

Cambridge Bay
Ikaluktutiak
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Kugluktuk
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Taloyoak
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Kugaaruk
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Kelli Gillard PAg, CTaJ
Manager, Impact Assessment
Nunavut Impact Review Board
29 Mitik Street
P.O. Box 1360
Cambridge Bay, Nunavut
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Sent by e-mail:

August 19th, 2026

RE: KIA Response to Gwich'in Tribal Council (GTC) IR's GTC-14 and GTC-15 and Yellowknives Dene First Nation (YKDFN) IRs YKDFN-2 and YKDFN-11.

Dear Ms. Gillard,

The Kitikmeot Inuit Association (KIA) appreciates the opportunity to review to the Information Requests (IR's) put forward by other parties. We have reviewed the information and noted two IR's that were directed to KIA. Both the IR's themselves and KIA's response to the Gwich'in Tribal Council (GTC) IR's GTC-14 and GTC-15 as well as Yellowknives Dene First Nation (YKDFN) IR's YKDFN-2 and YKDFN-11 are outlined below:.

GTC-14: Issue of Concern

"The Project is receiving financial and regulatory support from numerous governments and was originally advanced for development by KIA, with support from Canada and GN.

It is a reasonable assumption that the various government agencies responsible for pursuing and supporting the Project have done their own due diligence assessments regarding potential economic and socio-economic benefits associated with a permanent road and port.

In other words, that some level of studies or analysis have occurred by these governments to justify their support of the Project. Information related to economic and induced development scenarios identified by these governments is important to understand what reasonably foreseeable induced development scenarios Governments anticipate should the Project be built and come into operation.



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The various and respective government agencies are therefore requested to provide relevant studies and assessments related to economic analysis and socio-economic costs and benefits of an operational road and port at Grays Bay. A summary of anticipated induced development scenarios used to inform the studies, and induced development scenarios considered likely to occur because of the Project being built are requested. This information is necessary to inform parties and WKR on future scenarios and induced development associated with the project and may reduce existing knowledge gaps related to a future with the Project. This is also in keeping with NIRB's use of the precautionary principle in considering how the Project may interact with valued components. Clarity on this topic was not evident in the initial impact statement review."

Information Request

"1. Submit related studies and summaries of analysis to the NIRB Public Registry of government-led or funded analyses, studies, or other forms of assessment related to economic and socioeconomic costs, benefits, and potential of an operational road and port at Gray's Bay like that proposed by WKR.

2. Provide a summary of anticipated induced development scenarios, including a minimum anticipated scenario, and an anticipated likely scenario, of projects, activities, and potential over the lifetime of the project (e.g., in perpetuity).

2.1. Identify underlying assumptions related to the development scenarios. 2.2. Provide the timeline of construction and operation of projects or activities identified.

2.3. Identify marine traffic or vessel components related to the construction or operation of the Project or for those supporting terrestrial-based projects, as well as expected increases in marine traffic and vessels anticipated with the development of a major port at Gray's Bay, and the likely source of travel of these vessels within and beyond Nunavut."

GTC-15: Issue of Concern

"The Project is receiving financial and regulatory support from numerous governments and was originally advanced for development by KIA, with support from Canada and GN.

It is a reasonable assumption that the various government agencies responsible for pursuing and supporting the Project have done their own due diligence assessments regarding potential economic and socio-economic benefits associated with a permanent road and port.



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In other words, that some level of studies or analysis have occurred by these governments to justify their support of the Project. Information related to economic and induced development scenarios identified by these governments is important to understand what reasonably foreseeable induced development scenarios Governments anticipate should the Project be built and come into operation.

The various and respective government agencies are therefore requested to provide relevant studies and assessments related to economic analysis and socio-economic costs and benefits of an operational road and port at Gray's Bay. A summary of anticipated induced development scenarios used to inform the studies, and induced development scenarios considered likely to occur because of the Project being built are requested. This information is necessary to inform parties and WKR on future scenarios and induced development associated with the project and may reduce existing knowledge gaps related to a future with the Project. This is also in keeping with NIRB's use of the precautionary principle in considering how the Project may interact with valued components. Clarity on this topic was not evident in the initial impact statement review."

Information Request

"3. Submit related studies and summaries of analysis to the NIRB Public Registry of government-led or funded analyses, studies, or other forms of assessment related to economic and socioeconomic costs, benefits, and potential of an operational road and port at Grays Bay like that proposed by WKR.

4. Provide a summary of anticipated induced development scenarios, including a minimum anticipated scenario, and an anticipated likely scenario, of projects, activities, and potential over the lifetime of the project (e.g., in perpetuity).

4.1. Identify underlying assumptions related to the development scenarios.

4.2. Provide the timeline of construction and operation of projects or activities identified.

4.3. Identify marine traffic or vessel components related to the construction or operation of the Project or for those supporting terrestrial-based projects, as well as expected increases in marine traffic and vessels anticipated with the development of a major port at Grays Bay, and the likely source of travel of these vessels within and beyond Nunavut."

KIA's Response to GTC-14 and GTC-15

When KIA was identified as the proponent of the Gray's Bay Road and Port Project (GBRP Project), project development work was undertaken primarily by Nunavut Resources Corporation (NRC), a subsidiary of Kitikmeot Corporation (KC). West Kitikmeot Resources



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(WKR) subsequently became the Proponent responsible for advancing the GBRP Project and remains the Proponent. As a result, KIA does not currently hold the requested information. KIA understands that project information developed through earlier phases of the GBRP Project was transferred as responsibility for the Project transitioned. These IRs should be directed to the current Proponent, WKR.

YKDFN-2: Issue of Concern

“The GBR is stated to be a private road (RMP, p.1). RMP Section 5.1.1 indicates that there will be controlled access on the GBR. Community users are to have free access to the GBR while access for hunting will require permits from the KIA and Hunters and Trappers Association. As hunting may affect caribou behaviour (Volume 6, Section 16.4.3.2), knowledge of locations where hunting occurs may be important to understand caribou movements.”

Information Request

- “a) Will the road be patrolled for adherence to speed limits and the adherence to wildlife protection measures (RMP, Section 6), especially giving of right-of-way to wildlife?*
- b) Beyond requiring the presentation of a permit for hunting at a controlled access point, will there be monitoring of locations and timing of hunting activities and other offroad use where the GBR provided the initial point of access?*
- c) If the Proponent does not monitor harvest directly, can it conclusively state that indirect Project-related mortality of caribou is not significant?*
- d) How effective will a gate be against access to the GBR via snowmachine or quad?*
- e) Will access controls change when the GBR is connected to an all-season road in the NWT or other roads?”*

YKDFN-11: Issue of Concern

“The Total Allowable Harvest (TAH) for the BCH is 10 bulls per year in Nunavut. Bulls are mostly separated from females for calving/post calving.

From BCH seasonal ranges calculated for other projects, it is likely that analyses will show that male BCH seasonal ranges are largely confined to areas west of the proposed GBR. Only male Bathurst caribou are to be harvested under TAH, and if males are largely restricted to areas west of the GBR, then restricting hunter access to areas west of the GBR may result in fewer disturbances affecting female caribou and the peak calving areas that are east of the road.



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Assumed: Seasonal BCH ranges presented in the report are from location data for female caribou only (but see YKDFN IR#9)."

Information Request

- a) For the Proponent, please provide seasonal range maps from analyses of male BCH data.*
- b) For the Proponent, GN and KIA, please comment on the merit of restricting hunter access to areas west of the GBR.*
- c) For the Proponent, will the Proponent work with other parties to further limit access for hunting to ranges primarily containing male caribou (thereby reducing disturbances on females and calves)?*

KIA's Response to YKDFN-2 and YKDFN-11

KIA recognizes that road access, harvesting, wildlife protection and monitoring are important matters that will require further consideration through the assessment of the GBRP Project. Any measures ultimately proposed in relation to access or harvesting must be considered within the framework of the Nunavut Agreement, including the rights of Inuit and the respective roles and responsibilities of KIA, Hunters and Trappers Organizations (HTOs) and other relevant stakeholders.

Given that the proposed road crosses both Inuit Owned Lands and Crown Land, KIA expects that these matters will require further discussion among WKR, KIA, the Government of Nunavut, affected HTO's and other relevant parties as the NIRB's assessment process progresses. KIA is not presently in a position to identify or endorse a particular access restriction, monitoring approach or implementation protocol in response to these IRs. KIA understands that these are substantive matters, requiring careful consideration and expects the NIRB's process to provide meaningful opportunities for these discussions to occur.

Thank you.

John Roesch, P.Eng.

Senior Project Officer

Affiliates: Nunavut Tunngavik Incorporated, Kitikmeot Corporation,
Nunavut Resources Corporation. Inuit Tapirisat of Kanatami



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Kitikmeot Inuit Association,
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Cc Cory Barker, Director, Major Projects
Kitikmeot Inuit Association
Department of Lands, Environment & Resources