



**APPENDIX (3 comments)**

Screening comment # 1	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Whether the project is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; if so, why.
References	Project Description and Work Plan; Environment & Wildlife Management Plan (EWMP)
CONCERNS	
<p>The proposed exploration project overlaps with the annual ranges of the Qamanirjuaq and Lorillard caribou herds. Caribou is likely to be observed in the vicinity of the proposed exploration sites during winter and summer. Vehicle and helicopters movement, blasting and drilling have the potential to cause significant sensory disturbance to caribou (and other wildlife), causing stress and diverting them from their preferential habitats, if adequate avoidance and mitigation measures are not implemented</p> <p>The Caribou Barren-ground population was assessed as Threatened by the Committee on the Status of Endangered Wildlife in Canada in November 2016, and the Qamanirjuaq caribou herd vulnerability was assessed as medium-high in spring of 2016 by the Qamanirjuaq Caribou Management Board. The proposed EWMP is not reflective of the status of this herd and does not contain sufficient details to determine if the level of protection of caribou, and wildlife is sufficient.</p> <p>It is to be noted that DOE's Wildlife Research Division submitted two separate sets of comments on the EWMP, the first in June 2015 and the second in September 2016. These comments were not appropriately addressed in the latest version of the document. The EWMP, and the Detailed Project Description and Work Plan lack the sufficient information in order to determine whether the project is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN recommends that the proponent provide details on the following topics:</p> <p><b>Project description</b></p> <ul style="list-style-type: none"><li>• Winter road: timing, methods and duration of construction;</li><li>• Work schedule: details on duration of work and exact dates for what is considered as "summer months";</li><li>• Helicopters: flight paths, number and daily timing of flights for equipment, fuel and personnel, on</li></ul>	

- a seasonal basis (winter, spring, summer);
- Blasting: number of required blasts per bulk sampling site, explosive charges, and decibel levels of noise generated;
- Drilling: locations and estimated number of holes drilled, timing, and decibel level of noise generated.

### **Biophysical environment**

- Background noise levels;
- Location and description of water bodies from which water will be drawn;
- Vegetation communities;
- Caribou habitat within the project footprint (which includes the winter road) and the associated zone of influence;
- Known areas of ecological significance, if any, and their associated timing window (caribou calving, post-calving and migration, dens, nesting sites, etc.);
- Species at risk likely to be encountered in the project's footprint and zone of influence;

### **Mitigation and monitoring for wildlife**

There are a few provisions in the EWMP related to postponing or suspending work when wildlife is present in the vicinity of the exploration sites:

- Page 6: *If any employees and contractors are approaching a work site where migrating caribou, caribou cows and calves, muskoxen nurse groups or other wildlife are in the **area**, this work site will be avoided until the animals have moved on a distance of 2-5 km from the site.*
- Page 7: *"Dunnedin Ventures will cease activities when caribou are present and will not resume activities until the caribou have safely moved out of the **area**."*
- Page 7: *"Activities such as driving of snowmobiles and ATV's, drilling, mapping, prospecting, blasting and overflights by aircraft at any altitude of less than 610 meters above ground level, will not be conducted when caribou are present."*
- What is the rationale for setting a 2-5 km buffer area with regard to the project footprint and the zone of influence (e.g. the spatial extent of the impacts) of the exploration activities and why the 3 km interval? What is meant by **area**?
- What are the distances at which blasting will cease should wildlife be observed in the vicinity of the exploration sites?
- What techniques will be used to detect the presence of wildlife around the exploration sites and what is the detection range and sensitivity of these techniques?

It should be noted that delay or suspension of work when wildlife is present near the exploration sites should apply not only to *migrating caribou, caribou cows and calves, muskoxen nurse groups (...)*, but to all wildlife at all times, when it is determined that this work is likely to cause impacts to wildlife.

- How will carnivore dens be detected before the construction of the winter road and blasting activities?
- How and when will Peregrine Falcon nests surveys be conducted?

- What are the policies related to speed limits and wildlife “right-of-way” for vehicles using the winter road.

**ADDITIONAL COMMENTS**

NA

Screening comment # 2	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Whether the project proposal is likely to arouse significant public concern; and if so, why.
<b>References</b>	Project Description and Work Plan; Environment & Wildlife Management Plan (EWMP)
<b>CONCERNS</b>	
<p>In the April 4, 2016 decision issued by the Nunavut Impact Review Board for the project, it is mentioned (p.8): [the proponent] <i>“Apologized that consultation sessions were not conducted during the development of the project proposal and noted that meetings with the Hamlet of Chesterfield Inlet, the Community Land and Resource Committee (CLARC), the KIA, and the Aqigiq HTO will be arranged for the week of April 12, 2016.”</i></p> <p>There is no indication in the proponent’s submission and that these meetings were held. There is no evidence that public concerns were taken into account in the design of the project and the preparation of the EWMP.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The GN recommends that the proponent conduct meaningful consultations with local and regional co-management organizations and integrate their comments and concerns related to wildlife and wildlife habitat in the EWMP.</p>	
<b>ADDITIONAL COMMENTS</b>	
NA	

Screening comment # 3	
<b>Department</b>	Culture and Heritage
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Archaeological resources
<b>References</b>	NIRB Notice of Screening and Comment Request; DVI Kahuna Project table of modifications; Project description and work plan
CONCERNS	
<p>A search of the Nunavut Archaeological Site Database indicates that 10 new archaeological sites have been recorded within the Kahuna Diamond Project development area. This however does not preclude the presence of unidentified sites or cultural features in the area.</p> <p>The proponent is proposing to undertake a diamond exploration program on the Kahuna mineral claim (March 1, 2017- March 1, 2019). The activities include prospecting, geological mapping, rock, till and soil sampling, test pit trenching, and bulk sampling, as well as the development of a winter road between the community of Rankin Inlet and the project area.</p> <p>The proponent has been proactive and the proposed winter road and the areas proposed for drilling and sampling have been the object of an archaeological assessment under Nunavut Archaeology Permit 2016-21A. To this day, one site has been identified within proximity of the proposed winter road (140 m SE of track); two sites in the SW and NW boundaries of Bulk sample 2 and; two others in the W and NW boundaries of Bulk Sample 3.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The Department of Culture and Heritage recommends that:</p> <ol style="list-style-type: none"> <li>1. The proponent work closely with the project archaeologist to clearly identify and mark the locations of the archaeological sites that might potentially be affected by development activities. Special caution should be exercised around sites located near the boundaries of Bulk Sample 2. One of these site is located only 12m NW of Bulk 2 boundary. The protection buffer zone should minimally be extended to 50m. Thus, the potential for adverse impact on archaeological resources will be avoided.</li> <li>2. The proponent confine winter transportation activities to the route/track identified on the accompanying map.</li> <li>3. Additional archaeological surveys be carried out if development activities are to occur in locations other than those described in the proposal (winter road, Bulk Samples 1, 2, and 3, and seven isolated drilling/sampling locations).</li> <li>4. No activities be conducted in the vicinity (50 m buffer zone) of any archaeological sites. If archaeological sites or features are encountered during the project, activities should</li> </ol>	

immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Department of Culture and Heritage.

All archaeological and palaeontological sites in Nunavut are protected by law. The applicant must understand that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site. Moreover, the building of inuksuit is not recommended.

#### **ADDITIONAL COMMENTS**

N/A