



Tłıchǫ Government

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July 3, 2026

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 Impact Statement – Tłıchǫ Government
Information Requests**

Dzẹ nezı (Good Day),

Masi cho for the opportunity to be part of this proceeding. The Tłıchǫ Government (TG) reiterates its concerns over the road’s potential impacts on caribou, caribou migration, and Tłıchǫ harvesting rights. The Tłıchǫ respect the self-determination of our Inuit neighbours to decide what should happen on their lands, and we would like to continue collaborating to make sure caribou and caribou migration are protected when there is economic development.

TG’s Information Requests (IRs) outlined below are intended to better understand the potential impacts, mitigations, and alternatives related to the Grays Bay Road and Port.

IR Source:	Tłıchǫ Government (TG)
IR Number:	#1
IR Directed To:	WKR
Subject:	Habitat Connectivity and Alternative Routes
Reference:	Volume 2 – Introduction, Project Description and Alternatives Volume 6, Section 16 – Assessment of Potential Effects on Caribou
Issue/Concern:	In TG’s July 16, 2025 comments, TG requested ‘habitat connectivity’ as part of the baseline information to determine potential impacts on migratory caribou. In Volume 6, section 16, WKR states that “habitat connectivity is not explicitly considered in the assessment of change in habitat. Studies that have addressed habitat connectivity in Arctic tundra ecosystems are limited (e.g., Fullman et al. 2021). Movement filters created by human disturbances can alter the location and timing of local-scale and broad-scale movements, but these filters are likely insufficient in

quantity and extent in the BCH-RAA1 or DUH-RAA (see Section 16.2.2.6), even with the Project, to alter connectivity between seasonal ranges or seasonal habitat.”

Part of the migration route the Tłı̨chų have seen the caribou use follows a valley between Carrot Lake and Contwoyto Lake. Construction of the proposed road to Jericho mine will pose a significant threat to the migration pattern for the caribou, particularly any construction in the valleys between the lakes that serve as a key migration corridor.



Figure 1. Ekwò waiting at the end of the valley north of Jericho Mine (photo taken by Petter Jacobsen, Tłı̨chų Government Ekwò Nàxoèhdee K'è monitoring program July 2017)

Tłı̨chų Elders and scientists are concerned about the current proposal and would like the road to stay further away from Contwoyto Lake.

TG has initiated discussions with WKR directly regarding potential changes to the south end of the Grays Bay Road route and understands that WKR is open to changing its south terminus location to avoid potential impacts to caribou and caribou habitat in this sensitive migration corridor.

<p>Information Request:</p>	<p>IR regarding Alternatives: Can WKR confirm that it is open to changing its terminus location at Jericho mine? Can WKR comment on or provide an update on its analysis for an alternative route that stays further away from Contwoyto Lake, to avoid obstructing this important caribou migration corridor?</p> <p>If these details are already described in the Impact Statement, please provide the reference.</p>
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<p>IR Source:</p>	<p>Tłı̨chų Government (TG)</p>
<p>IR Number:</p>	<p>#2</p>
<p>IR Directed To:</p>	<p>WKR</p>
<p>Subject:</p>	<p>Mitigating Impacts on Caribou (general) - TARP</p>

Reference:	Main Document / Volume 6, Section 16 – Assessment of Potential Effects on Caribou
Issue/Concern:	<p>WKR has concluded that “based on predicted magnitude and spatial extent of residual effects, the expected mitigation, management and enhancement measures for the Project (i.e., a TARP and MCCMMs), and the context of baseline conditions, the residual cumulative effects on the BCH [Bathurst Caribou Herd] are determined to not be significant.”</p> <p>Proposed mitigation for impacts to caribou: WKR proposes that mitigations to impacts on caribou will be done through a caribou trigger action response plan (TARP). It is not clear if the TARP has already been prepared or is planned to be developed in the future.</p>
Information Request:	<p>IR regarding TARP: This is a hugely important issue and the adequacy of planned mitigations will be essential for project success. Can WKR please confirm whether the TARP – or a framework of the TARP - has already been prepared. If yes, please provide a copy (or reference if already included in the Impact Statement). If not yet developed, can WKR describe what the proposed mitigations are that would be included in the TARP, when it will be developed and how they will be seeking input on it.</p>

IR Source:	Tłchq Government
IR Number:	#3
IR Directed To:	<p>WKR</p> <p><i>(We are not sure if it is appropriate to ask KIA or HTA for information as part of the NIRB process, but would also appreciate hearing their perspectives if they would like to share)</i></p>
Subject:	Monitoring and Enforcement: Access (including road closures) and illegal harvesting
Reference:	Volume 6, Section 16 – Assessment of Potential Effects on Caribou
Issue/Concern:	<p>In TG’s July 16, 2025 comments, TG wanted to better understand the mitigation measures of the project to address access and illegal harvesting of caribou.</p> <p>Proposed mitigation for illegal harvesting (Permits): Section 16 talks about “users seeking access to the road for harvesting purposes will require approval (permit) from KIA and an Inuit Wildlife Organization (HTA)”.</p>
Information Request:	<p>IR regarding Permits: Can WKR/KIA/HTA elaborate on and clarify if and how these permits will be monitored (and how often?), and who is responsible for enforcing these permits? What existing or future structures (legal or otherwise) will WKR/KIA/HTA be relying on to ensure that those who commit illegal harvesting will be held accountable?</p> <p>IR regarding Permits: Can WKR/KIA/HTA provide examples where this approach has successfully reduced illegal harvesting?</p>

	If these details are already described in the Impact Statement, please provide the reference.
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IR Source:	Tłıchǫ Government
IR Number:	#4
IR Directed To:	WKR
Subject:	Controlled Access
Reference:	Grays Bay Road and Port Road Management Plan DRAFT
Issue/Concern:	Proposed mitigation for access (private/controlled access): Grays Bay Road Management Plan explains that the Grays Bay Road will be a multi-user, multi-use road, that will be of private/contracted user benefit in perpetuity as the road is anticipated to operate permanently. This road will be operated and maintained by WKR. TG also understands that this road will be on both Inuit Owned Land (IOL) and Crown Land.
Information Request:	IR regarding controlled access: Can WKR please expand on how controlled access will be administered on both IOL and Crown Land? Is the intention to restrict access on Crown-managed land or only on IOL private land? IR regarding controlled access: If there is a change in ownership or if the road becomes a public road how will that affect access and control over access – and any associated mitigations that rely on controlled access? Will these details be outlined in the leases WKR will have with KIA and the federal government – or is some other mechanism anticipated? It is important to understand the extent to which any mitigations are reliant on the private, access-controlled nature of the road in case the road is managed differently in the future and, as a result, such mitigations become less effective or irrelevant. If these details are already described in the Impact Statement, please provide the reference.

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@tlichoc.ca), cc'ing lands@tlichoc.ca.

In Tłıchǫ Unity,



Brett Wheler
A/Director of Lands, Tłıchǫ Government