



February 6, 2018

Attn:

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Nunavut Impact Review Board  
P.O. Box 1360 (29 Mitik Street)  
Cambridge Bay, Nunavut X0B 0C0

**Re: Response to Comments Received Regarding Dunnedin Ventures Inc.'s "Kahuna Property Field Camp" Project Proposal - NIRB File No.: 15EN028 - Application No.: 125186**

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This letter is in response to a January 26, 2018 notice from the Nunavut Impact Review Board (NIRB) that provides Dunnedin Ventures Inc. (Dunnedin or the Company) an opportunity to address comments regarding Dunnedin's "Kahuna Property Field Camp" project proposal. Dunnedin would like to thank interested parties and the NIRB for their input and welcomes all comments regarding current and future work on the Kahuna Property.

The main purpose of Dunnedin's Kahuna Property Field Camp submission was to address community concern about helicopter traffic by operating closer to work sites and minimizing flights out of Rankin Inlet.

We note that some comments refer to exploration activities already authorized on the property. For clarity, this new application is for a temporary field camp only. Exploration work on the Kahuna Property since 2015 has already been screened by the NIRB and permitted by regulators (INAC File No.: N2015C0019; NWB File No.: 2BE-KDP1722; KIA File No.: KVL315B01 and KVRW16F01).

#### **DUNNEDIN RESPONSES TO COMMENTS FROM INTERESTED PARTIES**

Public concern submitted to the NIRB during the commenting period are addressed below, specifically referencing each submission by interested party or agency:

- Government of Nunavut (GN)
- Fisheries and Oceans Canada (DFO)
- Indigenous and Northern Affairs Canada (INAC)
- Kangiqliniq Hunters and Trappers Organization (HTO)
- Nunavut Impact Review Board (NIRB)

#### **Government of Nunavut - Department of Culture and Heritage - Archaeological Resources**

The footprint of the proposed Kahuna field camp and surface impact will be minimal. Tent floors will be supported 10cm to 30cm above ground level on 30cm x 30cm wooden footings. No excavation is required and no ground disturbance is expected. Temporary fuel containment berms made of arctic grade rubber will be laid out flat upon the ground surface. No excavation is required and no ground

disturbance is expected, the exception being a single grey water sump requiring a surface disturbance of approximately one square meter using hand tools. Excavation and exploitation of gravel resources is not part of the Kahuna Field Camp application.

The Company clarifies that:

- No archaeological sites were noted during investigations undertaken by Golder Associates Ltd. in September 2016 (Nunavut Archaeology Permit Number 2016-21A). Surveys overflow the camp area with two low level reconnaissance aerial flights while investigating Dunnedin's winter trail route permitted under KIA Right of Way Licence KVRW16F01 and INAC permit N2015C0019.
- No archaeological sites were noted during initial ground inspections conducted by members of the Aqigiq (Chesterfield Inlet) HTO accompanied by Dunnedin staff in September 2017 as part of the site selection process
- No archaeological sites are noted on high resolution air photos collected by drone over the proposed site in September 2017.
- A Nunavut Archaeology Permit will be obtained prior to undertaking a thorough and systematic ground archaeological assessment of the proposed camp site and associated facilities when the ground is free from snow.
- As required under the Archaeological and Palaeontological Terms and Conditions attached to Dunnedin's existing INAC permit N2015C0019, any archaeological site identified during work will not be disturbed, the location will be recorded, marked off limits and reported to the Department of Culture and Heritage (Government of Nunavut), the Land Administration Division at INAC and KIA.
- Prior to commencement of use of Dunnedin's permitted winter trail and conducting any exploration activities in 2018, Dunnedin will flag and avoid all identified archaeological sites in the vicinity of the winter trail and work areas so as to prevent any disturbance of those sites.

#### **Government of Nunavut (GN) - Department of Environment - Caribou Mitigation**

Dunnedin's Kahuna Property Environmental and Wildlife and Management Plan (EWMP) has now been updated to include:

- Between the summer and late summer period of July 4 and September 16, Dunnedin will avoid operating in areas when caribou are taking refuge from insect harassment. This could include ridge tops, elevated and downwind lakeshore areas.
- With respect to groups of caribou referenced in Dunnedin's EWMP, a threshold of 50 individuals prompting phased shutdowns was recently approved for the current INAC permit (dated May 1, 2017) that authorizes exploration on Kahuna claims. In addition, the same 50 caribou threshold is cited in approved EWMP's used by other operators in the area, and along the same migratory route.
- For clarity, Dunnedin has revised the EWMP regarding overall mitigation protocols. These enhanced protocols simplify current mitigation and avoidance procedures for individuals and groups of wildlife less than 50 (in flowchart format). The updated EWMP also clarifies

Dunnedin's phased shutdown procedures (in flowchart format) to be implemented when migrating caribou approach areas of operations up to and including the cessation of activities, and until such time as caribou have safely passed beyond the area of operations.

The GN Department of Environment identified the calving period for the Qamanirjuaq caribou herd as June 9 to June 22 (2 weeks). This is a portion of the May 15 to July 15 caribou protection period for calving and post calving cited in the Terms and Conditions of INAC permit N2015C0019 authorizing exploration on crown claims within Kahuna Property, and included in Dunnedin's EWMP. Dunnedin's EWMP is therefore more conservative, reflecting the longer calving protection period already specified by INAC in our current exploration permit.

As stated in Dunnedin's NIRB application for the proposed camp, the Kahuna Property is not located near any previous, current or proposed caribou calving or post calving protection area recognized by INAC, KIA, GN, or the Nunavut Planning Commission's (NPC) Draft Nunavut Land Use Plan (DNLUP). Calving and post calving areas for the Qamanirjuaq and Lorillard Caribou herds (as defined in the by GN and the DNLUP) are approximately 65 and 100 km from the Kahuna Property, respectively.

**Government of Nunavut (GN) - Department of Environment - Polar Bear Interaction**

Bears and Other Predators, Section 4.2.5 in the EWMP has now been updated to include:

- Polar Bear habitat protection measures
- A 1km radius exclusion zone around any known polar bear den from September 15 to April 15 of each year, or until it is documented and reported that the family group has left the den.
- All interactions and sightings of polar bears will be reported to Mike Harte, GN Wildlife Deterrent Specialist, (867) 934-2065, [mharte@gov.nu.ca](mailto:mharte@gov.nu.ca).

**Government of Nunavut (GN) - Department of Environment – Storage, Recovery and Transport of Contaminated Soil and Snow**

Dunnedin will comply with the GN's recommendation to include a sufficient quantity of bulk containment bags in the property's spill kit inventory that will contain a minimum of 30m<sup>3</sup> of contaminated material. Dunnedin's Kahuna Property Spill Prevention and Response Plan (SPRP) have been updated to reflect this.

**Government of Nunavut (GN) - Department of Health**

The GN Department of Health supports the project. Dunnedin's Kahuna Property Spill Prevention and Response Plan were included for review in the submission to the NIRB. Prior to use, camp water sources will be analyzed by ALS Environmental Services, a certified water testing facility to confirm that camp water is potable.

**Government of Canada – Fisheries and Oceans Canada (DFO-FPP)**

DFO-FPP has no concerns with the project as proposed, was not aware of any significant public concerns with the project as proposed. DFO-FPP concludes Dunnedin has outlined appropriate mitigation measures and that project will not result in serious harm to fish or aquatic species at risk. Dunnedin will promptly notify DFO-FPP should any action cause or, be about to cause, serious harm to fish that are part of or support a commercial, recreational or Aboriginal fishery. Notifications will be directed to <http://www.dfo-mpo.gc.ca/pnw-ppe/violation-infraction/index-eng.html>

**Government of Canada - Indigenous and Northern Affairs Canada (INAC)**

INAC acknowledged support for the project proposal from the Hamlet of Chesterfield Inlet and the Aqigiq Hunters and Trappers Organization (HTO). INAC stated they were unable to comment on whether the project proposal aroused significant public concern until further consultation was done with Rankin Inlet and the Kangiqliniq HTO. INAC recommended Dunnedin consult affected stakeholders in Rankin Inlet prior to commencement of the project. In response, Dunnedin held additional consultation meetings with the KIA, the community of Rankin Inlet and the Kangiqliniq HTO on January 11 and 12, 2018.

A summary record and details of the January 11 and January 12, 2018 consultation meetings in Rankin Inlet was provided in a separate letter to the NIRB titled “Additional Information Request by NIRB-Update on Consultation with Community of Rankin Inlet” and dated February 6, 2018.

**Kangiqliniq Hunters and Trappers Organization (HTO)**

- On December 8, 2017, Dunnedin responded to the Kangiqliniq HTO’s original letter dated November 20, 2017 regarding the Kahuna camp application. Dunnedin’s response titled ‘15EN028-DVI Response to the NIRB\_HTO Comments-171208’ is available on the NIRB public registry website ( [www.NIRB.ca](http://www.NIRB.ca) )
- Following consultation meetings in Rankin Inlet on January 11 and 12, 2018, the Kangiqliniq HTO provided additional comments on the Kahuna Property Field Camp proposal in a submission to the NIRB dated January 24, 2018. Several issues in the Kangiqliniq HTO written response were not brought up during meetings in Rankin Inlet, but are addressed below.

**1. Helicopter Traffic and Wildlife Harassment**

Dunnedin is not involved in any investigation, or the low flying helicopter incident referenced by the Kangiqliniq HTO in their letter. The incident (and photo HTO provided) involved a white and red Astar helicopter on or about July 8, 2017. From June 15 to July 15, 2017, Dunnedin used a blue Long Ranger with call sign C-GFEG contracted from Great Slave Helicopter (see photo). At no time during the summer program did Dunnedin use the helicopter in referenced by the HTO.

To assist the Kivalliq Inuit Association (KIA) at the time of the incident, Dunnedin staff working in Rankin Inlet contacted KIA Executive Director Gabriel Karlik by email and telephone between July 8 and 13, 2017 to provide flight-path, work locations and aircraft information. To the best

of our knowledge, the KIA received an explanatory letter from the party involved at that time, and the incident was resolved 6 months ago.

Contrary to comments in the HTO letter, Dunnedin does not harass caribou and in fact, made considerable efforts to avoid caribou during the 2017 summer program by employing community wildlife monitors, flying at altitude, diverting to alternate work areas and even suspending operations for periods of time when herds were observed.



## 2. Helicopter Activity and Caribou Migration Route

A main purpose of the Kahuna field camp proposed by Dunnedin was to respond to public concern by minimizing helicopter activity out of Rankin Inlet and over caribou migratory grounds along the shore of Hudson Bay - a concern also highlighted in the HTO letter. To achieve this, the proposed site was situated 40 km north of Rankin Inlet, midway between Rankin Inlet and Chesterfield Inlet, on crown mineral tenure, close to work sites already authorized for exploration work by INAC and NWB permits.

At the recent meetings held in Rankin Inlet, there was little to no public concern regarding the proposed camp location during the winter months. To address concern about possible impact on migrating caribou and harvest during summer, Dunnedin agreed to involve cabin owners Tagak Curley, Piers Apilardguk (owners of cabins 15 and 20km northwest), and other knowledge holders from Rankin Inlet and Chesterfield Inlet, in a review of the camp location next spring. If needed and as soon as practicable, Dunnedin agreed to investigate alternate sites further north to support exploration during summer. The Company also invited community members to visit the site to see Dunnedin's field and camp operations first hand.

With respect to the maps provided by the Kangiqliniq HTO, these were authored by the Government of Nunavut (GN) on January 22, 2018 for the HTO response. The Company worked on the property during the summers of 2015, 2016 and 2017 and it is unclear if the data

presented in the maps cover these years. The GN collar telemetry data is not readily available to land use proponents and would certainly assist Dunnedin with future program and land use planning. We also note some missing information that would be useful, (i.e. historic walk-line periods used, tracking results over multiple years, number of collars tracked). In addition, we would like to correct that Dunnedin was active between June 16 and September 28, which includes the period covered by Maps 1 and 2, not just Map 3, as the HTO suggests.

Dunnedin is committed to minimizing impacts on caribou migration and community harvest. The Company would like to reiterate that it will continue to employ wildlife monitors from local communities during work programs, as per past programs. The Company also adheres to wildlife monitoring and mitigation measures included in current INAC and KIA authorizations covering work on the Kahuna Property since 2015. Measures specific to helicopters include: *“Helicopter pilots will be instructed that they are not to fly over wildlife in a way to cause them to change behavior, run or flee at any time, within or outside of migration. If such an interaction should occur incidentally, helicopter pilots will be instructed to divert and/or change altitude as quickly as safely practicable and choose alternate corridors on future flights. Helicopters are to maintain a minimum altitude of 610 metres whenever migrating caribou are present. Helicopters will not land in any area where wildlife are present unless under an emergency situation.”*

Furthermore, Dunnedin has updated its caribou mitigation procedures to include some of the enhanced measures recommended by the GN – Department of the Environment as part of this application.

### **3. Location of Proposed Camp in Relation to Caribou Migration and Proposed Moratorium on Summer Exploration South of Camp**

Dunnedin representatives travelled to Rankin Inlet on October 25 and 26 and updated the KIA and KIA Community Lands and Resource Committee (CLARC) on the camp proposal, prior to submitting an application to the NPC and NIRB. A request was made to meet with the Kangiqliniq HTO at the time, but they were unavailable. However, Brian Sigurdson (HTO Chair) and Clayton Tartak (HTO Secretary Manager) were in attendance at the CLARC meeting and expressed no concern at the time. Mr. Tartak subsequently asked that Dunnedin meet with the HTO Board on their next trip into the community. This was eventually arranged for January 12, 2018, following year-end holidays and recent Territorial and municipal elections.

In advance of selecting the proposed Kahuna field camp site in late September 2017, 10 different locations were investigated using a drone, satellite imagery and field inspection by staff accompanied by two members of the Aqigiq (Chesterfield Inlet) HTO. To minimize aircraft use, the site was also situated near work sites already screened and authorized for exploration by the NIRB, INAC and NWB.

Dunnedin has committed to involve cabin owners Tagak Curley, Piers Apilardguk and other knowledge holders from Rankin Inlet and Chesterfield Inlet to review the field camp location

next spring. If needed and as soon as practicable, Dunnedin agreed to investigate an alternate site further north to support exploration during summer. There were no concerns with the current camp location for winter operations.

In their response to the NIRB, the Kangiqliniq HTO has requested Dunnedin suspend all exploration south of the proposed site between June 23 and October 1. The Kangiqliniq HTO's proposed moratorium of all summer exploration activity on crown mineral claims south of camp would eliminate a wide range of exploration methods for properly evaluating mineral potential.

Exploration activity on Kahuna mineral claims is already authorized under INAC, KIA and NWB permits (including drilling, geophysics, mapping/prospecting, staking and a winter trail). These permits require Dunnedin to submit and follow an approved caribou mitigation plan, and include caribou protection measures such as helicopter restrictions and phased cease work procedures should caribou come within 2 km of a drill. Drilling will not resume until caribou have moved beyond 2 km of the work site.

Dunnedin would like the NIRB and Kangiqliniq HTO to consider that the Kahuna claims extend only 5 km south of the proposed camp location. The remaining 15 to 20 km of land extending south of the property to the shore Hudson Bay is situated on Inuit Owned Lands administered by the KIA, and is not part of the Kahuna Property nor explored by Dunnedin. The establishment and use of Dunnedin's proposed camp will significantly reduce the number of helicopter flights and other transits over those lands to the south that are IOL.

It is our opinion that Dunnedin's current mitigation methods, including ongoing input from the community and the HTO, will reduce the potential for disruption of caribou migration and harvesting south of the camp during summer months

**NIRB – Additional Information Request, Rankin Inlet Community Consultation**

- A log and summary of Community Consultations was included in Dunnedin's "Kahuna Property Field Camp" Project Proposal application to the NPC and NIRB on November 7, 2017.
- On January 11 and 12, 2018 Dunnedin conducted additional consultation meetings in the community of Rankin Inlet (Public, HTO, KIA, individuals) with respect to this application.
- In a letter dated January 26, 2018 and pursuant to subsection 144(1) of the Nunavut Planning and Project Assessment Act, S.C. 2013, c. 14, s. 2 (NuPPAA), the NIRB requested **additional information** regarding the recent meetings in Rankin Inlet to complete NIRB screening.
- Dunnedin has provided this additional information in a separate letter to the NIRB titled "*Additional Information Request by NIRB-Update on Consultation with Community of Rankin Inlet*", dated February 6, 2018.

Dunnedin has listened to community feedback requesting reductions of helicopter flights between the Kahuna Project and Rankin Inlet, and have pledged to modify our exploration plans to include a temporary field camp that would help us achieve this goal as soon as possible. We trust that the responses provided above sufficiently address comments from interested parties, allowing the Nunavut Impact Review Board to complete its screening assessment of the “Kahuna Property Field Camp” and issue a decision to the responsible minister in a timely manner.

If you have any further questions or require any additional information, please do not hesitate to contact me at (604) 646-8355, or by email, [ctaylor@Dunnedinventures.com](mailto:ctaylor@Dunnedinventures.com).

Regards,

A handwritten signature in black ink, appearing to read 'CT', with a long horizontal stroke extending to the right.

Chris Taylor  
CEO  
Dunnedin Ventures Inc.