

January 12, 2009

Leslie Payette
Manager Environmental Administration
Nunavut Impact review Board
P.O. BOX 1360
CAMBRIDGE BAY, NU, X0B 0C0

Dear Ms. Payette,

***DRAFT ENVIRONMENTAL IMPACT STATEMENT, URAVAN MINERALS
INC. GARRY LAKE PROJECT***

The Department of Environment and Natural Resources (ENR) has reviewed the above noted DRAFT Environmental Impact Statement and has the following comments.

Section 14.1.2 of the Draft Environmental Impact Statement “Caribou, with particular emphasis on calving activities” includes requirements for an assessment of potential impacts of project activities on caribou, with an emphasis on calving activities. The subsequent section (14.1.3 Caribou habitat, particularly the caribou calving grounds of the Beverly herd) focuses on “potential impacts of project activities on caribou habitat, particularly the caribou calving grounds of the Beverly caribou herd.” with “Particular emphasis must be placed on the potential impacts from ground and airborne traffic, taking into account the type, frequency, altitude and timing of traffic, particularly low-flying fixed- and rotary-wing aircraft, and noise levels.”

ENR recommends that the Proponent be required to include information on caribou numbers including current (2007-2008) population estimates, and population trends in the analysis of potential impacts of project activities on the Beverly caribou herd (specifically, and barren ground caribou in general) in their EIS. The Department will provide the most current survey information to the Proponent for this purpose. Current and historic range data should also be used for the assessment of Beverly caribou habitat, calving grounds, and other relevant factors.

Current population estimates completed on the Beverly herd indicate a dramatic drop in herd numbers and productivity, the cause of which is not well understood at this time. In the assessment of potential impacts of industrial activity on the biophysical aspects outlined in the Draft EIS, ENR would like to see the Proponent analyze the potential effects of industrial

development (given the sensitivity of caribou to disturbance during critical life stages) on a herd that is currently experiencing a drastic, and potentially catastrophic population decline.

Should you have any questions or concerns with regards to the above, please do not hesitate to contact Gavin More, Manager: Environmental Assessment and Monitoring Section, at (867) 920-6595 or gavin_more@gov.nt.ca.

Sincerely

A handwritten signature in purple ink that reads "Gavin More". The signature is written in a cursive, flowing style.

Gavin More
Manager
Environmental Assessment and Monitoring
Environment and Natural Resources