackenzie Valley Environmental Impact Review Board

Box 938 , 5102-50th Avenue, Yellowknife, NT X1A 2N7

From: Sherry Sian Fax: (867) 766-7074

Phone: (867) 766-7063

Date: Sept. 30, 2003 Pages: 26 including this page

To: Distribution Fax:

CC: Bob Wooley

Re: Previous Comments on Draft Cumulative Effects Study (EA-03-002, EA-03-003, EA-03-004, NSV
EA-03-006)

NOTES:

For those of you wishing to see the complete compilation of comments on Gartner Lee's Draft Cumulative Effects Study, please see the following submissions.

This transmission may contain information that is confidential and privileged. It is intended solely for the use of the addressee and is protected by legislation. If you have received this fax transmission in error, please call (867) 766-7050 (collect) and destroy any pages received. Thank you.

Todd Burlingame	Chair	(867) 766-7059TBurlingame@mveirb.nt.ca
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Fish Habitat Management
Suite 101, 5204-50th Avenue
Yellowknife, Northwest
Territories
X1A 1E2

Your file *Votre référence*

Our file *Notre référence*

SC02167
SC03002
SC03022
SC03031

September 17, 2003

Sherry Sian
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
Box 938, 5102-50th Avenue
Yellowknife, NT
X1A 2N7

RE: Draft Cumulative Effects Study (Draft CE Study) from Gartner Lee.

Dear Ms. Sian:

The Department of Fisheries and Oceans – Fish Habitat Management (DFO) received the Draft Cumulative Effects (CE) Study Report via fax on September 5, 2003. DFO notes that it also received via E-mail a revised Draft CE Study Report on September 12, 2003. DFO was not aware, until today that the E-mailed draft was different from the originally faxed version. Although we have not provided comments on the revised Draft CE Study Report, we understand that the remaining sections of the report (i.e. cumulative effects assessment) are forthcoming and we will have an opportunity to review the final draft of the CE study. The following comments are based on the September 5, 2003 Draft CE Study Report.

Generally, DFO found it difficult to review the report as presented. For the final draft, DFO assumes the maps and matrix will be properly labelled and better explained.

Section 4.3.5 Fish refers to a report but is not properly referenced or noted. The author should note whether the quotas are in pounds or kilograms. Also it is not clear whether these numbers are annual quotas and annual harvests. It is not clear why the author did not include a traditional use section given that cultural and heritage concerns have been raised. Clarification is required.

On page 31, third paragraph, it is not clear why the third drill site is not considered in the CEA study. It is generally assumed that all components of the proposed project(s) under CEA review would need to be considered and that the study boundaries should at a minimum include the project footprint.

It is not clear whether all past projects have been considered or identified. For example, the previous diamond exploration work conducted by D. Smith should be

Canada

included in the scope of assessment. It is not also clear if Diamonds North exploration work falls within the regional study boundary. It is suggested that a full listing of all past land use permits be obtained.

There appear to be some discrepancies within this report versus the information provided in the Developer's Assessment Reports (DAR). For instance, the Draft CEA Study mentions on page 27 and page 30 that large diameter casing will be utilized for on-ice drilling although this was not stated in the DARs. Clarification is required.

The Draft CEA Study also reports (page 38) that the camp facility for Snowfield Development Corporation was previously permitted. This contradicts information presented in the Land Use Application and DAR for Snowfield. Clarification is required.

The Draft CEA Study (page 38) also indicates that drilling is all land based, using from 1 to 30 sites and drilling between 1 to 20 holes per site. This could result in up to 600 holes if 20 holes are drilled at 30 sites. The Draft CEA Study should therefore be more specific since the original project description suggested that a maximum of 100 holes would be drilled.

The Draft Report includes duplication (at least in what was received by fax). Pages 37 to 40 (fax page 41, 42, 43, 44) are repeated in the report on pages 40 to 43 (fax page 45, 46, 47, 48) which makes the Report difficult to read. The Resolution table in each of these sections are also different.

I very quickly glanced at the revised Draft CE Study and noted on page 33, Table 7 – that the author should distinguish between quota (409 tonnes per annum or total between 1980-2002) versus actual harvest?

If you have any questions or require clarification, please call me at (867) 669-4912 or Dave Balint at (867) 669-4926.

Sincerely,

Elaine Blais

Elaine Blais

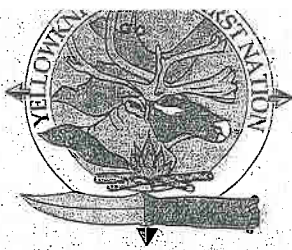
Area Habitat Biologist

Fish Habitat Management-Western Arctic Area

DB/EB

Cc: Julie Dahl, Habitat Chief, Western Arctic Area

Canada



Box 2514, Yellowknife, N.W.T. X1A 2P8

Detah Ph.: (867) 873-4307

(867) 873-8951

Fax: (867) 873-5969

September 17, 2003

Todd Burlingame
Chair, Mackenzie Valley Environmental Impact Review Board
Box 938, 200 Scotia Centre, (5102-50th Avenue),
Yellowknife, NT, X1A 2N7
Fax: (867) 766-7074

RE: Comments on the Draft Regional Cumulative Effects Study for Drybones Bay and Wool Bay (CE Study)

Dear Mr. Burlingame,

The Yellowknives Dene First Nation (YKDFN) is pleased to submit the following comments, without prejudice, regarding the draft regional cumulative effects study for the Drybones and Wool Bay areas.

Reasons for Referral to Environmental Assessment

The draft CE Study states the referrals were made based on concerns about potential cumulative effects to the area.


Issues

1. The reasons for referral are public concern and cumulative effects as shown by the excerpt (figure 1) of the Snowfield Development Corporation Mackenzie Valley Land and Water Board's (MVLWBs) referral to environmental assessment.
2. The CE study is incorrectly interpreting the MVLWBs reasons for referring the developments to environmental assessment. The CE study suggests "public concern about potential cumulative effects" as the only reason for referral. This is incorrect. The reasons for referral include:
 - a. Public concern caused by the proposed development.
 - b. The development might cause significant adverse (cumulative) environmental impacts.
 - c. Aboriginal interest that warrants further consideration before further action is taken.

**Snowfield Development Corporation, MV2003C0023 Referred
Diamond Exploration, Drybones Bay Area**

PRELIMINARY SCREENING DECISION	
<input checked="" type="checkbox"/>	Outside Local Government Boundaries
<input type="checkbox"/>	The development proposal might have a significant adverse impact on the environment, refer it to the EIRB.
<input checked="" type="checkbox"/>	Proceed with regulatory process and/or implementation.
<input checked="" type="checkbox"/>	The development proposal might have public concern, refer it to the EIRB.
<input type="checkbox"/>	Proceed with regulatory process and/or implementation.
<input type="checkbox"/>	Wholly within Local Government Boundaries
<input type="checkbox"/>	The development proposal is likely to have a significant adverse impact on air, water or renewable resources, refer it to the EIRB.
<input type="checkbox"/>	Proceed with regulatory process and/or implementation.
<input type="checkbox"/>	The development proposal might have public concern, refer it to the EIRB.
<input type="checkbox"/>	Proceed with regulatory process and/or implementation.

Preliminary Screening Organization
Mackenzie Valley Land and Water Board

Signature: 

June 18, 2003

Figure Error! Bookmark not defined.: Source:
<http://www.MVLWB.com/2003html/MV2003C0023/MV2003C0023refer.pdf>

Planning Instruments

The CE Study introduction states that in the absence of planning instruments the Review Board must for every environmental assessment 117. (1) of a proposal for a development include a determination by the Review Board of the scope of the development, subject to any guidelines made under section 120 and (2), consideration of, (a) the impact of the development on the environment including the impact of malfunctions or accidents that may occur in connection with the development, and any cumulative impact that is likely to result from the development in combination with other developments.

Issues

1. The Review Board must consider the statutory provisions of S.117(2)(a) for every environmental assessment. It does not matter if there are any planning instruments in place.
2. Having planning instruments (plans) for the Drybones Bay and Wool Bay areas would not solve the environmental and cumulative issues. The Canada Mining Regulations C.R.C., c. 1516 state that mining exploration work can happen anywhere except:
 - a. National Parks,
 - b. cemetery or burial ground,
 - c. on other claim's that have been recorded and has not lapsed,

- d. places where the minerals have been granted or leased by Her Majesty
- e. in places where prospecting for minerals and locating a claim is prohibited by order of the Governor in Council,
- f. land under the administration and control of the Minister of National Defence, the Minister of Energy, Mines and Resources or the Minister of Transport, unless the consent of that Minister has been obtained in writing, or
- g. The land owned or leased by Her Majesty, unless the grantee or lessee consents or is ordered to consent.

The existence of land use plans or other such documents cannot stop anyone from staking and exploring for minerals. Therefore, land use plans are not "the answer" to the cumulative impact and public concern issues raised by the YKDFN.

Yellowknives Dene First Nation Field Trip

The CE Study states the YKDFN were collecting information on archaeological and heritage resources at the Drybones Bay and Wool Bay areas over a 9 to 11 day period and that the study was conducted as a separate project and was "not related to the cumulative effects project."

Issues

1. Before the CE Study started, the YKDFN informed the Review Board that its consultants (GLL), government, and the proponents could work together and individually and independently prepare their respective reports.
2. The CE study and the fieldwork are related. The YKDFN maintained from the outset that the Review Board consultants could independently participate in the fieldwork and ask any questions of the elders and government representatives they wanted. Whether the Review Board or its consultants chose not take up the offer; that is a separate matter.
3. in a letter send to the Honorable Nault, Minister of Indian and Northern Affairs, the YKDFN state the following:
 - a. The YKFN provided a two and a half week field camp free to the Board's consultants. The Board decided two days of in-field research/consultation was sufficient.
 - b. The Board is ignoring Traditional Knowledge in the assessments and CEA study, even when it has a Traditional Knowledge coordinator on staff. The YKDFN has repeatedly offered to provide meaningful opportunities for the Board to incorporate Traditional Knowledge, but the Board has declined.
 - c. The YKDFN offered proponents and their consultants the opportunity of meeting with elders and scientists at our sponsored fieldwork at Drybones and Wool Bay. None of the proponents attended.

The concerns identified for Mr. Nault remain. The CE Study would have even better if the consultant stayed to the full length of time offered, and actively engaged the elders and scientists on the fieldtrip.

The Review Board has a Traditional Knowledge coordinator on staff that could have worked with the YKDFN and the Review Board's consultant to help bring together the Consultant's fieldwork with the knowledge of the elders. This is an opportunity to try new ways of working together.

Use and Occupancy Identification

The CE Study indicates that Wool and Drybones Bays are within the traditional territory of the North Slave Métis Alliance.

Issues

1. The consultant has not completed the background research necessary to arrive at the conclusions provided. Therefore, until the consultant has the evidence needed to independently verify these assertions; it is reasonable to withhold making them.

General Comments

The CE study has many pages but little in the way of analysis. That is not good practice. Analysis of information for predictive purposes is necessary to frame the range of impacts on the environment anticipated by the proposed developments, and those developments in combination with other impacts on the environment.

Issues

1. Review of Developer's assessment reports is simply a repetition of what is already included in the DARs, unless it creates new knowledge by way of synthesis and analysis.
2. The CE Study does not include the VEC identified by the YKDFN.
 - a. Raptors,
 - b. moose,
 - c. muskrat,
 - d. fish,
 - e. beaver,
 - f. water,
 - g. wildlife habitat,
 - h. grasslands.
3. The membership also noted that moose are already being impacted because of the low flying planes and helicopters. This cumulative impact was not discussed in the CE Study.
4. The cumulative impact of improved access is not discussed or analyzed.
 - a. "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." Source: YKDFN Public Meeting April 4, 2003 on the Review Board's public record.

The results of the Review Board's first CE study are positive and challenging. The YKDFN have provided some constructive comments and criticism that will contribute to a better decision-making tool for the Board.

The YKDFN commend the Review Board on the CE Study initiative and encourage the Board to consider similar CE Study initiatives in the future.

Sincerely,



Chief Peter Liske - Dettah

C.c. Sherry Sian, Mackenzie Valley Environmental Impact Review Board
Yellowknife, NT. Fax: (867) 766-7074

Yellowknives Dene First Nations Legal Counsel, Edmonton, Alberta
Fax: (780) 424-5852

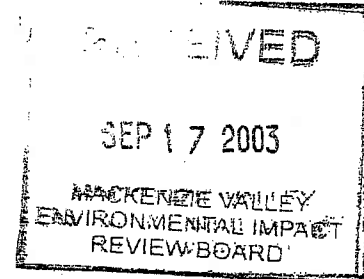
September 17, 2003

Sherry Sian
Environmental Assessment Officer
Mackenzie Valley Environmental
Impact Review Board
P.O. BOX 938
YELLOWKNIFE, NT X1A 2N7

Your file - Votre référence

Our file - Notre référence

4.30 PM



Dear Ms. Sian:

Re: Comments on the Draft Regional Cumulative Effects Study for Drybones Bay and Wool Bay

Indian and Northern Affairs Canada, NT Region (INAC), has reviewed two versions of the Draft Regional Cumulative Effects Study for Drybones Bay and Wool Bay submitted by Gartner Lee Ltd. to the Mackenzie Valley Environmental Impact Review Board (Review Board). These versions were received by INAC on September 5th and Sept. 12th, 2003.

Please find below our comments on these draft materials. Due to inadequate time for review, these comments should be taken without prejudice to comments we may submit in future once we have had an adequate time period to review and assess the materials.

General comments on process

INAC has several concerns regarding the way the cumulative effects study has proceeded and how decisions and processes have been communicated to participants. This report, especially the analysis and recommendations sections should be completed and made available for review and comment prior to any public hearing on the proposed projects. This would ensure a transparent process for all participants. Comments in this letter will be restricted to the content of the two drafts reports. Our comments on process will be communicated in a separate letter to the Review Board.

Specific comments on report contents

1. Section 1. - Introduction: The first sentence states that "diamondiferous kimberlite has been found in the Drybones Bay and Wool Bay areas". This is not correct. In fact, diamondiferous kimberlite has only been found at Drybones Bay. Additional kimberlite has been found to the south and south east of Drybones Bay at Mud Lake, however it has not yet been proven diamondiferous. There is a significant distinction to be made

between the Drybones Bay area and the Wool Bay area which are approximately 20 km. apart and as of yet no kimberlite at all has been discovered in the Wool Bay area.

2. Section 3.1.3 – Sources: There is a wealth of available information that the contractor has not accessed which is pertinent to the study, including recent mineral exploration activities information which is available in the archives at the CS Lord Geoscience center, as well as information pertaining to the history of the Great Slave Lake commercial fishing industry, the Great Slave Lake transportation industry activities (both current and historical), as well as extensive commercial sport fishing and hunting activities and substantial recreational activity, including boating, camping, fishing and hunting. The contractor has not demonstrated taking advantage of these local information sources.
3. Section 3.2.2 and digital maps: The maps were not attached to the report and were only received on the afternoon of Sept. 15th. The methodology states that information collected was recorded as polygons and that this information included an indication of the relative importance of the area for each component. However the maps that were distributed show that information collected on land use, recreational activities, and biological resources and use have been recorded as lines, not polygons. Lines do not give as clear an indication of the area of importance as the size of the area cannot be calculated, and lines cannot be overlaid to determine overlap as effectively. Areas of overlap were originally mentioned as one of the deliverables by the contractor, however given the use of lines and the absence of a reference to a map showing areas of overlap in draft 2 (this was mentioned in draft 1) it seems that this information will not be provided. As well, there was no indication on these maps of the relative importance as previously mentioned.
4. Section 3.4 - Interviews with Industry Associations and Developers: This section mentions that interviews were conducted with the proponents and “information requests were made to Industry Association and other non-mining, industry operators that may have information about or currently utilize these areas”. The contractor has failed to document these efforts in the report. Copies of the actual interview questions used in sessions with industry associations, developers, and government officials should be supplied in an appendix to the report. A list of the questions asked of aboriginal groups and elders should also be supplied. Confidence in the thoroughness of the contractor’s work would be boosted by the addition of a list of people who the contractor tried to interview, and a list of those who were successfully contacted.
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6. Section 3.6.1 - Visual tools: We received only one map of each of the two areas whereas this section indicates a total of seven maps (three of each area and a combined overlap map). Where are the other maps? The second draft of the study drops item 4, a results map indicating areas of overlap between maps 1,2, & 3 for each area. Why?

7. Section 3.7 - Refining Impact Decision Tool: States that "This step involves receiving comments on the draft products and revising the documents and products as appropriate". Given that a substantial portion of the products are missing, including key sections involving the analysis and discussion of the collected information (Section 4.7) and recommendations for proposed mitigations (Section 6), this step cannot be adequately performed.
8. Section 3.8 - Public Hearing: The meaning of this section is unclear. Will a presentation be made by the contractor on this report and the decision making tool at the public hearing?
9. Section 4.1: It is unfortunate that so much effort was expended documenting historical references to the area while the section on present day land and water use (Section 4.1.3) is incomplete. This documents is sadly lacking in details on present conditions and uses of the study area.
10. Section 4.1.4 Heritage Resources: Archeology: This section presents a table (table 2) which is a "Summary of the Archeological Features Identified In A Preliminary Report on the Cultural and Historical Resources of the Drybones and Wool Bay Areas (Draft, August 18, 2003) prepared by Land and Environment, Yellowknives Dene First Nation." The table does not identify which sites are contemporary, which are new and which are previously known and recorded. This should be done in order to allow comment on the sites as a number of them have question marks following the "Resource Site Description", which denotes a level of uncertainty regarding a number of the sites.
11. Section 4.2.4 Hydrology: In that much of the activity in the study areas is governed by the coming and going of the ice, more detail should be include here regarding the limits on accessibility during freeze up and break up which provide protection to the area at critical times of the year and which limit the periods of time available for various activities, which in turn provides protection of the areas as it limits the periods of time the areas can be exposed to specific activities.
12. Section 4.3.2: Reference is made to the Yellowknife-Back Bay and it's littoral zone. It should be noted that the area referenced is outside the regional study area and the reference to (Jackson *et al.*, 1996: 117) is not listed in the bibliography so that one can check the reference for the area in which Jackson *et al* derived their information.
13. Section 4.3.5 - Fish: This section states in paragraph three a number of statistics for the commercial fishing quotas for Area IV. It does not indicate whether the figures are in pounds or tons.
14. Section 5 - Review of the Developers' Environmental Assessment Reports: This is all essentially redundant information in that it is only regurgitation of the DAR's which have already been reviewed and commented on. There is no new information presented by the contractor in this section, which is unfortunate as one would fully expect analysis on the

proposed mitigation measures provided by the proponents in relation to the total combined cumulative effects, both past and current, in the study areas.

15. Section 5.1.1.1 - Proposed Project-Specific Mitigation - Consolidated Goldwin Ventures: In the third paragraph of this section it states that "The third drill site is located on land, approximately 500 meters north of the Hearn Channel. This site is located outside the Local and Regional Study Areas, and is not considered in this project." Why was it not included in the study area?
16. Section 5.1.1.3 - Proposed Project-Specific Mitigation - North American General Resources Corporation: The first paragraph of this section states that "The drill site is located within the Wool Bay Local Study Area, on an unnamed island approximately 250 metres south and east of Wool Bay proper. This is completely incorrect. The drill site is 1.2 kilometres from the nearest point of Wool Bay (over the water to shore and then overland), and is 3.5 kilometres, by water, from the mouth of Wool Bay. This lack of attention to detail is consistent throughout the study. It is particularly disturbing in identifying the drill site location as Wool Bay proper contains at least two cabins used by the people from Dettah.
17. Section 4.4 - Valued Environmental Component Identification: Clarification is required on the term VEC and more care is required in defining what is meant. Both valued environmental component and valued ecosystem component are commonly used and there is a distinct difference between the two and as such they are not interchangeable.
18. Section 4.4.1 - Social, Cultural and Environmental Sensitivities: There are a number of inconsistencies and inaccuracies reported in these tables. Time does not allow us to go into detail, however the contractor should consult with RWED to correct these errors. As well, the statement "Interference with the cultural use of the land as in loss of access to resource is unknown." is confusing and misleading. This should be clarified.
19. Section 4.5 - Identification of Potential Cumulative Effects - 4.5.1 - Existing activities and projects: This section contains a statement that "The regional study area between Dettah and Matonabee Point hosts 60 active mineral claims, 1 active lease and 56 pending leases¹⁹." Further the footnote #19 states that the source for this information is the "Lands Directorate, Department of Indian Affairs and Northern Development.". Both the statement and the footnote are incorrect.
As of Sept. 16th there are app. 70 active mineral claims, app. 20 pending mineral claims, and 3 active mineral leases (mineral claims that have been taken to lease) in the regional study area (see attached map).
Correct information can be obtained from the DIAND Mineral and Petroleum Resources Directorate, NWT Mining Recorder's Office on the 5th floor of the Bellanca building in Yellowknife and the DIAND Operations Directorate, Land Administration, also on the 5th floor of the Bellanca building in Yellowknife.
20. Section 4.5.1: The reference to leases/pending leases and the incorrect footnote attributing the information to the "Lands Directorate" will no doubt cause confusion as to

whether the contractor is talking about surface leases or sub-surface interests, which could be considered vastly different in a cumulative effects assessment. The information presented is specific to mineral interests which was obtained from Mining Recorders Office, Mineral and Petroleum Resources Directorate, DIAND.

20. Section 4.5 - Identification of Potential Cumulative Effects - 4.5.1 - Existing activities and projects - Table 11. - Summary of land and water activities in the regional study area. The information provided in this table contains mostly incorrect information and several omissions. For example:

- There is no permitted quarry in the study area. The MVL&WB did have an application for a quarry, but the application was either withdrawn or is being held in abeyance.
- There is one active Land Use Permit for mineral exploration work in the area.
- There are not 9 applications for exploration in the study area, there are only 4.
- There is one storage permit in the area for a mineral exploration camp and equipment.
- There is one application for scientific geological work in the area.
- No mention is made of the extensive, year round, commercial fishing activities in the area, including winter road access.
- No mention is made of licenced outfitted hunting in the area or the number of licenced outfitters who conduct hunting and fishing in the area.
- There is one recreational cottage lease in the area.
- No mention is made of the well over a dozen shacks, cabins, large cottage, trailers, tent frames and various other structures spread throughout the area.
- There is only one commercial fish plant in the area, not two.
- There are 6 formal, permanent, land based Coast Guard Navigational Aids and at least one, maybe more, seasonal water based nav aids in the study area. Insufficient maps of the study were submitted to DIAND for determining the complete boundary of the study area.

Table 11. contains many inaccuracies and should be properly researched before being resubmitted.

21. Section 4.5.2 - Proposed projects: This section contains a reference to Table 11. It should be corrected to refer to Table 12.

22. Section 4.5.2 - Proposed projects - Table 12. - Access roads: The table does not seem to make it clear that there will only be one ice road to the area that will be utilized by the four exploration companies. It is evident in the applications and in discussions with the companies, as well as based on past activities, that for practical, economic and logistical reasons there would only be one ice road constructed to the area. Short spur roads to primary areas of activity would be opened for the short duration of the activity and then closed.

23. Section 4.5.2 - Proposed projects - Table 12. - Operations - Fuels, North American General Resources Corporation: This section makes reference to 3,000 lb propane tanks (3 - 100 lb containers ...). This needs to be corrected.

24. Section 4.5.3 - Scoping cumulative effects: This section refers to a Table 13 which we presume is the unlabeled chart provided in an 11" x 17" format. The "matrix" as it is called, attempts to quantify the "potential" cumulative effects by identifying the the "possible residual effects of existing activities and developments". The "matrix" needs to be corrected by deleting the reference to Quarry - Excavations under Existing Activities and Developments. (Continued next page).
25. Section 4.5.3 - Scoping cumulative effects: Paragraph two of this section appears to have Tables 11. and 12. mixed up.

INAC would like to thank the Mackenzie Valley Environmental Impact Review Board (the Review Board) for the opportunity to comment on the Draft Regional Cumulative Effects Study for Drybones Bay and Wool Bay Developments. If you require clarification on our comments please contact either Lionel Marcinkski, at 669-2591, Miki Promislow, at 669-2616, or Fraser Fairman at 669-2587.

Sincerely,



Miki Promislow
Environment and Conservation
Indian and Northern Affairs Canada

From: Gavin_More@gov.nt.ca
Sent: Wednesday, September 17, 2003 4:33 PM
To: Sherry Sian
Cc: Jane_McMullen@gov.nt.ca
Subject: FW: CE Document

Hi Sherry

Further to the email sent from Jane regarding Raymond Bourget's comments, I am in receipt of comments from Prince of Wales Museum staff. These are attached.

Given that we have used email submissions, I won't redraft these items into a single letter as I had intended [unless requested by yourself].

Gavin

-----Original Message-----

From: Kathleen Groenewegen /YK /ECE
Sent: September 10, 2003 10:31 AM
To: Gavin More /YK /RWED
Cc: Tom Andrews /YK /ECE
Subject: RE: CE Document

Hi Gavin,

Tom and I have reviewed the draft Regional Cumulative Effects Study for the Drybones/Wool Bay area and, together, offer the following comments regarding the cultural/heritage contents:

As previously expressed regarding the Developer's Assessment Reports, we are unable to provide substantial comments until the archaeological assessment report has been received from Callum Thomson and subsequently reviewed; his report is not legally required to be submitted until March 31, 2004.

p.12/13, Visual Tools: Gartner Lee Ltd. refers to maps that were produced that detailed cultural/heritage resources. We ask that these maps not be available for public attention, and that no further maps that contain such information be produced.

p.17, Heritage Resources: Archaeology: The 4th site in the list refers to Old Fort Resolution. This is an error, and should be replaced with Old Fort Providence. Also on page 17, Gartner Lee Ltd. states that there were 6 previously known archaeological sites, but on page 19, the footnote refers to only 4 previously known archaeological sites.

p.17, footnote: Gartner Lee Ltd. states that Borden numbers are issued by Artefacts Canada in the Department of Heritage Canada. This is an error, and should be replaced with the Archaeological Sites Registry Office at the Canadian Museum of Civilization.

Please do not hesitate to contact Tom or myself, should you have any questions or concerns.

Thank you,
Kathleen

GIS Assistant
Prince of Wales Northern Heritage Centre
Education, Culture & Employment
Government of the NWT
Yellowknife, NT

867-873-7258
867-873-0205 fax
email: kathleen_groenewegen@gov.nt.ca
visit our website at <http://pwnhc.ca>

Sherry Sian
From: Gavin_More@gov.nt.ca
Sent: Wednesday, September 17, 2003 4:39 PM
To: Sherry Sian
Subject: FW: CE Document

Hi Sherry

I'm battling through the 64 new emails I received and have found one more brief set of comments.

Gavin

-----Original Message-----

From: Elise Keppel /YK /ECE
Sent: September 17, 2003 8:09 AM
To: Gavin More /YK /RWED
Subject: RE: CE Document

Gavin,

Neither the individual DAR's nor the CE document for Drybones Bay included any information on #'s of employees to be hired, approaches to hiring northerners, or involvement in education and training initiatives. Which should these be included in - the DAR's, or the CE document? Those would be the main concerns from ECE.

Thank you :)
Elise

-----Original Message-----

From: Gavin More /YK /RWED
Sent: Tuesday, September 09, 2003 9:25 AM
To: Tom Andrews /YK /ECE; Deb Archibald /YK /RWED; Raymond Bourget /YK /RWED; Michael Brown /YK /DOT; Ernie Campbell /YK /RWED; Dean Cluff /YK /RWED; Kathleen Groenewegen /YK /ECE; Ken Hall /YK /RWED; Elise Keppel /YK /ECE; Andrew Langford /CCINET; Philip Lee /YK /RWED; Steven Matthews /YK /RWED; Angela Plautz /YK /DOT; Deana Twissell /CCINET
Subject: FW: CE Document

Hi

This came out in fax on Aug 29. Please review and send comments by Sept 16 (sooner would be appreciated). Deadline for my consolidated submission is Sept 17.

Thx

Gavin More
Manager, Environmental Assessment

-----Original Message-----

From: ssian /unix [mailto:ssian@mveirb.nt.ca]
Sent: September 9, 2003 7:20 AM
To: Gavin More /YK /RWED
Subject: RE: CE Document

Sherry Sian, M.E.Des.
Environmental Assessment Officer
MVEIRB
Box 938, 5102 - 50th Avenue
Yellowknife, NT X1A 2N7
Phone: (867) 766-7063
Fax: (867) 766-7074
e-mail: ssian@mveirb.nt.ca

-----Original Message-----

From: Gavin_More@gov.nt.ca [mailto:Gavin_More@gov.nt.ca]
Sent: Monday, September 08, 2003 4:41 PM
To: Sherry Sian
Cc: Alan Ehrlich
Subject: RE: CE Document

Hi Sherry

Could you resend the draft ce document. I have the fax sent under Alan's name but I can't find an electronic version (the later helps me circulate to the other departments, etc).

Thx

Gavin

-----Original Message-----

From: ssian /unix [mailto:ssian@mveirb.nt.ca]
Sent: September 8, 2003 2:06 PM
To: Anne.Wilson /unix; atgovt /unix; cpawsnwt /unix; Gavin More /YK /RWED; kris /unix; marcinkoskil /unix; mvaydik /unix; mike.fournier /unix; paterson /unix
Cc: TerraFirma /unix; lstephenson /unix; stephmat /unix
Subject: Snowfield Development Corp. (EA-03-006) - Information Requests

Please make submissions by the end of day September 12, 2003.

Sherry Sian, M.E.Des.
Environmental Assessment Officer
MVEIRB
Box 938, 5102 - 50th Avenue
Yellowknife, NT X1A 2N7
Phone: (867) 766-7063
Fax: (867) 766-7074
e-mail: ssian@mveirb.nt.ca

From: Shelagh Montgomery [smontgomery@theedge.ca]
Sent: Wednesday, September 17, 2003 4:17 PM
To: Sherry Sian
Subject: Re: Draft CE Study

Hi Sherry,

I just left you a phone message, but figured I ought to pop off a quick e-mail as well. I was going over the draft CE study for Drybones and Wool Bays prepared by Gartner Lee. I appreciate the opportunity to review reports before they are finalised for the Board but in this instance I don't understand the purpose of reviewing an incomplete draft. I'd be very interested in having more information about the "impact decision tool" that is identified as one of the "Milestones/Deliverables" but otherwise not really addressed, beyond a brief description. I'd also like to see the "Analysis and discussion" section (s. 4.7) which is altogether absent. Will we be given the opportunity to see a "final draft" before it goes to the Board?

I would like to add that in what I did see in the report provided, I am pleased that socio-economic and cultural issues are being taken into consideration along with biophysical issues in the CE overview.

Regards,

Shelagh

Sherry Sian wrote:

> It has been brought to my attention that some parties on the e-mail
> distribution list may not have received the CE Study last week. In
> this event, please review the attached documents (the fax cover with
> direction and the Report).

> Please call or send me an e-mail if you have any questions or
> concerns.

> Sherry

> _____
> Sherry Sian, M.E.Des.
> Environmental Assessment Officer
> MVEIRB
> Box 938, 5102 - 50th Avenue
> Yellowknife, NT X1A 2N7
> Phone: (867) 766-7063
> Fax: (867) 766-7074
> e-mail: ssian@mveirb.nt.ca

.....
.....
Shelagh Montgomery, PhD
Cumulative Effects Programme Director
Canadian Arctic Resources Committee
1910 50th Street, 3rd Floor Mackay Building

Mailing address:

Sherry Sian

From: BlaisE@DFO-MPO.GC.CA
Sent: Wednesday, September 17, 2003 3:37 PM
To: Sherry Sian
Cc: DahJ@DFO-MPO.GC.CA; BalintD@DFO-MPO.GC.CA
Subject: CumulativeEffectsDraftcommentsSept 12, 2003

Our comments.....



Fisheries
and
Oceans

Pêches
et Océans

Fish Habitat Management
Suite 101, 5204-50th
Avenue
Yellowknife, Northwest
Territories
X1A 1E2

Your file *Votre référence*

September 17, 2003

SC02167
SC03002
SC03022
SC03031

Sherry Sian
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
Box 938, 5102-50th Avenue
Yellowknife, NT
X1A 2N7

RE: Draft Cumulative Effects Study (Draft CE Study) from Gartner Lee.

Dear Ms. Sian:

The Department of Fisheries and Oceans - Fish Habitat Management (DFO) received the Draft Cumulative Effects (CE) Study Report via fax on September 5, 2003. DFO notes that it also received via E-mail a revised Draft CE Study Report on September 12, 2003. DFO was not aware, until today that the E-mailed draft was different from the originally faxed version. Although we have not provided comments on the revised Draft CE Study Report, we understand that the remaining sections of the report (i.e. cumulative effects assessment) are forthcoming and we will have an opportunity to review the final draft of the CE study. The following comments are based on the September 5, 2003 Draft CE Study Report.

Generally, DFO found it difficult to review the report as presented. For the final draft, DFO assumes the maps and matrix will be properly labelled and better explained.

Section 4.3.5 Fish refers to a report but is not properly referenced or noted. The author should note whether the quotas are in pounds or kilograms. Also it is not clear whether these numbers are annual quotas and annual harvests. It is not clear why the author did not include a traditional use section given that cultural and heritage concerns have been raised. Clarification is required.

On page 31, third paragraph, it is not clear why the third drill site is not considered in the CEA study. It is generally assumed that all components of the proposed project(s) under CEA review would need to be considered and that the study boundaries should at a minimum include the project footprint.

9/22/2003

It is not clear whether all past projects have been considered or identified. For example, the previous diamond exploration work conducted by D. Smith should be included in the scope of assessment. It is not also clear if Diamonds North exploration work falls within the regional study boundary. It is suggested that a full listing of all past land use permits be obtained.

There appear to be some discrepancies within this report versus the information provided in the Developer's Assessment Reports (DAR). For instance, the Draft CEA Study mentions on page 27 and page 30 that large diameter casing will be utilized for on-ice drilling although this was not stated in the DARs. Clarification is required.

The Draft CEA Study also reports (page 38) that the camp facility for Snowfield Development Corporation was previously permitted. This contradicts information presented in the Land Use Application and DAR for Snowfield. Clarification is required.

The Draft CEA Study (page 38) also indicates that drilling is all land based, using from 1 to 30 sites and drilling between 1 to 20 holes per site. This could result in up to 600 holes if 20 holes are drilled at 30 sites. The Draft CEA Study should therefore be more specific since the original project description suggested that a maximum of 100 holes would be drilled.

The Draft Report includes duplication (at least in what was received by fax). Pages 37 to 40 (fax page 41, 42, 43, 44) are repeated in the report on pages 40 to 43 (fax page 45, 46, 47, 48) which makes the Report difficult to read. The Resolution table in each of these sections are also different.

I very quickly glanced at the revised Draft CE Study and noted on page 33, Table 7 - that the author should distinguish between quota (409 tonnes per annum or total between 1980-2002) versus actual harvest?

If you have any questions or require clarification, please call me at (867) 669-4912 or Dave Balint at (867) 669-4926.

Sincerely,

Original Signed by

Elaine Blais
Area Habitat Biologist
Fish Habitat Management-Western Arctic Area

DB/EB

Cc: Julie Dahl, Habitat Chief, Western Arctic Area

9/22/2003

Sherry Sian

From: Jane_McMullen@gov.nt.ca
Sent: Wednesday, September 17, 2003 3:00 PM
To: Sherry Sian
Cc: Raymond_Bourget@gov.nt.ca; Jason_McNeill@gov.nt.ca; Gavin_More@gov.nt.ca
Subject: Drybones CE report - GNWT comments



BDY.TXT (199 B) FW: Revised
Developer's Assess..

As requested.

Raymond

* -----Original Message-----

* From: Raymond Bourget /YK /RWED

* Sent: Tuesday, September 02, 2003 4:53 PM

* To: Gavin More /YK /RWED; Jason McNeill /YK /RWED

* Subject: RE: Revised Developer's Assessment Report for CGV (EA-03-002)

* I Have read through the above noted report and have the following comments:

* Table #'s referred to in body of report are incorrect.

* Example - Page 13 refers to table 1 listing fish species.

* Table 1 is a conformity table. Page 14 refers to table 2 listing wildlife species. Table 2 is not wildlife.

* Table 6, the Wildlife Table includes: Arctic Fox, Arctic Ground Squirrel, Arctic Hare, grizzly Bear and Northern Flying Squirrel. I am not aware of any reports of these species in the area. If the report writer is aware of any reports RWED would be very interested in seeing them.

* Table 6, lists ermine and lists shorttail weasel. These are the same animal.

* Page 11 reference to effects on hunting. The 3rd drill area is within an area identified as an area where people harvest moose.

* Page 11 reference to sound effects on wildlife. Statement made that this is not an immediate site for wildlife and most wildlife would be hibernating. The drill sites are all immediate wildlife sites, as per discussions with Yellowknives Dene. Particularly drill site 3. The statement that most of the wildlife would be hibernating is incorrect. Of the species listed on table only the Arctic Ground Squirrel and the bears hibernate. the rest are all active during winter.

* Table 8 lists Yellow perch. I do not believe that yellow perch are found in the area.

* Raymond

Sherry Sian

From: paul cowley [cowleypgeo@hotmail.com]
Sent: Tuesday, September 16, 2003 9:18 AM
To: Sherry Sian
Cc: paul@gold-city.com
Subject: RE: NAGR Comments to Draft Cumulative Report

Hi, Sherry:

On the Draft Cumulative Report, when will we be able to review the outstanding maps and sections? And the Yellowknives' report?

I will participate in the pre-hearing conference by phone. Let me know the details on how to link in. Any idea how long it will go and time of day? I am planning on leaving that day for an out-of-town field job. I guess if it is too late in the day I would be able to join the conference.

Paul Cowley

>From: "Sherry Sian"
>To: "paul cowley"
>Subject: RE: NAGR Comments to Draft Cumulative Report
>Date: Mon, 15 Sep 2003 15:43:49 -0600
>
>Hi Paul,
>
>
>
>This note is to confirm receipt of your submission. The final report
>will be released to the parties no later than Sept. 26, 2003. The
>mechanism for providing your comments and developing mitigations will be
>forthcoming after the Review Board's meeting this week.
>
>
>
>Also, will you be participating in the Pre-Hearing Conference on Sept.
>23, 2003 by phone or e-mail?
>
>
>
>Cheers,
>
>Sherry
>
>

>Sherry Sian, M.E.Des.
>Environmental Assessment Officer
>MVEIRB
>Box 938, 5102 - 50th Avenue

9/22/2003

North American Resources Corporation

80-8190 King George Highway

Surrey, BC

V3W 5B7

September 15, 2003

Mackenzie Valley Environmental Impact Review Board
Box 938, 5102-50th Avenue,
Yellowknife, NT, X1A 2N7

Attention: Sherry Sian

Dear Shelly:

Re: Draft Cumulative Effects Study from Gartner-Lee

After reviewing the Regional Cumulative Effects Study for Drybones Bay and Wool Bay dated September 2003, sent out September 5, 2003, I have the following comments for consideration.

1. First paragraph of Introduction page 1, line 1 needs correction and should read: "Diamondiferous kimberlite has been found in the Drybones Bay area, resulting in increased exploration activities." No kimberite has been found in Wool Bay area.
2. We consider the Local Study Area dimensions of 10km diameter referred on page 3 Section 1.4.2. too large and support a <1 kilometre radius local study area.
3. There is a reference on page 8 to the *Preliminary Report on the Cultural and Historical Resources of the Drybones and Wool Bay Areas, August 18, 2003* provided to Gartner-Lee as a source of information. When will this report be available to the Developer's so we can design mitigating measures to areas of concern in a timing manner?
4. There are references to polygon maps on page 9-13. Maps are not included at this stage to comment on. I would like to make at least a generalized comment until maps are provided for further comment. Polygon maps can be regional and generalized and potentially misleading depending on the topic, whereas point data is site specific. Proper consideration needs to be made of the appropriate representation of each topic. Also, on page 13, first paragraph, second line, I can see how the size of a polygon can depict range but I can't see how the size of a polygon can depict density. Wouldn't density be depicted by, say a pattern since shading already depicts confidence of information.
5. Several sections to this draft remain unavailable including 4.1.3, 4.4.3, 4.5 and 5.0. When will these sections be available for comment?
6. In section 4.1.4, the six archaeological sites provided by PWNHC and listed should have a qualifier beside each, geographically relating (in general) to the Drybones or Wool Bay areas. Also, it should be reiterated that the search radius was 5 kilometers for the project areas.

7. There is a reference to an Appendix B regarding information provided by the North Slave Metis Alliance. When will this report be available to the Developer's so we can design mitigating measures to areas of concern in a timing manner?
8. Page 33, Section 4.4.1.3, first paragraph should be corrected to read: "The drill site is located within the Wool Bay Local Study Area **centered around** on an unnamed island approximately 250 metres south and east of Wool Bay proper."

Please consider these comments for your review. I would like to comment further on the outstanding maps and sections once they are available. My contact numbers remain (604)202-7009 and fax (604)682-6577.

Yours truly,

Paul S. Cowley, P.Geol.
Vice President Exploration