



Allen Ehrlich  
Senior Environmental Assessment Officer  
Mackenzie Valley Environmental Impact Review Board  
P.O. Box 938, 5102 - 50th Ave  
Yellowknife, NT X1A 2N7

Dear Mr. Ehrlich

**Hunter Bay Resources – Mineral Exploration**  
**MVEIRB Information Requests**

Thank you for the opportunity to provide information concerning Hunter Bay Resources proposed mineral exploration on the eastern shores of Great Bear Lake. Please find attached the Government of Northwest Territory's response to the Mackenzie Valley Impact Review Board's requests.

Should you have any questions regarding our response, please feel free to contact me at 920-6593.

Sincerely

A handwritten signature in blue ink, appearing to read "J. Holder". The signature is fluid and cursive, with a long horizontal stroke at the end.

Joel M. Holder  
Environmental Assessment Analyst  
Environmental Assessment and Monitoring  
Environment and Natural Resources

**IR Number: 1.1**  
**Source: MVEIRB**  
**To: Government of Northwest Territories**  
**Subject: Potential Impacts on Caribou**

## **Preamble**

The SLWB received a letter on May 11, 2007 from the Sahtu Renewable Resources Board stating that it is concerned with the disruption of migrating caribou during scheduled operations. The Deline Renewable Resources Council letter of May 8, 2007, expresses concern that the area is a “very important caribou migration route”.

In its letter of May 15<sup>th</sup>, 2007, the GNWT Department of Environment and Natural Resources states that the mitigations proposed by the developer are not sufficient to minimize impacts on wildlife. On page three of that letter, the GNWT identifies three specific and necessary mitigation measures pertaining to caribou. These include shutting down operations if caribou approach within 500m, staying 500m away from mineral licks, and staying 5 km away from recognized caribou crossings between May 15<sup>th</sup> and October 15<sup>th</sup>.

The SLWB did not conclude that this project might have a significant adverse impact on the environment. The measures contained in the Screening Report and in the draft Land Use Permit do not include the mitigations that the GNWT described as necessary.

## **Request**

1. In your view, without the caribou mitigations proposed by the GNWT, might the proposed development have a significant adverse impact on caribou? Please explain.

*As we stated in our letter to the Sahtu Land and Water Board dated May 15<sup>th</sup>, 2007 the mitigations presented by Hunter Bay Resources “are not sufficient to minimize impacts to wildlife and wildlife habitat”. The project occurs within the annual range of the Bluenose-East barrenground caribou herd<sup>1</sup>, a herd that is in decline, and on the extreme eastern edge of Boreal Woodland caribou range<sup>2</sup>, a species listed as Threatened under the federal Species at Risk Act (SARA).*

*With respect to boreal woodland caribou, there are obligations under SARA for those responsible for assessing the effects of developments, including ensuring the mitigation and monitoring of any effects regardless of their significance. Developments occurring within the range of boreal woodland*

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<sup>1</sup> <http://www.nwtwildlife.com/NWTwildlife/caribou/distribution.htm>

<sup>2</sup> <http://www.nwtwildlife.com/Publications/speciesatriskweb/woodlandcaribou.htm>

*caribou habitat should have mitigations in place to minimize impacts to caribou in the event that animals are encountered during operations. Those recommended in our letter are sufficient in our opinion to sufficiently minimize effects.*

*Similarly, while barrenground caribou are not listed under SARA, populations are in decline and it is the opinion of ENR staff that mitigations are necessary to reduce any potential negative effects of the proposed development. Again, those recommended in our May 15<sup>th</sup> letter are, in our opinion, sufficient.*

2. In your opinion, were your views adequately reflected in the results of the Preliminary Screening? Please explain.

*The views and recommendations of ENR staff were not adequately reflected in the results of the Preliminary Screening of this project application as the mitigations recommended to the SLWB for minimizing potential negative effects to caribou, both boreal woodland and barrenground, were not included in permit terms and conditions.*