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February 14, 2014

Sharon Ehaloak, Executive Director  
Nunavut Planning Commission  
P.O. Box 2101  
Cambridge Bay, NU X0B 0C0

**RE: Submission to Draft Nunavut Land Use Plan**

Thank you for the opportunity to submit comments on the Draft Nunavut Land Use Plan (DNLUP). TMAC Resources Inc. (TMAC) has had an opportunity to review this important first generation draft plan that will form the foundation for future land use planning in Nunavut. We have read the February 6, 2014 submission of the NWT & Nunavut Chamber of Mines and support it.

We believe the DNLUP as presented by the Nunavut Planning Commission generally provides a good basis for developing an all-inclusive strategy for land use in Nunavut.

As a general comment, the DNLUP would be improved by the inclusion of specific criteria that the NPC will apply in considering whether a proposed activity is in conformity, and when further conformity review may be required. This would increase procedural certainty and improve the ability of project proponents to consider potential impacts on project scheduling and logistics, which are essential components of major project development in Nunavut.

As you are aware, TMAC is engaged in developing the Hope Bay Project on the Kitikmeot mainland southwest of Cambridge Bay. The Hope Bay project consists of the entire Hope Bay Greenstone Belt, which is 80km long and 20km wide. Three significant gold deposits have already been discovered, and additional discoveries are possible.

The TMAC strategy for developing Hope Bay rests on beginning production at the northern end of the Belt and progressively developing mines farther to the south. The potential exists at Hope Bay for the creation of a long term gold mining camp environment tied by common infrastructure that would open access to the interior of the Belt to lower cost marine transportation. At Hope Bay, we have a mix of land tenure, with significant deposits resting on both IOL and Crown Lands.

With this operating environment, certainty of marine logistics through both sides of the Canadian Northwest Passage, and consistency of land designations within the

Hope Bay Belt are paramount considerations. Based on this perspective, we respectfully submit the following specific comments.

### **1. Section 3.1.1.3 National Marine Conservation Areas – Lancaster Sound**

Lancaster Sound is a critical marine transportation corridor in support of development in Nunavut. Previous shipments of Hope Bay material and supplies have been made through this area, and this route will be used by our project again. Although it is recognized that shipping can be permitted within a NMCA, we would seek assurance or clarification that the identification of sensitive marine features in Lancaster Sound would not preclude these critical activities.

### **2. Section 4.1.1.1 Huikitak River**

TMAC acknowledges that the Kitikmeot Inuit Association is developing plans to create a conservation area in and around Huikitak River south west of the Boston deposit, and that Inuit Owned Land parcels in this watershed have been withdrawn from surface access by the KIA. TMAC supports this initiative.

### **3. Section 4.2.1 Transportation Infrastructure**

Transportation infrastructure is a critical need of industry in developing projects throughout Nunavut at remote locations. The establishment of transportation corridors in Nunavut to add critical certainty to move forward plans to construct roads and rail links that will add to the economic feasibility of mining projects in the territory. A number of transportation corridors have already been identified in the DNLUP. However, a transportation corridor in the Kitikmeot, and specifically at Hope Bay, has not.

We urge the NPC to consider the establishment of a transportation corridor in the DNLUP for the Hope Bay Project approximating the Hope Bay Phase II Road Route. This would provide the certainty required to allow for the transportation infrastructure necessary to develop the entire Hope Bay Belt. We believe this would help achieve the NPC's objectives stated in Section 4.2 of the DNLUP.

### **4. 5.1.1 Mineral Exploration and Production**

As mentioned previously, the Hope Bay project straddles Inuit Owned and Crown Lands. We understand that the mineral potential at Hope Bay has been recognized for decades and was a factor in the Inuit Owned Lands selection process. We note that the Inuit Owned Land parcels at Hope Bay have been designated in the DNLUP for Economic Development. However, the Crown land portions of the Hope Bay project have been designated for Mixed-Use.

It appears to us that zoning for our project is based on land tenure. Inuit Lands are to be developed for the economy while Crown lands may be. We are not aware of any significant ecosystem, geographic or land value differences between Inuit Owned and Crown Lands at Hope Bay. It is probable that future development will straddle two land use designations, while the mineral potential is similar for the entire greenstone belt.

We are concerned about the future Land Use conformity consequences of this situation. Future planners and decision makers may well be confused when faced with this arbitrary distinction, leading to uncertainty. In principle, we believe that the long recognized economic development potential for Hope Bay should have land use priority where no other competing land use or value has been identified. We respectfully request that the land use designations for our project area be reviewed with the aim of designating the entire Hope Bay greenstone belt (Inuit Owned and Crown) for Economic Development use.

## **5. 7.9 Legal Non-Conforming Uses**

The plan currently indicates that, "Any use of land which does not conform to the Plan but which lawfully existed prior to the approval of the Plan is a legal non-conforming use. When a legal non-conforming use ceases, the legal rights will terminate." As the meaning of this phrase could be ambiguous, we suggest clarifying that a legal non-conforming use will deem to be continued as long as any required permits or approvals remain in force, and that renewal of such permits or approvals would also be deemed as a continued use.

## **6. Table 1, PSE 1, Area 51 (Queen Maud Gulf Islands inside DND)**

As indicated in Section 1 above, the Hope Bay project relies on marine transportation links to eastern Canada that may utilise this section of Kitikmeot coastline.

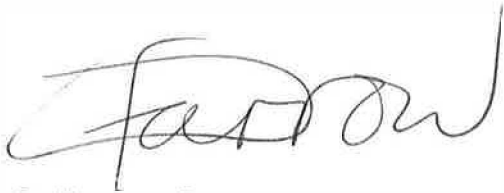
We seek clarification if such a future designation would impact marine shipping through the eastern approaches to the Northwest Passage.

## **7. Table 1, PSE 3, Area 46A (Lambert Channel)**

As previously indicated in Section 1 above, the Hope Bay project relies on marine transportation links to western Canada that will utilize this section of Kitikmeot coastline. We seek clarification on how such a designation would impact marine shipping essential to the development of the mineral resources of the Kitikmeot region.

I again thank you for this opportunity to comment on this important tool to govern land use in Nunavut. We understand that the Commission will focus in the upcoming months on consultations on the DNLUP within the Kitikmeot region and we wish the NPC well in these deliberations. I look forward to any feedback you may be able to provide on our specific comments, leading to the completion of the plan for approval at the end of the year.

Sincerely,

A handwritten signature in black ink, appearing to read 'Catharine Farrow', with a stylized, cursive script.

Catharine Farrow  
Chief Executive Officer

c.c. Charlie Evalik, President, Kitikmeot Inuit Association