

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

5 October 2006

Martin Haefele
Environmental Assessment Officer
Mackenzie Valley Environmental Impact Review Board
P.O. Box 938
5102 - 50th Avenue
Yellowknife NT X1A 2N7

Dear Mr. Haefele:

EA0607-003 Ur Energy

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on the draft work plan for the EA of Ur-Energy Inc.'s application for a land use permit to conduct uranium exploration in the area of Screech Lake, NWT.

Following are suggestions for improving the work plan to ensure that an adequate assessment is conducted.

EA PROCESS

In addition to the factors listed in the draft work plan, the Review Board should also consider the following:

- The MVLWB did not find that the development might have significant impacts on the environment because many potential impacts were not considered adequately, or at all, in their preliminary screening.

These include the following categories from the Preliminary Screening Report: noise, population reduction, behavioural change, game species (including caribou) effects, removal of wildlife corridor and effects to aboriginal lifestyle.

An additional inadequacy was that aircraft movement was not considered as a component of development, although Ur-Energy states that all movement of equipment and personnel will be by helicopter.

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- Although the developer's application contains information on potential impacts of their proposed activities, no evidence is provided to support the assumptions upon which their conclusions concerning impact significance are based; therefore the MVLWB and the MVEIRB should not accept these conclusions without requesting that supporting evidence.

An example is the conclusion that the impacts of noise will be reversible, which may not be the case if caribou change their spring migration route to avoid disturbance, or if pregnant caribou lose their fetus during or after migration through this development area.

- The record for the previous EA outlines concerns and remains relevant to the current EA. Therefore it makes sense that the submissions from the previous EA should be transferred to this EA and posted on the Review Board's public registry.

However, the record for the 2006 preliminary screening of this Ur-Energy proposal also outlines concerns and is relevant to this EA. Therefore submissions from the screening conducted by the MVLWB should also be transferred to this EA. There should be links from the MVEIRB's public registry to the MVLWB's public registry for this application.

In case this suggestion is not accepted, I have attached the BQCMB's submission provided to MVLWB for the preliminary screening of the 2006 application by Ur-Energy, and ask that the issues raised therein also be considered during the current EA.

- The record for the preliminary screening of this 2006 application should also be used to determine the relevant issues to be considered during this EA, as information was provided during the 2006 screening that was additional to information provided in the 2005 EA.

For example, the proposed development is within the primary migration route of both the Beverly and Ahiak caribou herds (not the Beverly and Qamanirjuaq). Information on the vulnerability of caribou during this period and maps showing caribou location data based on satellite-collared caribou from both of these herds were provided by GNWT-ENR in their submission to MVLWB.

In addition, all five barren-ground caribou herds that use range in the NWT and Yukon to the west of these herds are declining. Declines of NWT herds were documented by 2005 surveys and confirmed by 2006 surveys; this information was not available during EA0506-003. Furthermore, the BQCMB and the GNWT agree that the Beverly herd is likely declining.

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SCOPE

Scope of Development

The scope described in the work plan is not consistent with Ur-Energy's application. The application specifies that the proposed development involves drilling 5 holes between March and May 2007, and a maximum of 20 holes over a 5-year program, if initial results are positive. Although they state that the majority of the drilling will occur during winter 2007/08, they don't specify when drilling may occur in subsequent years. But they have requested a 5-year permit and indicate that they will complete further work up to December 2011. Therefore the temporal scope of the proposed development appears to differ from "spring, summer and fall over a two year period".

Scope of Assessment

Factors – As stated in the draft work plan, MVRMA section 117(2) specifies that the factors to be considered by the Review Board will include "the impact of the development on the environment, including malfunctions or accidents and any cumulative impact that is likely to result." However, based on consideration of the issues identified by EA0506-003, it appears that the scope of the assessment of cumulative effects should be refined to include (as described in Table 1) "environmental effects resulting not only from this particular development but from this development in combination with other past, present and future developments." As Table 1 also indicates, cumulative effects must be a key issue in this assessment.

Issues – As stated above, the record of the preliminary screening for this 2006 application by Ur-Energy should be used as the basis to expand or refine the issues identified by the review of the record for EA0506-003.

Thank-you for the opportunity to comment on the draft work plan. Please contact me if you would like to discuss these comments from the BQCMB.

Sincerely,

Leslie Wakelyn
BQCMB Biologist

cc: Jerome Denechezhe, BQCMB Chairperson
Deborah Johnson, BQCMB member for GNWT

Attachment