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RE: Application Acknowledgement for Golden Bull Resources' Amendment and Extension Request with the Kitikmeot Inuit Association for the "SLAVE" Project

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Golden Bull Resources Corp. (Golden Bull) is applying to amend the land use permit for the Slave Project to include the exploration for mineral resources on the Rockinghorse (CO-44-00-01 A&B) claim in addition to the permitted Hood (CO-20-00-03R) and Contwoyto (CO-08-00-01, 02, 03 and 05) claims. Project activities will include prospecting, geological mapping, sampling, grid establishment, ground geophysical surveys and diamond drilling. Additional components of the project will include the use of motorized vehicles, and potential soil testing, trenching and the use of explosives. Project activities will be supported by small fly camps and by two 20 to 25 man camps, which are proposed to be located at Penthouse Lake and Contwoyto Lake. Upon completion of the program, all garbage and camp materials will be removed, and disturbed areas remediated.

In the Nunavut Impact Review Board (NIRB) Part II form, it is stated that an "Environment Canada approved incinerator will be selected to burn combustible waste." EC looks forward to reviewing the design specifications of the incinerator when this information is made available. EC has developed a Technical Document for Batch Waste Incineration, and is available at the following web link: <http://www.ec.gc.ca/drgd-wrmd/default.asp?lang=En&n=82401EC7-1>. The technical document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting. This information should be incorporated into an incineration management plan for the camps. EC would like the opportunity to review this plan prior to implementation.

On page 32 of the NIRB Part 2 form, it is stated that "according to the government website, there are no species at risk within the project area." Based on the Environment Canada database the following species at risk have potential to be in the project area.

- The following comments are pursuant to the *Species at Risk Act* (SARA), which came into full effect on June 1, 2004. Section 79 (2) of SARA, states that during an assessment of effects of a project, the adverse effects of the project on listed wildlife species and its critical habitat must be identified, that measures are taken to avoid or lessen those effects, and that the effects need to be monitored. This section applies to all species listed on Schedule 1 of SARA. However, as a matter of best practice, Environment Canada suggests that species on other Schedules of SARA and under consideration for listing on SARA, including those designated as at risk by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), be considered during an environmental assessment in a similar manner.

| Terrestrial Species at Risk ¹ | COSEWIC Designation | Schedule of SARA | Government Organization with Primary Management Responsibility ² |
|--|---------------------|--|---|
| Peregrine Falcon (<i>anatum-tundrius</i> complex ³) | Special Concern | Schedule 1 (<i>anatum</i>) Schedule 3 (<i>tundrius</i>) | Government of Nunavut |
| Short-eared Owl | Special Concern | Schedule 3 | Government of Nunavut |
| Barren-ground Caribou (Dolphin and Union population) | Special Concern | Pending | Government of Nunavut |
| Grizzly Bear | Special Concern | Pending | Government of Nunavut |
| Wolverine (Western Population) | Special Concern | Pending | Government of Nunavut |

¹ The Department of Fisheries and Oceans has responsibility for aquatic species.

² Environment Canada (EC) has a national role to play in the conservation and recovery of Species at Risk in Canada, as well as responsibility for management of birds described in the Migratory Birds Convention Act (MBCA). Day-to-day management of terrestrial species not covered in the MBCA is the responsibility of the Territorial Government. Populations that exist in National Parks are also managed under the authority of the Parks Canada Agency.

³ The *anatum* subspecies of Peregrine Falcon is listed on Schedule 1 of SARA as threatened. The *anatum* and *tundrius* subspecies of Peregrine Falcon were reassessed by COSEWIC in 2007 and combined into one subpopulation complex. This subpopulation complex was listed by COSEWIC as Special Concern.

Impacts could be disturbance, attraction to operations, and destruction of habitat.

Environment Canada recommends:

- Species at Risk that could be encountered or affected by the project should be identified and any potential adverse effects of the project to the species, its habitat, and/or its residence noted. All direct, indirect, and cumulative effects should be considered. Refer to species status reports and other information on the Species at Risk registry at www.sararegistry.gc.ca for information on specific species
- If Species at Risk are encountered or affected, the primary mitigation measure should be avoidance. The proponent should avoid contact with or disturbance to each species, its habitat and/or its residence.
- Monitoring should be undertaken by the proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, this monitoring should include recording the locations and dates of any observations of Species at Risk, behaviour or actions taken by the animals when project activities were encountered, and any actions taken by the proponent to avoid contact or disturbance to the species, its habitat,

- and/or its residence. This information should be submitted to the appropriate regulators and organizations with management responsibility for that species, as requested.
- For species primarily managed by the Territorial Government, the Territorial Government should be consulted to identify other appropriate mitigation and/or monitoring measures to minimize effects to these species from the project.
 - Mitigation and monitoring measures must be taken in a way that is consistent with applicable recovery strategies and action/management plans.
- All mitigation measures identified by the proponent, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of the proponents' representatives (including contractors) conducting operations in the field. Environment Canada recommends that all field operations staff be made aware of the proponents' commitments to these mitigation measures and provided with appropriate advice / training on how to implement these measures.
 - Implementation of these measures may help to reduce or eliminate some effects of the project on migratory birds and Species at Risk, but will not necessarily ensure that the proponent remains in compliance with the *Migratory Birds Convention Act*, *Migratory Birds Regulations*, and the *Species at Risk Act*. The proponent must ensure they remain in compliance during all phases and in all undertakings related to the project.

Environment Canada has no issues with the amendment provided the proponent follows mitigation measures outlined in the application, addresses concerns listed above, and that they are in compliance with their existing land use permit. Terms and conditions applied to the land use permit should be carried forward to the amendment. Previous comments and recommendations submitted by C. Parker on October 19, 2007, relating to the "SLAVE" Project would still apply (see attached).

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing by email at carrie.spavor@ec.gc.ca.

Yours truly,

Original signed by

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Environmental Assessment - North,
Environmental Protection Operations

cc: Carey Ogilvie (Head, EA-North, Environment Canada, Yellowknife, NT)
Paula Smith (Environmental Assessment Coordinator, Iqaluit, NU)