

GNWT Response to:

MVEIRB IR#3

Topic

Boreal Woodland Caribou – Update the effects assessment and the application of the Boreal Caribou Recovery Strategy

Comment

Parties have expressed concerns about how to assess project related effects to boreal woodland caribou, at both a territorial wide range and in the North Slave region due to:

- a lack of baseline data;
- uncertainty regarding identifying local populations and their trends; and
- how to apply Boreal Caribou Recovery Strategy (PR#38) including the applicability of the NT1 range

The developer's position on the issues is stated in the following quote, "What the GNWT was trying to convey to the Board in our recommendation that stated "Please recognize that boreal caribou population trends cannot be specific to the North Slave region and that the trends can only be applied to the entire NT boreal caribou range" was that the habitat disturbance-population self-sustainability model developed by ECCC for the national recovery strategy for boreal caribou cannot necessarily be used to infer population trend in the North Slave region, and thus GNWT can only report on population trend at the scale of the whole NT1 range based on that model (PR#99 p2)." Within the NT1 range there may be unidentified local populations of boreal caribou that could be affected by the proposed all-season road. Further, the potential effects of the all season road may be insignificant at the NT1 scale, but significant to these local populations. ECCC, WRRB and developer have met on several occasions to discuss this topic (PR#12, PR#94, PR#100, PR#99, and PR#107).The latest information on the record indicates there remain outstanding concerns. The developer states "the concerns that ECCC spoke to in their December 21, 2016 letter to GNWT and the concerns that the WRRB spoke to in their December 16, 2016 response to the GNWT still stand" (PR#107).

Recommendation

Please provide an update on the assessment of boreal caribou for this EA. This should include:

- any additional meetings with ECCC and/or WRRB, including results,
- any plans for additional meetings, and

- the status of commitments made in the above referenced documents, such as a proposed North Slave Region monitoring program including a collaring program for boreal caribou (PR#107)

GNWT Response

Past Meetings with ECCC and WRRB

Meeting summaries for all meetings between the GNWT and Environment and Climate Change Canada (ECCC) and/or the Wek'èezhì Renewable Resource Board (WRRB) to discuss boreal caribou with respect to the Tłıchǵ All-season Road (TASR) have been posted to the Review Board's registry, as noted below.

The GNWT met with ECCC and the WRRB on November 10, 2016 (PR#[94](#); [99](#); [100](#)) and January 20, 2017 (PR#[107](#)) to discuss boreal caribou with respect to the proposed TASR. The GNWT has also met with the WRRB on May 25, 2017 to discuss the Adequacy Statement Response for the TASR (PR#[121](#)). Caribou monitoring, habitat and range were discussed at the May 25, 2017 meeting but the meeting was not solely focused on caribou.

Future Meetings with ECCC and WRRB

There are no meetings planned between GNWT, ECCC and WRRB to discuss boreal caribou and the TASR at this time. The GNWT is open to meeting with either party should they wish to discuss any issue related to the TASR.

Status of Commitments Made in the Documents Referenced in WRRB's Information Request

1. Commitment: GNWT to provide a written rationale on why boreal caribou population trends can only be applied to the entire NT1 range.
 - Status: A rationale was provided and is posted on the Review Board's registry (PR#[99](#)).
2. Commitment: Caribou collaring
 - Status: In March of 2017, ENR deployed 20 GPS/Iridium collars on female boreal caribou in the Wek'èezhì region, within a study area centered around the proposed TASR Alignment. Please see the GNWT's [response to ECCC IR#7](#) (ID9) for maps of the preliminary results of the GNWT's Boreal Caribou collaring program in the Wek'èezhì Region.
3. Commitment: Habitat suitability modeling
 - Status: GNWT explored the possibility of developing a habitat suitability model and maps based on the biophysical attributes for boreal caribou critical habitat described in Appendix H, Table H-1 of the national recovery strategy (ECCC 2012). Reviewing the biophysical attributes

described for boreal caribou during different seasons suggested that boreal caribou use almost all habitat types at some point during the year, including habitat that would meet the definition of “disturbed habitat” used in the national recovery strategy. Further work on a habitat suitability model was therefore not pursued, and the impact assessment focused instead on how much new habitat disturbance the project would contribute relative to baseline conditions and to the 65% undisturbed habitat threshold applied at the scale of the NT1 range. For the ASR, it was assumed that all undisturbed habitat is suitable habitat for boreal caribou, and disturbed habitat is unsuitable.

- GNWT did not quantitatively evaluate the relative impact of alternative routes on caribou habitat, as a qualitative review of Figure 4-2 from the Project Description Report confirmed that Alternate Routes B, B', and C would all traverse larger amounts of undisturbed habitat relative to the proposed TASR alignment which follows an existing linear feature and overlaps with large areas of recent fires.
4. Commitment: Establishment of a Wildlife Effects Monitoring Program
 - Status: The GNWT is working on drafting a Wildlife Effects Monitoring Program (WEMP) and updating the draft Wildlife and Wildlife Habitat Protection Plan (WWHPP). A draft WEMP will be provided prior to the technical sessions and a revised draft WWHPP will be provided to reviewers prior to the public hearing.
 5. Commitment: Consider opportunities to restore other linear disturbances to offset the TASR
 - Status: The TASR Project Description Report mentioned the possibility of reclaiming the first 60 km of the Tłıchǫ Winter Road System to offset some of the loss of boreal caribou habitat. The GNWT has determined that is not applicable for two reasons. Firstly, as per Section 19.8.1 of the Tłıchǫ Government, the GNWT only has a right of free access to the Tłıchǫ winter road's right of way in order to establish, build, manage, control, vary and close up the Tłıchǫ winter road and therefore the GNWT cannot commit to reclamation of the terrestrial portions of the winter road (KM 0-60) at this time. Any reclamation activities planned for the terrestrial portions of the Tłıchǫ winter road (KM 0-60) will be managed and addressed jointly by the Tłıchǫ Government and the GNWT by way of a bilateral agreement. In addition, the Tłıchǫ Winter Road is outside of the boreal caribou range so restoration of that land will not offset new habitat disturbance in the boreal caribou range. Please see the GNWT's response to ECCC IR#8 on habitat offsetting for boreal caribou for additional information.

References

ECCC. 2012. Recovery Strategy for the Woodland Caribou (*Rangifer tarandus caribou*), Boreal population, in Canada. http://www.registrelep-sararegistry.gc.ca/default.asp?lang=En&n=33FF100B-1#_Toc337193703

**GNWT Response to:
MVEIRB IR#16**

Topic

Road Safety and Emergency Response Planning

Comment

The developer informed the Review Board that “The Community Governments of Behchokǵ and Whatì will seek to enter into discussions with the GNWT and other emergency response departments and organizations to ensure a strategy is in place for emergency response measures along the Project route” (PR#110 p5-37).

Recommendation

Please provide the Review Board with an update on discussions between the Community Governments of Behchokǵ and Whatì and the GNWT regarding emergency response.

GNWT Response

IR Preamble

Upon review of this IR, the Government of the Northwest Territories (GNWT) and Tłıchǵ Government (TG) recognized that it would be of a greater benefit to work together in developing a response as the Tłıchǵ Government and its citizens have greater authority in responding to community driven programming and mitigations.

A focus group was held (June 8, 2017) with all the senior leaders of the Tłıchǵ Government, Tłıchǵ Community Services Agency (TCSA) and Senior Administrative Officers from Behchoko and Whatì. These focus groups provided guidance, allowed for an in-depth response and provided greater clarity with respect to which authority holds responsibility.

Please note, if further questions emerge on any of these issues at hearings or technical sessions, the GNWT may turn to the Tłıchǵ Government for comment.

IR Response

In 2017- 2018, the GNWT will be reviewing the delivery of ground ambulance and highway rescue services in the Northwest Territories. The review is intended to support the establishment of a plan to address current challenges and identify measures for safety and security along territorial highways.

There is an increased interest from the two Behchokǵ fire halls to increase their capacity and provide emergency response services along the Tłıchǵ All-Season Road (TASR). Key communities which deliver rescue and ambulatory services (including

Behchokǝ) will be involved in the 2017-2018 plans to complete a comprehensive operational review.

Following the referenced review above, an Action Plan will be developed to address identified gaps, deficiencies and future needs with ground ambulance and highway rescue services. This work will take into consideration the TASR to the community of Whatì.

Since December 2016, the Senior Administrative Officer for the Community Government of Behchokǝ (CGB) has held ongoing dialogue with the regional fire marshal regarding their emergency response service capabilities in the future scenario of an all season road.

It was noted in [PR#96](#), IR7, that the Community Government of Whatì (CGW) is interested in expanding its emergency services and personnel – both EMT and firefighting capacity.

While the CGW has not yet engaged directly in discussions with the GNWT regarding expansion of these services, these conversations are anticipated to take place in the future.

The GNWT has established a multi-departmental working group involving Health and Social Services, Department of Justice, Department of Infrastructure and the Department of Municipal and Community Affairs to develop a Ground Ambulance and Highway Rescue Services Action Plan.

MACA is responsible for facilitating a prompt and coordinated response by the GNWT and its partners to emergencies affecting all or part of the NWT. The Department also assists communities in developing and maintaining municipal emergency plans and programs, which is a requirement of the Civil Emergency Measures Act (CEMA).

Ground ambulance and highway rescue services beyond municipal borders falls outside the scope of CEMA. Municipal legislation empowers community governments to establish ground ambulance and highway rescue services, and they possess the authority to pass bylaws allowing ambulance and emergency services to extend beyond community boundaries (on public highways) and to set rates for ambulance services.

The CGB, CGW, TCSA and the GNWT continue to work closely with one another regarding emergency response services.

**GNWT Response to:
MVEIRB IR#17**

Topic

Food Security and Traditional Harvesting – Combined effects of the project on food availability

Comment

The developer and parties suggest that Whatì residents will benefit from access to cheaper and healthier store-bought foods as a result of this project (PR#110 p 5-37, PR#110 pdf p 564, PR#110 pdf p 562, PR#96 pp69-70). The developer predicts that project operations could create a positive residual effect to “food security,” (PR#110 p 5-59) and concludes no mitigations are necessary (PR#110 p 5-20). The Review Board requires the developer to consider how the potential impacts listed below relate to the developer’s conclusion:

- The potential for increased hunting pressure from outsiders (PR#96 p 12) including traditional harvesters and recreational hunters, and reduced harvesting success (PR#96 p 68). Recognize that the North Slave Métis harvest moose and caribou in the area, and caribou remains a principle item in the North Slave Métis diet (PR#110 p 5-14).
- The potential for increased participation in traditional harvest activities due to greater access (PR#96 p 41).
- Concerns that the traditional cultural principles for sustainably harvesting resources may no longer be observed (PR#7 Appendix B p 14).
- Potential effects on trappers’ incomes, considering biophysical effects to harvested and trapped species, during road construction and operation (PR# 96 p 68).
- Effects on the availability of affordable groceries in Whatì, including future plans, supply and demand from Whatì residents, mine employees, Gamètì residents and Wekweètì residents (PR#96 p 41) and possible increases in the cost of living (PR#96 p 59) and the cost of food (PR#96 p 68).
- Effects from a potential reduction in reliance on country food (PR#96 p 12).
- Potential changes to the amount of time that Whatì residents have to participate in the subsistence economy (PR#7 Appendix B p57) and to prepare, cook, distribute and learn about country foods (PR#96 p 67).

It is unclear how the developer considered each of these impacts on their own or in combination in its overall conclusions about residual effects and mitigations.

Recommendation

1. Discuss likely overall effects to Whatì residents' ability to access and afford appropriate, healthy food that meets their dietary needs by considering the combined effects of the impacts suggested by Whatì residents and Aboriginal Governments (above). Include cumulative effects from the NICO mine and an extended operating season of the winter roads from Gamètì and Wekweètì. Discuss the likelihood of overall impacts. Include tables or figures to present complex interactions, where appropriate.
2. How will the effects predicted in question 1) above vary among different groups of Whatì residents, for example, single parents, Elders, infants, the employed and "chronically unemployed" (PR#7 Appendix B)?
3. Propose mitigations and explain specifically how the developer will mitigate likely cumulative effects, if applicable.

GNWT Response

IR Preamble

Upon review of this IR, the GNWT and Tłıchǵ Government recognized that it would be of a greater benefit to work together in developing a response as the Tłıchǵ Government and its citizens have greater authority in responding to community driven programming and mitigations. A focus group was held (June 8, 2017) with all the senior leaders of the Tłıchǵ Government, Tłıchǵ Community Services Agency and Senior Administrative Officers from Behchokǵ and Whatì. These focus groups provided guidance, allowed for an in-depth response and provided greater clarity with respect to which authority holds responsibility.

Please note, if further questions emerge on any of these issues at hearings or technical sessions, the GNWT may turn to the Tłıchǵ Government for comment.

IR 17 Response Discussions:

Summary: Food security, as defined by the United Nations' Committee on World Food Security, is the condition in which all people, at all times, have physical, social and economic access to sufficient safe and nutritious food that meets their dietary needs and food preferences for an active and healthy Life (CFS: Committee on World Food Safety; Global Strategic Framework for Food Security & Nutrition [FCS], Fifth Version 2016) The GNWT has provided this definition for Food Security as a guide for this analysis.

Widely accepted indicators of food security include the following parameters (Everybody Eats; A discussion Paper of Food Security in Newfoundland and Labrador, November 2015 Pg. 4, Food First NL).

Production: Fishing, Farming and Processing
Distribution: Transportation, Delivery, Wholesale
Access: Growing, Buying, Harvesting (Hunting & Fishing)
Consumption: Preparing, Preserving, Celebrating (Tradition)
Disposal: Recycling, Composting, Incineration

The Tłıchǫ All- season Road (TASR) will increase access to remote areas for Tłıchǫ citizens and Indigenous peoples who assert Aboriginal rights near the proposed road development project. The road will provide staging areas (roadside turnouts) for vehicles and equipment used for trapping and provide access points for traditional land uses such as berry picking, trapping (increasing income), fishing and hunting. The road will also improve access to the area for traditional purposes. From a purely food security position, this is a positive net effect for all Indigenous groups that historically use the area.

The TASR will travel through recent burned areas where forest fires have created large tracts of fertile lands that promote growth of morel mushrooms which has recently provided seasonal employment to Indigenous harvesters living in close proximity to the area. Wages earned from picking morels may provide a source of income and increase the resident's capacity to afford a wider selection of groceries.

It is not known if territorial highways affect furbearing animals in the way that roads affect northern ungulates in terms of collisions or habitat fragmentation. The Government of the Northwest Territories (GNWT) provides Local Wildlife Committees (LWC) with annual funding assistance through the Community Harvesters Assistance Program (CHAP) for distribution to their respective memberships. The purpose of this funding is to provide financial assistance to organizations recognized by the GNWT as representing the interests of hunters and trappers within a particular community. These program funds assist in defraying a portion of capital and operating costs of harvesting activities. Funding is available for renewable resource harvesters for the purchase of small tools and related equipment required to store, process and preserve foods from community hunts or harvests. The Take a Kid Trapping / Harvesting Program supports community youth in the development of hunting and trapping skills. The GNWT also provides support to various youth serving organizations that use 'on-the-land' / hunting / trapping as a means to support health and social well-being goals.

Conservation is also related to food security. Increased access by all hunters (Indigenous and/or non-Indigenous) into the area could result in an increase in competition for subsistence animal species and may potentially decrease the amount of available country food. To ensure protection of wildlife is to preserve access to country foods. Currently the hunting of Barren- ground Caribou

populations is protected by a ban on an open hunt. These measures are in-place to ensure the protection of wildlife and conserve food for future generations. As wildlife populations recover to sustainable harvest levels, bans may be lifted and limitations on hunting may then be removed. Please refer to the Tłıchǵ Government's response to IR 18 Perception of Land, Table 18-1, for further details regarding potential impacts and benefits on harvested species as a result of the TASR.

The GNWT believes that the TASR itself will increase food security. The community of Whatì is currently dependent on the arrival of groceries by air freight during the snow-free months. An all-season road will make it possible for community members to access stores in Yellowknife, Hay River or any other location of their choice that is connected to the road and highway system. The TASR allows for greater freedom and independence for residents who choose drive to stores which provide a great variety of groceries when the opportunity is available, or alternatively, to provide access to freight companies that will ship food directly into Whatì. Community members will not have to rely on commercial business to arrange for transport of food and residents that have family members travelling back from Yellowknife can have food delivered directly if required. This will inevitably reduce the potential of food shortages, increase food variety and allow Tłıchǵ community members to plan shopping trips and shopping frequency.

The Community Government of Whatì has completed a Strategic plan (2014-2019) "Our Focus for the Future", which was approved by council May 5, 2014. The strategic plan includes references to being dependent on the current winter road as a community weakness. The all-weather road is viewed as potentially bringing opportunities that the community members can capitalize on, and is referenced under the current community Opportunities section of the plan. The GNWT is aware however, that, food stability & security are listed in the plan as current community threats. (Community of Whatì Strategic Plan 2014-2019: #healthycommunity#happy).

Whatì residents are the best people to answer how potential changes to the amount of time that Whatì residents have to participate in the subsistence economy and to prepare, cook, distribute and learn about country foods. It is the GNWT's position that the TASR will support greater participation in the subsistence economy by providing increased access to areas to those who may have had limited access prior to its construction (low income residents). This access will allow for a higher level of participation and distribution between the communities of Whatì and Behchokò.

With regard to learning about the preparation, cooking and distribution of country foods, the GNWT currently produces a number of resources and provides programs

that are available for communities seeking guidance that assist in making healthy choices (Table 1 below):

Table 1: Existing GNWT Programs and Resources

Existing GNWT Programs and Resources	Program Summary
Healthy Food Guidelines:	A resource that was developed by the First Nations Health Council to support schools in creating healthy food environments that include traditional foods, guidelines for foods/beverages to be served frequently, moderately, and foods to avoid serving, samples of rotational menus, ideas for healthy food fundraising and recipes.
Nutrition Fair for Northern Communities:	Developed by a GNWT coalition, this is a compendium of ideas that can be used to organize community nutrition fairs. This resource includes over 200 ideas, many which feature the benefits of traditional country foods, for enjoyable and interactive activities and displays.
Changing Diets:	The Benefits of Traditional Northern Foods – Developed by a GNWT coalition, this resource is a compendium to the NWT Grade 5 Health Program.
NWT Health Program:	The current NWT Health Program addresses Nutrition themes and outcomes at all grade levels from K-9. The benefits of traditional country foods are highlighted in all grades, including use of the NWT Food Guide which features country food and a special emphasis on awareness of NWT food customs, and knowledge/skills in preparing a community feast at the grade 9 level.
Healthy Family Program Collective Kitchen:	A program delivered to schools and families that was developed by the GNWT to support food skills using northern traditional foods and nutritious/reasonably priced retail foods. The GNWT administers funds to the TCSA to deliver the Healthy Family Program (HFP), a voluntary home visitation program for young mothers and new parents, and particularly at-risk families. It focuses on the importance of nurturing parent-child relationship in order to increase the child's developmental opportunities and improve health outcomes. A strong emphasis has been placed on building parent skills to provide affordable nutritious meals for their children through the Collective Kitchen. The Collective Kitchen component of the program provides hands-on opportunities for families to make a variety of healthy meals using affordable, locally available ingredients with a focus on vegetables, dried beans, and lentils. Traditional foods and activities are also incorporated into the program. Group or individual cooking and meal planning sessions are offered to meet the nutritional needs of all family members but especially for children less than 5 years of age. As part of the program, families receive a box of healthy food so that they can make meals at

	home. Coordination with local stores to provide food boxes and/or food vouchers, as well as donations from community gardens helps support the program.
Nutrition North Program:	The GNWT administers direct contributions to the Tłıchq Government the Nutrition Education Initiative to increase community members' knowledge of healthy eating and increase skills for shopping for and preparing healthy store bought and country foods. The Nutrition Education Initiative is part of the Nutrition North Program, a federal program jointly administered by the federal departments of Indigenous and Northern Affairs Canada (INAC) and Health Canada. Eligibility for the Nutrition Education Initiative is based on the federal retail food subsidy criteria developed by INAC. Health Canada then complements the INAC retail subsidy through the funding of community-based nutrition education initiatives.
Traditional Foods in Health and Social Services Facilities:	The GNWT is working on a Traditional food policy to assist in facilitating the provision of traditional foods for communities, elders, patients, and residents who require treatment or long-term care in Health and Social Services facilities. GNWT regulations require facilities to apply for and have permits to accept, purchase, and use local meats. Currently, local traditional foods are provided in Behchokq, Fort Smith, Fort Simpson and Yellowknife Traditional Wellness Program, with less frequent provision in Hay River and Inuvik. The aim is to further promote and increase the use of traditional foods across all facilities in collaboration with other organizations, local traditional food suppliers and the health system to capture the nutritional, health and socio-cultural benefits of eating traditional country foods.

The road will also provide the Tłıchq with greater access to their lands and wider territory. Residents from Behchokq travelling further North into the Tłıchq Lands, Wek'èezhì and Mòwhì Gogha Dè Nìtâèè (the Gamètì Winter road runs through Tłıchq Lands) will enjoy increased participation in the subsistence economy, and several other Indigenous groups will be able to harvest, trade, hunt and fish in an areas that would normally be only accessible by boat, air, and off road vehicle after the closure of the winter road (harvesting where within the Wek'èezhì boundary, will be subject to the Tłıchq Land Claim Agreement).

IR 17.1 Response

As stated in IR 96, IR 4, the TASR is expected to provide citizens of Whatì with “cheaper, more diverse, and healthier store bought foods” (p. 69). Presently, food for the community is flown in via charter flights, resulting in an increased cost of food

due to added freight charges. Flying in food not only results in higher costs for Whatì residents, but it also reduces the variety of nutritious foods available, particularly when compared to urban centres (such as Yellowknife) where food is trucked in.

Recently, a new food program was implemented in Whatì that aimed to reduce food costs in the grocery store (Communication with Whatì SAO, June 8, 2017). The results of this program has seen a net positive effect, with staple food items – such as eggs, bread, and milk – going down in price. As such, these nutritional food items are more affordable for the households and individuals in the community. We believe the TASR will follow the same pattern as these targeted interventions, which have proven to reduce the costs of nutritious food items for citizens in Whatì. A detailed suggestion for food warehouse storage in Whatì is addressed below in response to IR 17.3.

It is anticipated that the reduced cost of food in Whatì is likely to render positive impacts for the communities of Gamètì and Wekweètì, particularly during the extended winter road season. The TASR is expected to extend the winter road to Gamètì and Wekweètì by approximately six weeks ([PR# 7](#), page 5-10). With this longer driving season, residents of Gamètì and Wekweètì will have the opportunity to access Whatì's food store, and in theory, cheaper and nutritious goods for longer periods during the winter.

We have also noted in [PR# 96](#) IR4, that Tłıchǫ citizens are heavily reliant on their country foods, with over 90% of Tłıchǫ households eating meat and/or fish that are obtained from hunting and fishing.¹ The community of Whatì has some of the highest participation rates in region for harvesting activities, compared to NWT averages. In [PR# 96](#) IR1, it is suggested that the TASR will increase Tłıchǫ citizen's ability to more easily access important hunting and fishing areas, thus increasing their consumption of country foods (page 12).

Issues related to increased access in Tłıchǫ country are addressed in the responses to Review Board IR 18 and IR 19. The Tłıchǫ Government and Community Government of Whatì recognize the complexity of the main benefits and losses with increased access to Tłıchǫ lands, and as such, are committed to ensuring that hunting and access on Tłıchǫ lands are well-managed.

¹ NWT Bureau of Statistics. 2013. Households eating meat or fish obtained from hunting or fishing in 2013. Available online at <http://www.statsnwt.ca/Traditional%20Activities/>

Mitigation 10: To ensure effective management, the TG will investigate the need for regulations and policies to manage the construction of cabins and design of hunting, trapping, and fishing in the area, in order to minimize impacts on local animal populations. The Tłıchǵ Government and the GNWT commit to work together to provide clear guidance on this topic.

The combination of the reduced costs of foods in the Whatì grocery store, plus an increased ability to consume country foods, is likely to render an overall decrease in the cost of living and Whatì residents' grocery bills. This benefit extends to more remote communities such as Gamètì and Wekweètì, with the extension of the winter road season. In sum, the communities are likely to see a net benefit from the decreased costs of foods – and overall cost of living – as a result of the TASR.

We expect that the residual effect of the road on prices of food will be positive. Therefore, a cumulative effects assessment is not required. This would only be required if there were a residual negative effect of the road on food security. Therefore, there will be no further estimates done about the cost of food related to the potential future scenario of the NICO mine.

IR 17.2 Response

With an overall reduction of the costs of food in the Whatì store, we expect an overall net benefit for the residents of Whatì. This is particularly important to note for some of the more vulnerable groups of residents who have lower or fixed incomes.

If you refer to [PR#96](#) Table 3B-1, the Tłıchǵ Government has outlined and detailed how certain groups of residents in Whatì will see an added benefit from more affordable foods as a result of the TASR. This includes an increase in childhood nutrition and for youth in the community, young women and families being able to access to cheaper and nutritional foods, and elders being able to access more affordable, nutritious foods from the store.

IR 17.3 Response

In addition to the mitigations already listed in [PR# 96](#) (Table 1-1; Appendix D), additional work has been done, and discussed, to manage potential impacts from the TASR in regards to cheaper, more affordable foods.

It should be noted that the Tłıchǵ Regional Economic Development Working Group (TREDWG) has integrated a country foods strategy into to its economic development plan, which focuses particularly on activities carried out by Tłıchǵ women, such as harvesting berries and medicines. This is a new initiative that was approved in June 2017 and has been designed with the intent to reduce the cost of

living for Tłıchǵ citizens. It is anticipated that this program will further increase the consumption of country foods, especially for Tłıchǵ women and families. The community food program that was implemented in Whatì (see IR Response 17.1 above) is an indication of the success of food program interventions for accessing cheaper and more nutritious foods (Focus group with staff, June 8, 2017).

Another option that has been discussed by the Community Government of Behchokò and Community Government of Whatì is looking at building a food warehouse in each community. The intent of a food warehouse would be to increase Behchokò and Whatì's capacity for food storage, which could further reduce the frequency in which food is trucked and transported into the communities and thus lowering costs even further. A food warehouse also has the potential to increase the supply and variety of food available for residents to purchase. A food warehouse in Whatì would further increase the community's capacity to supply food for neighbouring communities, such as Wekweètì and Gamètì. Further dialogue is needed between the CGW, CGB and the GNWT to clarify this potential opportunity.

References

NWT Bureau of Statistics. 2013. Households eating meat or fish obtained from hunting or fishing in 2013. <http://www.statsnwt.ca/Traditional%20Activities/>

**GNWT Response to:
MVEIRB IR#19**

Topic

Traditional Harvesting, Assessment Endpoints, Measurement Indicators, and Conclusions

Comment

The developer's wildlife effects assessment conclusions were used to infer conclusions regarding effects to traditional harvesting. However, it is not clear whether the wildlife effects assessment is able to adequately measure/assess effects to traditional harvesting. The developer's assessment of wildlife VCs (such as bison, woodland caribou, moose, and fish) used "measurement indicators" to assess effects to the wildlife VCs which, in turn were compared with the assessment endpoint. The measurement indicators are: habitat availability, habitat distribution, and survival and reproduction. The assessment endpoint applied to wildlife is "self-sustaining and ecologically effective populations" (PR#110 p4-3). The developer states that the "ecologically effective" component of the assessment endpoint considers traditional harvesting (PR#110 p4-4). It is not clear how Indigenous people's ability to traditionally harvest could be described or measured with the measurement indicators proposed by the developer. The complexities of traditional harvesting are not adequately measured by solely examining habitat availability, distribution and survival and reproduction. For example, additional considerations likely include the ability of Indigenous harvesters to harvest at the same success rate, at the same time, in the same locations as they have traditionally done. Clarification is also required regarding extrapolations drawn from the conclusions of the wildlife effects assessment applied to traditional harvesting. The developer states

"Overall, residual effects of the Project on wildlife and fish due to increased competition from overharvesting by non-Tłıchǫ residents will not have a significantly adverse effect on the ability of wildlife and fish to be self-sustaining, and therefore on the ability of Tłıchǫ, NSMA, YKDFN and DGGFN [Deh Gah Got'ie First Nations] members to continue harvesting" [emphasis added] (PR#110 p5-58).

Recommendation

1. Can the developer please clarify how the measurement indicators used in the wildlife assessment are able to assess effects to traditional harvesting including changes to harvesting success rates, locations, and timing?
2. Does the developer's conclusion that that Tłıchǫ, NSMA, YKDFN and DGGFN members can "continue harvesting" refer to traditional harvesting (e.g. with similar success rates to what was observed in the past, in the same locations that were historically used)?

GNWT Response

1. Several different indicators were considered in assessing potential effects to Traditional Use and Way of Life (Section 5.4.3.1) and Harvesting (Section 5.4.3.2) of the Adequacy Statement Response (ASR; [PR#110](#)), as provided in the Adequacy Statement (Table 5.3-1; [PR#70](#)). Potential changes in the following indicators were considered:

Traditional Use and Way of Life Indicators:

Practice of traditional activities and culture;
Quantity or quality of traditionally harvested resources (availability); and,
Perception of the land by traditional users.

Harvesting Indicators:

Competition for resources.

Wildlife and wildlife habitat measurement indicators were only considered in assessing the potential changes in the indicators *quantity or quality of traditionally harvested resources (availability)* and *competition for resources*.

The ability of Indigenous harvesters to continue practicing traditional land use, including traditional harvesting, will depend on numerous factors which were assessed under both topics of Traditional Use and Way of Life and Harvesting. The following paragraphs summarize the potential effects pathways that were considered in assessing effects to Traditional Use and Way of Life and Harvesting.

Potential Effects Pathways

- *Enhanced year-round access to hunting, trapping and fishing areas for harvesters* (Section 5.4.3.1); and,
- *Direct disturbance to preferred traditional use areas including culturally significant areas* (Section 5.4.3.1).

The assessment of potential Project effects on traditional use and way of life and harvesting considered both direct and indirect effects. Direct effects are generally related to changes in access to traditional use areas or disturbance to land that would result in the land no longer being available for traditional activities. Direct effects on traditional use considered locations and timing of harvesting, where data was available.

- *Effects to wildlife and fish resulting in changes in the availability of traditional resources for harvesting* (Section 5.4.3.1); and,

- *Effects to wildlife and fish resulting in changed traditional perceptions of the land (Section 5.4.3.1).*

Indirect effects are related to changes in the availability of traditionally harvested resources (i.e. wildlife and fish). Indirect effects are therefore related to residual adverse effects on other aspects of the environment affecting the availability of resources that can be harvested, such as changes in the quantity, or abundance and distribution of wildlife and fish resources, and changes in the quality of these resources. As a result, the assessment of Project effects on traditional use and way of life, including traditional harvesting, considers the results of effects assessments of valued components for Wildlife and Wildlife Habitat (Section 4.3) and for Fish and Fish Habitat (Section 3.3). Indirect effects are also related to changes in traditional use or value of traditional use areas based on people's changed perceptions of the land or resources.

- *Increased mobility and time spent away from the community may result in changes to traditional way of life and culture (Section 5.4.3.1).*

The assessment also considers intangible aspects of traditional harvesting, such as connection to land, transfer of Traditional Knowledge, and continued practice of the Indigenous way of life on the land. Socio-economic factors that may affect traditional land use and harvesting were also considered under Economic Wellbeing (Section 5.4.2).

- *Increased access and use of the region may result in increased harvesting pressure on wildlife and fish by outsider harvesters (Section 5.4.3.2).*

Concerns were identified by Indigenous residents about increased harvesting pressure on wildlife and fish and competition in the Project area, due to increased public access (PR#7; #28), and was discussed under Harvesting (Section 5.4.3.2). Therefore, the measurement indicators and residual effects results in the wildlife and wildlife habitat assessment, were only considered when assessing the indirect effects (availability of resources) on traditional land use, and effects of increased harvesting pressure (competition for resources) on harvesting.

2. The ability of Indigenous harvesters to continue harvesting at the same success rate will depend on numerous factors.

Baseline information related to current Indigenous harvesting success in the NWT, including the number of animals harvested and how often they are harvested, is unknown. In the absence of current and publicly available data related to Indigenous harvesting success, the assessment considers the most relevant data

available to predict residual Project effects on traditional use and harvesting, including access to preferred traditional use areas, availability of resources, and competition for resources. The ASR acknowledges the potential for both positive and negative Project effects on traditional use and harvesting (Sections 5.4.3.1 and 5.4.3.2).

The Project is expected to result in enhanced access to the existing trail network and preferred hunting, trapping, fishing and culturally important areas for Indigenous harvesters, and potentially to new areas in the region previously inaccessible most of the year (Section 5.4.3.1 and 5.5.3.1). Direct disturbance to preferred harvesting areas is considered minimal because the proposed Tłıchǫ All-season Road (TASR) predominantly follows an existing trail that is currently used by harvesters, and because access along preferred summer and winter harvesting routes will be maintained during Project operations with the installation of bridges over the La Martre and James rivers. The consideration and installation of suitable road crossings, pullouts and signage at access points of other culturally significant winter snowmobile trails, or summer ATV trails that intersect the TASR will also enhance access (Section 5.4.3.1).

The wildlife and wildlife habitat assessment (Section 4.4) assessed the potential effects of the Project on ungulates and furbearers, including changes in abundance and distribution, and therefore changes in the availability of resources for harvesting. Although some local changes in the movement patterns, distribution and abundance of boreal and barren-ground caribou, moose and furbearers were expected because of the Project, adverse and long-term changes in wildlife populations were not anticipated at the regional scale (Section 5.4.3.1). Although some changes to local distributions of individual wildlife may result from Project construction, these changes are expected to be minor and temporary. The availability of wildlife resources for harvesting may decrease in certain preferred harvesting areas during both Project construction and operations, into the long-term (Sections 5.5.3.1 and 5.5.3.2) due to a combination of effects, such as sensory disturbance and barriers to movement. However, the associated predicted effect on the availability of wildlife resources for harvesting is expected to be limited, since the regional area contains high proportions of habitat undisturbed by anthropogenic sources for boreal caribou, barren-ground caribou, moose and furbearers where they can be harvested. Residual effects on the availability of wildlife for harvesting due to increased harvesting were predicted to be low in magnitude and continuous. Adverse and long-term changes in wildlife populations are not anticipated (Section 5.5.3.2). The ongoing monitoring of caribou populations, movement patterns and harvesting, and adaptive management by the GNWT in collaboration with Indigenous governments and co-management boards will play a large role in determining continued Indigenous harvesting success.

The fish and fish habitat assessment (Section 3.4) assessed the potential effects of the Project on fish habitat availability and distribution, and on fish abundance. With the implementation of mitigation measures, including the enforcement of NWT's fishery regulations by DFO and the GNWT to prevent overfishing in any one area, no residual effects from Project construction or operation activities were anticipated on existing fisheries in the region. The preferred traditional fishing locations are also largest (i.e., Lac La Martre, La Martre River, and Boyer Lake), and have substantial fish abundances that can likely support an increase in fishing pressure; therefore, it was determined that fish would remain available for traditional harvesting at both the regional and local scale.