

## **MHBL Response to Government of Nunavut Department of Sustainable Development on FEIS conformity, wildlife mitigation, and wildlife monitoring.**

MHBL requested GN-DSD to review and comment on SD F1 – Wildlife Mitigation Plan: Doris North Project. The response from GN-DSD included an enumeration of specific FEIS conformity issues as outstanding (letter to Ben Hubert dated March 3, 2004 copied to NIRB):

“Of note, outstanding information items required from our Conformity Review of the FEIS include the following (discussed with you on 03 February):

- Ecological basis of the spatial boundaries;
- Ecological basis for selection of VECs;
- Identification of Criteria and Indicators;
- Discussion of Impact and Cumulative Effects Assessments Methodology;
- ....”

MHBL comments:

### **Ecological basis of the spatial boundaries**

Ecological boundaries for mobile VECs are not easily contained to prescribed areas and territories. The baseline data for wildlife in the area were collected from studies over the Hope Bay greenstone belt (Hope Bay Study Area – HBSA), the area with mineral exploration and development potential and region for potential interactions with the VECs. The HBSA was seen as a suitable boundary for mobile non-migratory species like muskox, but inadequate for important migratory species like caribou. While the interactions between wildlife and the project will be restricted to the project footprint and adjacent buffer zone, the cumulative effects from these interactions may extend to the limits of the ranges occupied by wildlife present – in the case of caribou south into the NWT and north to cover most of Victoria Island. The ranges of all wildlife species expected in the HBSA are described in SD D2 – overview report of wildlife and wildlife baseline data for the HBSA from 1994 - 2002. The local study area, that area where interactions with the project are expected, was used for residual impact assessment.

### **Ecological basis for selection of VECs**

VEC selection involved more than ecological considerations. The basis of VEC selection is reviewed in FEIS Section 3.6 with linkages and related communities of interest tabulated in Table 3.3.

### **Identification of Criteria and Indicators**

Impact assessment criteria and indicators of environmental effect are provided in FEIS Table 5.1.

### **Discussion of Impact and Cumulative Effects Assessments Methodology**

FEIS section 5.1.4 and Table 5.2 examine the potential of cumulative effects of current and foreseeable projects (Figure 5.1) outside the Hope Bay greenstone belt. The only foreseeable potential cumulative effects that were found would be associated with

ongoing mineral exploration and production on the Hope Bay belt. The potential cumulative effects of ongoing mineral exploration and production were reviewed in the impact assessment on each VEC which were generally predicted to be similar to the effects of the Doris North project as discussed in the FEIS. These are further assessed in the supplementary response dated 15 March, 2004 to INAC's conformity review.

### **Wildlife Mitigation and Monitoring**

#### **Mitigation**

The draft Wildlife Mitigation Plan (SD F1) is under review with GN-DSD who has made constructive comments regarding its implementation and reporting. It is MHBL's hope and intention to conclude an agreement – in – principle with GN – DSD by a formal wildlife mitigation and monitoring plan for the Doris North Project prior to the Final Project Hearings in mid-June.

#### **Monitoring**

Site specific monitoring for wildlife presence, interactions with the project, and the requirements for response are an integral element of the draft Wildlife Mitigation Plan. The draft Wildlife Mitigation Plan spells out recording wildlife observations and interactions with the project. The agreement with GN – DSD will address reporting procedures.

MHBL has proposed a cooperative caribou telemetry monitoring program which is under review DSD. MHBL is also examining a monitoring scheme that could be implemented to monitor for local changes in the terrestrial ecosystem.

The agreement with GN – DSD will address terrestrial monitoring and reporting procedures.

### **Social and Economic issues**

The Government of Nunavut mandate includes the social and economic well being of residents of Nunavut and so has concerns for potential social and economic effects of the project. MHBL will address potential social and economic effects pursuant to the NLCA Article 26 and is currently in negotiations for and Inuit Impact and Benefit Agreement (IIBA) with the Kitikmeot Inuit Association. MHBL hopes to conclude IIBA negotiations before Final project hearings in mid-June, 2004. In the meantime social and economic issues related to INAC and Health Canada reviews of the FEIS are addressed in the responses to each.

MHBL  
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