



March 2, 2020

Jaida Ohokannoak
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik)
Cambridge Bay, NU X0B 0C0

Dear Ms. Ohokannoak,

**Re: Blue Star Gold Corp.
Ulu Gold Project
Proposal Application – 125502 / 20EN001
Request for Review and Comments**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the application referenced above based on its mandated responsibilities under the *Species at Risk (NWT) Act* and the *Wildlife Act* and provides the following comments for the consideration of the Board.

Topic 1: Bathurst caribou

Comment(s):

The proposed Ulu Gold Project overlaps the Bathurst caribou calving and post-calving range (please see Figure 18 of the [Bathurst Caribou Range Plan](#)) and is likely to impact Bathurst caribou when they are most sensitive to disturbance. The herd's calving grounds since 1996 have been west of Bathurst Inlet and the proposal falls within this area. Calving and post-calving ranges of migratory barren-ground caribou herds have been consistently identified as necessary to the survival of these populations, and the most important and sensitive ranges, both from a traditional knowledge and scientific. Displacement from preferred calving ranges has been linked to negative effects on calf survival and population trend ([Recovery Strategy for Barren-Ground Caribou in the NWT-draft](#)). Restricting these areas from development will ensure caribou are protected from sensory disturbance that may contribute to population decline. The Bathurst herd is at a critical point, with the 2018 population estimate of about 8,200 demonstrating a decline of more than 98% from peak numbers in 1986. As a result, any human-caused factors that may impede recovery need to be kept to a minimum.

Topic 2: Bathurst Caribou Range Plan

Comment(s):

The [Bathurst Caribou Range Plan](#) (BCRP), finalized in August 2019, was developed collaboratively with Industry, non-governmental organizations, federal, territorial, Indigenous governments and organizations in the Northwest Territories, Nunavut and Saskatchewan. The BCRP recognizes the sensitivity and importance of calving and post-calving ranges and recommends protection of caribou be provided during this time through establishment of adaptively managed conservation areas, allowing for boundary changes over time. The BCRP also provides other management tools such as mobile caribou conservation measures (BCRP, pg. 2) that are protective of the Bathurst Caribou herd in other parts of its range.

Topic 3: Wildlife Protection Plan

Comment(s):

The Wildlife Protection Plan submitted by the developer does not provide adequate protection from sensory disturbance to Bathurst caribou during calving and post-calving periods (p. 20). Restricting activities when caribou are observed near camp within a distance of 1 km is inadequate when recent research on the George and Leaf River herds in northern Quebec shows that caribou may experience disturbance within 2-4 km of exploration camps in summer and up to 21 km in winter ([Plante et al 2018](#)). Further, no trigger distance and threshold numbers of caribou are provided for when the developer uses satellite collar information for making decisions on project activity reductions nor do they discuss issues of lag time in location data being received and forwarded by ENR. These trigger distances and threshold numbers would necessarily differ from those for visual observations made during flights.

Should you have any questions or concerns, please do not hesitate to contact me at Loretta_ransom@gov.nt.ca or (867) 767-9233 extension 53095.

Sincerely,



Loretta Ransom
A/Director
Environmental Stewardship and Climate Change Division
Department of Environment and Natural Resources
Government of the Northwest Territories