

**Sherry Sian**

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**From:** BalintD@DFO-MPO.GC.CA  
**Sent:** Monday, June 30, 2003 3:27 PM  
**To:** Sherry Sian  
**Cc:** BlaisE@DFO-MPO.GC.CA; DahlJ@DFO-MPO.GC.CA; BalintD@DFO-MPO.GC.CA  
**Subject:** Comments Draft Terms of Reference

Sherry:

I have attached a copy of a letter with our comments.  
I will fax a signed copy shortly.

**Dave Balint**

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Comments on Work plan's for Drybones and areas Drilling programs.

Title's - These are not "advanced mineral exploration programs" threshold for "advanced" is generally accepted as work designed to define a discovery and collect data to support various levels of economic feasibility. These are basic first pass exploration drill programs.

2) Scope of Development: Again remove "advanced"

3) Scope of Assessment: What is "potential" public concern. How does a person measure it.

4) Terms of reference: In general most of these are covered off by mitigation specified in standard land use permits, DFO's form letters etc..

C - 2) Generally a developer will only know the location of the first few holes, with the locations of subsequent holes only determined based on the results of the first few. Land use permits have generally not been restricted to specific holes and sites, but to the activity proposed or to a general area where the activity will take place. The developer is usually requested to inform the Board of the locations of additional drill sites in the area so the inspectors know where to go etc.

C - 6) Water sources and balances will only be known for the first few holes, again amendments and updates to the board are usually the means of information regarding follow up activities. I do not think they will be flooding ice roads and pads so this should not be an issue. The water usage of drills has been shown to be below water licence thresholds before so requesting water balances seems excessive. Not sure what "lease construction refers to - is this a typo?"

C - 7) This is speculative until results are known from drilling , could be nothing, could be more drilling, should be some sort of qualifier put on this.

E - 2) The drilling is aimed at a target with a fixed location, so alternative sites are somewhat limited.

I - 1) I assume this is referring to the RWED maps of registered trap lines etc. Not sure how to portray hunting on the map other than very generally as it is an opportunistic activity. If you could portray hunting sites accurately on a map you wouldn't have to hunt for them? It seems like something the community can better identify.

I - 2) Other than very general stuff like caribou in winter wouldn't this come from the community?

J - There was considerable work undertaken by Anne Wilson as part of her thesis on the drilling from ice issue. This should be referred to. I believe that updates were published in some WKSS documents. This covers off most of the impacts of small diameter core drilling on water. In general the expectations placed on the proponent here seem unreasonable given the scale of the project.

J - 1 A table of all wildlife? How specific does this have to be, shouldn't there be a qualifier such as "commonly" or "frequently" or significant. To take it to the extreme a slug is wildlife so do they count? Wouldn't the community have to ID what is important to them?

J - 2 Again shouldn't there be a qualifier specifying a threshold of some sort. The proponent needs more guidance here.

K - 1) The proponent is limited to providing sites registered with the Prince of Wales, any others would have to come from the community.

K -2) Not sure what an indirect impact on a specific site is getting at.

L) Will comment on the proposed general CEA for the area when I see the terms of ref.