

GOVERNMENT OF NUNAVUT

Comments on Draft EIS Guidelines for the Garry Lake Project

At the request of the Nunavut Impact Review Board, the Government of Nunavut has reviewed the document *Draft Guidelines to the Preparation of an Environmental Impact Statement for UraVan Minerals Inc.'s Garry Lake Project – November 2008*.

In general, the GN believes the guidelines are generally satisfactory. Our comments are intended to bring added clarity to certain areas, including spatial boundaries, valued ecosystem components, cumulative effects assessment, management plans, and socio-economic monitoring.

Also, please note that the Department of Culture, Language, Elders and Youth has become involved in the review of potential impacts to heritage resources based on its understanding of issues and NIRB's initiative to include heritage resources in the socio-economic impact statement.

The Government of Nunavut will also require 6 copies of the Draft Environmental Impact Statement. Please see below for more details.

1. SPECIFIC COMMENTS

Reference: Section 6.4 Spatial Boundaries; Page 19-20

Issue: The definition of the Local Study Area (LSA) should be clarified. The Guidelines indicate that the LSA includes an area where there is potential for immediate impacts due to a project. However, page 20 of the Guidelines further stated *the Local Study Area includes the Project facilities, buildings and infrastructure, the Proponent's mineral leases, and all areas proposed for project activities*; this appears to imply the LSA is limited to the project footprint areas.

Proposed changes: DOE believes the LSA is the area for which a particular VEC is subject to potential immediate impacts from a project, and the boundaries of the LSA may vary depending on the type of Valued Ecosystem Components (VEC). For example, for the Beverly caribou herd VEC, DOE recommends that the Beverly caribou calving ground be used as the LSA.

Reference: Section 11.1.1 Valued Ecosystem Components; Page 30

Issue: The Guidelines propose a list of VECs both environmental and biological. However, given the focus of this review is mainly on caribou, particularly the Beverly caribou herd as directed by the Minister of Indian and Northern Affairs

Canada (INAC) on Sep. 18, 2008, DOE recommends contents regarding baseline, impact assessment, management, mitigation and monitoring for other VECs need not be as extensive and the focus should be on caribou, caribou habitat, and impacts to hunting.

Suggested changes: DOE recommends that the proponent incorporates our previous comments regarding wildlife, spill contingency planning, abandonment & restoration in the EIS which can be found in our correspondence of Apr. 23, 2008 during the Part 4 screening for this project proposal.

Reference: Section 14.1.6 Cumulative Effects Assessment; Page 39

Issue: The Guidelines directed the proponent to conduct cumulative effects assessment (CEA) related to the Beverly caribou herd within both the Beverly calving ground and throughout the Beverly annual range which includes trans-boundary areas, in order to fully understand the cumulative impacts of various activities on the Beverly herd. DOE generally concurs with the scale of the CEA study required in order to fully understand cumulative impacts on the herd. However, DOE would like to recommend the CEA study be limited to an extent that is fair and feasible for the proponent.

Proposed changes: Therefore, DOE recommends that the proponent only conducts a detailed impact assessment of its Garry Lake project within the Local Study Area using literature research and other best available information. The results of this assessment could then be integrated into a cumulative effects assessment. Additionally, DOE expects the proponent to extrapolate, based on the best available information, the potential impacts of other projects within the Beverly annual range. Any information gaps identified by the proponent should be communicated in the EIS, and their effects on the results of the impact analysis should be noted.

Furthermore, a list of environmental and human factors that may impact cumulatively on the Beverly caribou would include:

- 1-Insect harassment;
- 2-Forage quantity, quality and availability and its variations with weather/growing season;
- 3-Human harvesting as affected through increased access (before and after effects);
- 4- Predation;
- 5-Disease and parasites;
- 6-Distributional shifts (all seasonal ranges);
- 7-Climate change.

The proponent also needs to discuss how the above list in combination with projects within the Beverly caribou annual range would cumulatively impact on the Beverly caribou, through literature review and other best available information. Please note that this list is not exhaustive and other pertinent impacts should be added as deemed necessary.

DOE believes that the results of an impact assessment for the Garry Lake project combined with the results from extrapolation for other projects and the identification of information gaps in the Beverly annual range, will provide a useful approximation of the potential cumulative effects on the Beverly caribou herd.

Reference: Section 15.2 Management Plans; Page 41-42

Issue: The Guidelines have directed that a list of management plans should, at a minimum, be part of the EIS. DOE recommends that many of the management plans can be consolidated, for the ease of reviewing and for simplification purposes.

For example, the Waste Management Plan and Water Management Plan as directed on page 41 of the Guidelines can be consolidated into an Environmental Management Plan.

Proposed changes: For wildlife, the Wildlife Habitat Protection Plan, Human / Carnivore Interactions, Ground and Air Traffic, and Contingency Plan for wildlife encounters as directed on page 41 of the Guidelines, can be consolidated into a single Wildlife Mitigation and Monitoring Plan (WMMP). The WMMP can include all the relevant wildlife mitigation, management and monitoring measures. Additionally, adaptive management measures should also be included in the WMMP, to handle any inefficacy of any management measures and/or changes to the project and/or environment.

Reference: Overview, paragraph 3, Section 16.1, Page 43

Issue: Incorrect department name

Proposed changes: "...the Nunavut Planning Commission and the Government of Nunavut Departments of Environment and Economic Development and Transportation, as well as the Nunavut Bureau of Statistics".

Reference: Overview, paragraph 4, last bullet, Section 16.1, Page 43

Issue: The Kivalliq Socio-Economic Monitoring Committee has been established to assist project proponents in developing socio-economic monitoring programs that meet the requirements of section 12.7.2 of the NLCA. The guidelines do not include reference to the Kivalliq Socio-Economic Monitoring Committee for project-specific socio-economic monitoring.

Proposed changes: An additional bullet should be added to the description of the approach to monitoring referencing the Kivalliq Socio-Economic Monitoring Committee and its relationship to the project-specific monitoring program for the Garry Lake Project.

Reference: Item Number j, Section, 3.4, Page 14

Issue: Inconsistency on wording and emphasis

Proposed changes: For consistence the terminology and wording should parallel to that established in section 11.1.2 Valued Socio-Economic Components and in 14.2 Socio-Economic and Cultural Impacts “Burial sites and other archaeological, cultural, heritage, and sacred sites”

Reference: Item Number c, Section 11.2.9, Page 34

Issue: Inconsistence on wording and emphasis

Proposed changes: For consistence the terminology and wording should parallel to that established in section 11.1.2 Valued Socio-Economic Components and in 14.2 Socio-Economic and Cultural Impacts “Burial sites and other archaeological, cultural, heritage, and sacred sites”.

Reference: Item Number I, Section 15.2, Page 41

Issue: Inconsistence on wording and emphasis

Proposed changes: For consistence the terminology and wording should parallel to that established in section 11.1.2 Valued Socio-Economic Components and in 14.2 Socio-Economic and Cultural Impacts “Burial sites and other archaeological, cultural, heritage, and sacred sites”.



2. EIS HARD COPY REQUIREMENTS

The Government of Nunavut will require 6 copies of the draft Environmental Impact Statement.

Please send 2 copies to:

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