



Canadian Arctic Resources Committee

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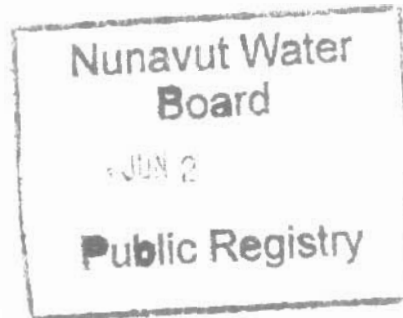
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June 23, 2003

Elizabeth Copeland
Chairperson
Nunavut Impact Review Board
Cambridge Bay NU
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Re: Bathurst Inlet Port and Road Project

Dear Ms. Copeland

We are in receipt of an e-mail from your staff indicating that today is the deadline for comments on the revised project description for the proposed Bathurst Inlet Port and Road (BIPAR) project. We submit the following general findings and more detailed comments in the attachment.

Status of New Regulatory Applications and Re-screening Deadline

We are aware that new regulatory applications were submitted on May 13, 2003 to the Department of Indian Affairs and Northern Development, the Department of Fisheries and Oceans and to the Kitikmeot Inuit Association for this proposal. We are not aware whether these new applications have been accepted and whether the appropriate referrals have been made to your Board. It is not clear when your board will complete the re-screening of this project proposal. We suspect that it is June 30, 2003 given that the revised project description appears to have been received on May 15 and there is a 45-day limit for a screening pursuant to s. 12.4.5 of the NLCA. Would you confirm for us whether NTRB has received referrals for these new applications and what the deadline is for this re-screening?

Non-Conformity with General Requirement for a Project Description

We are concerned that the revised project description does not meet the "General Requirement for a Project Description" as adopted by your Board in 1997. The following areas are not dealt with or presented in any detail:

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- Alternatives, including the previously proposed route through to a port east of Kugluktuk, the use of winter roads only, and the option of building no infrastructure in the area but continuing to depend upon existing supply routes. In a project of this magnitude, one would expect a serious and detailed comparison of the relative costs of developing the port site east of Kugluktuk or Bathurst Inlet and a more substantial analysis of the costs and benefits of the two road alignments than is presented (the revised description merely asserts that 'ours is cheaper').
- status of any vegetation or wildlife pursuant to the *Species at Risk Act*.
- impacts likely to be associated with operation of the road and port facility. Virtually the entire Bathurst caribou herd can be expected to cross the proposed road alignment. The revised description does not contain up to date information concerning the Bathurst caribou herd and makes the unsupported and frankly suspect assertion that operation of the facilities will result in 'no effects incremental to those of habitat alteration during construction'. As a result, monitoring and mitigation measures are not explored in any detail. The sole mitigation measure proposed for caribou impacts, for example, is to stop traffic on the road 'when caribou are in the area'. Since this may occur on any given day from late March through late October, based on GNWT radio-collaring data, it is difficult to see what economic or practical sense there may be in building an all-weather road in this location.
- results of public consultations.
- monitoring programs.

Rationale for the Proposal and Economic Viability

We have serious concerns with the purpose and need for the proposal. It is not clear whether the project is to simply provide the fuel resupply for several mining projects or to allow for resupply of Kitikmeot communities with fuel and supplies from Yellowknife, and/or to facilitate further mineral development in the Kitikmeot. It is not clear whether there is any specific support or demand from either the communities or the mining companies.

A major concern regarding economic viability is the proposed port site. There is no indication in the project description as to the confidence levels of the charts associated with the last 40 km. of the approach through Bathurst Inlet to the proposed port site. The project description anticipates ships of 25,000 (and in one instance, perhaps 50,000) tonnes, which are ships of significant size requiring high confidence levels for navigation. The approach is, in many places, shallow and narrow. The viability of navigation

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through this last portion of the approach is not addressed and could prove to be a very significant factor in assessing costs, risks and environmental impact.

The project financing is not described in any way in the revised project description. The last project description assumed that there would be a toll for the use of the road to finance it. There would now appear to be no source of tolls. There is one mention that the project is dependent on the price of fuel and that should fuel prices increase to make mining activity uneconomic, the project would be in jeopardy (8.3 Seasonal Shutdown, pg. 65). The same rationale would apply to commodity prices for minerals and this is the reason that was given for the scaling back of the proposal late last year.

The case for building an all-weather road, as opposed to a winter road, does not appear to have been supported in the revised project description. The proposed road corridor transects the migratory paths of the Bathurst Caribou herd from late March through October and if the road is to be used during this time, a strong case justifying the need to create potential negative impacts on the herd should be set out. The project description, on the other hand, indicates that fuel transportation is envisaged only during the winter months. It does not indicate why ore shipments could not be similarly confined to winter months, obviating the need for a great deal of the construction and maintenance costs anticipated.

Given the uncertainty surrounding the economic viability of the proposed project and to avoid any further unnecessary expenditure of resources, we would strongly urge your Board to request a copy of the revised feasibility study for this proposal and any other supporting economic analyses. We note that your Board requested such material in its April 14, 2003 letter to the proponent that has gone unheeded.

Transboundary and Cumulative Effects

The proponent has identified few effects outside of Nunavut and not provided any analyses of such effects. Clearly there are components of the project that will take place outside of Nunavut. For example, shipping of fuel through international waters and Canadian internal waters in the NWT, road transport of goods into the mines located in the NWT, road transport of goods from Alberta or Yellowknife along the Tibbett to Contwoyto winter road mostly located in the NWT. The economic effects of the reduced fuel haul on the NWT or remaining traffic along the winter road that will have to carry the burden of the road construction and maintenance costs is not analyzed. Project effects on the harvesting activities of NWT communities is not considered, despite a body of evidence emerging from the Diavik and Ekati monitoring programmes indicating changes in the Bathurst caribou herd's behaviour. The project ought not to proceed to assessment without having incorporated the latest data on the potential for cumulative effects on the herd. It would be extremely unfortunate if the proponent were permitted to expend the public resources necessary to conduct an environmental assessment of this

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project only because it was allowed to avoid assessing impacts on the herd with the simple assertion that there will be none of significance.

It is clear that the Izok Lake mine is still part of this project, deferred only because of the current price of metals. The potential for this and other mines to be added to the project is mentioned at several points by the proponent. When the road is extended to Izok Lake, the dynamics and timing of road use will change dramatically with the potential for even more serious disturbances for the Bathurst Caribou herd. In order for the potential cumulative and long-term effects of this project to be properly assessed, it is imperative that the road extension to Izok Lake and the potential for new 'feeder' roads to local mineral deposits be included in the scoping of the assessment. Very little information is provided about either of these, save the indication that the development potential for the region is a major factor in the rationale for the project. If this is to be a part of the rationale, much more detailed information concerning the location and commercial viability of mineral deposits and the likely corridors for roads connecting them to the proposed road, must be made available for the assessment.

We are concerned about the cumulative effects associated with this project and all the other resource development occurring in the Slave Geological Province and the range of the Bathurst Caribou herd, especially in the absence of an adequate management and monitoring framework. In the face of such uncertainty, should your Board recommend a Part 5 or 6 review, we strongly urge that the scope of the review be set in such a way as to capture the eventuality that Izok Lake and other adjacent properties will be developed.

Other Deficiencies

Numerous other deficiencies exist in the project description and are a cause for significant concern:

- It is not clear how many quarries will be needed (37 mentioned in the text but 34 shown on Figure 4 and no detailed maps of the sites provided). There will be at least eight quarries on eskers and their impacts are not described.
- Effects of the road as a possible barrier to caribou migration or use of the road by predators is not described.
- Revenues to government from the project are not described or analyzed.
- There was no attempt to consider or analyze the possible effect of the port and road on Bathurst Inlet Lodge, a world-class naturalist destination.
- There was no attempt to conduct any analysis of potential gains or losses related to greenhouse gas emissions and the contribution of the project to Canada's commitment to the Kyoto Accord.
- The potential for truck transport or shipping spills based on current use of Tibbet to Contwoyto winter road or Arctic shipping has not been presented. No risk management techniques are described other than regulatory compliance.

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- It has not been specified where the fuel for the diamond mine haul will originate from, what the sulphur content of the fuel will be and what nationality of ships will be used. This may be a cause for concern given shipping safety track records and Canadian sovereignty interests.
- No caribou protection measures pursuant to the draft West Kitikmeot Land Use Plan are identified or discussed. No thresholds or caribou densities are specified for work or truck hauling stoppages.
- Few details presented on any possible effects of the project on the Ahiak (Queen Maud Gulf) Caribou herd.

Conclusions

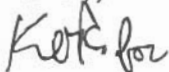
Based on our preliminary review of the revised project description, it is difficult to determine what exactly this project is and whether it is economically viable. There are numerous deficiencies as outlined above and in the attachment including non-conformity with your Board's operational procedures. In summary, we believe that the project proposal should be returned to the proponent for clarification pursuant to s. 12.4.4 (c) of the Nunavut Land Claims Agreement (NLCA).

Should your Board be of the view that the project description is sufficient to conduct a re-screening, we would strongly recommend a review under Part 6 of Article 12 of the NLCA. This is based on the potential significant adverse effects on the ecosystem and wildlife habitat as the road and port are located within the calving grounds of the Bathurst caribou herd, other possible effects on barren-ground grizzly bears and possibly other species at risk (eg. the Berring wolffish). The resulting effects on users of the Bathurst caribou herd, largely communities in the NWT, have not been considered. The socio-economic effects of the project on the NWT have not been adequately identified or described and may be significant. Public concern with the project has been expressed by various parties in the past including the Mackenzie Valley Environmental Impact Review Board, Government of the Northwest Territories, Lutsel K'e First Nation and others.

We specifically request that your Board consider the need for participant funding for the review of this project, whether the review is ultimately decided as a Part 5 or Part 6 review. Furthermore, we ask that you transmit this request to the Minister of Indian Affairs and Northern Development as part of your screening decision.

Thank you for the opportunity to submit our comments. We would be pleased to discuss any of this with you at your convenience.

Sincerely,



Karen Wrysten
Executive Director

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cc. Hon. Robert Nault, Minister of Indian Affairs and Northern Development
Hon. Robert Thibeault, Minister of Fisheries and Oceans
Hon. Paul Okalik, Premier of Nunavut
Hon. Stephen Kakfwi, Premier of the NWT
Hon. Ethel Blondin-Andrew, MP Western Arctic
Nancy Karetak-Lindell, MP Nunatsiag
Cathy Towtongie, President, Nunavut Tunngavik Inc.
Charlie Evalik, President, Kitimeot Inuit Association
Tom Kudloo, Chair, Nunavut Water Board
Todd Burlingame, Chair, Mackenzie Valley Environmental Impact Review Board
Grand Chief Joe Rabesca, Dogrib Treaty 11 Tribal Council
Chiefs Darrell Beaulieu and Peter Liske, Yellowknives Dene First Nation
Chief Archie Catholique, Lutsel K'e First Nation
Clem Paul, President, North Slave Metis Alliance

DETAILED COMMENTS ON THE REVISED PROJECT DESCRIPTION FOR THE BATHURST INLET PORT AND ROAD PROJECT

Conformity with The General Requirement for a Project Description

The revised project description is not in conformity with "The General Requirements for a Project Description" as adopted in 1997 by the Nunavut Impact Review Board as part of its Operational Procedures. The following deficiencies, as set out directly in the above directive, have been noted:

- Alternative routes for the road are not mapped. Alternative sites for a port and the no-go option are not presented. Although criteria are presented for the preferred alternative, the evaluation or ratings are not presented.
- The frequency of use and aircraft that will use the airstrip are not presented.
- The types, volumes handling and storage of any toxic materials to be transported to the port site or to the mine sites are not detailed.
- There is no presentation of the status of any vegetation or wildlife in relation to its status under the federal *Species at Risk Act*.
- The developer has not presented the results of any of its public consultation meetings or discussions.
- The effects of the project have not been described in terms of any gender or age differences.
- Any potential drawbacks associated with the project have not been identified or described.
- Monitoring programs have not been described nor have schedules for submitting reports to NIRB.

Detailed Comments

Executive Summary

Pg. ii—Fourth paragraph fails to mention that the project may be reviewed pursuant to Part 6.

1.0 Introduction

Pg. 1—Fails to mention that the project may be reviewed pursuant to Part 6.

1.1 Background Information

pg. 2—Fourth paragraph, Con Mine did not start production until 1938 and did not require an airstrip. An airstrip at Yellowknife was not started until the summer of 1944.

Sixth paragraph states "transporting fuel and supplies through a port at Bathurst Inlet could provide reductions in operating costs and increased security of supply for these

mines also". There are no financial analyses or references provided to support this statement. Furthermore, there is no evidence of agreement or support from individual mining companies or communities. Although there are some subsequent statements on the following page around the economics of the project, no data or financial analysis is provided. The project appears to hinge on these assumptions without adequate justification or rationale.

Pg. 3—Fourth bullet, does the Hay River vs. Bathurst Inlet cost comparison include capital costs for possible barging operations or chartering costs?

Pg. 4—Third bullet, what evidence is there that there is excess capacity in the current Kitikmeot labour force that could take advantage of this project above and beyond positions that could be available at Diavik, Ekati, Lupin and Hope Bay? The following statement "The mining industry has the greatest potential for employment in the future" is made without any supporting analysis of labour force conditions, training and education levels, or economic choice preferences data for Kitikmeot residents.

It is not clear who will pay for the road and port and on what basis. Will the road be a public road?

The last paragraph remarks "the establishment of a marine port on Canada's arctic coast... will provide a significant boost to the security and sovereignty of the Arctic and Arctic waters". The proponent has not identified the source of the fuel to be shipped to Bathurst Inlet, the nationality of the proposed tanker or tankers, or how opening the Northwest Passage to commercial ship traffic will enhance Canadian sovereignty.

1.3 Approval Agencies and Required Approvals, Licenses and Permits

Pg. 6—Third paragraph, the statement that "all incremental interactions with the environment proposed by the Project lie entirely within Nunavut" is factually incorrect. Proposed tanker shipping through the Beaufort Sea and Amundsen Gulf area is clearly outside Nunavut. The ultimate destination for the fuel, Diavik and Ekati, is outside Nunavut. Truck traffic carrying goods to Bathurst Inlet will also originate outside of Nunavut and add incrementally to existing use of the Tibbett to Contwoyto winter road, if there is the capacity.

Although it may be the wish of the proponent that the screening may lead to a Part 5 review, the option remains open for a Part 6 review.

Pg. 7—Kitikmeot Inuit Association, have there been any discussions begun regarding an IIBA (Inuit Impact and Benefit Agreement)? What is the status of the negotiations and who are the parties as KIA is indirectly part of the Joint Venture?

The Department of Indian Affairs and Northern Development is of the view that they must still fulfill the requirements of the *Canadian Environmental Assessment Act*.

The Nunavut Impact Review Board neglects to mention that a Part 6 review is possible and what might be involved with this process under the NLCA.

Pg. 8—There may be a requirement for DFO to consider the effects of the port site (ie. dock and barge landing), ocean infilling and operation on habitat disturbance, proposed ocean sewage disposal from the port site and the desalinization plant discharges, if any.

Are there any potential authorizations necessary from NRCan as a result of blasting or transport and storage of explosives?

1.3.2 Operations

Pg. 9—There may be requirement for vehicle registration and licenses depending whether the road is considered a public road.

1.4 Previous Environmental Assessments

Pg. 10--Is Inmet still part of the Project Technical Committee?

2.2 Type of Activity

Pg. 11--The first paragraph makes the following statement; "The portion of the route from Barrow Strait to Queen Maude [sic] Gulf, a distance of approximately 650 km, is currently not a regular shipping route but has been used by summer cruise ships and other vessels... The final 40 km of the route south of Bathurst Inlet community is also new but has been chartered". On page 13 of the project description it states that the "dock site has been designed to handle 50,000 tonne vessels carrying fuel, mineral concentrate and general cargo". The proponent has not provided any evidence on the safety and risks with the shipping route through the Northwest Passage for commercial traffic, and for the southern portion of Bathurst Inlet.

2.3 Alternative and Preferred Options

Pg. 11—Figure 2 does not show the location of the proposed road to the port site east of Kugluktuk as suggested by Inmet in conjunction with the earlier potential Izok Lake mine.

It is not clear why the option of a winter road for a winter-only operation, as proposed in the revised project description, was not presented or evaluated. There is clearly no need for an all-weather road unless the intent is to ship mineral concentrates from inland base metal deposits.

2.4 Project Location and Land Status

Pg. 12—This section states again that there are no elements of the project outside Nunavut, see comments on page 6 above. The text mentions 37 quarry sites while Figure 4 shows 34.

Fifth paragraph refers to “a Nuna Logistics proposal had a narrower running surface”. What is the specific reference?

Pg. 13—Port and road selection criteria are set out but there are no details on weighting of the criteria or the ratings or evaluation of each alternative. The no-go option does not appear to have been considered.

2.5.2 Overland Access

Pg. 15—Is there capacity on the Tibbet to Contwoyto winter road to handle the traffic from the project? Has permission been granted to use the winter road?

2.6.2 Port to Contwoyto Lake Road Construction

Pg. 19—Paragraph after Table 2, there is little description of the amount of dust that will be generated, nor what could be done to mitigate it.

2.7.2 Road Operation

Pg. 21—Third paragraph, assumption is that Tibbet to Contwoyto Lake winter road remains in operation.

2.8.1 Quarries

Pg. 23—Third sentence, replace “to proceed unchecked or alter...” with “to proceed unchecked or alter”.

2.8.2 Road

Pg. 23--Will scarification of road surfaces take place? Will there be any to attempt to re-vegetate roads or other portions of the development?

2.9 Environmental Protection and Contingency Plans

Pg. 23—Last sentence should read “which is provided IN Appendix 1.”

2.10 Environmental Protection and Contingency Plans

Pg. 24--Table 6 does not include any employee training, details on dust suppression or thresholds for road closure due to caribou crossings?

3.2 Climate and Permafrost

Pg. 26—Last paragraph of this section mentions that a weather station at the port site has been in operation since late 2001 yet no climatological data are presented.

3.3 Air Quality

Pg. 26—There has been air quality monitoring equipment at Ekati and Diavik and also at Daring Lake on the NWT side.

3.4 Vegetation and Wildlife Habitat

Table 9 does not contain any reference to status of any of the rare plants under the *Species at Risk Act*.

3.5 Fish and Wildlife

Table 10 does not contain any reference to status of any of the rare plants under the *Species at Risk Act*. For example, the Berring wolffish is listed in the *Species at Risk Act* as being of “special concern” under Schedule 3.

3.6.3 Birds

Tables 12 and 13 do not contain any reference to status of any of the rare plants under the *Species at Risk Act*.

3.6.4 Mammals

Table 14 does not contain any reference to status of any of the rare plants under the *Species at Risk Act*. The listing for grizzly bear should be changed to read “barren-ground grizzly bear”

3.6.5 Mammals-Marine

Table 15 does not contain any reference to status of any of the rare plants under the *Species at Risk Act*.

3.7 Traditional Knowledge

The project description as a whole appears to make little use of Traditional Knowledge other than a couple of references to an interview with a local resident.

3.8 Heritage Resources

Pg. 39—Second paragraph, FMA Consultants Inc., 2003 is not listed in the references

3.9 Social and Economic Setting

Pg. 40—Third paragraph, Hornal 2000 is not listed in the references. Fourth paragraph, the assessment of the labour force and business in the region is key to the possible benefits articulated earlier by the proponent. This information should have been presented here in the project description.

4.0 Public Consultation Process

Pg. 44—The results or feedback from all of the public consultations to date are not presented.

5.1 Port Construction

Pg. 45—The last paragraph states “sewage will be treated in a skid mounted sewage treatment plan prior to release on the tundra”. No details are provided on the type of treatment or location of discharges. This may be a concern for public, wildlife and aquatic ecosystem health.

5.1.1 Air Quality Effects

Pg. 45—No mention of potential effects from dust generation. There is no analysis of the net greenhouse gas emissions from the project are presented.

5.1.2.2 Freshwater

Pg. 46—There is no discussion of any potential effects from desalinization.

5.1.2.5 Mammals

There is no reference here to the recent report by Russell, D.E., G. Kofinas, and B. Griffith. 2002. Barren-Ground Caribou Calving Workshop: Report of Proceedings. Technical Report No. 390. Canadian Wildlife Service, Ottawa, Ontario, 39 pp. This report is the basis for a redefinition of calving grounds. Using this new approach, the entire port and road complex lies within the calving grounds of the Bathurst caribou herd. That is, Russell et al. (2002) recommended mapping the extent of calving as the area used up until three weeks past the peak of calving. The median peak of calving for the Bathurst herd is June 5-9, but has been recorded as late as June 11-15 (1969 and 1986). For the Bathurst herd, the extent of calving will be the area occupied until July 5.

This section does not make use of the recently released synthesis study on cumulative effects from the development of the Alaskan North Slope.

5.2 Port Operations

Table 19 is not clear on what if any, materials arrive via the winter road from Yellowknife.

5.2.2.1 Marine

Pg. 48—The last paragraph states “interaction with marine life will be the same as with other form [sic] of shipping in arctic waters. No concentration of marine wildlife is expected along the route that is not now exposed to arctic marine traffic”. There is no supporting evidence to reach this conclusion. The size of the marine vessels, up to 50,000 tonnes, for fuel shipping would be dramatically larger than fuel resupply and involve different noise emissions and risks associated with spills. In addition, there has been no attempt to map or analyze the distribution of significant marine mammals with regard to the potential shipping routes.

5.2.3 Terrestrial Interactions

No mention is made of the potential for dust generation from traffic.

5.2.3.2 Mammals

See comments above under 5.1.2.5. The assertion “interactions of port operations with mammals will be passive with no effects that are incremental to those of habitat alteration during construction’ is completely unsupported. There is no reference to noise, dust or light emissions from the port operations that may influence the behaviour or mammals such as wolverines, barren-ground grizzly bears and caribou.

5.3 Environmental Effects of Road and Contwoyto Camp Construction

The road construction is scheduled to overlap caribou migrations.

5.3.1 Air Quality

While personal protective equipment may help to mitigate dust and noise for workers, nothing is suggested here for mitigation on the environment, including the potential disturbance of migrating caribou.

5.3.2 Aquatic Environments

Pg. 50—There is no mention of the potential effects of accidents or spills of the reagents, blasting material or other toxic material that may be trucked to the diamond mines

5.3.3.2 Mammals

Pg. 56—This section asserts that “interactions of road construction operations with mammals generally will be passive with no significant effects on the animals.” This

conclusion is completely unsubstantiated. Earlier material in the revised project description shows that the road construction scheduling (pg. 18) and labour force scheduling (Table 3, pg. 20) clearly show that there will be significant activity during spring and fall migration movements of the Bathurst caribou herd. The vast majority of the herd appears to cross the road alignment. No evidence is presented such that these movements would not be disturbed in some way. No thresholds or caribou protection measures are identified as to when work or traffic stoppages will be instituted.

5.4 Environmental Effects of Road Operations

Table 21 does not include any projected road traffic to the port site from Yellowknife.

5.4.1 Air Quality

See comments above for 5.1.1 and 5.3.1.

5.4.2 Aquatic Environment

Pg. 56—There is no mention of the potential for spills or accidents.

5.4.3.2 Mammals

Pg. 57—The statement is made that “the road will be operated between January and April. No caribou will be in the Project area at that time of the year... The effects of road operations on caribou populations will be negligible” is completely unsupported. There is no attempt to present the growing body of data from site-specific monitoring and radio-collaring that cows and calves in the post-calving period tend to avoid the mine sites and related infrastructure. There have been public concerns expressed about the ability of caribou to cross the road to the Misery satellite operation from Ekati. BHP-Billiton has adopted special mitigation measures including caribou ramps up to the side of the road to allow for passage. The proponent has not presented any evidence that the road bed will not constitute a hazard for caribou crossings and that it may disrupt migration patterns. The road may also be used as insect relief habitat but may also promote improved access for predators. The only mitigation offered by the proponent is to construct and operate an all-weather road that will only be operated in the winter.

5.7 Effects of the Operation of the Bathurst Inlet Port and Road on the Social and Economic Environment of the NWT

Pg. 58—Although absolute numbers are provided for the reduction in the truck haul out of Yellowknife, it would be more helpful to include a percentage reduction. No discussion of the effects of this shift away from the Tibbet to Contwoyto winter road on the remaining traffic that would have to absorb more of the construction and maintenance costs. No attempt to model or present any financial analysis of the effects on the NWT.

6.0 Cumulative Effects

Pg. 60—No attempt to quantify or describe qualitatively the effects of the shift rotation on family life and community well-being. Need to include Izok and other potential mines in any further environmental reviews. Indirect socio-economic effects on NWT residents including potential reductions in wildlife harvesting, are not described or analyzed.

7.0 Mitigation Measures and Residual Impacts

Pg. 61—First paragraph, second sentence should read “Table 6”.

7.1 Air Quality

See comments above for 5.1.1 and 5.3.1.

7.5 Pit/Quarry Development

Pg. 62—No description of the residual impacts from quarrying esker material.

7.12 Contingency Plans

Pg. 64—No mention of marine spills or truck accidents resulting in spills.

9.0 Monitoring and Maintenance Plans

Pg. 66—No details on the monitoring programs are provided such as indicators to be monitored, frequency, thresholds for management response, or reporting.

Prepared by Canadian Arctic Resources Committee
June 23, 2003