

Sherry Sian

From: BlaisE@DFO-MPO.GC.CA
Sent: Wednesday, September 17, 2003 3:37 PM
To: Sherry Sian
Cc: DahJ@DFO-MPO.GC.CA; BalintD@DFO-MPO.GC.CA
Subject: CumulativeEffectsDraftcommentsSept 12, 2003

Our comments.....



Fisheries
and
Oceans

Pêches
et Océans

Fish Habitat Management
Suite 101, 5204-50th
Avenue
Yellowknife, Northwest
Territories
X1A 1E2

Your file *Voire référence*

September 17, 2003

SC02167
SC03002
SC03022
SC03031

Sherry Sian
 Environmental Assessment Officer
 Mackenzie Valley Environmental Impact Review Board
 Box 938, 5102-50th Avenue
 Yellowknife, NT
 X1A 2N7

RE: Draft Cumulative Effects Study (Draft CE Study) from Gartner Lee.

Dear Ms. Sian:

The Department of Fisheries and Oceans - Fish Habitat Management (DFO) received the Draft Cumulative Effects (CE) Study Report via fax on September 5, 2003. DFO notes that it also received via E-mail a revised Draft CE Study Report on September 12, 2003. DFO was not aware, until today that the E-mailed draft was different from the originally faxed version. Although we have not provided comments on the revised Draft CE Study Report, we understand that the remaining sections of the report (i.e. cumulative effects assessment) are forthcoming and we will have an opportunity to review the final draft of the CE study. The following comments are based on the September 5, 2003 Draft CE Study Report.

Generally, DFO found it difficult to review the report as presented. For the final draft, DFO assumes the maps and matrix will be properly labelled and better explained.

Section 4.3.5 Fish refers to a report but is not properly referenced or noted. The author should note whether the quotas are in pounds or kilograms. Also it is not clear whether these numbers are annual quotas and annual harvests. It is not clear why the author did not include a traditional use section given that cultural and heritage concerns have been raised. Clarification is required.

On page 31, third paragraph, it is not clear why the third drill site is not considered in the CEA study. It is generally assumed that all components of the proposed project(s) under CEA review would need to be considered and that the study boundaries should at a minimum include the project footprint.

It is not clear whether all past projects have been considered or identified. For example, the previous diamond exploration work conducted by D. Smith should be included in the scope of assessment. It is not also clear if Diamonds North exploration work falls within the regional study boundary. It is suggested that a full listing of all past land use permits be obtained.

There appear to be some discrepancies within this report versus the information provided in the Developer's Assessment Reports (DAR). For instance, the Draft CEA Study mentions on page 27 and page 30 that large diameter casing will be utilized for on-ice drilling although this was not stated in the DARs. Clarification is required.

The Draft CEA Study also reports (page 38) that the camp facility for Snowfield Development Corporation was previously permitted. This contradicts information presented in the Land Use Application and DAR for Snowfield. Clarification is required.

The Draft CEA Study (page 38) also indicates that drilling is all land based, using from 1 to 30 sites and drilling between 1 to 20 holes per site. This could result in up to 600 holes if 20 holes are drilled at 30 sites. The Draft CEA Study should therefore be more specific since the original project description suggested that a maximum of 100 holes would be drilled.

The Draft Report includes duplication (at least in what was received by fax). Pages 37 to 40 (fax page 41, 42, 43, 44) are repeated in the report on pages 40 to 43 (fax page 45, 46, 47, 48) which makes the Report difficult to read. The Resolution table in each of these sections are also different.

I very quickly glanced at the revised Draft CE Study and noted on page 33, Table 7 - that the author should distinguish between quota (409 tonnes per annum or total between 1980-2002) versus actual harvest?

If you have any questions or require clarification, please call me at (867) 669-4912 or Dave Balint at (867) 669-4926.

Sincerely,

Original Signed by

Elaine Blais
Area Habitat Biologist
Fish Habitat Management-Western Arctic Area

DB/EB

Cc: Julie Dahl, Habitat Chief, Western Arctic Area