



**Athabasca Denesuline Né Né Land Corporation**

July 3, 2026

Kelli Gillard,  
Manager Impact Assessment  
Nunavut Impact Review Board  
Sent via email: [kgillard@nirb.ca](mailto:kgillard@nirb.ca); [info@nirb.ca](mailto:info@nirb.ca)

**RE: Athabasca Denesuliné NéNé Land Corporation (ADNLC) Information Requests for West Kitikmeot Corp.'s Gray's Bay Road and Port Project Proposal NIRB 23XN038**

Dear Kelli Gillard and the Nunavut Impact Review Board.

The Athabasca Denesuliné NéNé Land Corporation (ADNLC) represents the three Denesuliné First Nations of Fond du Lac, Black Lake, and Hatchet Lake. As caribou people who have lived in relationship with the Bathurst and Beverly Herds for millennia, we are concerned about the effects the proposed project may have on the future of caribou, our communities, and all caribou peoples. We have reviewed the Impact Statement submitted by West Kitikmeot Resources Corp. for the proposed Gray's Bay Road and Port Project with a specific focus on potential impacts to Bathurst and Beverly Caribou. Our Information Requests at this time are below. We anticipate that we may have more as the technical review period continues.

Our detailed Information Requests follow below.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Robillard'.

Ron Robillard,  
President, Athabasca Denesuliné NéNé Land Corporation (ADNLC):  
[rrobillard@adnlc.ca](mailto:rrobillard@adnlc.ca)

Chief Joseph Custer Reserve # 201  
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CC:

Katie Rasmussen, Ecological Consultant, ADNLC:  
[katiebeth.rasmussen@gmail.com](mailto:katiebeth.rasmussen@gmail.com)

## Information Requests

IR Source	Athabasca Denesųłiné NÉNé Land Corporation
IR Number	ADNLC-IR-01
IR Directed To	West Kitikmeot Resources Corp.
Subject	Project Purpose and Need
Reference	Volumes 1 & 2
Issue/Concern	<p>To ensure responsible and sustainable development, the first step is for the proponent of any project to demonstrate the need for the project and that any alternatives have been considered to ensure the project is carried out in a way that provides the most benefits and the least harm. The Nunavut Impact Review Board's regulations require that the Board take into account the need and purpose of the project in the assessment.</p> <p>There is not have enough information detailing the need for the project at this time, its purpose, and expected benefits, especially considering that the Project poses a risk to already extremely vulnerable caribou herds such as the Bathurst, and Dolphin and Union herds, as well as to other herds whose populations are not so critically low, but are still vulnerable to linear infrastructure and future associated developments such as the Beverly Caribou.</p> <p>The Project Overview states that there are 3 main benefits to the project.</p> <ul style="list-style-type: none"> <li>• <i>Economic – Transformative Benefits</i></li> <li>• <i>Community and Social – Supply Chain Resilience</i></li> <li>• <i>Sovereignty and Security – Strategic Presence</i></li> </ul> <p>It is not clear from the information provided which components of the Project are necessary to achieve each of the stated needs/ purposes and benefits.</p>
Information Request	<ol style="list-style-type: none"> <li>1. Is the road portion of the project required for the Sovereignty and Security Need/Purpose listed? If so, please provide detailed information on how the road portion of the project is necessary to achieve the goal and benefit of increased Sovereignty, security and a strategic presence, or if the port alone achieves this goal / benefit. In particular, if there is no connection to southern road systems via a permanent access road or winter road in NWT, does</li> </ol>

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	<p>the currently proposed route of the Gray's Bay Road still achieve the stated purpose and estimated benefits?</p> <ol style="list-style-type: none"> <li>2. It is unclear from the information provided how the proposed road will deliver the purported benefits to communities of "improved safety and supply chain reliability to communities". The Gray's Bay Road does not go through a single community and yet community supply chain and access to goods is listed as an important benefit. Please provide the economic breakdown and anticipated supply-chain pathways demonstrating how the construction of this road will improve the supply chain and a comparative analysis of existing supply chains and alternatives considered to improve them for the benefit of communities in the region.</li> <li>3. The Project Purpose and Need descriptions throughout the IS focus on "unlocking the critical mineral wealth of the Kitikmeot Region", yet no information or analysis is provided demonstrating the difference to expected mineral development if the project moves forward or not. Please provide a detailed breakdown of how 'go' or 'no-go' scenarios for GBPR would impact future development. Please distinguish the road and the port as separate entities in the analysis.</li> </ol>
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IR Source	Athabasca Denesųłiné NÉNé Land Corporation
IR Number	ADNLC-IR-02
IR Directed To	West Kitikmeot Resources Corp.
Subject	Rationale for current timing of Project Review
Reference	Volumes 1 & 2
Issue/Concern	<p>The timing of this review doesn't seem to be logical or strategic given that there is no certainty on the NWT route to connect the Gray's Bay Road to the south.</p> <p>We note that throughout the IS, the assumption is made that the Gray's Bay Road will connect to the south via a winter road (Tibbitt to Contwoyto) and/or to an all-season road in the future. Given that there is no certainty that either of those roads will exist at the time that construction is supposed to start on GBPR, we question the effectiveness of a review at this time, and wonder if it would be a better use of time and resources to wait to have this review at a future date when those questions can be answered with any certainty.</p> <p>Many foundational assumptions in the Impact Statement, including purpose/need for and benefits of the project, construction activities and timelines, mitigation and monitoring activities, road maintenance, and economic and community benefits, all rely on the assumption that the</p>

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	<p>currently proposed route will connect to a winter road or all-season road in the NWT that will connect the Gray's Bay Road to southern Canada. Yet at this time this is not a certainty.</p> <p>Our final concern regarding timing of this review relates to the timing misaligning with the current Nunavut Land Use Planning process. Given that in the IS WKR states that this is a "transformational project" and that in the absence of a Nunavut Land Use Plan, they will "monitor the status of the draft Land Use Plan to assess potential impacts and modifications to project planning" ...and... "...incorporate relevant aspects of the draft Plan where feasible", it seems to us more strategic to wait until a Plan is in place.</p>
Information Request	<ol style="list-style-type: none"> <li>1. What is the rationale for putting this project through the NIRB at this time before there is any certainty regarding the NWT portion of the route and before the Nunavut Land Use Plan is finalized?</li> <li>2. For every project component that currently relies on a southern route in the IS (e.g. construction starting from the south, equipment or materials driving up from the south, benefits of having a connection to the south etc.) please provide an updated analysis in the event that no southern route exists.</li> <li>3. In the event that a southern route is confirmed but does not join at the currently expected location at Contwoyto Lake, please provide WKR's strategy for responding to that new information. Will WKR propose a new route or keep the currently proposed route?</li> </ol>

IR Source	Athabasca Denesūliné NÉNé Land Corporation
IR Number	ADNLC-IR-03
IR Directed To	West Kitikmeot Resources Corp.
Subject	Future third-party use of the road must be considered in analysis of impacts
Reference	Throughout document.
Issue/Concern	<p>The IS page 1-14 of Volume 2 states that no future third-party use of the Project or future development coming off the Project, including spur roads, mineral shipping or transport, are part of the Project and therefore are not part of the Project Impacts Assessment. However, the purported Project benefits are based on the 3<sup>rd</sup> party use of the Project infrastructure and on 'unlocking the critical mineral wealth' of the region.</p> <p>If the foundational purpose of the Project is specifically for future 3<sup>rd</sup> party use, how can an analysis of impacts of the road be considered without a full understanding of the potential amount and impact of traffic?</p>
Information Request	<ol style="list-style-type: none"> <li>1. Please provide an analysis of possible future traffic scenarios based on known and foreseeable future developments that would use the road, as well as other possible users of the road (DND,</li> </ol>

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	<p>tourism, community use, etc.). This should include how different minimum and maximum traffic scenarios would impact factors that have effects on caribou including:</p> <ul style="list-style-type: none"> <li>• Expected volume, frequency, timing, and type of vehicle traffic</li> <li>• Expected transport of dangerous goods and associated mitigation plans</li> <li>• Expected noise, vibrations, lights, smells, and other anthropogenic disturbances coming from the road</li> <li>• Potential for harvest and poaching off the road</li> <li>• Footprint of spur roads and other infrastructure that will be required to connect the proposed GBPR to the reasonably foreseeable future developments</li> </ul> <p>2. Please update the relevant analyses in the Impact Statement to include impacts of traffic from third party use. These should include any analysis of effects on caribou from the above sources as well as cumulative effects.</p>
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IR Source	Athabasca Denesūliné Néné Land Corporation
IR Number	ADNLC-IR-04
IR Directed To	West Kitikmeot Resources Corp.
Subject	Use of Inuit Qaujimajatuqangit (IQ), Indigenous Knowledge (IK), and Community Knowledges (CK)
Reference	Volume, 3, 4, 6 and throughout document
Issue/Concern	<p>In section MD 3.2.4. Integration Methodology, the IS lists how IQ, IK, CK were integrated into the IS. More information is required for ADNLC to understand specifically which areas of the IS were informed by IQ/IK/CK and how.</p> <p>While use of IQ/IK/CK are stated to be central to the development of the Project and throughout the Impact Statement, it is unclear exactly how IQ/IK/CK was used in the determination of significance of effects of the Project, to assess route alternatives, and whether the conclusions reached in this Impact Statement were corroborated by IQ / IK / CK.</p>
Information Request	<ol style="list-style-type: none"> <li>1. The Banci and Spicker 2024 report is referenced as the primary source of Inuit Knowledge / Qaujimajatuqangit. While ADNLC respects the OCAP principles of IQ and IK, including sensitivities around data ownerships, confidentiality and the sensitivity of publicly sharing IQ and IK, we wonder if WKR can share the methodology used in the Banci and Spicker 2024 so that we can understand how the Project-specific IQ referenced throughout the IS was gathered and validated.</li> <li>2. It is unclear how the IQ/IK/CK that is cited was used beyond</li> </ol>

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	<p>determining Valued Components. Was IQ/IK/CK used in any of the modelling or analysis of significance of effects, cumulative effects, caribou herd vulnerability or important habitat/ habitat selection? Please demonstrate how IQ/IK/CK was used.</p> <p>3. Were final conclusions of this Impact Statement brought back to Knowledge Holders to validate / corroborate the conclusions and findings? If so, please provide an account of the validation / corroboration discussions.</p> <p>4. For questions regarding route selection and IQ/IK/CK, see ADNLC-IR-05</p>
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IR Source	Athabasca Denesųfiné NÉNé Land Corporation
IR Number	ADNLC-IR-05
IR Directed To	West Kitikmeot Resources Corp.
Subject	Alternative Routes Considered
Reference	Volume 2 Section 2.4 Alternatives
Issue/Concern	The section on alternatives considered requires more information on the three routes proposed as well as more alternatives to be considered. Not enough information has been provided to understand the data and assessment that went into determining which route was preferred and why.
Information Request	<ol style="list-style-type: none"> <li>1. Throughout the document, WKR states that IQ and IK were used to inform route selection, yet based on the conclusion in the IS it seems that the route was chosen primarily to support connection to mineral claims and to favour a shorter route. Please provide detailed evidence of whether and how IQ/ IK/CK were used in the analysis of alternative route selection and the corroboration or validation of results and conclusions of the analysis.</li> <li>2. The IS states that the route alternative that would avoid the calving grounds was not chosen because it was a longer corridor. However, not all land is the same in terms of impacts to caribou and other wildlife, nor to land users. A longer route does not necessarily translate into a greater negative effect. In order to meaningfully assess alternative route options, it's necessary to see a detailed analysis of each alternative route and how each route interacts with important caribou habitats (and other values on the landscape). Please provide maps and reports demonstrating each alternative route, the number of critical habitats such as calving grounds, post-calving grounds, water crossings, critical movement and migration routes, eskers, important spring, summer, winter habitats and important rutting habitat that the routes cross, including detailed knowledge from Inuit and Indigenous Knowledge Holders/ land users regarding which areas are the critical areas for caribou throughout the year. These maps should</li> </ol>

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	<p>also include movement data, collar data and data demonstrating movement through the region and use of the region across all years that data is available.</p> <p>3. We do not have enough information to understand the need for the all-season road. More alternative analyses considering options including 1. analysis of port construction alone, without a road, and 2. Analysis of future mines building winter roads or accessing other means of transportation, should be provided with clear tables showing evidence of how benefits to the region would change if the road were not constructed, and what alternative means to achieve those goals/benefits could be considered (or have been considered?)</p>
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IR Source	Athabasca Denesūłíné NÉNé Land Corporation
IR Number	ADNLC-IR-06
IR Directed To	West Kitikmeot Resources Corp.
Subject	Noise and Vibrations
Reference	Volume 5 Section 13 – Noise and Vibration
Issue/Concern	<p>Noise and Vibration were only considered in the context of human disturbance and effects were determined based on regulatory thresholds based on human responses to noise. Caribou are extremely sensitive to noise and vibration and perceive it very differently than humans. Noise and Vibration were also only considered in the context of construction and operations and maintenance of the road and associated Project facilities; however, the expected future use of the road must be considered to understand the potential impacts of the road.</p> <p>Due to the importance of caribou, a caribou -specific noise and vibration analysis is needed to understand potential impacts to caribou movement, migration, and use of nearby habitats. This analysis should consider the entire life of the road and potential minimum and maximum traffic activity on the road.</p>
Information Request	<ol style="list-style-type: none"> <li>1. Please provide a caribou-specific analysis of noise and vibration with determinations of magnitude of significance of effects based on caribou responses to noise and vibration. (not on regulations designed for humans)</li> <li>2. Potential future maximum traffic amounts should be included in this analysis to have an understanding of the range of potential noise and vibration that could be created by use of the road over the long-term lifespan. Without understanding the potential noise and volumes of traffic on the road, we cannot properly understand the potential response of or effects on caribou</li> <li>3. The cumulative effects analysis in Section 13.4 states that it doesn't consider vibrations because "vibration is localized and transient effect that does not persist once the activity has ceased"</li> </ol>

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	In the case of a road with constant traffic, vibration and noise could be constant. A cumulative effects analysis considering vibration based on potential minimum and maximum traffic levels and types of traffic for the lifetime of the road is important for the assessment of potential long-term impacts to caribou and necessary mitigations.
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IR Source	Athabasca Denesųliné NéNé Land Corporation
IR Number	ADNLC-IR-07
IR Directed To	West Kitikmeot Resources Corp.
Subject	Road lighting and traffic lights
Reference	Volume 6
Issue/Concern	No analysis of whether or how the road design will include lighting, and whether and how light pollution from the road and from traffic using the road may impact caribou and how it will be mitigated
Information Request	<ol style="list-style-type: none"> <li>1. Please provide details of whether or not road design includes lighting or reflective surfaces that may cause avoidance by caribou?</li> <li>2. Please provide an analysis including a scale from estimated minimum to maximum future traffic on the road and how traffic lights may impact caribou or other wildlife.</li> </ol>

IR Source	Athabasca Denesųliné NéNé Land Corporation
IR Number	ADNLC-IR-08
IR Directed To	West Kitikmeot Resources Corp.
Subject	Beverly Caribou not adequately addressed in the IS
Reference	VS .6.3. Caribou
Issue/Concern	<p>Beverly Caribou are excluded from this section and largely excluded throughout the Impact Statement. While we recognize that the proposed road is on the edge of the Beverly annual range, Beverly caribou may overlap with the proposed route and experience effects of induced development, human activity, and cumulative effects in the region.</p> <p>Information on Beverly caribou movement and potential interaction with the route should be considered in the Impact Statement. Not only from the perspective of caribou movement and habitat, but also from the perspective of other potential effects such as access for hunting, other human activity, and sensory disturbance.</p>
Information Request	<ol style="list-style-type: none"> <li>1. Please include an analysis of how the Beverly caribou may interact with the currently proposed route including all available data on Beverly Caribou movement, annual and seasonal range use including historic, current, and potential future shifts in range.</li> </ol>

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	2. Ensure that an analysis of induced development impacts and cumulative impacts include Beverly Caribou
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IR Source	Athabasca Denesųłiné NéNé Land Corporation
IR Number	ADNLC-IR-09
IR Directed To	West Kitikmeot Resources Corp.
Subject	Determination of the Local Assessment Area
Reference	Section 16.1.4
Issue/Concern	No Inuit, Indigenous, or Community Knowledge was cited as supporting the 4km Zone of Influence for the Local Assessment Area
Information Request	1. Will WKR clarify if the cited literature in the “Local Assessment Area” section was the only information used to determine the LAA, or was any IQ, IK, or CK considered?

IR Source	Athabasca Denesųłiné NéNé Land Corporation
IR Number	ADNLC-IR-10
IR Directed To	West Kitikmeot Resources Corp.
Subject	Residual Effects Characterization
Reference	Table 16.6 Magnitude
Issue/Concern	No information is provided on how the categories/ criteria defined in Table 16.4 were translated into a threshold for significance in Table 16.6. For example, Under Magnitude, the Threshold for significance is stated as “High Magnitude” but there is no way to determine how that conclusion was reached. Isn’t it possible that a Moderate Magnitude or even a Low Magnitude that persists over a long time period, may result in significant impact on caribou?
Information Request	1. For each row in the Table 16.6, please provide more information and evidence demonstrating how the Threshold for Significance was determined.

IR Source	Athabasca Denesųłiné NéNé Land Corporation
IR Number	ADNLC-IR-11
IR Directed To	West Kitikmeot Resources Corp.
Subject	Long-term funding to achieve long term proposed mitigation, monitoring, and maintenance of the road in perpetuity.
Reference	Volumes 6, 9,10, 11 (any area that cites mitigation, monitoring, and ongoing maintenance)
Issue/Concern	Given that the road is expected to be permanent infrastructure, but mines are not permanent and may have lifespans of anywhere from only 10-40+ years, it is unclear if there will be adequate funding to continue monitoring and mitigation measures on the road in perpetuity if there are

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	no income sources from mining operations.
Information Request	<ol style="list-style-type: none"> <li>1. Can WKR provide details regarding how long-term road maintenance and monitoring and mitigation measures will be guaranteed to be funded throughout the lifetime of the road?</li> <li>2. Please ensure to consider and include increasing costs of these activities under various future climate change scenarios such as permafrost melt, increased flooding, increased drought, increased wildfires and other scenarios that may impact long-term road maintenance, monitoring programs and mitigation programs.</li> </ol>

IR Source	Athabasca Denesųłiné NÉNé Land Corporation
IR Number	ADNLC-IR-12
IR Directed To	West Kitikmeot Resources Corp.
Subject	Access Control on the Road
Reference	Volumes 6, 9, 10, and 11.
Issue/Concern	ADNLC is concerned about whether or not access control on a 230km road is a realistic goal in perpetuity. And, despite the fact that access management is identified as an important mitigation measure, the IS lacks a detailed explanation of how access will be controlled.
Information Request	<ol style="list-style-type: none"> <li>1. Please provide a detailed Access Management Plan which should include possible or reasonably expected challenges and barriers to implementation and how WKR would address those as well as how this plan will be funded in perpetuity.</li> <li>2. Based on WKR engagement and consultation to date, can WKR provide evidence for whether or not there is community support for access control and what it might look like?</li> </ol>

IR Source	Athabasca Denesųłiné NÉNé Land Corporation
IR Number	ADNLC-IR-13
IR Directed To	West Kitikmeot Resources Corp.
Subject	Determination of Significance of effects on caribou
Reference	Volumes 4 and 6, 9, 10 – all caribou analysis
Issue/Concern	<p>ADNLC appreciates the amount of work provided as part of the review of potential effects on caribou. That said, it is unclear if or how all of these analyses in combination with IQ/IK/CK were used to achieve the final determination of no significant effects.</p> <p>It is also unclear if or how mitigation measures impacted the determination of significance. Given that the effectiveness of all mitigation measures are unproven, it is important to see the effects assessment both with and without minimization of effects from the</p>

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	proposed mitigations.
Information Request	<ol style="list-style-type: none"> <li>1. Please provide a step-by-step explanation with accompanying flowchart or other clear visual to explain exactly what data was used and how it was used in the determination of significance of effects. These should include clear citations of where information came from for each data source and each decision point. This should also demonstrate how other analyses conducted such as the Caribou Herd Vulnerability Model and the Cumulative Effects Analysis were considered and weighted in the final determination of significance of effects</li> <li>2. Were any of the Significance Determinations conclusions reviewed with Indigenous Knowledge Keepers, land users or local communities to validate or question/challenge conclusions? If so, please provide reporting on this validation/corroboration step.</li> <li>3. Based on the IS, it's unclear if and how the assumed success of mitigation measures was considered in the determination of significance of effects. If mitigation measures were incorporated into the analysis, please provide a table showing exactly what mitigation measures were included, what the significance effect was before the mitigation, how they were determined to change the effect, and how that change was incorporated or weighted in the final determination of significance. If this information is already in the report, please add report sections to the table for ease of cross-referencing.</li> </ol>

IR Source	Athabasca Denesųłiné NÉNé Land Corporation
IR Number	ADNLC-IR-14
IR Directed To	West Kitikmeot Resources Corp.
Subject	Permafrost Thaw and Proposed Mitigations for Caribou
Reference	
Issue/Concern	No mention is made in the IS of how or if the engineering/construction and ongoing maintenance requirements to counteract potential future permafrost thaw may be at odds with the mitigations for caribou (gentle slopes, even surfaces, road shut-down periods at sensitive times, etc).
Information Request	<ol style="list-style-type: none"> <li>1. Please provide an analysis of how permafrost is likely to change throughout the lifetime of the project including, importantly, as a direct result of the project, and how that may affect the road structure.</li> <li>2. Please provide an accompanying table showing the engineering or design elements and ongoing maintenance that might be required for long-term response to predicted or possible changes in permafrost and whether those are compatible with suggested mitigations and design elements for caribou.</li> </ol>

IR Source	Athabasca Denesųłiné NÉNé Land Corporation
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IR Number	ADNLC-IR-15
IR Directed To	West Kitikmeot Resources Corp.
Subject	Cumulative Effects Assessment and Reasonably Foreseeable Induced Development
Reference	Volumes 4, 6, 10,
Issue/Concern	Need for clarity on what data went into the Cumulative Effects Assessment and how the cumulative effects analyses were considered in the determination of significance of effects.
Information Request	<ol style="list-style-type: none"> <li>1. Please provide a clear explanation with supporting visuals such as tables, flowcharts, impact pathways, (or other) demonstrating precisely what data went into the cumulative effects analysis.</li> <li>2. Please provide a clear explanation with supporting visuals and citations demonstrating how cumulative effects analyses were used in the final determination of significance of effects.</li> <li>3. It is not clear which reasonably foreseeable induced developments were considered as part of the cumulative effects analysis and what details and assumptions were associated with each of those projects and project components (location and length of future linear developments like spur roads or winter roads, energy centers or transmission lines, infrastructure footprints and zones of influence, locations of expected future developments). Please provide a list of all developments and components of those developments used in the assessment, as well as a map showing possible future spatial configurations of these developments.</li> </ol>

IR Source	Athabasca Denesųłiné NéNé Land Corporation
IR Number	ADNLC-IR-16
IR Directed To	West Kitikmeot Resources Corp.
Subject	Expand caribou analysis to include possible future range expansion
Reference	Volume 6, 10, 11
Issue/Concern	The Bathurst Herd is at a critical all-time low and their range has contracted considerably as a result of this. Efforts to support the herd to expand in numbers and range are underway. For a project that is permanent on this landscape, it is important to have an analysis of future scenarios of Bathurst Caribou possible future range use expansion into their full range again.
Information Request	<ol style="list-style-type: none"> <li>1. Please provide an analysis of how current vulnerability, habitat use, and determinations of significance may change if the analysis is carried out using possible future scenarios of an expanded range for the Bathurst Caribou.</li> </ol>

IR Source	Athabasca Denesųłiné NéNé Land Corporation
IR Number	ADNLC-IR-17
IR Directed To	West Kitikmeot Resources Corp.

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Subject	Future requests for Information or data
Reference	n/a
Issue/Concern	<p>ADNLC submits these Information Requests under extreme time limitations. We note that we may have future information requests as we have the time to dive deeper into a thorough technical analysis of the Impact Statement. Additionally, we expect to have more questions after receiving the responses to these questions and responses to the IRs of other groups.</p> <p>In particular, we anticipate we may have questions and data requests regarding the modeling methods and data inputs, model assumptions, and spatial data used for the various caribou analyses.</p>
Information Request	<ol style="list-style-type: none"> <li>1. Does WKR foresee any challenges or barriers to sharing that data with ADNLC at a future point during the technical review period?</li> </ol>

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