



Mackenzie Valley Environmental Impact Review Board

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From:	Sherry Sian	Fax:	867-766-7074
	EAO	Phone:	867-766-7063
Date:	November 21, 2003	Pages:	31 including this page
To:	Snowfield Development Corp.	Fax:	
		CC:	MVLWB
Subject:	YKDFN's Proposed IRs (EA-03-006)		

NOTES:

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Sherry Sian

From: Luciano Azzolini [TerraFirma@theedge.ca]
Sent: Friday, November 21, 2003 11:39 AM
To: Sherry Sian
Cc: Rachel Ann Crapeau
Subject: YKDFN IRs



03-05 YKDFN IR
Snowfield.doc (...)

Hello Sherry, attached are the Irs the YKDFN will formally submit this afternoon. Regard Louie Azzolini

Louie Azzolini, Dip. Planning, M.A., M.B.A.
Terra Firma Consultants
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IR Number: 1

Source: Snowfield Development DAR

To: Snowfield Development Corporation

DAR Section: Corporate History

ToR Section: B-1 Corporate History

Preamble

Snowfield asserts its satisfactory corporate standing since the 1980's and the expertise of its directors. However, that assertion lacks information about what projects the company worked on in Northern Quebec, and British Columbia. Without this information, there is no way for the Yellowknives Dene First Nation or the Review Board to determine weight of the evidence offered by the proponent. Evidence is needed to support Snowfield's assertion about its corporate history.

Request

1. Résumés of all the authors of the Development Assessment Reports.
2. Resume and northern/aboriginal experience in development projects of the Snowfield Board of directors including Mr. Robert Paterson, Mr. John Nagy, Mr. Marvin Mitchell and Mr. Gennen McDowall.
3. Resume of Mr. Lawrence Stevenson highlighting his northern/aboriginal experience in similar development projects.
4. Please describe the nature and location of projects Snowfield operated in BC and the YT.
5. Please provide the names of the community and First Nation nearest the respective exploration projects conducted by Snowfield.

IR Number: 2

Source: Snowfield Development DAR

To: Snowfield Development Corporation

DAR Section: B-2 Proposed Development Ownership

ToR Section: B-2

Preamble

The Yellowknives Dene are taking early steps to ensure that the company allocates sufficient resources to environmental management and environmental liability management. There is also uncertainty if the directors are responsible for any accident or malfunction, which is not discussed in the EA, and what capacity the company has to deal with unforeseen events.

The YKDNF also wants to ensure there is no real or perceived conflict of interest regarding the financing of Snowfields developments.

Request

1. Provide a list of all private share offerings issued by Snowfield since taking active interest in the project in environmental assessment. The information is available from the Vancouver stock exchange, and reporting of such private placements are required and available. Please provide those to the Review Board.
2. Please provide the Review Board existing insurance coverage information regarding the Snowfield's board of directors.
3. Please have Snowfield's consultants, Mr. Lawrence and Mr. Beauregard provide the Review Board proof of professional insurance and the nature and extent of its coverage.

IR Number: 3

Source: Snowfield Development DAR

To: Snowfield Development Corporation

DAR Section: B-2 Proposed Development Ownership

ToR Section: B-2

Preamble

The Yellowknives Dene are taking early steps to ensure that the company allocates sufficient resources to environmental management and environmental liability management. There is also uncertainty if the directors are responsible for any accident or malfunction, which is not discussed in the EA, and what capacity the company has to deal with unforeseen events.

The YKDNF also wants to ensure there is no real or perceived conflict of interest regarding the financing of Snowfields developments.

Request

4. Please provide evidence to verify that Mr. Beauregard, the field operations manager has the requisite professional and technical background to ensure environmental and general management compliance.
5. Please inform the Board what bonding Snowfield is prepared or has planned for its projects in assessment?

IR Number: 4

Source: Snowfield Development DAR

To: Snowfield Development Corporation

DAR Section: B-4 Environmental Performance Record

ToR Section: B-4

Preamble

Snowfield indicates it has never had a problem conducting its exploration programs in an environmentally responsible manner and that Snowfield's consultant has been involved in projects in Canada and the United States that have never resulted in forfeiture of bonding.

The Yellowknives Dene appreciate the statements made by the proponent but would prefer to have evidence to substantiate these claims. Otherwise, the YKDFN are compelled to take a precautionary approach and presume the proponent is unable or unwilling to provide evidence to support its assertions.

Request

1. Please summarize the exploration programs Snowfield and Mr. Stephenson have previously licenced and bonded in the last 5 years. Please include the name of the regulatory authority requiring the bonding.
2. Certification that Snowfield is an ISO 14000 registered company.
3. Please provide certificates of compliance or letters of referral from other regulatory bodies in Northern Quebec and British Columbia to certify the assertions made by Snowfield.
4. If Item number three cannot be answered, please provide the name, and contact numbers of other regulatory agencies and regulators Snowfield has worked with in the last 10 years in British Columbia and Northern Quebec. The response provided by the proponent is unclear and inadequate.

IR Number: 5

Source: Snowfield Development Corporation

To: Snowfield Development Corporation

DAR Section: C-1 Development Description timing constraints

ToR Section: C-1

Preamble

The proponent provides a very general overview of the timing of the proposed development work. All the proposed work is subject to in field changes, which in fact means that the proposed timing of the development is unknown. In addition, the proponent does should adhere to the ToR, and identify key time constraints affecting the development of the project and the environmental constraints affecting the timing of the project and how the two are reconciled in the development planning.

Request

1. Please summarize for each component of the proposed development the key timing constraints that exist, why they exist and what degree of flexibility the proponent has in modifying the project to accommodate the identified constraint.
2. Please identify and report the environmental timing constraints (e.g., freeze-up, ice formation on Great Slave Lake) that exist for each part of the proposed project, and the alternatives available to the proponent to address environmental timing constraints.
3. Has the proponent considered rapid site assessments of the proposed development areas in the summer time prior to development to ascertain valued cultural resources and how this type of work may influence the overall timing of the development?

IR Number: 6

Source: Snowfield Development Corporation

To: Snowfield Development Corporation

DAR Section: C-2 Location and Design of Operations

ToR Section: C-1

Preamble

The Terms of Reference provided by the Review Board are specific about mapping requirements and the level of detail required in the DAR. DFO provides a one page summary of its information requirements for development proponents. The proponent provides a generalized description of the proposed design and operations of the projects but does not elaborate in sufficient detail on the nature, extent, type and operational parameters associated with bulk sampling, the cutting of vegetation for ground geophysical surveys, the length of the geophysical surveys, the nature of bulk sampling proposed, the methods of removing and its overall management strategy regarding the location and design of its operations.

Request

1. Provide a map showing the location of drill sites at each drill location.
2. Provide a map showing the proposed access road to each drill site.
3. Provide a map showing the proposed new cut line required for access roads.
4. Provide a map showing proposed helicopter landing areas.
5. Provide a map showing proposed water bodies to be used for camps and drilling.
6. Provide a map showing the proposed draw down on each of the proposed water bodies to be used by Snowfield.
7. Provide a map showing alternative winter road alignments.
8. Provide a map showing the location of trenching and or other bulk sampling methods including reverse circular drilling.
9. Provide a map and pictorial showing what an area would look like once Snowfield's proposed bulk sampling program was complete?
10. Provide a map showing the proposed location of sumps?
11. Provide an analysis of the volume of waste each sump would retain.
12. Provide a map showing existing water courses in relationship to each proposed sump.

13. Provide a map showing the location of all fisheries habitat potentially affected by any component of the proposed projects.
14. Provide a map showing alternative drill locations considered by Snowfield.
15. Provide a map showing the location and extent of ground geophysical work proposed by Snowfield.
16. Provide an overall map that shows the location of all components of all of the projects in relationship to other past, existing and proposed projects.

IR Number: 7

Source: Snowfield Development Corporation

To: Snowfield Development Corporation

DAR Section: C-3 Development Description

ToR Section C-3

Preamble

The proponent has significantly altered the original development application to include bulk sampling. Bulk sampling has occurred at Diavik, BHP, and De Beers. The bulk sampling that happened was equivalent to a small mining operation. In addition, the purpose of the environmental assessment is to provide Snowfield the opportunity of demonstrating and showing Northern residents, Aboriginal people and its shareholders its management capacity to undertake developments in an environmentally sound manner.

The development description provided by Snowfield in its DAR submitted on August 19, 2003 by Mr. Lawrence, and the supplementary DAR submission provided by EBA Engineering in September 2003 contain insufficient information to undertake a reasonable environmental assessment of the proposed developments.

Request

1. For each development component and activity discuss how Snowfield has accounted for environmental and First Nations interest. That is show how part so Snowfields development have been modified or proposed to minimize their effects on the social, cultural and bio-physical environment. For example, the routing of the winter road from Dettah/Yellowknife is important. Snowfield should for this development component show how its road routing takes into consideration important environmental, social and cultural variables.
2. Provide information about how camp location, construction methods, and materials selection have taken the environment into consideration.
3. Describe alternative sump locations, methods and alternatives considered such as backhauling to Yellowknife and preferred environmental characteristics of the method proposed in the development description.
4. Please provide information on how the proposed drill targets were selected and what if any environmental considerations were taken in their citing.

5. Please provide information regarding Snowfield's timber cutting, clearing and salvaging protocol and the need for timber authorizations pursuant to Forest Management Act and Regulations.
6. Please provide Snowfield's rationale for the selection of winter route alternatives and its proposed route. Please provide maps when discussing existing cut lines etc.
7. Please provide Snowfield's information regarding the rationale for the location of its various camps including the design, construction and materials selections.
8. Please provide information regarding the rationale for the proposed drilling methods, bulk sampling methods, and inland vehicle transport methods.
9. Please provide information regarding the rationale for the selection of the proposed drilling equipment in comparison to alternatives available.
10. Please provide information regarding the rationale for water use, disposal and treatment considerations.

IR Number: 8

Source: Yellowknives Dene First Nation

To: Snowfield Development Corporation

DAR Section: C-4 Waste management

ToR Section: C-4 Waste management

Preamble

The Yellowknives Dene review of other development proposals in environmental assessment at the Drybones and Wool Bay note waste disposal is treated differently by some proponents. The YKDFN note proactive proponents are backhauling all their wastes including water. This is laudable, and given the sites proximity to Yellowknife, one of the features that makes it economically attractive, should also contribute to improved environmental performance.

Request

1. Please provide an analysis of the total amount of greywater likely generated from the proposed development over its entire life assuming a maximum development scenario. That is Snowfield doing everything it proposes.
2. Provide the Review Board site data relevant to the location of the greywater sump outfall. This should include the following information:
 - a. The final dispersion of the effluent, demonstrating how the soil can accept the amount of water that will be generated, treated and discharged.
 - b. If soil treatment is not planned, the type of water storage planned, its location, and any particular management needed to ensure acceptable aquatic and/or terrestrial impacts.
3. Please inform the Review Board how Snowfield will decide where to put drill cuttings on land, in the winter, if snow covers up the land and it cannot see natural drainage ways or smaller water bodies.
4. Has Snowfield identified and flagged suitable locations to place drill cuttings with the YKDFN before snowfall?
5. How will Snowfield address waste snow that is polluted or environmentally impacted in some way by the proposed development?
6. What is the nature of waste rock that will be generated by the bulk sampling? What are its characteristics?

7. Water that comes into contact with bulk sampled areas may become a waste if it results in its acidification, therefore, please provide information about how Snowfield will manage any acid rock effects.
8. Has Snowfield considered the option of backhauling all wastes produced by the development?

IR Number: 9

Source: Yellowknives Dene First Nation

To: Snowfield Development Corporation

DAR Section: C-5 Water Use

ToR Section: C-5

Preamble

Snowfield states its inland drill program will consist of at least 100 holes not including bulk sampling. The amount of water that will be used in the proposed development, the waste water created, and it's potential to impact the environment.

YKDFN review of similar projects suggests Snowfield will require about 25,000 litres per hole for a total minimum of about 2,500,000 liters of water. This is the equivalent of 550,108 imperial gallons of water. Keeping in mind most of this water will contain some type of waste. That will about 21 pools 12.0x6.0x1.35 meters (40'x20'x4'6"). Not all the water for the drilling will come from one water source. But it does point to the need to carefully think about where the water used for the drilling comes from and what using that water might mean to the fish habitat and to the environment.

Request

1. Please provide information about the volume of water used as a proportion of the total volume of the water body.
2. Please provide the anticipated reduction in the depth of the unfrozen area of the inland water body as measured from the under surface of the ice cover.
3. Inform the Review Board if there are any fish in the inland water body.
4. Please provide information about alternative sources of water for the inland drill program if Snowfield cannot use water from inland water bodies.
5. Please provide information about the water bodies Snowfield intends to use for its development.
6. Please provide information about the volume of water the water bodies.
7. Please provide information about the maximum drawdown on the water bodies.
8. Please provide information about the fish and fish habitat characteristics of the water bodies.
9. Please provide information on the connectivity of the water bodies to above ground seasonal or freshet water movement.

10. Please provide information about any preliminary reconnaissance conducted to determine preferred water bodies for the drilling programs.
11. Please provide information about the maximum drawdown the lakes selected for water use can sustain.
12. How will developer determine where to put drill cuttings in winter if snow covers up natural drainage ways and small water bodies?
13. What are the suspended solids/additives present in the water that will be released on land?
14. How will developer select the water disposal location at each of the drill sites given winter/early spring conditions?
15. Does this water meet CCME water guidelines? If not will there be impact to the environment? If no, provide evidence to prove that conclusion.
16. Provide the Review Board site data relevant to the location of the greywater sump outfall. This should include the following information: (a) The final dispersion of the effluent, demonstrating how the soil can accept the amount of water that will be generated, treated and discharged. (b) If soil treatment is not planned: (and this is the likely scenario at the Drybones Bay area), the type of water storage planned, its location, and any particular management needed to ensure acceptable aquatic and/or terrestrial impacts.
17. Where are the locations of these wastewater releases?

IR Number: 10

Source: Yellowknives Dene First Nation

To: Snowfield Development Corporation

DAR Section: C-5 Water Use

ToR Section: C-5

Preamble

YKDFN members wondered how the current work programs would impact the main streams flowing into Great Slave Lake and other lakes and what would happen to the lakes and the surrounding wetlands if the major arteries were impacted.

Request

1. Please provide a map showing the location of all streams potentially impacted by the proposed development and how Snowfield is mitigating any potential impacts to those streams and fish habitat.
2. If Snowfield cannot accurately identify and characterize streams possibly impacted by its proposed development on what basis is it concluding it will not impact these streams?

IR Number: 11

Source: Yellowknives Dene First Nation

To: Snowfield Development Corporation

DAR Section: E-Alternatives and C-6 Future Development and D-1 and D-2 Effects of the environment on the development

ToR Section: E-Alternatives and C-6 Future Development and D-1 and D-2 Effects of the environment on the development

Preamble

Because environmental assessment is a planning process, one of its most important functions is to consider the environmental impacts of alternative development methods, times, and scenarios. The proponent has not demonstrated that alternatives were consciously considered in the proposed development or the DAR. The following questions are designed to obtain information the proponent may well have but did not consciously put into the DAR.

Request

1. Please provide information about alternative drilling methods considered for delineation of kimberlitic ore.
2. Please provide information on alternative winter road routing to the various drill sites proposed by Snowfield.
3. Please provide information about who will manage the road of the various proponents intending to use the winter road to Drybones Bay. Will Snowfield be the principal manager caretaker of the winter road? If not, who will be the principal/primary contact regarding the design, location, routing and management of the winter road over the duration of the proposed development and permitting window.
4. Please provide information about the alternative drilling locations for the various drill sites considered.
5. Please provide information about the alternative access routes to the various drill sites and camps. Please include map information.
6. Please provide information on alternative bulk sampling methods considered by Snowfield.
7. Please provide information on the alternative transportation methods on site considered.

8. Please provide information about alternatives to cut lines for geo-referencing including the use of NavPak's and other similar devices to avoid cutting trees.
9. Please provide information on alternatives to burning and disposing of human and water wastes in sumps.
10. Please provide information on the success and use of sumps in Precambrian shield environment and alternatives to using sumps.
11. Please provide information on alternative waste management methods considered by Snowfield. Was backhauling all wastes considered? Was backhauling some wastes considered?
12. Please provide information regarding alternative drilling methods considered including barge drilling if it was considered.
13. Please provide information on alternative camp locations considered.
14. Please provide information on alternative camp configurations considered.
15. Please provide information about how the environment could impact that alternatives considered and which alternative provides superior response to effects of the environment.
16. Please provide information about how timing of the development could change the effect of the environment on each of the alternatives considered.
17. Please provide information that shows Snowfield has optimized its project taking into consideration available alternatives, timing and effects of the environment.

IR Number: 12

Source: Yellowknives Dene First Nation

To: Snowfield Development Corporation

DAR Section: G – Public Consultation

ToR Section G – Public Consultation

Preamble

Snowfield outlines what it calls “consultation efforts.” The Yellowknives Dene does not consider the proponent’s effort to be consultation. The demonstrated efforts do not even meet the minimum threshold of discussion.

The proponent misrepresents communication with the YKDFN consultant and relies on the YKDFN to plan, arrange, and pay the cost of public meetings, to facilitate the distribution of the proponent’s information, and to initiate public and Aboriginal consultation. Snowfield has no material basis for suggesting it has even initiated consultations.

Request

1. Please provide the Review Board information about what Snowfield would consider its definition of “consultation with First Nations” as it applies in the NWT.
2. Please provide the Review Board information about what Snowfield is willing to commit to with regard to on-going meaningful consultation with First Nations in the NWT in general, and specifically, the YKDFN?
3. Please provide the Review Board information about what human and financial resources Snowfield is prepared to allocate to its consultation efforts.
4. Please provide information about what other First Nations Snowfield has consulted with in the NWT and in Canada within the last three years – five years.
5. Please provide the Review Board information about what Snowfield understands its role to be in the consultation and communication process with First Nations during EA.
6. Please provide the Review Board information about what Snowfield understands government’s role to be in the consultation and communication process with First Nations during EA.
7. Please provide The Review Information about Snowfield’s consultation policy.

8. Please provide information about what regulatory authorities were contacted in the NWT before applying for the development authorizations? e.g., was DFO contacted? Was Indian and northern affairs contacted?
9. Please provide relevant information about what the proponents consider the minimum appropriate method and content of advice to first nations about planned exploration or mining work.
10. Please provide information regarding the impact of having to wait one winter season before initiating its drill program in order to establish a working relationship with the YKDFN and to obtain appropriate baseline information?
11. Please provide information about what the developer is committing to with regard to on-going meaningful consultation with first nations in the NWT in general, and specifically, the YKDFN?
12. Please provide information about the consultation process used to infuse the development proposal with traditional knowledge?

IR Number: 13

Source: G-2 Issues Resolution section of Snowfields August DAR

To: Snowfield Development Corporation

DAR Section: G-2 Table 6 Issues Resolution

ToR Section: G-2

Preamble

Snowfield concludes that having a First Nation Advisor is sufficient to mitigate almost all impacts created by the development proposal. The YKDFN disagree and must therefore conclude that the issues are and remain unaddressed. The proposed mitigation is inadequate and insufficient to avoid, mitigate and/or otherwise compensate for the direct, indirect and induced impacts of the development proposal.

Request

Please provide the Review Board information regarding what mitigation measures Snowfield proposes in addition to having a team of First Nation members on-site at all times during all seasons to manage and monitor Snowfields developments.

IR Number: 14

Source: G-2 Issues Resolution section of Snowfields August DAR

To: Snowfield Development Corporation

DAR Section: G-2 Table 6 Issues Resolution

ToR Section: G-2

Preamble

In addition to the issues included in Table Six of the DAR, the YKDFN placed on the public registry at the beginning of the environmental assessment a serious of additional issues that were of significant importance to the YKDFN. Please provide information about Snowfields proposed mitigation of these issues.

Request

1. **Impact on forest resources.** Members cited that there were impacts to forest resources with all the trees getting knocked down for trails, drilling and ground magnetic surveys. How will Snowfield address this issue?
2. **Sound effects on wildlife.** There were questions about how sound impacted wildlife, and how a relatively pristine area could be changed by the year round sound. Please provide information about how Snowfield proposes to address this important issue.
3. **Impact on inland streams.** Members wondered how the current work programs would impact the main streams and what would happen to the lakes and the surrounding wetlands if the major arteries were impacted. Please provide information about how Snowfield proposes to address this important issue.
4. **Cumulative Impacts.** Membership expressed serious concern about the cumulative impacts from the exploration activities. "If five companies get permission, then other companies see the door open and move forward with their applications and this will result in cumulative impacts." Although this could also be addressed in the cumulative effects section it is also a significant issue. Please provide information about the potential development scenario under current development opportunities of the area for diamonds.
5. **Cumulative Impacts of Improved Access.** Improved winter road access to the areas will open up new lands, and this is an added impact. Then there are associated impacts. Outfitters will add small camps because there is a winter road. "The open door effect" that will result in increased traffic that results in increased garbage, noise and general nuisances. Impacts that were not there before the ice winter road. If the road cannot be controlled there will be an impact including additional cabin construction. Cabin construction that is unmanaged and uncontrolled. The Snowmobile association is marking trails and opening the land up to more and more people and this is also causing an impact. Trails are being overtaken by other users.

6. **Cumulative Impact Valued Ecosystem Components.** Members reiterated that they were very concerned about what might happen to the moose, muskrat, beaver, fish, water and wildlife habitat, beavers, bald eagles (raptors), plants, trees, grasslands, wetlands for the ducks. Please provide information about just how these plants and animals will be impacted.
7. **Cumulative Archaeological and Heritage Impacts.** Members wanted the PWHC notified that its information is incomplete and that they should note that in all communications. Please provide information regarding Snowfields intentions to complete the archeological knowledge base before undertaking any work.

IR Number: 15

Source: H- Assessment Boundaries section of the Proponents DAR

To: Snowfield Development Corporation

DAR:

ToR Section: - Assessment Boundaries section of the Proponents DAR

Preamble

The broader nature of Snowfields proposed development is not captured in the recently completed Gartner Lee Limited Cumulative Effects Assessment. In addition, Snowfield does not provide enough information in either of its DARs to undertake an appropriate scoping of the boundaries for the environmental assessment. Therefore, the YKDFN request information on the following.

Request

1. Please provide a list of VECs selected by the developer and an explanation why those suggested by the YKDFN in April were not used.
2. Please provide rationale and evidence to support Snowfields selection of temporal and spatial extent of likely impacts on the VECs selected.
3. Please provide information on the criteria used by the developer to determine the scoping and boundaries determination with respect to significance consideration on VECs.
4. Please provide information about how the EA boundary scoping phase was integrated into the overall EA in order to determine priority boundaries by VEC.
5. Please provide information about the boundary scoping decisions taken for each VEC and environmental component and how significance criteria were established based on boundaries proposed by Snowfield.
6. Please provide information on how Snowfield determined its scope of assessment boundaries for VECs and environmental components and VEC indicator elements.

IR Number: 16

Source: Section I, Page 20 of Snowfields DAR and Page 27 K- Cultural and Heritage Resources

To: Snowfield Development Corporation

DAR Section: Section I, Subsistence and Traditional Land Use and K- Cultural and Heritage Resources.

ToR Section: Section I, Subsistence and Traditional Land Use and K- Cultural and Heritage Resources.

Preamble

The proponent references the Yellowknives Dene mapping project and concludes based on it that “no traditional land or any subsistence use was noted on the map or raised during the meeting” with respect to Snowfield’s proposed development it concludes there are no culturally important or heritage sites identified in the areas where it proposes work, and that on the community map there were observed no important cultural or traditional use sites.

Information for the Review Board

The sweeping conclusions arrived at by the proponent after having briefly viewed a small portion of the map demonstrates why the YKDFN want to manage the use and interpretation of its written and mapped knowledge.

Respectful use of the Yellowknives Dene mapping information would have at least included calling the YKDFN to determine if the mapping information could be used. Snowfield did not do this.

Respectful use of the mapping information by Snowfield would have included a fax of phone call to see if its interpretation of the information was correct. Snowfield did not do this.

By drawing inaccurate conclusions based on inappropriate interpretation of map information raises concerns about the reliability and credibility of the EA report for the Board’s purposes and the willingness and ability of the proponent to protect of the social, cultural and economic well-being of Yellowknives Dene.

Snowfield’s conclusion that “no traditional land or any subsistence use was noted on the map or raised during the meeting” with respect to Snowfield’s proposed drilling program is in error.

The Yellowknives submit statements made by Yellowknives Dene at the YKDFN sponsored public meeting on April 3, 2003 as evidence to show that Snowfield's claim is inaccurate and The meeting was recorded and the Yellowknives will make the recording available if requested.

"We are concerned about the potential impact on our land and local trappers. They get many furs from the area and others do as well. There is also cabin out in front of the drill sites. The Prince of Wales Heritage Centre does not have 100% knowledge of the historical information of the area. We can tell you what is there. If you disturb spiritual sites, you will be approached and removed.

You have been over there for a while, but this is the first time I have seen you come into the community. We have rights and this is our homeland you are operating on. We continue to use those trails near Moose Bay and Drybones Bay. There are spiritual sites, archaeological sites, and a number of burial sites, old villages. This is an important area. There are archaeological sites off the Wool Bay. You will have a significant Impact on the Land." Fred Sangris April 2, 2003

"There are many grave sites around. You will destroy the gravesites. You must pay for that. We can't just sit back as you take over the land. You have to inform Chief and council about what you are doing. You have to tell the community. You can't treat us like tied up dogs. We need to talk to and respect each other. People lived there before and you can't treat us like this. You are destroying everything on our land. We can't drink our water and eat our fish. You only want the money from our land. You have to tell our community what you are doing on our land" Mr. Paper April 2, 2003.

"I used to trap and hunt at Wool Bay and Drybones Bay area. There are many grave sites at the areas also. There are lots of elders' trails. The previous mining companies never consulted us. This is our land. Drybones Bay and Wool Bay, that is where the hunt and trap. At Wool Bay I raised all my kids there. I have a house there. Its where I raised my kids. They say when the mine is finished it will all be put it back. I don't think so. Those places are also good fishing places. There is muskrat and moose down there. Wool and Drybones Bay is our trapping place. Those places are our back yard without consulting. This will be a big impact on us. Our people have been impacted but they did not get anything from it. We have experience with what has happened to our land with mines. I can see fore myself. She said she was concerned about her children and her children's children." Judy Charlo April 2, 2003.

"We used to set nets out there in the Wool Bay and Drybones Bay. Doing work on the water will impact the water, maybe doing it inland is better,

but not on the lake. We should have more meetings like the one tonight. We can't just make a decision with one meeting. We need to consider this more." Isadore Tsetta April 2, 2003

"I used to go trapping and canoeing with those elders over there. If there is mining everything will be different. Maybe we should tell him how people use to live around there in the area. Mining companies say nice things but the possibilities, but..... The stories told say that Dettah down to Drybones Bay, there were tents all the way down. This was the stories they use to tell. Last year he and Stan, were out there, with a D-10 and a Cat and Drill. Its important that YKDFN get sufficient notice in advance. If I found something in your back yard you would want to get paid for that. For us Drybones Bay and Wool bay is like our "national park" there is moose, muskrat, beaver and lots of animals down there. As a kid, when I traveled down that way the elders showed me where all the graves where. That area use to be a village (Drybones) bay. There is an old stove made out of rocks down there to. We can't stop you. Today we are suffering in different ways." James Yellowknives Dene Member, April 2, 2003.

Statements made by Yellowknives Dene Membership at the April 4 Afternoon Meeting Session.

- *There are quite a few wolverines in the area. In fact, there have been cut lines made on either side of a trap line. They put in a main line then put off wing lines. Baseline and grid lines basically. They do this to take magnetic readings.*
- *The site preparation for the drilling will disturb the area and cause habitat damage for the ducks and wild grasses. The wet lands will be impacted, and the drill cuttings are going to be back into the wetlands and impact the muskrat.*
- *Around Wool Bay there is an old Village there, near where they plan to drill out on ice. People are noticing that there is lots of traffic going towards Wool and Drybones Bay.*
- *They will be drilling at least 30 holes if all the land use permits are approved. The land use permits document what the proponents are proposing. "That information exists and we should have it."*
- *It seems that the way trees are being knocked that they do not care for what they are doing, or the regulations.*
- *The land use permits are for about two years and they require community consultation before they can go there to work. All the things they have done so far*

show a lack of respect for the people of the YKDFN. Any future work has to have more consultation here. Rachel noted Diamonds North was issued a permit before the community consultation.

- *They should come and see us first before they go to the museum. The museum only knows about the larger graveyard sites and has told them there is basically nothing there, or has given them a limited amount of information. Our concern is your hunting, trapping and fishing rights.*
- *Where will we take our kids out in the spring, summer and fall to hunt moose there? What about if the muskrat habitat is disturbed? What about the ducks? It is close to our community! We do not want our kids to go too far to learn how to hunt. Rocher River is too far away but the Wool and Drybones Bay areas are close to town and are good for teaching purposes for hunting and trapping.*

The overall comment arising from the review of Snowfields EA is that the YK Dene First Nation doubt 1) the reliability of the EA information and conclusions provided, 2) the sincerity of the proponent's commitments, 3) the proponent's ability to respectfully integrate and apply environmental knowledge into its operations. Snowfield has provided the Board with inaccurate information and distorted conclusions based on inappropriate use of Yellowknives Dene intellectual property.

Request

1. Respecting the significant cultural significance of the proposed development areas and the associated cultural landscape, is Snowfield prepared to accommodate YKDFN needs regarding the full protection of the areas?
2. Over the years, cultural, economic and social factors have led to the development of distinct cultural landscapes in and around proposed development area. Through centuries, the local inhabitants perpetuated this cultural landscape through subsistence interaction with the natural resources through consensus-driven institutions. The YKDFN has recently experienced profound changes in its social, cultural, administrative and technical conditions.
 - a. Is Snowfield prepared to work with the YKDFN over an extended period of time in order to ensure the resulting cultural landscape continues to reflect the local identity of the place and residents and represents the regional characteristics of YKDFN?
3. The United States National Park Service has guidelines respecting cultural Resource Management. It says "[c]ultural resource management involves research, to identify, evaluate, document, register, and establish other basic information about cultural resources; planning, to ensure that this information is well integrated into management processes for making decisions and setting

priorities; and stewardship, under which planning decisions are carried out and resources are preserved, protected, and interpreted to the public.

- a. Is Snowfield prepared to undertake a full independent cultural resource assessment and accept the independent results?

IR Number: 17

Source: Snowfield's DAR, page 28, L-Cumulative Effects

To: Snowfield Development Corporation

DAR Section: Section L – Cumulative Effects

ToR Section L – Cumulative Effects

Preamble

Snowfield indicates that in lieu of preparing cumulative effects assessment it participated in the cumulative effects assessment of Drybones Bay. However, the Gartner Lee Limited cumulative effects assessment was concluded without the benefit of Snowfields bulk sampling proposal and much of its proposed development description. The Gartner Lee Limited study is therefore incomplete, inappropriate for Snowfields use, and inconsistent with acceptable cumulative effects assessment practice. The basic concern is that there are basically no cumulative effects of the proposed developments.

The Gartner Lee Limited study was supposed to bring all the projects under one umbrella and provide a platform for good cumulative effects decisions. However, the acknowledged unsatisfactory nature of the cumulative effects study, the narrowly focused supplementary DAR proved by Snowfield for only one of its bulk sampling programs fails to address the basic issue.

There is no conformity with the cumulative effects Terms of Reference for. If unaddressed this issue could become the basis for an impact review by the Review Board.

Request

1. Snowfield is asked to provide information regarding its willingness and capacity to prepare a cumulative effects assessment using existing information and additional information it may need to obtain either through primary and/or secondary research.
2. Snowfield is asked to provide sufficient information regarding cumulative cultural landscape impacts in a form comparable to the United States National Park guidelines for cultural resource management for the Review Board's consideration.
3. Mr. Callum Thomson, Thomson Heritage Consultants concludes that "[t]he extent of cumulative impacts on heritage resources of continued mineral exploration and eventual development is difficult to measure without a better understanding of the

resource base that will be affected. However, present knowledge of the density of sites, the often large extent of sites, and the distribution of sites in many different environments around Drybones Bay and between Wool Bay and Matonabee Bay as a result of the surveys and investigations described in the report and YKDFN 2003 suggests that the cumulative effect on cultural resources of continued and expanded exploration, gravel extraction, mine development and the construction of associated infrastructure will be negative, with or without mitigation. It is also clear that local aboriginal peoples, who still hunt, trap and fish in the area and whose ancestors are buried in the area, are concerned about the effects on their traditional activities and sites of spiritual significance.”

- a. Please indicate if Snowfield accepts the area where it proposes to undertake development has value at a cultural landscape level? If Snowfield suggests the area does not have a significant cumulative cultural landscape value, please provide information used to arrive at that conclusion.