



ᐱᐃᐃᐃᐃᐃᐃᐃᐃ

Avatiligiyiit

Department of Environment

Ministère de l'Environnement

June 30, 06

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensingtrainee@nwb.nunavut.ca

**RE: NWB2BE-KAZ – PACIFIC RIDGE EXPLORATION LTD. – URANIUM
EXPLORATION WATER LICENSE APPLICATION**

Dear Richard:

The Department of Environment (DOE) has reviewed the project proposal from Pacific Ridge Exploration Ltd. for conducting uranium exploration near Kazan River, and has the following comments and recommendations.

1. URANIUM EXPLORATION

We are aware that Nunavut Planning Commission has determined low level exploration for Uranium to be in conformity with the Keewatin Regional Land Use Plan despite the following;

Page 65 of the Keewatin Regional Land Use Plan states:

3.5 - Uranium development shall not take place until NPC, NIRB, NWB and the NWMB have reviewed all of the issues relevant to uranium exploration and mining. Any review of uranium exploration and mining shall pay particular attention to questions concerning health and environmental protection. (A) (CR)

3.6 - Any future proposal to mine uranium must be approved by the people of the region. (A) (CR)

DOE is concerned that the issuing of permits relating to exploration for uranium may lead to an expectation that further development of these projects will be permitted, and proponents should be made aware of the issue.

The Keewatin Regional Land Use Plan conformity requirements stipulate that the completion of a review to address environmental and health related matters on uranium exploration and mining, in advance of any uranium development. NPC has stated that there needs to be a full discussion and debate of all the issues as well as further moral and political questions of Kivalliq residents, involving community organizations, co-management bodies, and government before uranium development is considered. In particular, the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) should be consulted given that it was established as a direct result of the concerns of communities in the Thelon basin, particularly Baker Lake, over uranium development.

DOE recommends that actions and conformity requirements as outlined in the Keewatin Land Use Plan be concluded before any further permitting of uranium development including uranium exploration in the Kivalliq region; whereby NWB, NPC, NIRB, and the NWMB conduct a review of all issues relevant to uranium exploration and mining, and that the proponent engage in community consultations.

2. ABANDONMENT & RESTORATION PLAN

Based on the *Mineral Exploration Guidelines for Saskatchewan (2005)*, DOE has the following recommendations to make:

- Drill mud solids or cuttings with a uranium concentration greater than 0.05% are to be disposed of down drill holes and be sealed.
- Any drill hole that encounters uranium mineralization with a content greater than 1.0% over a length of more than 1 meter with a meter-percent concentration greater than 5.0 will be sealed by cementing (grouting) over then entire length of the mineralization zone and not less than 10 meters above or below each mineralization zone.
- Drill holes are to be sealed by cementing the upper 30 meters of bedrock or the entire depth of the hole, whichever is less.
- Gamma radiation level of a uranium core storage area is advised to follow the standards below. Gamma levels measured at 1 meter from surface for a storage area should be reduced to 1.0 µSv and in no instance will the level be allowed to exceed 2.5 µSv. If the radiation level of the cores is greater than 1.0 µSv, cores should be placed at a fenced-in area.

3. WILDLIFE

Raptor Nesting Areas

The raptor nests occur throughout the permit area. DOE recommends the proponent not to disturb nesting raptors from 15 April to 1 September by staying

at least 1.5 km away from them when in transit by aircraft, and to avoid approaching them closely while on foot.

The following is a list of general precautions that must be considered when conducting prospecting activities near Peregrine Falcon, Gyrfalcon, and other raptor nests (most of these precautions will also apply to all nesting bird species):

1. Disturbance is most harmful early in the nesting period (May and June for Peregrine Falcon and Gyrfalcon, similar for Rough-legged Hawk):
Raptors will attempt to maximize their chances of successfully raising young. If they decide early in the breeding period that their nest is at risk, they may abandon it. If nests are disturbed at this stage of nesting, there may not be sufficient time to renest. All disturbances to nests during the early part of the nesting cycle must be avoided (avoid nest sites from late May to mid-July).
2. Individuals show variability in their response to disturbance:
Different birds will show different responses to varying levels of disturbance. This may result from the general health of the bird, weather conditions, previous life experiences, and adaptability. Therefore, treat all nest sites with equal precaution, regardless of the response of the bird. Do not disturb raptor nests during conditions of poor weather (rain, snow, high winds).
3. Approaching the nest site near the time of fledgling (where chicks fly away from the nest) often leads to premature nest departure:
During the last few weeks of nesting, severe disturbance at the nest often causes young raptors to jump out of the nest. This can cause death from exposure, predation, starvation, or trauma from the fall itself. All activity within 100m of a nest site during the latter part of the nest stage (10-20 August for peregrine falcons in this region) must be avoided.

Further details on wildlife issues can be obtained from the contact information below:

DOE Contacts

Manager, Wildlife

-Dan Shewchuk, (867) 857-2828, dshevwchuk@gov.nu.ca

Wildlife Officer,

-Joe Niego, (867) 793-2944, jniego2@gov.nu.ca

Biologist, Kivalliq Region, Arviat

- Mitch Campbell, (867) 857-2828, mcampbell@gov.nu.ca

4. THE CANADIAN HERITAGE RIVERS SYSTEM

We also are concerned regarding permit areas requested along a Canadian Heritage River, Kazan River. Please note that The Canadian Heritage Rivers System (CHRS) is Canada's national program for freshwater conservation. The



objectives of the program are to give national recognition to Canada's outstanding rivers and to ensure long-term management that will conserve their natural, cultural and recreational values for the benefit and enjoyment of Canadians, now and in the future.

We ask the prospectors to respect the values of the Heritage Rivers (refer to the management plans provided by CHR Board) and not to engage in any activity that would interfere or otherwise detract from the experience of tourists and Nunavummiut using the Heritage Rivers now and in the future.

We thank the NWB for giving us the opportunity to review and provide comments on the Pacific Ridge Exploration Ltd. exploratory project. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

Helen Yeh
Environmental Assessment Coordinator
Environmental Protection Service
Department of Environment
Government of Nunavut
P.O. Box 1000, Stn. 1360
Iqaluit, Nu X0A 0H0
PH: (867) 975-7733
FX: (867) 975-7739
EM: hyeh@gov.nu.ca