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Nunavut Impact Review Board (NIRB)
PO Box 1360
Cambridge Bay, NU X0B 0C0

RE: Yellowknives Dene First Nation (YKDFN) Comments – West Kitikmeot Resources Corp's (WKR) Grays Bay Road and Port Project

The Yellowknives Dene First Nation (YKDFN) has reviewed the proposed Grays Bay Road and Port Project submitted by West Kitikmeot Resources Corp. (WKR) and wishes to respectfully submit the following comments and concerns for the record. While the proposed development lies outside the borders of the Northwest Territories, it intersects with lands, waters, and ecological systems that are of deep cultural, spiritual, and subsistence importance to the YKDFN and our members.

The YKDFN asserts that this project will have transboundary and cumulative effects that directly or indirectly affect our rights, our land use, and the health of the ecosystems that we have relied on since time immemorial. We believe this project must be approached with caution, care, and full consideration of Indigenous knowledge, Section 35 rights, and long-standing responsibilities to land, water, and wildlife.

1. Our Perspective on the Project

The proposed development includes the construction of a deep-water port on the Coronation Gulf and a 325 km all-season road that will extend from Grays Bay to Jericho Station, with a Phase II connection to the Northwest Territories border. Though primarily framed as an economic and logistical opportunity for Nunavut, the project has potential to alter the entire western Arctic landscape and facilitate intensified industrial access into one of the last relatively undisturbed regions in Canada.

From the YKDFN perspective, the proposed road and port system introduces risks that are not localized but regionally significant — especially for wildlife and cultural continuity. We are concerned about the long-term ecological footprint, the opening of new development corridors, and the lack of adequate planning around cross-jurisdictional effects.

2. Environmental Components of Concern

One of our greatest concerns is the potential impact on the Bathurst caribou herd. This population of barren-ground caribou is a cultural keystone species vital to the socio-economic and cultural fabric of Indigenous communities across the sub-arctic, and central to YKDFN's cultural identity, harvesting practices, and spiritual connection to the land. The Bathurst herd has declined by approximately 98% since its peak in the 1980s. Its migratory range, encompassing more than 390,000 km², spans across diverse biomes in Nunavut and the eastern Northwest Territories, including areas actively used by YKDFN harvesters.

Human activities and climate change have increasingly disturbed the long-standing relationship between people and caribou. Even modest increases in human footprint, particularly from roads and traffic corridors, are known to create wide *zones of influence* that deter caribou movement, disrupt migration, and impact calving success. The Bathurst herd's range overlaps with various land use management regimes and Indigenous territories. The proposed road introduces a year-round disturbance through sensitive habitats, and without clear protections, it risks eroding the core of this shared and rapidly declining resource.

Other key environmental components of concern include:

- **Water systems and fish-bearing lakes** vulnerable to sedimentation, contamination, and permafrost disruption.
- **Bird and predator species** affected by fragmentation and altered habitat connectivity.
- **Traditional food security** tied to clean water and healthy wildlife populations.
- **Culturally sensitive areas** including historic trails and burial grounds that could be unintentionally damaged.

3. Potential Effects on Land, Animals, and People

The YKDFN foresee the following major categories of potential impact:

a. Habitat Fragmentation and Wildlife Displacement

The road would disrupt the continuity of intact tundra and taiga ecosystems, displacing species like caribou, moose, wolves, wolverines, muskox, and migratory birds, all of which play roles in YKDFN harvesting traditions.

Recommendation: Route the road to avoid critical and culturally sensitive habitats; implement roadless buffers and community-led wildlife monitoring programs.

b. Aquatic Ecosystem Disruption

Altered drainage patterns and erosion risk contaminating waterways important for whitefish, lake trout, and other fish that support food sovereignty.

Recommendation: Apply permafrost-sensitive road designs, enforce erosion controls, and monitor water quality continuously, especially in areas linked to Indigenous harvesting.

c. Cumulative Development Pressures

The road would enable expanded mining and industrial access, intensifying environmental degradation and disrupting traditional harvesting areas.

Recommendation: YKDFN requests that NIRB and WKR mandate a comprehensive regional cumulative effects assessment that incorporates future development scenarios and require access and impact management plans. Both the assessment and the plans should be developed in collaboration with transboundary Indigenous governments, including YKDFN.

d. Cultural Sites and Heritage Landscapes

Construction may intersect with sacred sites, trails, and areas of cultural significance to YKDFN, which are often not mapped or publicly known.

Recommendation: Engage YKDFN Elders and knowledge holders to co-lead cultural impact assessments and implement robust protection protocols.

e. Traditional Land Use and Knowledge Transfer

Loss of access to clean, productive land diminishes not only food security but intergenerational transmission of language, knowledge, and stewardship practices.

Recommendation:

Conduct a Traditional Land Use (TLU) study to overlay the project area and boundaries, providing guidance for mitigation measures and ongoing monitoring. Ensure Indigenous governance is upheld in land-use decision-making by collaborating closely with Indigenous stakeholders throughout the project cycle.

f. Human Health and Community Well-being

Increased road access raises risks of cultural disconnection, substance abuse, and health stressors due to industrialization and community exposure.

Recommendation: Fund health impact assessments and co-develop wellness support programs with Indigenous communities near the project corridor.

g. Monitoring, Enforcement, and Accountability

Past projects in the North have suffered from weak enforcement of mitigation and monitoring plans, often leaving Indigenous communities to observe and report impacts without sufficient capacity or recourse.

Recommendation:

YKDFN recommends that a co-developed compliance and monitoring framework be established, with Indigenous Guardians or Dene land users empowered to oversee and report on environmental conditions, caribou behavior, and cultural site protections, with funding secured for the life of the project.

h. Emergency and Spill Response Planning

Increased traffic, fuel storage, and marine activity raise risks of contamination to freshwater systems and harvesting grounds in both Nunavut and NWT, particularly along waterways that cross jurisdictions.

Recommendation:

YKDFN recommends that a regional spill response and emergency preparedness plan be developed in consultation with Northwest Territories and Nunavut communities, to include localized response protocols, training, and cross-territorial communications pathways.

4. Future Engagement and the Path Forward

YKDFN acknowledges WKR's stated intent to collaborate with Kitikmeot communities and incorporate Inuit Qaujimagatuqangit (IQ). However, to uphold the spirit of **shared stewardship and inter-Nation respect**, we ask to be formally included in the project's ongoing review and engagement process as a potentially impacted transboundary rights-holder.

We strongly recommend the following steps:

- Establish a transboundary Indigenous working group, including YKDFN, to advise the NIRB and the proponent on caribou, land use, and cultural impact mitigation.
- Require proponents to engage with YKDFN in developing monitoring programs, with capacity support for Dene-based observation and Traditional Knowledge documentation.
- Ensure a regional cumulative effects framework is applied that recognizes the interconnectedness of land, animals, and Indigenous ways of life across jurisdictions.

We emphasize that many areas of cultural and spiritual significance remain undocumented in state mapping systems. These include historic travel corridors, caribou observation sites, and places tied to ceremony and identity. Development through such areas may result in irreversible cultural loss. As such, YKDFN recommends a precautionary approach and the application of Traditional Knowledge mapping co-led by Elders and land users before any land disturbance occurs.

In closing, the Grays Bay Road and Port Project is not just a regional infrastructure proposal, it is a transformation of a fragile and sacred landscape. We urge NIRB to consider this project with the utmost scrutiny, guided by Indigenous values and intergenerational obligations to the land and its beings. YKDFN remains committed to collaborating in good faith with all governments and partners involved in this process to ensure that development, if it proceeds, does so in a way that respects Indigenous rights, protects the land, water, and animals, and honors our shared responsibility to future generations.

We look forward to future engagement and will remain involved in the regulatory process as it unfolds.

Mahsi cho,



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