Attachment #1:

Land Use Planning Process Considerations from the Public Records of EA's 0708-002 through 0708-005

Introduction

The Review Board notes that Indian and Northern Affairs Canada (INAC) and other parties are in the beginning phases of developing an *Upper Thelon Land and Resource Management Plan*. The environmental assessments of proposed developments by Uravan Minerals Inc. and Bayswater Uranium Corporation identified a variety of issue areas and recommendations that may be relevant to the studies and consultations associated with this fledgling planning process.

The Review Board further notes that INAC's December 7, 2007 letter introducing the proposed process for developing the *Upper Thelon Land and Resource Management Plan* envisioned the Review Board playing a role. Specifically, it proposed that the Review Board might "participate in discussions to finalize the scope of the environmental and cultural/traditional knowledge studies" in support of the *Upper Thelon Land and Resource Management Plan* process.

Given that the proposed planning process is still in its infancy, the Review Board has provided the following list of documents from these environmental assessments (Table 1), along with a table outlining evidence and opinion brought forward in those documents (Table 2) which might merit consideration during the *Upper Thelon Land and Resource Management Plan's* developmental phase. Considerations include species at risk, site-specific and cumulative effects assessments on caribou, alternative economic development activities, and elements of cultural impact assessment in the Thelon geologic basin, among others.

A weblink to the location of each document on the Review Board' online public registry at reviewboard.ca is provided in attachment 1b.

The Review Board notes that these excerpts from the public records of these files are not to be considered exhaustive. The full public record for each of these files is available for consideration by any interested party at any time, either on the Review Board's website public registry at reviewboard.ca or at the Review Board offices in Yellowknife.

List of Acronyms

BQCMB	Beverly and Qaminarjuaq Caribou Management Board
ENR	Environment and Natural Resources (department of GNWT)
GN	Government of Nunavut
GNWT	Government of the Northwest Territories
INAC	Indian and Northern Affairs Canada
LKDFN	Łutsël K'e Dene First Nation
MVLWB	Mackenzie Valley Land and Water Board
NIRB	Nunavut Impact Review Board
NWT	Northwest Territories
NWTMN	Northwest Territory Métis Nation
WWF	World Wildlife Fund – Canada

Table 1: List of Key Documents from EA 0708-002

NOTE: PR# = Public registry numbers are all from the Review Board's environmental assessment EA0708-002: Uravan Minerals Inc's South Boomerang Lake Mineral Exploration Project, unless otherwise noted.

PR#	Document Description	Online registry date	Originator
21	BQCMB Comments on Conduct of EAs in Upper Thelon	02-Nov-07	BQCMB
27	Letter introducing Upper Thelon Plan - INAC Dec 7 2007	10-Dec-07	INAC
28	Boomerang EA Project Description Summary	19-Dec-07	Uravan
34	BQCMB comments on draft work plans	08 -Feb-08	BQCMB
38	NWTMN comments on Draft Work plans	15-Feb-08	NWTMN
42	Canoe Arctic Responses- Evidence Transfer and Scoping	31-Mar-08	Canoe Arctic
43	Treaty #8 Tribal Corp. Evidence Transfer Responses	31-Mar-08	Treaty #8 Tribal Corp.
45	INAC Evidence Transfer Response	07-Apr-08	INAC
46	BQCMB Evidence Transfer Response	07-Apr-08	BQCMB
118	IR responses from INAC submitted after the hearing	30-Apr-08	INAC
133	Submission by Alex Hall regarding Uranium Exploration in the Thelon River system	19-May-08	Canoe Arctic
135	Further Submission - Boomerang Lake EA0708-002	23-May-08	GNWT
139	David Pelley letter regarding Uravan Minerals and Bayswater Exploration	20-May-08	David Pelley
140	BQCMB comments regarding EA0708-002 Boomerang Lake South. Request from May 2, 2008	23-May-08	BQCMB
141	Treaty #8 Tribal Corporation comments regarding submissions on Bayswater and Uravan EAs	28-May-08	NWT Treaty #8 Tribal Corp.
144	Comments from BQCMB to NIRB re: caribou and Garry Lake Project proposed by Uranium North	18-June -08	BQCMB
146	LKDFN submission on Bayswater and Uravan Project EA0708-002,EA0708-003, EA0708-004, EA0708-005	30-May-08	LKDFN

Locations of documents not on the public record for EA0708-002 mentioned in the excerpts below are noted in the text.

Table 2: List of Potentially Relevant Evidence/Comments Raised during EAs0708-002 to -005

The excerpts are listed below by general category. There are 10 categories the Review Board has identified where this material may be of assistance to the Upper Thelon Land and Resource Management Plan process by focusing its attendant studies and consultations. They are:

1. Species at Risk
2. Regional assessment of cumulative effects of mineral exploration, especially on barren ground caribou
3. Estimates of caribou numbers travelling through the Upper Thelon River Basin
4. Impacts on caribou of aircraft overflight and other exploration activities
5. Best management practices for activities around barren land caribou
6. Alternative economic development activities
7. Heritage resources assessment/traditional knowledge studies in the Upper Thelon River Basin
8. Cultural impact assessment and traditional knowledge studies in the Dubawnt River watershed
9. Wilderness and other associated values
10. Existing land use management documents meriting consideration

ISSUE TO CONSIDER	PARTY (PR#)	SUBMISSION DETAILS	WEBLINKS
1) Species at Risk	GNWT (135, pg. 2)	"ENR [Environment and Natural Resources of the Government of the Northwest Territories] notes the following species, and their SARA/COSEWIC designation, that have habitat within, or in the vicinity of the Thelon Watershed: • Peregrine Falcon (special concern) • Grizzly Bear (special concern) • Wolverine (special concern) • Rusty Blackbird (special concern) • Short Eared Owl (special concern) It is uncertain how uranium exploration programs in the proposed project area will affect these species, however for most of the species listed loss of habitat, and/or habitat degradation is a potential threat to species survival. Because of the uncertainty regarding how important the habitat is to the survival of the species at risk listed above, ENR strongly suggests that… further research is done on the possible impacts of development on species at risk in the area".	http://www.mveirb.nt.ca/upload/project_document/1211576728_GNWT%20Additional%20Information%20EA0708-002%20Boomerang%20Lake%20South.pdf

ISSUE TO CONSIDER	PARTY (PR#)	SUBMISSION DETAILS	WEBLINKS
2) Regional assessment of cumulative effects of mineral exploration, especially on barren ground caribou	INAC (45, response #3; 118, response to IR0607-003-14)	45: "On February 28 2007, in response to an information request from the Review Board, INAC provided a description of a cumulative effects study that focuses on the impacts of mineral exploration in the Thelon region for the UR Energy assessment (EA 0607-003). The study continues to move forward…". 118: "In April 2006, INAC Mineral Development Division (MDD) initiated discussions… [about a cumulative effects study] with the Akaitcho Treaty 8 Interim Measures Agreement Office. The MDD was responding to concerns expressed by Akaitcho community members and organizations regarding the cumulative effects of mineral exploration and mining in general and uranium exploration and mining in particular within the watershed… The primary objective… is to help identify geographic areas where exploration activities (past or future) may compete/conflict with traditional or wildlife use." *Review Board note: Additional detail on the proposed terms of reference, milestones and timelines for this cumulative effects study are provided in PR#118. INAC reported in April 2008 (PR#45) that the study continues to move forward but has no information for public use at this time. The Review Board notes that information from this study and others mentioned in submissions by the BQCMB below may be of value in moving forward with the Upper Thelon Land and Resource Management Plan.*	45: http://www.mveirb.nt.ca/upload/project_document/1207688069_INAC%20Evidence%20Transfer%20Responses.pdf 118: http://www.mveirb.nt.ca/upload/project_document/1173306600_INAC%20IR%20Responses%20post%20hearing.pdf
2) Regional assessment of cumulative effects of mineral exploration, especially on barren ground caribou	BQCMB (21, pg. 1; 34, pgs. 1, 4; 46, pgs. 2-6; 140, pgs 5-6; 144, pg. 3)	21: "INAC should commit to and establish a timeline for meaningful… regional assessment of cumulative effects of mineral exploration on barren-ground caribou". 34: "In our submissions to MVEIRB during the environmental assessment of the UR-Energy proposal, the BQCMB recommended… cumulative effects assessment for caribou, and range-wide conservation planning for caribou. Based on the limited information we have to date, it appears that little progress has been made on land use planning for the Thelon region, and the GNWT is just beginning to consider how to conduct cumulative effects assessment for caribou". 34: "…the spatial boundary for assessment of cumulative impacts on caribou should include the entire year-round ranges of the Beverly and Ahiak barren-ground caribou herds. Similarly, the spatial boundary for assessment of cumulative impacts on caribou harvest and caribou-related aspects of aboriginal cultures should include the caribou ranges as well".	21: http://www.mveirb.nt.ca/upload/project_document/1194297910_BQCMB%20response%20re%20conduct%20of%20upper%20Thelon%20EAs_2Nov07.doc 34: http://www.mveirb.nt.ca/upload/project_document/1202755285_BQCMB%20comments%20on%20draft%20work%20plans.pdf

ISSUE TO CONSIDER	PARTY (PR#)	SUBMISSION DETAILS	WEBLINKS
2) Regional assessment of cumulative effects of mineral exploration, especially on barren ground caribou, cont.	BQCMB, cont.	46: *Review Board note: The BQCMB's submission identifies that in addition to project-specific impacts, cumulative effects throughout the ranges of these herds are issues meriting consideration, including:* • "Cumulative effects of disturbance from multiple exploration projects occurring within the same small area in the Upper Thelon region… • Cumulative effects of disturbance from Upper Thelon exploration in combination with the effects of disturbance from ongoing exploration and development on the Beverly calving and post-calving areas in Nunavut and on winter range in Saskatchewan". • Habitat loss – If exploration projects continue to be approved in the upper Thelon area, loss of important migration habitat will likely occur as caribou avoid areas of activity. Key water crossings may be abandoned if industrial activity is encountered near them. • Contamination – If there is any contamination from individual exploration sites, there will be potential for caribou to accumulate this contamination through each year… *Review Board note: In PR#46, the BQCMB also noted the following changes in the regional context that merit further consideration:* 46: "Increasing uncertainty about the population status of the Beverly herd - A June 2007 Beverly calving ground survey found low numbers and density of caribou and calves on the Beverly calving ground during the calving period. Until further information is obtained on the status of the Beverly herd, the precautionary principle should be applied and development should not occur if there are any potential impacts to caribou cows and calves". 46: "Increasing potential for detrimental cumulative effects of exploration and development on Beverly and Ahiak caribou from activities occurring across their year-round ranges". *Review Board note: pages 4-5 of PR#46 spell out in detail activities in Nunavut and Saskatchewan that are of concern to the BQCMB as cumulative effects contributors.* *Review Board note: In PR# 140, the BQCMB make note of other initiatives than the Upper Thelon Land and Resource Management Plan that relate to the assessment of cumulative effects in the general region, which the BQCMB expressed desire to get involved in or see the results of incorporated into expedited land use planning. These include (at pages 5-6):* • "Assessment of cumulative impacts – INAC provided some information to MVEIRB regarding plans for an upper Thelon cumulative effects study over a year ago, which included work related to caribou…	46: http://www.mveirb.nt.ca/upload/project_document/1207689914_BQCMB%20response%20to%20Evidence%20Transfer%20Scoping%20Questions_7Apr08.pdf 140: http://www.mveirb.nt.ca/upload/project_document/1211908396_BQCMB%20comments%20may%202008.pdf

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2) Regional assessment of cumulative effects of mineral exploration, especially on barren ground caribou, cont.	BQCMB, cont.	• GNWT-ENR has initiated a caribou and cumulative effects modeling that will focus initially on Bathurst caribou and mines. No results will be available for some time, and it is unclear if or how they will provide information useful for assessing the cumulative effects of exploration activities on Beverly and Ahiak caribou. • Two INAC-led cumulative effects processes that have been underway in the NWT for many years, the Cumulative Impact Monitoring Program and the Environmental Management Framework (previously the Cumulative Effects Assessment and Management Framework), have not yet developed a means to monitor or assess the cumulative effects of exploration activities on caribou." 144: *Review Board note: The BQCMB provided an additional submission which included comments it submitted to the Nunavut Impact Review Board on Uranium North's proposal to conduct exploration in the Dubawnt Lake area of Nunavut. In that case, the BQCMB identified a series of projects currently known or planned for the area and thus (at page 3)* "recommended a regional assessment of the cumulative impacts of mineral exploration and other land use activities, including activities in the Kivalliq region of Nunavut. From the BQCMB's perspective it is clear that continued assessment of individual projects on a case-by-case basis will not be adequate to ensure that significant adverse eco-systemic and socio-economic effects will be prevented… Regulatory and other territorial and federal government agencies (i.e. Nunavut NIRB, GN, INAC) should be taking action to identify and mitigate potential cumulative effects of human land use activities, including mineral exploration, on barren-ground caribou. This assessment of cumulative effects should occur at a regional scale (i.e., much larger than individual project areas)."	144: http://www.mveirb.nt.ca/upload/project_document/1213820016_BQCMB%20comments%20to%20nirb%20june%2018%202008.pdf
2) Regional cumulative effects ass't., cont.	NWT Treaty #8 Tribal Corporation (43, pg. 2)	[Concerned about] "cumulative impacts of uranium exploration activity (especially helicopter and drill noise) upon Beverly and Ahiak post-calving feeding and migration, particularly in the vicinity of the Thelon River valley".	http://www.mveirb.nt.ca/upload/project_document/1207683609_Treaty%208%20Tribal%20Corp%20Responses.pdf

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2) Regional assessment of cumulative effects of mineral exploration, especially on barren ground caribou, cont.	LKDFN (146, pgs. 3-4)	"One mineral exploration project may not seem like a significant impact to the vast Thelon region. However, we do not assess projects in isolation. The potential for cumulative effects from past, present and reasonably foreseeable future developments is huge, especially given the current high market prices, and we will not "open the door". Various studies, models and frameworks to assess and manage cumulative effects have been proposed, but all are incomplete and many key pieces of information which are required input to these models (e.g., the current population and health status of the Beverly caribou herd) are not yet available. In cases where impacts are uncertain or unknown… the precautionary principle must apply. Until we have the required data to make informed decisions, we will not approve any developments which could potentially jeopardize our way of life".	http://www.mveirb.nt.ca/upload/project_document/1212422862_LKDFN%20WLED%20May%2030,%202008%20%20Ltr..pdf
2) Regional assessment of cumulative effects of mineral exploration, especially on barren ground caribou, cont.	n/a (identified by Review Board)	*The Review Board also notes that the Nunavut Impact Review Board referred Uravan's Garry Lake uranium drilling project to a public review on June 27, 2008 based on, among other things, "cumulative impacts in relation to similar other projects, to caribou and calving grounds". In its Screening Decision Report 08EN037 of June 27, 2008, the Nunavut Impact Review Board also noted (at page 5):* "Parties have expressed cumulative effects concerns regarding projects in this region on numerous occasions. Subsequent recommendations from the NIRB regarding these concerns have been forwarded to the Minister in previous Board decisions, specifically 08EN024 (UR Energy Inc.), 08EN015 (Cameco Corporation – Turqavik-Aberdeen), 08EN022 (Coronation Minerals), and 08EA038 (Pacific Ridge Exploration Ltd.); and included the following recommendation: Territorial and federal government agencies in Nunavut should work together with Regional Inuit Associations, co-management boards and industry to develop an action plan to identify and mitigate potential cumulative effects of human land use activities, including mineral exploration,on barren-ground caribou. This assessment of cumulative effects should occur at a regional scale (i.e. larger than individual project areas). There is little evidence before the [Nunavut Impact Review] Board that the above recommendation has been acted on by the mentioned Parties and consequently it is necessary to include the cumulative effects issue as an issue of concern to NIRB in relation to the activities of this specific project."	http://ftp.nirb.ca/2008%20DECISIONS/08EN037-Uravan%20Minerals%20Inc/080627-08EN037-Screening%20Decision%20Report-OT2E.pdf

ISSUE TO CONSIDER	PARTY (PR#)	SUBMISSION DETAILS	WEBLINKS
3) Estimates of caribou numbers travelling through the Upper Thelon River Basin	Uravan (28, pg. 13)	"Uravan's primary knowledge regarding the types of wild life and wild life movements on the Boomerang property and surrounding region has been obtained predominantly from field observations during periods of active exploration programs, which as noted above, generally occur from July through the third week in September… Barren ground grizzlies are present in the Boomerang area resulting in the installation of an electric perimeter fence around the camp. [In 2006 and 2007] field crews made mention of observing, from time to time, wolves, fox, ptarmigan and moose; albeit consisting of small numbers, e.g., one or two at a time. Approximately 40 muskoxen in herds and individuals were also observed from time to time from field personnel in September. No caribou were observed prior to September, however, caribou herds were observed traversing the area on their annual migration south during the first week in September. Groups of up to 50 caribou could be observed moving by the camp. It is estimate[d] that about 1800 caribou passed through the Boomerang camp during this time (perhaps providing a cost effective opportunity for the caribou collaring program or other potential research programs). From September 5th-19th (when the exploration program ended) the presence of caribou was intermittent and in small numbers."	http://www.mveirb.nt.ca/upload/project_document/1198257610_Boom%20EA%20Project%20Description%20Summary_121907.pdf
3) Estimates of caribou numbers travelling through the Upper Thelon River Basin, cont.	Canoe Arctic (42, pg. 3; 133, pg. 2)	42: Alex Hall of Canoe Arctic Inc. criticized Uravan's large mammal sightings over 2006 and 2007 as "impossibly low". In PR#133 (at page 2), Alex Hall of Canoe Arctic Inc. provides the location of nine crossings where between 1975-2007 "I have observed at least tens of thousands of caribou in a single herd crossing the upper Thelon River in late July or early August". "… I have more experience than anyone else in this area during the June-July-August period. The part of the upper Thelon River containing the mineral claims of Uravan and Bayswater is central to the main migration routes for the Beverly Caribou Herd in spring, summer and fall. It has been my privilege to encounter many hundreds of thousands of caribou migrating through the upper Thelon over the past three decades or more". *The Review Board notes that the specific crossing locations are provided in the Canoe Arctic submission.*	42: http://www.mveirb.nt.ca/upload/project_document/1207935894_Canoe_Arctic_Responses-_Evidence_Transfer_and_Scoping.pdf 133: http://www.mveirb.nt.ca/upload/project_document/1211496350_Alex%20Hall%20submission%20may%2019.pdf

ISSUE TO CONSIDER	PARTY (PR#)	SUBMISSION DETAILS	WEBLINKS
3) Estimates of caribou numbers travelling through the Upper Thelon River Basin, cont.	BQCMB (140)	Submission provides "an updated summary of the importance of the upper Thelon region to caribou" (page 1). (page 2) "An assessment of the importance of the upper Thelon region to caribou should include the following information sources: 1. Traditional knowledge held by people who have used the area in the past, and continue to value the region, including the Akaitcho Dene and the Athabaska Denesuline 2. Information based on observations made by others who know and value the area (such as Alex Hall). 3. Historical and recent information from government surveys. This includes historical survey information, which was compiled and mapped by the BQCMB (http://www.arctic-caribou.com/parttwo/mapatlas.html) and recent surveys which have been conducted by the GNWT Department of Environment and Natural Resources (ENR). 4. Information from tracking collared caribou using satellite technology, which is being conducted by GNWT-ENR." *Review Board note: The BQCMB submission goes on to provide new maps to augment previous information, based on two years of location data for approximately 20-25 adult female caribou. It notes that the maps are based on limited information and do not represent natural variation in range by entire caribou herds over the long-term. Needs to be augmented more in future.* (page 3) "…during the period March 2006 to April 2008, collared Beverly and Ahiak caribou primarily used the proposed Uravan and Bayswater exploration areas in April-May and August-October. This provides further evidence to support the historic survey data for Beverly caribou, which showed that the area is a key migration route for this herd during both spring and fall. Data from surveys and tracking collared caribou both illustrate that the proposed exploration areas have also been used regularly by caribou, both in the past and recent years, as late summer-fall (August-September) and rutting range (October)."	http://www.mveirb.nt.ca/upload/project_document/1211908396_BQCMB%20comments%20may%202008.pdf

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4) Impacts on caribou of aircraft overflight and other exploration activities	BQCMB (34, pg. 2; 46, pg. 3; 140, pg.4; 144, pg. 2)	34: "The MVLWB did not find that the proposed developments might have significant adverse impacts on the environment… conclusions that are not necessarily supported by facts. On example is the conclusion that the impacts of noise will be reversible, which may not be the case if caribou change their spring migration route to avoid disturbance, or if pregnant caribou lose their fetus during or after migration through the development area". 46: "Low elevation surveys disrupt the feeding of caribou cows and calves during July-September, which can affect the growth/survival rates of calves and the condition of cows and whether they will be in good enough shape to breed in the fall". 140: Argue for consideration, alongside other direct and cumulative effects on caribou, of "disturbance from low-level flights, including airborne geophysical surveys, especially during spring migration and late summer (mid-August to mid-September". 144: "Fixed wing and helicopter flights will produce disturbance to caribou… particularly when aircraft take off and land and when they fly at low levels. Airborne surveys, especially those conducted at low elevation and with tight transect spacing, can affect the movements and feeding patters of caribou. This disturbance could have significant negative impacts if the flight path of aircraft crosses over large groups of cows with newborn calves or post-calving groups". *Review Board note: At page 4 of PR#144, the BQCMB had some recommendations related to airborne surveys and low level flights, which are included under #5) Best management practices, below.*	34: http://www.mveirb.nt.ca/upload/project_document/1202755285_BQCMB%20comments%20on%20draft%20work%20plans.pdf 46: http://www.mveirb.nt.ca/upload/project_document/1207689914_BQCMB%20response%20to%20Evidence%20Transfer%20Scoping%20Questions_7Apr08.pdf 140: http://www.mveirb.nt.ca/upload/project_document/1211908396_BQCMB%20comments%20may%202008.pdf 144: http://www.mveirb.nt.ca/upload/project_document/1213820016_BQCMB%20comments%20to%20nirb%20june%2018%202008.pdf
4) Impacts on caribou of aircraft overflight and other exploration activities, cont.	Canoe Arctic (42, pg. 3)	Alex Hall of Canoe Arctic questioned "Bayswater promising to keep their helicopters 300 and 610 metres above the ground so as not to disturb wildlife (when in reality helicopters used in mineral exploration seldom fly more than 50 or 100 metres above ground and harass the hell out of large mammals and canoeists alike)".	http://www.mveirb.nt.ca/upload/project_document/1207935894_Canoe_Arctic_Responses-_Evidence_Transfer_and_Scoping.pdf

ISSUE TO CONSIDER	PARTY (PR#)	SUBMISSION DETAILS	WEBLINKS
5) Best management practices for activities around barren land caribou	BQCMB (140, pg. 7; 144, pgs. 3-4)	140: "Permit conditions [for proposed exploration activities in the upper Thelon] must address the following: • No exploration work should be conducted in the areas proposed for exploration by Uravan and Bayswater during spring migration (mid-March to end of May) • If cows and calves approach the project areas, mitigation measures must be implemented to reduce disruption to feeding from July to September • Exploration activities should be completed by the end of September, to avoid disturbance during the rutting period • Exploration activities should not occur along the Thelon river, as caribou will be crossing the river at numerous places other than at designated crossings (this condition should also be included for tourism reasons)." 144: *Review Board note: The BQCMB noted that Uranium North adopted INAC's Caribou Protection Measures for a project impacting on the Beverly herd in Nunavut. Presumably these are the Caribou Protection Measures for the Inuvialuit Settlement Region (ISR) available on the website http://nwt-tno.inac-ainc.gc.ca/mpf/activity/prspisr_e.htm, which the BQCMB infers should be included in permit conditions for projects with impacts on barren ground caribou. The BQCMB further proposed the following permit conditions in case the Uranium North project is permitted (at pages 3-4):* • "All project activities must be stopped between May 15th and July 15th if caribou cows and/or calves are in the project area… This includes suspending drilling, blasting, flights below 610 m agl [above ground level], and operation of snowmobiles and all-terrain vehicles outside of camp. • Drilling, survey activities and flights below 610m agl should not be resumed unless caribou are at least 5 km away from the areas where these activities are conducted. • No exploration activities should be conducted within 5km of designated water crossings or block or cause diversion to migrating caribou. **Airborne surveys, low-level flights** • Low-level (below 300m agl) surveys, including airborne geophysical surveys, should not be conducted from May to August if caribou cows or cow/calf groups are in the area. • Minimum flight altitudes of 610m should be maintained at all times except when taking off and landing and when required for safety reasons; the amount of time aircraft spend at lower levels should be minimized". *Review Board note: At page 4 of PR#144, the BQCMB also provides recommendations on monitoring and mitigation for impacts on caribou.*	140: http://www.mveirb.nt.ca/upload/project_document/1211908396_BQCMB%20comments%20may%202008.pdf 144: http://www.mveirb.nt.ca/upload/project_document/1213820016_BQCMB%20comments%20to%20nirb%20june%2018%202008.pdf

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6) Alternative economic development activities	Canoe Arctic (42, pg. 1 ; 133, pgs 1, 2)	42: "…the dominant land use of the upper Thelon River during the past 35 years has been by recreational canoeists in summer, and the Thelon River is one of the most important tourism resources in the NWT and Nunavut. Recreational canoeists come from all over North America and Europe every summer to paddle the Thelon River, both on their own and with licensed tourism operators like me…. I have been forced to abandon the 160 km. stretch of the Thelon south of the sanctuary because of mineral exploration". 133: "Uranium mining on any part of this river would be catastrophic to its cultural, wildlife and tourism values".	42: http://www.mveirb.nt.ca/upload/project_document/1207935894_Canoe_Arctic_Responses-_Evidence_Transfer_and_Scoping.pdf 133: http://www.mveirb.nt.ca/upload/project_document/1211496350_Alex%20Hall%20submission%20may%2019.pdf
6) Alternative economic development activities, cont.	BQCMB (46, pg.3; 140, pg. 6)	46: "Potential loss of caribou harvesting opportunities – It is likely that the Beverly and Ahiak herds are decreasing, as are 5 herds to the west in the NWT and Yukon. Additional exploration and development across the caribou ranges may worsen the decline and/or increase the time it takes for the herd to recover. This could result in genuine hardship for people who rely on caribou harvests both for food and as a vital part of their cultures, including the Akaitcho, the Athabaska Denesuline and the Northwest Territory Metis Nation. According to a recent socio-economic study of the value of the Beverly and Qamanirjuaq caribou contracted by the BQCMB, the total annual net economic value of the harvest from the Beverly herd is almost $5 million, including more than $4 million for the domestic harvest and more than $620,000 for the outfitted harvest". 140: "Exploration activities should not occur along the Thelon river, as caribou will be crossing the river at numerous places other than at designated crossings (this condition should also be included for tourism reasons)".	46: http://www.mveirb.nt.ca/upload/project_document/1207689914_BQCMB%20response%20to%20Evidence%20Transfer%20Scoping%20Questions_7Apr08.pdf 140: http://www.mveirb.nt.ca/upload/project_document/1211908396_BQCMB%20comments%20may%202008.pdf
6) Alternative economic development activities, cont.	LKDFN (146, pg. 2)	"Allowing industrial development to proceed will impact the significant tourism potential of the area by changing the recreational and aesthetic values which draw people there from around the world".	http://www.mveirb.nt.ca/upload/project_document/1212422862_LKDFN%20WLED%20May%2030,%202008%20%20Ltr..pdf

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7) Heritage resources assessment/ traditional knowledge studies in the Upper Thelon River Basin	GNWT (135, pg. 2-3)	"It is a long-standing policy in the NWT, and nationally, that developers – rather than the public – are responsible for funding and conducting heritage resource impact assessments (HRIA) related to development projects. The Prince of Wales Northern Heritage Centre (PWNHC) recommends project-specific measures to be implemented and funded by development proponents to ensure that their projects do not place sensitive heritage resources at risk. **Analysis** The PWNHC is concerned that the exploration activities proposed for the Boomerang Lake South project area will impact areas with high potential for unrecorded heritage resources. While an archaeologist has never conducted detailed assessments of these exploration areas, our analysis of the regional archaeological record of the southern Thelon Basin indicates a high probability for the presence of unrecorded heritage resources. **Recommendations** The PWNHC recommends the following measures to reduce the risk of impact to heritage resources in relation to the Boomerang Lake South project: • The project proponent must hire an archaeologist to conduct a heritage resource impact assessment (HRIA) of all areas of potential ground disturbance – including drill sites, camp locations, and access routes – associated with their project before the commencement of development activities. • The project proponent must avoid all heritage resources by a minimum of 100 m during land use operations."	http://www.mveirb.nt.ca/upload/project_document/1211576728_GNWT%20Additional%20Information%20EA0708-002%20Boomerang%20Lake%20South.pdf
7) Heritage resources assess't/TK studies in the Upper Thelon River Basin	LKDFN (146, pg. 2)	"The LKFN and other Denesoline people have a significant history in the upper Thelon basin, due to the high availability of natural resources in the area throughout the year. There is a wealth of documented evidence of harvesting and land use in the area including hunting grounds, traplines, trails, campsites, and cabins. Along with Aboriginal use of the area, there was extensive European use in recent history, and many of the associated historical and archaeological sites remain undocumented".	http://www.mveirb.nt.ca/upload/project_document/1212422862_LKDFN%20WLED%20May%2030,%202008%20%20Ltr..pdf

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8) Cultural impact assessment and traditional knowledge studies in the Dubawnt River watershed	INAC (27, pg. 2)	*Review Board note: The Dubawnt River watershed also falls within the geographic area Indian and Northern Affairs Canada has identified as requiring further study in its proposed Upper Thelon Land and Resource Management Plan – the Thelon geologic basin.* The stated long-term goal for this plan is to "develop a land and resource management plan for the Thelon geologic basin that adequately balances the various interests of all parties and guides development in the region". *Review Board note: There is evidence on the public record for these four environmental assessments that information important to making management decisions is limited for the Dubawnt watershed as well as the Upper Thelon River Basin. There are information gaps related to both the biophysical environment (particularly potential impacts on barren ground caribou) and cultural valuation of the area (particularly but not limited to the location and categorization of likely heritage resources).*	http://www.mveirb.nt.ca/upload/project_document/1197656093_thelon%20plan%20from%20INAC%20dec%207%202007.pdf
8) Cultural impact assessment and traditional knowledge studies in the Dubawnt River watershed, cont.	NWT Treaty #8 Tribal Corporation (141, the portion of the document discussing EA0708-005 Crab Lake)	"The Crab Lake Project is just inside the Dubawnt watershed (though drilling is proposed to take place very close to the height of land between the two watersheds, and immediately adjacent to the Thelon Game Sanctuary)… Though the Crab Lake Project … is therefore somewhat removed from the core area of Akaitcho cultural importance along the Thelon River Valley, the activities' proximity to Beaverhill Lake, the Clarke River, and the Mosquito Lake/Mary Lake/Mantic Lake system is of concern. These areas were all used extensively by ancestral Denesoline, and Beaverhill Lake itself has sustained much more recent use." The submission goes on to say that "Watershed boundaries do not delimit caribou use. Both the Thelon and Dubawnt watersheds are critical post-calving habitat for the Beverly herd, and both the Clarke River forming the southern boundary of the Thelon Game Sanctuary and the Mosquito Lake/MaryLake/Sid Lake/Mantic Lake system are known by the Akaitcho Dene to contain major caribou [water] crossings and migration routes."	http://www.mveirb.nt.ca/upload/project_document/1212011598_s%20Final.pdf

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9) Wilderness and other associated values	Canoe Arctic (42, pg. 2)	"The Northwest Territories and Nunavut have acquired an international reputation as the home of the best wilderness canoeing rivers left on Earth. The Thelon River is second only to the South Nahanni River in popularity amongst wilderness canoeists. These paddlers come from as far away as Australia seeking remote untouched wilderness and solitude, to experience the pristine tundra and to see some of the last free-roaming herds of wild animals left on the planet. For some people it's akin to a religious experience…"	http://www.mveirb.nt.ca/upload/project_document/1207935894_Canoe_Arctic_Responses-_Evidence_Transfer_and_Scoping.pdf
9) Wilderness and other associated values	David Pelly (139, pg. 1)	"Given the vast areas to the east (mostly in Nunavut) that are almost certain to be developed, and the projects already underway in the Slave Province region of NWT, the mineral development opportunities for the future are ample. Setting aside the central corridor of the Thelon watershed will serve the Dene in all the ways they have identified, serve the wildlife which will perish without such protection, and will serve the thousands of Canadians who want to know a small piece of their country's wilderness remains intact".	http://www.mveirb.nt.ca/upload/project_document/1211841534_David%20pelly%20letter%20with%20attached%20article.pdf
9) Wilderness and other associated values	LKDFN (146, pg. 2)	"The Thelon area is also one of the few truly untouched wilderness areas left on Earth, which has value in and of itself".	http://www.mveirb.nt.ca/upload/project_document/1212422862_LKDFN%20WLED%20May%2030,%202008%20%20Ltr..pdf
10) Existing land use management documents meriting consideration	NWTMN (38, pg. 1)	"Although the proposed exploration is not within the current boundaries of the Thelon Game Sanctuary, all activities are planned to be within the Thelon Wildlife Sanctuary Extension and/or the Tyrrell Lake Special Management Area. The Thelon Game Sanctuary Management Plan has been approved by both the Federal and Territorial Governments and also states that mineral exploration is prohibited in the Sanctuary. The Thelon Game Sanctuary Management Plan contains relevant information to be considered in the environmental assessments of these projects". *Review Board note: During the course of these environmental assessments, other parties also identified these documents as well as others as meriting consideration during the development of any regional land use plan.*	http://www.mveirb.nt.ca/upload/project_document/1203095063_NWTMN%20comments%20on%20draft%20work%20plans.pdf