

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

12 February 2007

Martin Haefele
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
P.O. Box 938, 5102 – 50th Ave.
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Dear Martin:

EA0607-003 Ur Energy Inc. – Screech Lake Project, Post Hearing Recommendations

The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) and the Department of Environment and Natural Resources (ENR) have reviewed the above development application and provide the following recommendations based on the BQCMB's mandate under the *Beverly and Qamanirjuaq Barren Ground Caribou Management Agreement* and ENR's mandated responsibilities under the *Wildlife Act*.

These recommendations replace the initial recommendations submitted to MVEIRB by the BQCMB on behalf of the BQCMB and GNWT at the public hearing on 16th January 2007 (i.e., Part A of presentation). Revisions were required to incorporate and address changes to Ur-Energy's proposed activities and their scheduling as presented at the hearing and discussed during question periods.

Recommendations from BQCMB and GNWT-ENR

1. MVEIRB should not accept the statement from Ur-Energy that the residual impacts to caribou will be "minor", or that cumulative impacts will have a "negligible environmental consequence".

- No evidence is provided to support the assumptions upon which their conclusions concerning impact significance are based.
- The screening report filed with the application provides "a cursory description of the physical and biological environments of the Screech Lake target area" (p. 59), which is not adequate to support the conclusions made about potential impacts to caribou, cumulative effects, or the significance of either category.

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2. If this development is allowed to go ahead, permit conditions should include:

a) *For exploration in 2008 and subsequent years:*

- All activities should occur between January 1st and April 30th, as specified by the developer in their response to MVEIRB's information requests.
- If the developer wishes to operate in the project area outside this time period, proposed operating procedures and mitigative measures must be approved by GNWT-ENR and BQCMB.

b) *If exploration occurs in 2007:*

- Activities can occur until April 30th.
- Activities should not occur during May, when caribou cows are migrating towards their respective calving grounds (spring migration).
- If required, exploration activities may resume and be completed during June, but not extend beyond June 30th. However, operations may only resume during this period if calving cows are not present within the regional study area.

c) *Measures to be followed during operations:*

- i. If caribou are encountered during development the proponent should shut down operations if they approach within 500m of drilling operations/sites.
 - A community member should be hired to monitor caribou movements to determine when caribou are approaching and when they are within 500m of drilling operations/sites.
 - Suspended activities include drilling, aircraft overflights, and ATV or snowmobile use outside the immediate vicinity of the camp.
 - When caribou are further than 500m away operations may resume.
- ii. Minimum altitudes of no less than 300m should be maintained at all times other than landing or taking off. Wildlife should not be approached closer than 500m, chased or harassed by aircraft or other motorized vehicles.
- iii. Avoid concentrations of caribou by low-level aircraft at all times (altitude less than 300m).

d) *Caribou should not be disturbed at water crossings.*

No exploration activities should occur within 5 km of the Thelon River or its tributaries when caribou gather at water crossings.

e) *Ur Energy Inc. will provide the GNWT & BQCMB with records of any caribou sightings* made during the program including information on location (GPS), number and composition (sex and age).

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If you have any questions regarding the above, please contact Leslie Wakelyn, BQCMB Biologist (920-4733), or Joel Holder, ENR Environmental Assessment Analyst (920-6106).

Please also note that the initial recommendations submitted by the BQCMB alone as Part B of the presentation to the public hearing on January 16th remain unchanged.

Thank you for providing us with the opportunity to comment on this application.

Sincerely,


Jerome Denechezhe
BQCMB Chairperson

cc. Tom Beaulieu, Associate Deputy Minister, GNWT-ENR

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FROM: ROSS THOMPSON - BQCM B.

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ADDITIONAL NOTES:

