

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

27 July 2009

Leslie Payette
Manager Environmental Administration
Nunavut Impact Review Board
P.O.Box 1360
Cambridge Bay NU X0B 0C0

Dear Ms. Payette:

NIRB File No. 07EN047 – Uranium North Resource’s Permit Extension Request

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on the application from Uranium North Resources (Uranium North) for a one year extension to their land use permit in support of their “Amer Lake” uranium exploration project. This input is provided in response to the request in NIRB’s letter of 17 July 2009 for comments regarding “any additional mitigation measures that are appropriate” and “any other matter of importance to the Party related to the project proposal”.

The BQCMB would like to take this opportunity to provide information to the NIRB for use in developing and recommending improved permit conditions and for notifying INAC and Uranium North about the crucial need to avoid impacts from mineral exploration on both caribou and caribou habitat on their Amer Lake property.

Reconnaissance surveys of the Beverly caribou calving ground have been conducted by the Government of the Northwest Territories in each of the last three years (in June 2007, 2008, and 2009). Therefore information on the status of the herd is available now that was not known in 2007 when the NIRB conducted the project screening and INAC issued the permit to Uranium North for this project. We now know that the Beverly caribou herd has undergone a drastic decline in numbers, that this decline is continuing, and that the herd is extremely vulnerable. More details about the status and decline of the Beverly herd are provided in a press release and backgrounder issued by the BQCMB earlier this month, which are attached. Please ensure this information is made available to Uranium North and INAC.

While it is true that the Amer Lake property is not within a traditional caribou calving ground, all parties must understand the importance of minimizing disturbance to caribou and caribou habitat wherever and whenever caribou cow and calf groups are observed. This is essential to provide the Beverly herd with the opportunity to recover from its decline.

We generally support the proposal by the NIRB to re-issue the same terms and conditions for protection of caribou as those in the August 2007 Screening Decision, which we were glad to see

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included in the permit issued by INAC. We recommend modifications to those conditions and one additional condition as follows (changes bolded):

- 1) The proponent is required to suspend all project activities during the period of May 15 to July 15 when caribou are observed calving **or post-calving** in the area. **This includes blasting, low-altitude flights (lower than 610m above ground level), and the use of snowmobiles and all-terrain vehicles outside the immediate vicinity of camp.**
- 2) The proponent is required to suspend all low-altitude flights **(lower than 610m above ground level)** by aircraft, diamond drilling activities and equipment movement if caribou are observed during pre-calving or post-calving periods.
- 3) The proponent is also required to suspend all activities during caribou migration in the spring and in the fall when or if caribou herds are passing the project area until the migrating caribou **have passed. This includes blasting, low-altitude flights (lower than 610m above ground level), and the use of snowmobiles and all-terrain vehicles outside the immediate vicinity of camp.**
- 4) The proponent is also required not to conduct low-altitude flights **(lower than 610m above ground level)** over concentrations of caribou and musk ox.
- 5) **The proponent is required to establish a caribou monitoring program to provide information necessary to comply with the above conditions. An independent caribou monitor should be hired (preferably from Baker Lake) to conduct ground-based surveys to help assess when caribou are moving toward the project area, to ensure that potential disturbance is discontinued before caribou reach the project area.**

NIRB should ensure that regular inspection of project operations is conducted, and that NIRB's permit terms and conditions are enforced.

Please let me know if you require further information or have any questions about these comments from the BQCMB.

Sincerely,

[original signed by]

Leslie Wakelyn
BQCMB Biologist

Attachment

cc: Albert Thorassie, BQCMB Chairperson
Baker Lake HTO