

# **Yellowknives Dene First Nation Land & Environment Committee**

## **Bathurst Inlet Port and Road Project Description Review**

Prepared by

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To:

Nunavut Impact Review Board

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This submission details the concerns of the Land & Environment Committee of Yellowknives Dene First Nation in regard to the proposed Bathurst Inlet Port and Road Project. Yellowknives Dene living in the communities of NDilo and Dettah near Yellowknife, N.W.T. have relied on caribou for countless generations to feed and clothe us. Consequently, we have a great interest in protecting the health and continued migration of the Bathurst Caribou herd, now and in the future. As such, we have concerns about the possible negative impacts of the proposed road on this herd.

After having reviewed the Project Description Report, we have the following comments and recommendations for what should be addressed in an Environmental Impact Statement for this proposed project.

Zone of Influence: Define the Zone of Influence of the road on various VECs (Valued Ecosystem Components such as caribou and its predator species, plants, etc. ). In other words, within what distance from the road will dust be deposited on plants? Within what distance from the road will animals and birds likely be affected by activity and noise from road construction and use? Negative effects on caribou would be considered things like experiencing stress, or behavioural changes that reduce time spent feeding or resting.

Dust: ☰ The proponent must consider the effects of dust on the environment (dust coating the vegetation that wildlife eat, for example), not just effects on worker health and safety.

☐ Also, the breaking up of rock will likely be required for construction material. This will produce dust at the crushing site that will be difficult to mitigate. Where will rock be dug out and crushed, and how far may we expect that dust to travel?

Harvesting: Hunting by road construction personnel (*p. 55*) is not the only potential hunting impact created by a road. The completed road will provide easier access into a greater area of caribou range than presently is the case. This could lead to greater harvesting pressure on the Bathurst herd from a larger population of hunters (both subsistence and sport) gaining access to the northern part of the caribou range.

Road Traffic: ☰ The total number of truckloads worth of cargo currently projected to supply the mines (Ekati, Diavik, Lupin & Jericho) is 4,780 (*P.58-59*) These loads would be supplied from the Bathurst Port instead of from Yellowknife as is currently the case. However, trucks will still have to travel up the Tippet-Contwoyto Winter Road to get to the port for cargo pick-up. What is not clear is whether 4,780 trucks will be needed (1 for each load), or whether a fraction of this number will use the Winter Road, and later make a number of separate return trips on the Contwoyto/Port road between the port and the mines. The proponent should provide this information in a Project EIS, as the total truck volume has implications on the amount of traffic to which wildlife in the vicinity of the Winter Road will be subjected. The proposed Contwoyto/Port road may reduce the number of truckLOADS on the Winter Road by 4,780, but not the number of TRUCKS by that number. Another consideration under this proposal is that empty northbound trucks will be travelling the Tippet-Contwoyto road faster than loaded ones. Speed limits are 10 km/hr higher for empty trucks than for loaded trucks. (*p.11 of Tippet to Contwoyto Winter Road Project Description Report*) What effect this faster traffic will have on caribou and other wildlife within the Zone of Influence of the Winter Road should be discussed in a Project EIS.

☐ The Project Description states, “There will be no interaction between road traffic and the elements of the terrestrial environment.”(*p.57*) Does the proponent expect there to be no animals road-killed for the life of the road??

Barrier to Calving Ground Relocation: Over the last 20 years, the calving grounds of the Bathurst herd have shifted from east of Bathurst Inlet to west of it. If the herd in future needs to relocate the calving grounds eastward again, will the road act as a barrier to spring migration for that portion of the herd coming up from the southwest part of the winter range??

The proponent should show the locations of all traditional caribou trails that the proposed road will bisect.

The proponent should detail how elements of their road design will accommodate the crossing of migrating caribou.

Caribou Summer Distribution: P.57 states, “Summer maintenance work will begin when the spring migration and calving season is over and most caribou have moved south.” In 1999, collared females were in the vicinity of the proposed road between July 4 & Aug. 23. (From: Fig. 10.4-6 of Environmental Assessment Report for the De Beers Snap Lake Diamond Project). So even though “most caribou have moved south” in summer, the proponent should still give an estimate of what percentage of the herd will be in the area during road maintenance activity.

Cumulative Effects: Just as Yellowknives Dene are concerned about the future impacts on the Bathurst Caribou herd from a growing number of industrial developments in the N.W.T., we also extend this concern to developments in the Nunavut part of the herd’s range. The ultimate impact on caribou will not be solely from the Bathurst Inlet Port and Road Project (BIPAR) as presented in the Project Description, in combination with the present mines in N.W.T. Rather, in the near future, BIPAR is likely to extend to IZOK mine about 70 km to the west of the Lupin mine. As well, one can foresee branches eventually coming off the main BIPAR road to access other mines (Hackett, Yava, Goose, Musk). So, rather than a single long winding line of road from Yellowknife to Bathurst Inlet, caribou may be faced with navigating through a web of roads and traffic. This future “road web” should be evaluated in a cumulative effects assessment of BIPAR. Among the questions that we would like to see answered:

- How will caribou react to multiple roadways cutting across their migration routes?
- Might their migration be deflected in unpredictable ways and directions, moving them further away from traditional hunting areas of the Dene?
- How will all these roads contribute to a larger physical footprint on the caribou’s range, and an enlarged “noise footprint” over the landscape?

