



Athabasca Denesųliné Né Né Land Corp.

Athabasca Denesųliné Né Né Land Corporation
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31 October 2024

Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay NU X0B 0C0
Via email: info@nirb.ca

RE: 24XN038 Gray's Bay Road and Port Project Proposal Screening

Dear Francis Emingak and Nunavut Impact Review Board,

The Athabasca Denesųliné NéNé Land Corporation (ADNLC) represents the three Denesųliné Nations of Fond-du-Lac, Black Lake, and Hatchet Lake. The Athabasca Denesųliné (AD) have lived in relationship with the Bathurst, Beverly, and Qamanirjuaq caribou herds for thousands of years. These herds are the foundation of AD culture, well-being, food security & sovereignty, and ongoing traditions. We have already experienced the loss of Bathurst Caribou from their traditional wintering range as their population has declined, and we are deeply concerned for the long-term survival of this herd and all barren-ground caribou herds.

We have reviewed the Gray's Bay Road and Port Project Proposal (NIRB file 24XN038) and have serious concerns about the potential impact to the Bathurst Caribou Herd, potential impacts to adjacent herds such as the Beverly/Ahiak, and the potential serious and permanent negative impacts to all the communities who depend on these herds and live in relationship with the herds. We strongly recommend that a full environmental review is required, and that such a review must include consideration of the cumulative impacts of the full project which would include future phases of road connections through Northwest Territories and likely developments and increased human activities on the landscape as a result of this project.

The ADNLC looks forward to working closely with other concerned groups, the NIRB, and proponent as this review moves forward. Please ensure that any and all future communications about this project are sent to Ron Robillard, Chief Negotiator and President of ADNLC robillard@adnlc.ca; Danielle Charles, Office Administrator Danielle.charles@adnlc.ca; and Katie Rasmussen, Consulting Biologist katiebeth.rasmussen@gmail.com.

Sincerely,

Ron Robillard, Chief Negotiator, Athabasca Denesųliné NéNé Land Corporation (ADNLC)

COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: Grays Bay Road and Port	
Proponent: West Kitikmeot Resources Corp.	
Location: Kitikmeot	
Comments Due By: October 30, 2024	NIRB #: 24XN038

Indicate your concerns about the project proposal below:

<input type="checkbox"/> no concerns	<input checked="" type="checkbox"/> traditional uses of land
<input type="checkbox"/> water quality	<input type="checkbox"/> Inuit harvesting activities
<input type="checkbox"/> terrain consultation	<input checked="" type="checkbox"/> community involvement and
<input type="checkbox"/> air quality	<input type="checkbox"/> local development in the area
<input checked="" type="checkbox"/> wildlife and their habitat	<input type="checkbox"/> tourism in the area
<input type="checkbox"/> marine mammals and their habitat	<input type="checkbox"/> human health issues
<input type="checkbox"/> birds and their habitat	<input checked="" type="checkbox"/> other: harvesting activities by
any communities who rely on the caribou _____	
<input type="checkbox"/> fish and their habitat	

<input type="checkbox"/> heritage resources in area	

Please describe the concerns indicated above:

1. Disturbance to the calving and post-calving grounds, disruption of movement between critical habitats, and loss of/ fragmentation of critical habitats for the Bathurst Caribou

This 230-km long all-season road has the potential to intersect critical calving and post-calving habitats of the Bathurst Herd, as well as movement corridors, potentially including key fresh water crossings. The Bathurst Caribou Herd is already designated as critically low with no signs of recovery to date. Over 98% of the herd has already been lost, and they are on the brink of being lost completely. These habitats have been identified by both western scientific and Indigenous Knowledge to be habitats where caribou are particularly vulnerable and should not be disturbed. The Athabasca Denesųliné have serious concerns about such a permanent and significant linear structure being placed through such a sacred and critical habitat, and potentially disrupting movements between habitats at times when caribou are most sensitive during post-calving. We have serious concerns that the Bathurst Herd will not survive this development if it were to move forward.

2. Cumulative impacts of road developments on landscape and human activity

Roads transform landscapes and the human and ecological processes within those landscapes. This proposed all-season road has the potential to completely change access to barren-ground caribou for illegal harvest and potential over-harvest; roads bring disturbance in the form of human activity, noise, dust, invasive species, changes in predator-prey dynamics and inter-species competition and relationships, and new land uses, the cumulative impacts of which all have the potential to negatively

affect barren-ground caribou and the rights of harvesters.

3. Cumulative Impacts of all future phases of road

When assessing the long-term cumulative impacts of this project, future road connections must be considered and included in the cumulative effects analysis. This road is not a stand-alone project, and all potential increase in human activity, linear disturbance, future phases of road network connections, and new human disturbances and infrastructure must be considered. In addition, the vulnerability and sensitivity of this landscape and barren-ground caribou herds to climate change must be part of the analysis.

Do you have any suggestions or recommendations for this application?

Barren-ground caribou herds are declining as cumulative threats to these herds continue to increase. This project has the potential to completely change the landscape and the caribou herds within it. We recommend that the environmental review must consider the following:

- Cumulative impacts of future phases of road connections through NWT and Nunavut
- Cumulative impacts of likely and potential additional human use and development as a result of the construction of this road
- Cumulative Impacts and risk associated with climate change projections for the area
- Potential for pressure to other barren-ground caribou herds such as the Beverly/Ahiak
- A realistic assessment of the long-term recovery or survival of the Bathurst Herd and adjacent herds if this project is implemented
- Given the potential severe risks of this project, Indigenous Governments/Organizations and communities who are potentially impacted must receive sufficient funding to properly assess the potential long-term, intergenerational impacts of this project on all aspects of health, food sovereignty, culture, safety, and community social, economic, spiritual, and cultural well-being for current and future generations.

Given that caribou are central to the well-being, culture, sovereignty, and food security of many Indigenous communities, this review process must center Indigenous Knowledge, perspective, and rights.

Do you support the project proposal? Yes ☐ No ☒ Any additional comments?

Name of person commenting: Ron Robillard **of** Athabasca Denesuliné Néné Land Corporation (ADNLC)

Position: President/Chief Negotiator

Organization:

Signature:



Date: 31 October 2024