



Mackenzie Valley Environmental Impact Review Board

Box 938 , 5102-50th Avenue, Yellowknife, NT X1A 2N7
www.mveirb.nt.ca

From: Sherry Sian Fax: 867-766-7074

EAO Phone: 867-766-7063

Date: October 29, 2003 Pages: 4 including this page

To: Snowfield Development Corp. Fax:

CC:

Subject: New Additions to the Public Registry
(EA-03-006)

NOTES:

Note new additions to the public registry that follow in this fax:

- Clarification re: a map referred to in INAC submission.
- Clarification of DFO's comments on Cumulative Effects Study.

Thanks.

Sherry

Sherry Sian

From: BlaisE@DFO-MPO.GC.CA
Sent: Tuesday, October 28, 2003 5:09 PM
To: Sherry Sian
Cc: BalintD@DFO-MPO.GC.CA; BlaisE@DFO-MPO.GC.CA
Subject: Our response

Sherry - may be can talk tomorrow but here is our response to the questions you raised. Thanks,
Elaine Blais
DFO

DFO's submission states that there are some discrepancies in the project descriptions and in the cumulative effects study. Some of the comments I have noted from DFO's past submissions on the Registry include:

1. The precise drilling locations for all developers relative to shoals and water depth at the proposed drill sites
2. The number and location of drill sites for New Shoshoni Ventures
3. The source lake for water used to support drilling operations

Does this list reflect your concerns?

These concerns still remain and have not been resolved. Additionally we noted the following discrepancies in addition to those listed above.

Large diameter drilling was mentioned in the Cumulative Effects Study but this differs from the Land Use permit application.

Snowfield has proposed to establish a new camp called the Pebble Beach Camp on the shore of Great Slave Lake. However it is stated in the Cumulative Effects Study that this camp is already permitted, therefore mitigation or effects of establishing a camp are not relevant. This is an incorrect assumption and clarification is therefore required.

Reference was also made in the Cumulative Effects Study that the companies were drilling on land; therefore there would be no effects to the aquatic community. However the Land Use permit applications indicate that there was the possibility that drilling would occur in lakes. This information regarding drilling in lakes is particularly lacking in the case of the Snowfield project and needs to be reviewed and incorporated before the Cumulative Effects Study could be considered complete or thorough.

Preparatory work for the Snowfield Program also included cut-lines. There is no information presented to indicate where these lines crossed streams or other waterbodies and whether impacts to fish habitat or the aquatic community were mitigated.

We have attached the July 4, 2003 letter to Snowfield and a July 2, 2003 letter to the Mackenzie Valley Land and Water Board for the Public Record.

DFO had noted and/or requested:

- Contradictory statements as to whether location of drill sites are land based or on-ice. DFO requested clarification.
- DFO requested detailed maps to delineate the location of drill sites in proximity to fish habitat.
- DFO requested a fish habitat description in water bodies where drilling was proposed.
- DFO requested information detailing the quantities and sources of water to be used.
- DFO requested site specific information on bulk sampling.
- DFO requested site specific information on the location of the proposed camp.
- DFO advised that should a dock be necessary a review and/or permit under the Navigable Waters Protection Act would be necessary.

Other concerns were distributed about Tables 16 and 17. Did the comments circulated earlier today adequately reflect the concerns of DFO?

Table 16 was developed to identify possible areas of overlap between the residual effects of existing activities and developments and the potential residual effects of the proposed developments. It also indicates that there are potential impacts to fish and the aquatic environment from roads/access and from quarries, camping, and drilling and other activities. From DFO's perspective, it is not convinced that there will be residual impacts as listed in Table 16 given that there is no evidence to substantiate or support the independent evaluation of residual impacts (i.e. what are the residual impacts?)

It is important to note that there are other "potential" impacts that should have been included in Snowfield's DAR and subsequently considered in the Cumulative Effects Study. For example, there is the potential disruption to streams from cut lines and equipment that cross streams during the summer. Sediment disturbance and deposition and other habitat disruption activities on an ongoing basis could cause cumulative impacts and decrease fish productivity. Access by fish to streams during spawning migrations could also be disrupted which could impact fish productivity.

Table 17 also identifies potential cumulative effects on fish by shoreline and bottom alteration as a result of offshore activities. Although DFO is not convinced with the results as presented in Table 16, shouldn't the potential impacts to surface water quality, aquatic vegetation, spawning, nursery and similar fish habitat areas and other activities indicated in Table 16 have been carried forward to Table 17?

The potential cumulative effects therefore listed in Table 17 also seem to contradict the rationale presented in section 4.6.3 "*Cumulative Effects Decision-Making Tool*" and the Methodology presented in Section 4.6.3.1. which is:

- The first step in the methodology is to conduct an EA and identify residual effects for each development proposal.
- * The second step is to collectively compare the identified residual effects from the following sources:
 - * Each of the development proposals;
 - * Those identified in Table 17; and
 - * Those identified from any past, current and proposed developments or activities that might impact the Regional Study Area (section 4.7 provide guidance for the se considerations).

For example, from DFO's view, the environmental assessments are not yet complete given that there is outstanding information that we require yet the Cumulative Effects Study is now complete.

DFO's position or goal is to ensure that there will be no residual impacts to fish habitat (i.e. shoreline and bottom alterations) from each development given that DFO will be locating at re-designing, re-locating and mitigating potential impacts. If there are residual impacts that can not be addressed through re-design, re-location or mitigation, then an Authorization under Section 35 of the *Fisheries Act* may be required from DFO. However, information as requested by DFO from several of the developers still needs to be provided before we can make our final determination on whether an authorization is required or not. As such, DFO is not sure how an adequate cumulative effects study or a cumulative effects assessment can be conducted.

Would you mind briefly elaborating on your concerns about the bounding of aquatic resources?

The Cumulative Effects Study has not adequately explained how and why it established its regional and local study areas. For example, for effects to the aquatic environment, sub-watershed boundaries might have been more appropriate than just considering the Bays themselves. Shouldn't the boundaries have been VEC specific and based on the residual impacts?

Sherry Sian

From: Sherry Sian
Sent: Monday, October 27, 2003 2:08 PM
To: 'BlaisE@DFO-MPO.GC.CA'
Subject: Questions Re: Submission

Elaine,

After review of your submission, I have some questions to clarify your concerns. Your response to the following questions by the end of day tomorrow would be greatly appreciated.

DFO's submission states that there are some discrepancies in the project descriptions and in the cumulative effects study. Some of the comments I have noted from DFO's past submissions on the Registry include:

1. the precise drilling locations for all developers relative to shoals and water depth at the proposed drill sites
2. the number and location of drill sites for New Shoshoni Ventures
3. the source lake for water used to support drilling operations

Does this list reflect your concerns?

You also refer to a July 4, 2003 letter to Snowfield. What information had you requested related to the cumulative effects study?

Gartner Lee Ltd. submitted the maps in digital and hard copy format. Copies have been placed on the MVEIRB web site. Please refer to the environmental assessments section of the site. Maps 1-5 on land classes, use and mining are the maps you are referring to. Please let me know if you have any difficulty reading them. I have one hard copy available in our office.

Other concerns were distributed about Tables 16 and 17. Did the comments circulated earlier today adequately reflect the concerns of DFO?

Would you mind briefly elaborating on your concerns about the bounding of aquatic resources?

Thank you.

Sincerely,
Sherry Sian

Sherry Sian, M.E.Des.
Environmental Assessment Officer
MVEIRB
Box 938, 5102 - 50th Avenue
Yellowknife, NT X1A 2N7
Phone: (867) 766-7063
Fax: (867) 766-7074
e-mail: ssian@mveirb.nt.ca

Sherry Sian

From: Fraser Fairman [fairmanf@inac-ainc.gc.ca]
Sent: Tuesday, October 28, 2003 11:26 AM
To: Sherry Sian
Cc: Mike Byrne; Lionel Marcinkoski
Subject: RE: INAC's Comments on the Cumulative Effects Study for the Drybones/Wool Bay Areas

Sherry,

INAC does not intend to submit additional material. The Section of our letter (Point #25) that refers to an attached map is incorrect. If you have any others questions please let me know.

Cheers Fraser

Fraser Fairman
Environmental Scientist
Environment and Conservation
Indian and Northern Affairs Canada
P.O. Box 1500
Yellowknife, NT X1A 2R3
Tel: (867) 669-2587
Fax: (867) 669-2701

>>> "Sherry Sian" <ssian@mveirb.nt.ca> 10/27/03 10:14AM >>>
Fraser,

Your letter refers to an attached map. Had you intended to submit additional material?

Sherry

Sherry Sian, M.E.Des.
Environmental Assessment Officer
MVEIRB
Box 938, 5102 - 50th Avenue
Yellowknife, NT X1A 2N7
Phone: (867) 766-7063
Fax: (867) 766-7074
e-mail: ssian@mveirb.nt.ca

-----Original Message-----

From: Fraser Fairman [mailto:fairmanf@inac-ainc.gc.ca]
Sent: Friday, October 24, 2003 3:57 PM
To: Sherry Sian
Subject: INAC's Comments on the Cumulative Effects Study for the Drybones/Wool Bay Areas

Hello Sherry:

Please find attached INAC's comments on the Cumulative Effects Study for the Drybones/Wool Bay Areas' proposed developments. Please let me know if you have any concerns with the attachment.

Cheers Fraser

Fraser Fairman
Environmental Scientist
Environment and Conservation
Indian and Northern Affairs Canada
P.O. Box 1500
Yellowknife, NT X1A 2R3