

EA 0506-003
WR ENERGY



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PRINCE ALBERT GRAND COUNCIL
Athabasca Dene Lands and Research office

FACSIMILE TRANSMITTAL

DATE: June 23/05
TO: MVEIRB
FAX: 867-766-7074
FROM: Rosanna
RE: EA-0506-003

Number of Pages Sent (Including this one)

RECEIVED
3:00pm 4
JUN 22 2005
MACKENZIE VALLEY
ENVIRONMENTAL IMPACT
REVIEW BOARD

32

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Athabasca Denesuline Submission to MVEIRB

Project: EA 0506-003 Ur Energy

	Mackenzie Valley Environmental Impact Review Board FORM 1	Request for Party Status
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Name of Organization:	Athabasca Denesuline Negotiation Team (ADNT)
Name of Proceeding:	EA0506-003 Ur Energy Screech Lake Environmental Assessment

<p>Reasons for requesting Party Status in these proceedings.</p> <p>The ADNT represents three First Nations within whose Traditional Territory this proposed development is located. The Athabasca Denesuline have concerns about the development including its overlap with traditional activities, important wildlife habitat and special ecological places. The ADNT are currently and actively negotiating a resource harvesting agreement with the Governments of Canada and the Northwest Territories. As a consequence of these negotiations the ADNT and Governments have entered into an Interim Measures Agreement concerning consultation protocols. The geographic extent of this IMA encompasses that of the proposed development.</p>
<p>Participation: Please describe how you or your organization intends to participate in this proceeding, such as what information, witnesses, or presentations you plan to submit.</p> <p>The ADNT will participate in the process by preparing a written submission given our limited resources. Some of our concerns were noted in a March 16, 2005 submission to the Mackenzie Valley Land and Water Board and have been elaborated in the attached document. We also believe that a community session should occur in one of our communities as well as in Lutsel K'e.</p>
<p>If you represent a Responsible Minister or Responsible Authority please state which one. List the licences, permits or authorizations issued by your organization relevant to this proceeding.</p> <p>The ADNT represents the Black Lake, Fond du Lac and Hatchet Lake First Nations.</p>
<p>Contact Information: Please confirm the organization's contact information and the name of the primary contact person for Board correspondence purposes.</p> <p>Ron Robillard Athabasca Denesuline Negotiations Team c/o Prince Albert Grand Council Suite 206, 1004 - 1st Avenue West, Prince Albert, Saskatchewan, S6V 4Y4 Email: robillard@pagc.sk.ca or rgood@pagc.sk.ca Telephone: (306) 922-7612 or (306) 922-7613 Facsimile: (306) 763-2973</p>
<p>Dated at Prince Albert, Saskatchewan, on (MM/DD/YY) 06/22/2005.</p> <p><i>Rosanna Good</i> 06/23/05</p>

21/06/2005

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Athabasca Denesuline Submission to MVEIRBProject: EA 0506-003 Ur Energy**Submission to the Mackenzie Valley Environmental Impact Review Board****Project: EA 0506-003 Ur Energy****Uranium Exploration – Screech Lake****Submitted By:****Ron Robillard****Athabasca Denesuline Negotiations Team****c/o Prince Albert Grand Council****Suite 206, 1004 – 1st Avenue West, Prince Albert, Saskatchewan, S6V 4Y4****Email: rrobillard@pagc.sk.ca****Telephone: (306) 922-7612 or (306) 922-7613 Facsimile: (306) 763-2973****Background:**

On March 16, 2005 the ADNT responded to a land use permit application referred to them by the Mackenzie Valley Land and Water Board (MVLWB). The land use permit application was submitted by Charleton Mining Exploration Inc. for Ur Energy Inc and covered mineral (uranium) explorations south of the Thelon Game Sanctuary. In early May 2005 the project was referred to an Environmental Assessment (EA) at the Mackenzie Valley Environmental Impact Review Board (MVEIRB). The ADNT has prepared this submission to the MVEIRB as a means of participating in the EA process.

Environmental Assessment Procedure:

It is understood that the MVEIRB has planned a two step process. Phase One consists of a public hearing to clarify the scope of the development and the assessment, to gauge the level of public concerns and to provide the Board with some of the information needed in the EA. If the hearing and/or prior submissions do not provide the Board with sufficient information, the Board will enter a second phase that may consist of an information request only or may consist of a full EA process.

Phase One Schedule:

Timeframe	Activity/Milestone
May 20 to June 3	Developer/LKDFN to submit additional information
May 20 to June 3	Parties to EA to identify themselves
June 17	Pre-hearing conference (teleconference)
June 29	Community Hearing in Lutsel K'e
July 19	Board decision whether to enter phase two of EA
August 19	Issuance of decision and report of environmental assessment

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The pre-hearing conference will be conducted via telephone conferencing; and in Yellowknife. The public hearing will be held in Lutsel K'e.

The phase two schedule, if required, will be decided after phase one.

Other Parties, who have raised issues about this project, include the Lutsel K'e Dene First Nation, Akaitcho Treaty 8 Tribal Corp., BQCMB, WWF and the North Slave Metis Alliance.

Our Concerns

Athabasca Denesuline territory parallels the range of the caribou herds that our people have relied upon for more than 8,000 years. This includes the south-eastern part of the Northwest Territories. While our reserves and present-day communities are located in Northern Saskatchewan, hunting, trapping and other cultural use areas are located north of the 60th parallel. Athabasca Denesuline harvesting activity continues to occur there.

Artificial political, treaty and administrative boundaries continue to be drawn through the Athabasca Denesuline traditional territory. We do not regard these boundaries as having diminished our Aboriginal and Treaty rights in the area, including resource harvesting and the maintenance of our cultural resources, our identity and our ancestral lands. We continue to exercise these rights as we have in the past.

The Athabasca Denesuline outlined a number of concerns in their March 16th response to the MVLWB including overlap with (1) traditional land use, (2) important wildlife habitat and (3) special ecological places as well as (4) the lack of benefits for the Athabasca Denesuline. In addition we have a (5) procedural concern about the proposed EA process. Each of these concerns is further discussed below.

1. Traditional Land Use

Athabasca Denesuline travel routes, trap lines and overnight sites, identified during 1990 and 2002 studies, are in close proximity to the proposed land use permit. Our records show use by Fond du Lac and Black Lake First Nations. There is also the possibility that the proposed exploration activities could encounter unknown or unrecorded archaeological sites and aboriginal artefacts in this area.

Please see the attached Map 1.

2. Wildlife Habitats, Movements and Populations

Some of the species present in the area include red fox, wolf, grizzly, waterfowl, muskoxen, moose, and caribou. The Athabasca Denesuline utilise all of these species.

The proposed development is within the range of the Beverly-Qamanirjuaq caribou herds. The yearly migration of the caribou herds is integral to Athabasca Denesuline economic, social and cultural identity. Any potential disturbance to the caribou is a potential risk to Athabasca Denesuline identity.

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Several water crossings, rated low use, are used by caribou are located within the proposed development area. Water crossings are very sensitive to development activity.¹

While the project under consideration appears to avoid caribou calving and post-calving grounds, a recent Beverly-Qamanirjuaq Caribou Management Board position paper indicates that the mapped caribou ranges are only a rough guide to where the animals calve.² The caribou use other areas, which vary from year to year and may therefore overlap with the extent of the proposed project.

Please see the attached Maps 2 and 3.

3. Conservation

A special places analysis by the ADNT investigated the overlap between important wildlife habitat, unrepresented ecosystems³, mineral and other commercial activities, and Athabasca Denesuline traditional use to prioritize areas for protection. Portions of the "Screech property" were identified as High priority for protection.

Please see attached Map 4.

4. Athabasca Denesuline Benefits

This proposed development indicated no short-term economic benefit to the Athabasca Denesuline. Long-term benefits may be possible, but were unclear in the proposal, and not guaranteed.

5. EA Procedures

Athabasca Denesuline community members use the area in question and may be affected by the proposed development. These members are not resident in Lutsel K'e. The ADNT does not have the resources to ensure that representatives of the Athabasca Denesuline can travel and participate in EA related meetings. We therefore believe that a community session should be held in one of our communities as well as in Lutsel K'e. .

Conclusions

The land use permit application submitted by the proponent does not directly or adequately address our concerns about potential impacts on traditional activity, wildlife habitats, movements and populations, ecological integrity and economic benefit to the Athabasca Denesuline. Further the proposed EA process does not allow for a community meeting in an Athabasca Denesuline community.

Should the MVEIRB require additional information or clarification, please contact our office.

^{1,2} Beverly and Qamanirjuaq Caribou Management Board. September 2004. Protecting Calving Grounds, Post-Calving Areas and Other Important Habitats for Beverly and Qamanirjuaq Caribou. A Position Paper.

³ Based on the World Wildlife Fund's assessment of representation using their Enduring Features Analysis

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N.084.29

N.074.29

104°30'0"W

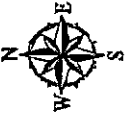
105°00'0"W

104°30'0"W

105°00'0"W

Map 1. Mapped Denesuline Traditional Land Use in the vicinity of the EA-0506-003 area in the Upper Thelon Watershed, south of the Thelon Game Sanctuary

Map Projection: Transverse Mercator
 Ellipsoid: GRS80 and Central Meridian: -102
 Reference #: Mar-11-05-Ur-Energy Inc.

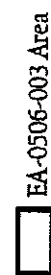


Map prepared June 21, 2005 by PAC Team Canada for the Athabasca Denesuline Negotiation Team

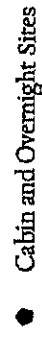
Data Sources:

- Lakes and Rivers from Government of Canada, Natural Resources Canada, Canada Centre for Remote Sensing, 2003, National Scale Frameworks Canada (1:1,000,000 and 1:7,000,000 scale product), Version 5.0, The Atlas of Canada.
- Athabasca Denesuline Traditional Land Use from 2002, Oral History and Mapping Project, and Usher, P.J., 1990, Recent & Current Use and Occupancy in the NWT by Chipewyan Denesuline Bands.

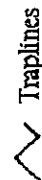
Legend



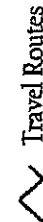
EA-0506-003 Area



Cabin and Overnight Sites



Traplines



Travel Routes

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