



MAY 27 2015

Mr. Simon Toogood  
Environmental Assessment Officer  
Mackenzie Valley Environmental Impact Review Board  
PO Box 938  
YELLOWKNIFE NT X1A 2P1  
VIA EMAIL

Dear Mr. Toogood;

**Husky Chedabucto Mineral Exploration Project Environmental Assessment (EA 1415-01) – Response to Information Requests**

The Government of the Northwest Territories (GNWT) has reviewed Information Requests (IRs) issued by the Tłıchǫ Government on May 19, 2015, and is providing the attached IR responses for MVEIRB's consideration.

Should MVEIRB or any of the EA participants have any questions, please contact Lorraine Seale, Manager, Project Assessment Branch (Lorraine\_seale@gov.nt.ca or 867-765-6786) or Charlotte Henry, Project Assessment Analyst (charlotte\_henry@gov.nt.ca or 867-765-6786).

The GNWT looks forward to participating in the June 18<sup>th</sup> and 23<sup>rd</sup> community hearings.

Sincerely,

Terry Hall  
Director, Land Use and Sustainability

c. Sjoerd van der Wielen; Tłıchǫ Government

Attachments:

1. GNWT Responses to Round Two Information Requests



Attachment 1: GNWT Responses to Round Two Information Requests from Tłıchq Government

<u>TOPIC</u>	<u>REVIEWER COMMENT/RECOMMENDATION</u>	<u>GNWT RESPONSE</u>
<p>Tlıcho Government IR #1 to GNWT: Husky Leases</p>	<p><b>Comment:</b> The Tłıchq Government has identified a concern with the four leases held by Husky that have been identified as key migratory bird habitat and as desirable for inclusion in the Dinàgà Wek’èhodì National Wildlife Area. The Tłıchq have concluded that there may have been a failure to properly consider these issues at the time of issuance of the mineral leases to Husky. For reasons of habitat and animal protection, Tłıchq have identified a need to include these leases as part of the Dinàgà Wek’èhodì National Wildlife Area.</p> <p><b>Recommendation:</b> How will GNWT balance its desire for economic development with its stated desire for habitat and animal protection as, for example, per its support for Protected Areas?</p>	<p>To clarify, Husky does not hold mineral leases in this area, only mineral claims.</p> <p>The GNWT’s balanced approach is based on the application of the concept of sustainable development in all its decisions and actions related to natural and heritage resources in the NWT (GNWT Sustainable Development Policy).</p> <p>The GNWT’s balanced approach is also discussed in the Land Use and Sustainability Framework (LUSF); goals of the LUSF are reflected in, and carried out through, the GNWT’s balanced approach to Land Use Planning. Post-Devolution, the GNWT remains committed to Land Use Planning and have initiated a partnership approach to ongoing Planning through the March 2015 Exploratory Forum that focused on developing a Land Use Planning Policy Framework for the NWT. Beyond that, the GNWT has developed specific initiatives such as the Ecological Representation Network Plan to meet conservation planning goals, and the Mineral Development Strategy to promote responsible resource development. As discussed in the GNWT’s preliminary screening comments for the proposed Husky project, GNWT has initiated a land use plan scoping study for the Wek’eezhii Management Area.</p> <p>Of note, the conservation planning process for Dinàgà Wek’èhodì National Wildlife Area has yet to conclude. The multi-stakeholder Dinàgà Wek’èhodì Working Group (DWWG), which includes Tłıchq Government representation, has held preliminary discussions on finding a boundary that would ensure culturally and ecologically important areas would be protected while including as little area of economic potential as possible, and excluding all active mineral claims. These discussions are documented in the minutes of the</p>

		<p>working group meetings, and in the interim draft recommendations report on the establishment of Dinàgà Wek'èhodi, March 2014.</p>
<p>Tlicho Government IR #2 to GNWT: Boreal caribou habitat</p>	<p><b>Comment:</b> All animals on the land, but especially the caribou, are at the heart and soul of the Tłı̨chǫ people and culture. Even though it might be found that the exploration project will not likely have any direct negative effects for the boreal caribou, the possible silica mine resulting from the exploration will indeed destroy prime boreal caribou habitat. A crucial part, under both the federal and territorial Species at Risk Act, is the protection of prime habitat.</p> <p><b>Recommendation:</b> GNWT should inform on how it intends to manage the concerns, given the Tlicho wish to see the mineral leases transferred.</p>	<p>In terms of impacts to boreal caribou habitat, the project occurs within the Boreal Caribou range, but as of now is completely within the perimeter of a fire that occurred in 1981. As per the federal Recovery Strategy, areas that have burned within the last 40 years are considered “disturbed habitat” and would thus not be considered Critical Habitat for boreal caribou at this time. New human disturbance features will be buffered by 500 m. If the 500 m buffer around the disturbance footprint is completely within the perimeter of the existing fire it will not add to the amount of disturbed habitat within the Boreal Caribou range. The fire in this area will become undisturbed habitat in 2022 when it turns 41 years old, but the buffered human disturbance footprint within that area will remain and would be considered in the total disturbance footprint within the boreal caribou range at that time.</p> <p>There could still be impacts to individual caribou such as sensory disturbance or vehicle collisions. GNWT - ENR has requested the proponent to submit revised Wildlife, Archeological, and Environmental Awareness Plans incorporating detailed Standard Operating Procedures that protect wildlife and wildlife habitat as well as including information from the DRAFT Wildlife &amp; Wildlife Habitat Protection Plan and Wildlife Effects Monitoring Program Guidelines. This document would describe mitigation to be implemented by the proponent during the two phases of proposed activity being examined in this environmental assessment.</p>

<p>Tlicho Government IR #3 to GNWT: viability of mining in area</p>	<p><b>Comment:</b> When an Aboriginal Government identifies long term concerns with the potential activity, the GNWT has a corresponding duty to understand the potential for the activity to proceed and to proactively take the necessary steps to deal with those concerns. For example, in BC, recently, when a specific area that was considered for exploration and mining was later identified as not acceptable, the province worked with the proponent (Fortune Minerals) to encourage the Proponent to disinvest. The province compensated the Proponent for the minerals leases held, and the parties all agreed that should the development ever become viable within ten years that the Proponent could buy the property back.</p> <p><b>Recommendation:</b> The GNWT's needs to set out its understanding of the suitability of mining in the area, given the depth of traditional use, cultural importance, and recreational significance of the area. Please identify whether the GNWT has considered the viability of mining in this region.</p>	<p>The Northwest Territories Geological Survey (NTGS; previously the Northwest Territories Geoscience Office) is a research organization that conducts geoscience research of the NWT's mineral and petroleum resources. NTGS has published three publicly available reports that discuss the mineral potential of the silica sands at Whitebeach Point. <i>Identification of Potential Silica Sand Deposits in the Northwest Territories</i>, published in 2012, provides an overview of silica sand deposits across the NWT. This overview Report concluded that the western shoreline of Great Slave Lake in the North Arm area is considered to have high potential. <i>Non-Renewable Resource Assessment (Minerals): Kwets'oot'àà Candidate Protected Area</i>, published in 2013, was a required assessment under the Protected Areas Strategy. Further research into the potential of the silica sands was documented in the assessment Report, which concluded the area has high potential for silica sand deposits however no testing had yet been completed on the chemical and engineering properties of the sand. The assessment Report also concluded that silica is the only real mineral potential in the study area, with exception to dimension stone which is available elsewhere. <i>Preliminary Investigations of Silica Resources of the Northwest Territories</i>, published in 2014, presented the chemical and physical test results for silica deposits in the Great Slave Lake, Liard and Mackenzie regions. Whitebeach Point on Great Slave Lake was the only deposit examined in this study that met the specifications for commercial silica sand. These reports were shared with the Dinàgà Wek'èhodì Working Group for the candidate protected area.</p> <p>For clarity, the GNWT would like to remind all parties that the scope of the Husky Chedabucto environmental assessment excludes mining activities.</p>
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