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Tahera Water License Application Comment Submission

The Hamlet of Kugluktuk wishes to make several comments regarding the water license application being made by Tahera Diamond Corporation in relation to their plans to mine diamonds at the Jericho site.

The community of Kugluktuk relies on water from the Coppermine River watershed for municipal purposes. The Jericho site is not within this watershed. Therefore, the Hamlet of Kugluktuk does not have any specific water concerns related to this project.

In reviewing the information provided to the Hamlet by Steve Lines, with the Nunavut Water Board, it is noted that the company will be expected to make compensation in relation to the destruction or alteration of water bodies that fish inhabit surrounding their project. Although it is unclear to us how the water license review process interacts with the issuance of a fisheries authorization for the project, we feel they must be closely interlinked, and we wish to take this opportunity for public comment to highlight our views.

The Hamlet of Kugluktuk is familiar with the Department of Fisheries and Oceans (DFO) No Net Loss policy as it has been applied to the Ekati Mine, the Diavik Mine and Kugluktuk Breakwater. In particular, we are aware that Diavik Diamond Mines Inc is currently being required by DFO to alter pristine lakes called M1, M2 and M3 near their project as compensation for lost fish habitat on East Island.

Several months ago, the Hamlet supported the appointment of Councillor Jack Himiak to the Ekati Fish Habitat Compensation Committee. The Hamlet has also supported our local HTO in accessing fish habitat compensation monies in order to address stream clearing issues for anadromous Arctic Char in the Coronation Gulf area. This is a good example of a project that can involve community residents, can actually make a difference for fish, and can revitalize a fish stock of importance to our community.

There is ample evidence and public support for the No Net Loss policy to be applied in an innovative manner in the Kitikmeot that respects the relative value of fish stocks to people, fish habitat problems that truly exist in the Kitikmeot, and considers the pristine and ubiquitous nature of small barren ground lakes.

It is less important to enhance fish stocks near a mining project that are not essential for harvesting purposes than it is to support habitat work for fish that are under harvesting pressure. It is much more important to deal with habitat problems that may exist at orphaned mineral exploration sites, such as Hope Lake, or try to deal with real problems such as low water flow in streams essential for Arctic Char spawning. When there are literally hundreds of thousands of small lakes on the Central Barrens Lands that continue to exist in a purely pristine condition, it is very difficult to substantiate how altering a handful really benefits fish populations as a whole.

We urge the Nunavut Water Board and the DFO to approve fish habitat compensation measures considering these values. If particular measures have been put forth by the Proponent in order to compensate for the loss or degradation of fish habitat at Carat Lake, Long Lake, or any of the other streams or water bodies surrounding the project, we would hope that these considerations can be used in order to design worthwhile enhancement projects. Such projects could include:

- Determining if barrels of substances have been dumped into Hope Lake, and extracting them before they contaminate the lake.
- Reviewing the draft West Kitikmeot Land Use Plan Clean-Up Site list to determine which other orphaned sites may pose a risk to fish, assess these problems and actually cleanup these sites.
- Build a bridge at S-Lake near Kugluktuk in order to protect the stream that provides intermingling of fish stocks within this lake.
- Consider any number of on other stream clearing projects on coastal streams and rivers similar to the project currently being conducted by the Kugluktuk Angonaitit Association at Hingittok Lake.

It appears that the Department of Fisheries and Oceans does not have the resources in order to address the ongoing and widespread spawning problems encountered by Arctic Char along the Kitikmeot coast. This Department has also not made it clear to Kugluktuk whether or not abandoned or orphaned waste sites that are now the responsibility of the federal government pose a threat to fish populations or waters that are important to our community. However, DFO does appear to be willing to use money raised by shareholders of mining companies to alter undisturbed water bodies that to no-one's knowledge have ever been fished. Fish habitat compensation related to the Tahera project poses an excellent opportunity to address all, or any one of these issues. We thank you for your kind consideration of our submission.

Sincerely,



Peter Taptuna
Mayor