

## **Alistair MacDonald**

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**From:** Alex Hall [alex@canoeartctic.com]  
**Sent:** May 19, 2008 2:05 PM  
**To:** Alistair MacDonald  
**Subject:** Environmental Assessments for Uravan and Bayswater mineral explorations

To: MACKENZIE VALLEY ENVIRONMENTAL IMPACT REVIEW BOARD

CONCERNING ENVIRONMENTAL ASSESSMENT (EA 0708-002) URAVAN MINERALS INC.  
BOOMERANG LAKE SOUTH MINERAL EXPLORATION

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The gin-clear Thelon is one of the great rivers of Canada. It is the largest and easily the most magnificent of the tundra rivers, by far the most unique, and one of the most important tourism resources in the Northwest Territories and Nunavut. For the Dene of Lutsel K'e, the Thelon is a sacred place. It is also vital to one of the largest caribou herds in North America---the Beverly Herd---in its spring, summer and fall migrations.

No other river north of the treeline has such a long and legendary human history. Nowhere else is the wildlife as rich. In recognition of its exceptional features, the Thelon was designated a Heritage River of Canada by the federal government in 1990.

Straddling the Northwest Territories/Nunavut border, the middle part of the Thelon watershed has been protected from industrial development since 1927 by the Thelon Game Sanctuary (known as the Thelon Wildlife Sanctuary since the 1990s), the largest and one of the oldest protected areas in Canada. On November 21, 2007 most of the remaining headwater areas outside the newly designated national park (Thaydene Nene) received interim protection for a five year period under the terms of the Akaitcho Protected Areas. However, approximately 100 miles (160 km.) of the Thelon sandwiched in between the newly (and temporarily) protected headwater areas and the Thelon Wildlife Sanctuary remain unprotected and clearly threatened by industrial development in the form of uranium mines, now in the early exploration phase.

The Dene of Lutsel K'e desperately wanted to include this part of their sacred river in the Akaitcho Protected Areas, but were prevented from doing so by the federal government when that government allowed uranium claims to be staked there during the negotiation phase between the two parties. Now, through a new land use planning process agreement with the federal government to extend over the next five years, the Dene of Lutsel K'e have a second chance of protecting the core area along this part of the Thelon provided that, during the negotiation period, mining companies are not permitted to drill for uranium along this last crucial piece of the river.

In that regard, it is paramount that the MacKenzie Valley Environmental Impact Review Board (the Board) remain consistent with its earlier decision regarding uranium prospecting on the Thelon and recognize the greater long-term cultural, caribou-conservation and tourism values of this sacred place. I urge the Board to reject the destructive and potentially irreversible impacts of uranium mining in this remote pristine wilderness and to allow the Dene of Lutsel K'e one last opportunity to protect this section of the Thelon River in perpetuity.

If we Canadians can realize the wisdom of protecting the Thelon in its entirety in this time of rampant industrial development and dwindling wild places, future generations will be truly grateful for our foresight. The 100 miles of the upper Thelon now claim-staked for uranium is a key link between the protected areas farther upstream and the wildlife sanctuary along the middle river, farther downstream. Uranium mining on any part of this river would be catastrophic to its cultural, wildlife and tourism values. And an industrial accident could result in long-term radiation poisoning of this great river running on down through the wildlife sanctuary to Baker Lake in Nunavut. Common sense dictates that the Thelon watershed be protected in its totality for future generations. It must remain whole.

I have previously written to the Board regarding the importance of the upper Thelon in terms of tourism, of the use of this part of the river by wilderness canoeists from all over the world, as well as the importance of the upper Thelon to my own tourism business over the past 34 years. I understand the Board will consider these earlier submissions regarding UR-Energy and scoping questions for the Uravan and Bayswater drilling projects. While no one looks forward to public hearings on the drilling applications of Uravan and Bayswater, if the community of Lutsel K'e decides it would be in their best interests to hold a public hearing on these matters, then I would urge the Board to hold such hearings.

Leslie Wakelyn has made several submissions to you on behalf of the Beverly & Qamanirjuaq Caribou Management Board regarding the importance of the upper Thelon River to the Beverly and Ahiak caribou herds. Nevertheless, I thought it would be appropriate for me to address this topic as well since I have more experience than anyone else in this area during the June-July-August period.

The part of the upper Thelon River containing the mineral claims of Uravan and Bayswater is central to the main migration routes for the Beverly Caribou Herd in spring, summer and fall. It has been my privilege to encounter many hundreds of thousands of caribou migrating through the upper Thelon over the past three decades or more. In terms of the summer migration, the Beverly Herd usually (there are lots of exceptions) passes through this area on its southward migration to treeline during the last two weeks of July and/or the first week of August. As such, the upper Thelon is part of the "post-calving area" of the Beverly Herd (the Beverly & Qamanirjuaq Caribou Management Board defines post-calving areas as those areas used by cows and calves between calving time in early June and the end of July).

In my experience, there are eight major river crossings (almost one every ten or twenty miles) used by the Beverly Herd along the portion of the upper Thelon River that lies within the areas containing the mineral claims of Uravan and Bayswater (see table below). In fact, most of these crossings have undoubtedly been important to Beverly caribou for hundreds and even thousands of years, as evidenced by the archaeological sites at these crossings in the form of stone caribou fences, stone teepee rings, old rotten teepee poles, chipping (tool-making) sites and numerous arrowheads, spear points, knives, scrapers, etc. that can be found lying on the surface. Indeed, archaeological sites of Aboriginal peoples can be found almost everywhere you look along the Thelon.

Below is a table of locations where I have observed at least tens of thousands of caribou in a single herd crossing the upper Thelon River in late July or early August within the areas claimed for minerals by Uravan and Bayswater. On two particularly memorable occasions with my clients in the late July period, I encountered massive herds, each containing at least 100,000 caribou, crossing the Thelon at Eyeberry Lake. There were caribou as far as you could see, moving by for the better part of a day. Experiences like these are life-changing events.

TABLE OF MAJOR CARIBOU CROSSINGS ON THE UPPER THELON RIVER BETWEEN THE THELON WILDLIFE SANCTUARY (in the north) AND GRANITE FALLS (junction of Elk and Thelon rivers in the south): 1975-2007.

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1. At the esker along the southern boundary of the Thelon Wildlife Sanctuary at 63 degrees, 21 and a half minutes North latitude.
  2. Where the Thelon River leaves Eyeberry Lake (between 63 degrees, 11 minutes and 63 degrees, 12 minutes North).
  3. Where the Thelon River enters Eyeberry Lake (63 degrees, 07 minutes North).
  4. Where Mary Frances River meets the Thelon River (63 degrees, 01 minutes North).
  5. Thelon River at 62 degrees, 55 minutes North.
  6. Thelon River at 62 degrees, 35 minutes North.
  7. Thelon River at 62 degrees 25 and one-half minutes North, 104 degrees 40 minutes West.
  8. Above and below Granite Falls at 62 degrees, 25 minutes North.
  9. Between Jim and Mantic lakes and between Mantic and Sid lakes just east of Granite

Falls.

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The gigantic treed eskers snaking across the tundra of the upper Thelon River---some miles in breadth and hundreds of miles in length---have to be seen to be understood. These linear oases of trees and sand dunes on the treeless tundra have transformed the upper Thelon---to my mind---into the most beautiful place on this earth.

Although I have travelled into many other parts of the Barren Lands, this area, more than any other, has come for me to mean Home, a personal Eden, my Heaven on Earth. As it has for the Dene of Lutsel K'e before me, this has become my spiritual place---my church. For more than twenty years now, my will has stated that my ashes are to go there in this pristine Garden of Eden.

It has often occurred to me that the Thelon is such a crucial part of the Barren Lands (it's the largest watershed in an area of mainland tundra that comprises one-eighth of the land mass of Canada) that if you could magically remove the Thelon from the map, the Barren Lands would be so impoverished as a result, that I would undoubtedly lose my interest in the place. In my travels across the tundra I came to realize many years ago that the Thelon is more valuable than all of the rest of the Barren Lands put together. The Thelon is the very heart and soul of the Barren Lands and we need all of this magnificent river to keep it a spiritual place. The "church" must not be desecrated, neither in whole nor in part!

One day before I leave this world, I dearly hope to see the entire upper Thelon watershed within the Northwest Territories become a keystone piece of one of the world's largest and most celebrated fully protected wild places, stretching all the way from Wood Buffalo National Park in Alberta to the Thelon country in Nunavut---a future tourism magnet that I predict will rival any park anywhere, and be the envy of every nation on this planet. If you look at a map of current protected areas and interim protected areas in the Northwest Territories, you will see we are well on our way to achieving just that.

To this Board my message is clear. Consider your options wisely. Think big. Think long term. Think 100 years, 500 years down the road. Don't foreclose the possibility that the people of Lutsel K'e will succeed in their dream to protect the upper Thelon River in its entirety. The result, my friends, would be a priceless and enduring gift from the Dene to Canada and to the rest of the world.

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