



Snap Lake Environmental Monitoring Agency
Main Floor, Lahm Ridge Tower
4501 Franklin Avenue
P.O. Box 95, Yellowknife, NT X1A 2N1
Phone: 867-765-0961 FAX: 867-765-0963
Website: www.slema.ca

Alexandra Hood
Permitting and Environmental Superintendent
Snap Lake Mine
De Beers Canada Inc
300 - 5102 50th Ave
Yellowknife, NT
X1A 3S8

May 14, 2012

RE: SLEMA Comments on Joint Regional Grizzly Bear DNA Proposal 2012

Ms. Hood

SLEMA has reviewed the Joint Regional Grizzly Bear DNA Proposal and has some comments and concerns.

First SLEMA would like to express its satisfaction that DeBeers is taking concrete steps towards participating in regional initiatives. This is a welcome step and hopefully will lead to greater cooperative regional work examining mining development- impacts on all the significant wildlife species.

SLEMA has the following comments in regard to the proposal:

- 1) SLEMA's strongest concern is in the Section 1.1 (objectives) and Section 2.3 (Sampling frequency) , the statement "Under the stated objective and the intent of providing data to ENR for assessment and management of cumulative effects". SLEMA is concerned as to whether the responsibility for assessing and managing cumulative effects is being transferred to the Government of the Northwest Territories. SLEMA requires clarification on the responsibility for cumulative effects.
- 2) The proposal needs to explain and specify the reporting schedule for the individual mine annual wildlife monitoring reports and the periodic monitoring reviews.
- 3) It is unclear why the pilot work conducted by Rescan and others is not included to justify the survey design modeling expected results based on pilot study data. Please amend the proposal to include a summary of those results and any recommendations.



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The proposal is vague about data management. It is unclear what is meant by 'population' data being transferred to GNWT for assessment of cumulative effects and what will be the reporting requirements. This proposal needs to be specific about the data being transferred and the timeframe for its reporting. SLEMA is concerned that we could be left without access to the results of the monitoring.

4) Grid Cell Size: SLEMA notes that the Grizzly Bear DNA work conducted in Nunavut has developed a methodology based on a 10x10km cell size. A deviation from this method to a 12x12km cell may limit comparative analysis between the different study areas. While a 10x10km cell may be appropriate for Barren ground grizzly bear population estimate, the goal of this proposal is not to produce a population estimate but to provide information on local densities, seasonal distribution, movements, and trends in those. Therefore a different scale sampling may be justified.

5) Study Area: Considering that this is a joint proposal from 3 companies representing 4 mine sites, the study area is too small (approx. 30,000 km² which is about 7,500km² per site). The southern study area could be slightly extended west and east and the northern study area could be slightly extended north and fully connect with the southern study area at McKay Lake. While the objective here is not to produce a population estimate, but rather a local density estimate and temporal/spatial trends, SLEMA suggests using the population delineation for female Barren ground Grizzly bear produced by McLoughlin et al as a guide for the study area boundaries. Very large lakes and water bodies can be used for the delineation of the study area as they represent temporary obstacle to movements and could help with population closure within the sampling time frame.

6) Survey Schedule: SLEMA supports the implementation of 6 sessions/year for the first two years as it will provide a stronger baseline for density estimate and subsequent trend analysis as well as other aspect of Grizzly bear behavior in the area (movements, seasonal distribution). However, SLEMA disagrees with the division of the study area into North and South for the establishment of the baseline. The study area as a whole (north + south) should be sampled in any given year. By dividing the study area into two, the proponent is steering away from the purpose of a joint proposal to monitor and address impacts at the appropriate scale.

7) Other Data Collection: Remote Cameras should be set up at a subset of hair snagging stations. This should be included in the proposal as it will provide valuable data that will provide some insight on behavioral (daily activity, association with other species) or demographic (age class or social status of individuals, litter size, recruitment) changes,



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and can be used as covariates in the Mark-Recapture models (capture rate of bears visiting the station, timing of visits over the sampling period, age class or social status of individuals).

- 8) The proposal does not explain about whether hair samples from other species especially wolverine will be analyzed or archived.
- 9) The proposal also does not acknowledge whether the sampling stations could also be integrated into aspects of the monitoring program for the mines. Given that the costs of the helicopter are so high, it is an opportunity for the mines to demonstrate an integrated wildlife monitoring program. SLEMA would be glad to contribute its experience and knowledge to expanding the efficiency of this proposal.

If you have any questions please feel free to contact David White at 867-765-0961 or dwhite@slema.ca

Sincerely

A handwritten signature in black ink, appearing to read 'J. Weyallon', is placed over a light grey rectangular background.

Johnny Weyallon
Chairperson