



Tłıchǫ Government

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October 30, 2024

Chairperson of the Nunavut Impact Review Board
29 Mitik Street
P.O. Box 1360
Cambridge Bay, NU
X0B 0C0

Re: 24XN038 - Grays Bay Road and Port Proposal – Tłıchǫ Government Comments

Dzẹ nezı (Good Day) Marjorie Kaviq Kaluraq,

The Tłıchǫ Government (TG) would like to thank the Nunavut Impact Review Board (NIRB) again for inviting us to comment on the Grays Bay Road and Port Project proposal. TG provided comments on the previous Grays Bay Road and Port NIRB File: 17XN011. We reiterate our concerns over the road's potential impacts on caribou, caribou migration, and Tłıchǫ harvesting rights, as well as potential impacts from future phases of a road that may go into Mǫwǝhı Gogha Dè Nııtlèè, to the Nunavut Border, and potentially beyond.

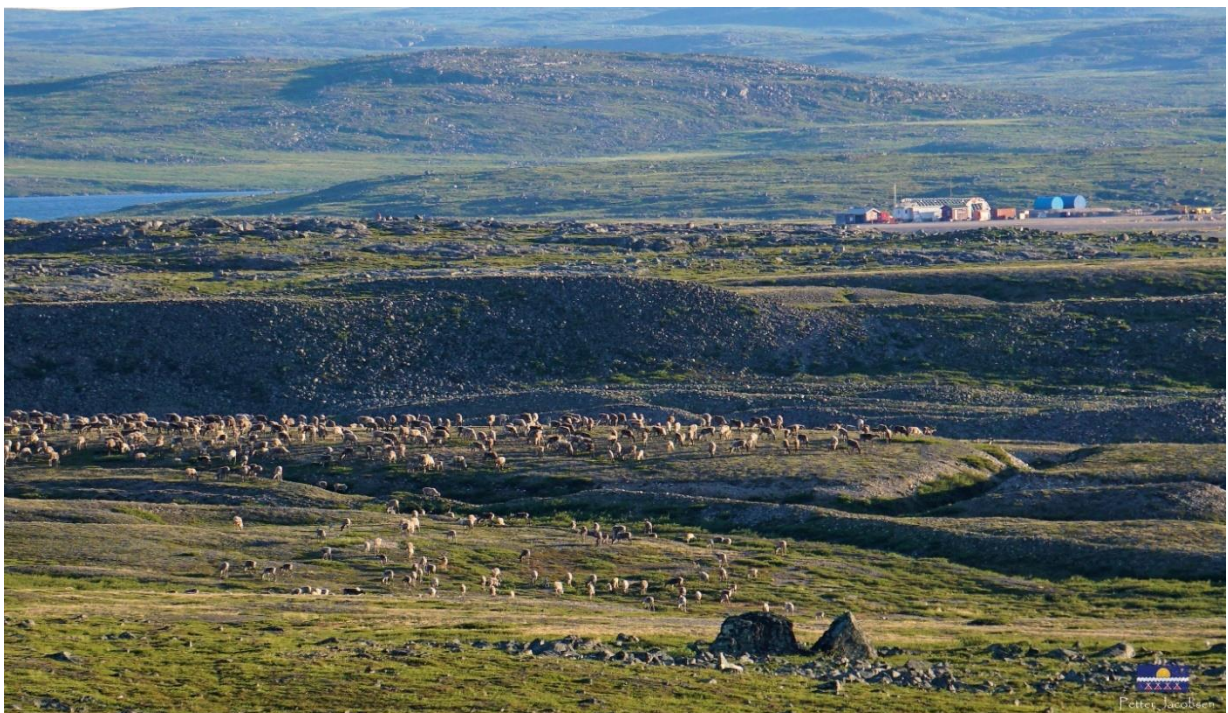


Figure 1. Ekwǫ waiting at the end of the valley north of Jericho Mine (photo taken by Petter Jacobsen, July 2017)

The proposal to construct a road on the calving and post-calving grounds of the Kòk'etì Ekwò (Bathurst Caribou) raises serious concerns for TG. The proposed road could disrupt the herd's natural migration from its calving grounds to its post-calving and summer ranges—an area with rich habitat the herd depends on every summer. Obstructions to this key migration corridor are likely to cause significant adverse impacts on the herd's health while they are already vulnerable and impact the ability for the herd to recover. Consequently, this may affect ability for ekwò to move south to Ṯchq̱ traditional lands where Ṯchq̱ rely on ekwò to exercise their constitutionally-protected harvesting rights and to practice Ṯchq̱ language, culture, and way of life. Considering the impacts from blocking this key migration corridor, the dire state of the Bathurst herd, and the management actions and sacrifices Ṯchq̱ are taking to try to save this herd, a discussion on alternate routes or variations should be considered before further decisions are made.

In addition to impacts on critical habitat, Ṯchq̱ are concerned for potential illegal harvesting of the Bathurst herd. Meat wastage and illegal harvest has been well documented on the TCWR and is contributing to the decline of the Bathurst herd. The proposed road will allow all-year access to the Bathurst range and allow hunters easy access and the potential for overharvesting. TG are concerned with the impacts of harvesting on the declining caribou herd.

Protecting the caribou is a significant and complex task that requires many different groups to work together through many different approaches. Given the significance of this project through a caribou lens and as a potential part of a larger transportation system, we expect that the project will be subject to a full environmental review.

The Ṯchq̱ desire to continue collaborating on a balanced approach relating to the protection of caribou habitat and migration of the shared herds, while at the same time recognizing room for types of sustainable economic development. We look forward to working with everyone through this process.

For future communication related to this proposal from either NIRB or the West Kitikmeot Resources Corp., please contact the Lands Regulation Division of TG by contacting Violet Camsell-Blondin, Manager of Lands Regulation (Violet.CamsellBlondin@tlcho.ca), cc'ing lands@tlcho.ca.

In Ṯchq̱ Unity,



Tammy Steinwand-Deschambeault
Director of Culture and Lands Protection
Ṯchq̱ Government