



**Northwest
Territories** Environment and Natural Resources

Martin Haefele
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
P.O. Box 938, 5102 - 50th Ave
Yellowknife, NT X1A 2N7

Dear Mr. Haefele

Sidon International Resources Corp. – Mineral Exploration (EA0506-06)
MVEIRB Supplementary Information Requests

Thank you for the opportunity to provide information concerning Sidon International Resources Corp.'s proposed mineral exploration near Defeat Lake. Please find attached the Government of Northwest Territory's response to the Mackenzie Valley Impact Review Board's request.

Should you have any questions regarding our response, please feel free to contact me at 920-6593.

Sincerely

Joel M. Holder
Environmental Assessment Analyst
Environmental Assessment and Monitoring
Environment and Natural Resources

IR Number: 2.1
Source: MVEIRB
To: Government of Northwest Territories
Subject: Increased access

Preamble

The Review Board has reached the preliminary conclusion that disturbance to traditional harvesting activities is in part attributable to recreational access to the area. The proposed development is likely to increase recreational access to the area, contributing to this cumulative problem.

The Review Board has not yet concluded that this impact can be mitigated, but is considering recommending the following potential mitigation measure:

- allowing drill site access by helicopter only.

The intent of the potential mitigation is to ensure that the proposed development does not create new ground access which may be used by recreational hunters or snowmobiles.

Request

1. Please provide your views on the feasibility of the measure.

Given that, there are other proposed heliportable mineral exploration projects in the NWT, it is conceivable that a heliportable program would be feasible.

2. Please provide your views on the capacity of the measure to reduce or prevent the impact described.

By restricting Sidon and Goldwyn to heliportable drilling only, this would help in maintaining the current recreational use of the area.

However, a winter heliportable drilling program for the operations would likely cause temporary disturbance to terrestrial wildlife species such as barrenground caribou, moose and furbearers that might utilize the region.

3. Is there any mitigation measure your organization would like to propose instead, or in addition, as a reliable alternative to achieve the same intent? If so, please describe the alternative measure, and describe why you view it as a feasible and effective mitigation for the impact described above.

Both a new winter road, as proposed by the proponent, and helicopter access only, will negatively impact wildlife and therefore, disturb traditional harvesting activities. The difference is, by only allowing access by helicopter impacts would be reduced to short-term impacts as opposed to a new road that could provide increased access indefinitely.

To help gain a better idea of recreational use of the Great Slave winter road and potential impacts on wildlife, that a road use monitoring plan be designed and implemented by the project proponents. Such a plan should include mechanisms for monitoring and recording road use, by whom, for what purpose and wildlife sightings and locations on the road. This plan should be developed in consultation with ENR staff.

IR Number: 2.2
Source: MVEIRB
To: Government of Northwest Territories
Subject: Impacts on heritage sites and burial sites

Preamble

The developer has not conducted preliminary work to identify drill targets in an area which may have a high density of heritage sites or grave sites. The Review Board has reached the preliminary conclusion that the proposed development could disturb heritage sites.

The Review Board has not yet concluded that this impact can be mitigated, but is considering recommending the following potential mitigation measures:

- requiring that the developer conduct heritage surveys on whole claim blocks before any other work is conducted on the ground; or,
- requiring the developer to conduct some geophysical work on the ground to identify drill locations. Once locations have been identified, the measure would require heritage surveys only on areas surrounding the drill locations before conducting the remainder of the project.

The intent of the potential mitigation is to ensure that the proposed development does not disturb any heritage or burial sites, including those as yet undocumented.

Request

1. Please provide your views on the feasibility of these measures.

Both measures listed are feasible. The benefit of the first measure – heritage surveys on whole claim blocks before any other work is conducted on the ground – is that it would generate a significant amount of baseline data for the claim block, which would assist in designing an effective mitigation program for heritage resources actually at risk of impact from the drilling program. The drawback of this measure is the time and cost required to conduct heritage resource impact assessments (HRIA) of entire claim blocks at the level of detail required to ensure that no impacts to heritage resources will occur. In this scenario, the archaeologist contracted by the proponent would likely prioritize the survey of a claim block based on the perceived archaeological potential of the landforms present; thus, even in the most carefully designed and implemented study it is likely that some areas would receive more detailed inspection than others. The benefit of the second measure – heritage surveys of defined drill sites – is that the archaeologist hired by the proponent can focus in detail on smaller areas, thus limiting the time of the HRIA while providing a high degree of certainty that the exploration program will not result in adverse impacts to heritage resources. The drawback is the risk – minimal if the geophysical work is limited to foot surveys, rock sampling, etc. – that

heritage resources could be impacted during identification of the drill locations.

2. Please provide your views on the capacity of these measures to reduce or prevent the impact described.

As described above, both measures have benefits and drawbacks. The best approach for minimizing the risk of impacts to heritage resources is a detailed inspection of the exact footprints of the exploration project prior to the commencement of development activities.

3. Is there any mitigation measure your organization would like to propose instead, or in addition, as a reliable alternative to achieve the same intent? If so, please describe the alternative measure, and describe why you view it as a feasible and effective mitigation for the impact described above.

A possible alternative is a combination of the listed measures, in which some general baseline studies of the heritage resource record of the claim blocks is conducted in conjunction with the geophysical work. This would be combined with a detailed HRIA of the selected drill targets. The benefits of this approach are that the archaeologist hired by the proponent will be able to assist the developer to select drill targets that do not place heritage resources at risk of impact, and some baseline data will be generated to assist in the design of effective mitigation measures for heritage resources at risk of impact from the defined drill targets.

