Tlicho All Season Road

Review by North Slave Métis Alliance



Background

NSMA members have traditionally used the project area, and continue to do so today NSMA has actively participated in the EA since July 21, 2016, to ensure its members' s.35 Aboriginal rights as Métis are respected and protected

NSMA Traditional Knowledge



The Developer should, once completed, accept the NSMA TK Study, and consider it in future regulatory discussions and decisions (e.g. WMMP and LUP)

Continuing Consultation with NSMA

- GNWT should continue working with the NSMA as a wildlife co-management partner in relation to TASR
 - NSMA should be included in the ongoing monitoring and management of wildlife in the project area.
 - NSMA should be included as a comanagement partner who receives boreal caribou collar monitoring result and data.
 - NSMA should be included in the list of relevant Aboriginal government organizations (WMMP p.49).

Direct & Indirect Effects on Boreal Caribou

Increased Hunting Access

- Access and harvest monitoring will need sufficient patrolling.
- Location/numbers of harvest check stations consider additional station rather than moving existing.

Apparent Competition: Uncertainty

- Needs more consideration; e.g., baseline resiliency of boreal caribou to this effect.
- Patterns in other studies with different proportions of wolves: ungulate SAR: alternative ungulate prey not relevant need data.
- Collect ongoing data on boreal caribou and include adaptive mitigation.

Direct & Indirect Effects on Boreal Caribou, Con't

- Predators and Travel Wolves may use ASR more efficiently
 - Hunting along road by wolves may increase mortality of boreal caribou, barren ground caribou, wood bison. Winter road= similar, but ASR changes reversibility and time scale of effect.
- Habitat Loss Baseline may be lower than when calculated, due to wildfires
 - Recommend recalculating amount of undisturbed habitat in the NT1 and Wek'eezhi portions of the NT1 range to determine need for habitat compensation.
- RSA size for Effects Assessment
 - Appropriateness of the RSA throughout EA? RSA that is too large can dilute predicted effects.

Wildlife Group Sizes vs Sensitive Seasons for Informing Mitigation

Reliance on mitigation by sensitive season

- Boreal caribou are solitary during the summer, and collar data will mostly inform about the location of limited collared caribou.
- Along with collar data, ensure that Table 1, Appendix E includes ground-based monitoring during both summer and winter construction.



Mitigation for Disturbing Sensitive Caribou: Blasting in the Winter

- Limited visibility in the dark may reduce the success of mitigation measures
 - In WMMP V.2, it is assumed that monitors can see wildlife up to 1 km away.
 - Visibility will be compounded by darkness, snowfall, and forest in the winter.
 - Suggest investigating solutions, such as infrared scopes.



Setback Distances for Caribou Water Crossings

- Water crossings are key habitat features for caribou and require appropriate mitigation
 - Determine whether caribou water crossings interact with the project.
 - If so, include AANDC's (2012) recommended setbacks around water crossings: May 15 - Oct 15, 10 km setback for blasting activities, 1 km for general activities.
 - Include water crossings and appropriate buffers as "key habitat features" in Section 19.0 of WMMP.

Mitigation During Sensitive Seasons

Mitigation during sensitive seasons for boreal caribou

- Extend caribou sensitive period by 1 month, 9 days, from the current (05 April to 06 June) period. This change would include calving and post-calving for boreal caribou, and would extend from 05 April to 15 July.
- Consider including the rut as a sensitive period.
- Extend the wood bison sensitive season by 1.5 months, from the current (01 March to 15 July). This change would render the sensitive season as 15 April - 15 July, which would adhere to AANDC *et al.* 20012 guidelines.
- Include similar table to Table 1, Appendix E for moose and wood bison.

Mitigation for Noise Disturbance & Snow Clearing

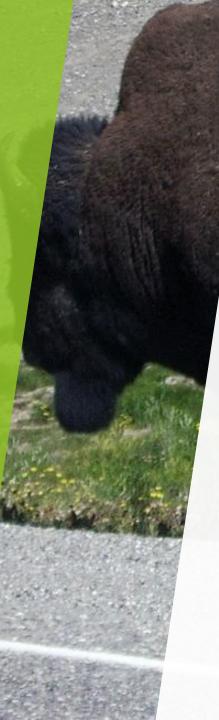
Mitigation for blasting and construction activities

- Blast noise (dB) at setback distances are not known or compared with thresholds. Suggest noise modelling and/or noise monitoring.
- Use adaptive management to adjust buffer distances based on behavioural responses of caribou and bison.
- Snowbank mitigation for movement of boreal caribou, moose, bison
 - Escape gaps: < 55 cm would allow caribou, moose, and wood bison to clear the road.

Protection for Large Groups of Bison



- Mitigation and enhanced protection for bison groups
 - Definition of "large groups" of bison.
 - Clarify work stoppage distances for bison or groups of bison, not just distances to invoke lower speed limits. (present in V.1, but removed in V.2 of WMMP).



Setback Distances for Bison

Setbacks and sensitive periods for bison

- Reinstate table of Timing Restrictions and Setback Distances that was in V.1 of the WMMP, including:
 - ▶ 10 m setback for construction vehicle stoppage.
 - Year-round setback of 250 m for stopping construction when bison are in the area.
 - 500 m setback for stopping construction activities during sensitive periods.
 - Add: Reinstate snowmobile setback distances (250 m was previously indicated for caribou in V.1, which should be reinstated)- add for bison.

Pushing Caribou & Bison away from Project Area



- Allow longer time for wildlife to leave the area on their own
 - Allow up to 2 hr for animals to clear the area naturally before they are approached on foot.
 - 15 minutes may not be enough time. Reluctance to move from a human occupied site can signal avoidance of nearby predators.



Wildlife Traffic Protection Speed Reduction

- Reinstate construction vehicle stoppage mitigation
 - Commit to traffic protection by ensuring construction vehicle stoppage at clearly defined distances from wildlife distances.
 - The WMMP lists distances from wildlife from which speed reduction distances.

Aircraft Mitigation for Wildlife

- Suggested more conservative avoidance distances (e.g., from Yukon, based on reactions of mountain caribou, a closely related species, to helicopter overflights).
- If helicopter support is used, we suggest that an annual audit on flight path and altitude compliance be done on a randomized, small subset of flights.
- Information from annual audits can be used by the GNWT to improve predictions about helicopter related impacts and results can inform future construction projects.

Wetlands, Rare Plants, Communities

- Surveys and setbacks for rare plants, rare ecological communities, and wetlands (important moose habitat)
 - Provide details on pre-clearing surveys.
 - Provide details on setbacks to be placed around rare plants, plant communities, and wetlands.
 - Buffers around wetlands are relevant for predicting impacts to moose.



Pre-Clearing Surveys for Wildlife Features of SAR

- Add key habitat features for SAR, and clearly describe survey methods
 - Include details of pre-clearing survey methodology, effort, seasonal timing.
 - Recommend expanding "key wildlife features" to include rutting areas, mineral licks, bat roosts, water crossings, hibernacula (not just dens and nests).
 - Describe survey methods for added features.

Vegetation Species Monitoring

- Long-term survey of invasive plants
 - GNWT includes a 1- and 5-year monitoring plan, including for rare and invasive species.
 - Recommend one more survey at 10 years, as northern invasive spp. can be slow to establish.

Wildlife Adaptive Management for Rapid Decision-Making

Include conceptual option for immediate adaptive management (does not need to follow weekly or annual reports).

Monitoring Traffic Effects on Wildlife



- Adaptive management of traffic threshold by analyzing caribou collar vs. traffic data
 - We agree with the GNWT's proposed traffic threshold of 200 vehicles/day.
 - Need further studies relevant to TASR to improve confidence in threshold: low traffic roads/traffic rates vs. wildlife reactions in NWT.
 - Analyzing real-time traffic data alongside step length/redirection of collared boreal caribou would help fill data gap. Results will greatly inform EAs and mitigation in future.

Monitoring Traffic Effects on Wildlife, Cont'd

Monitoring effects of road salt on wildlife

- Caribou and bison may be attracted to sites where road salt is applied, particularly in fall. May increase wildlife-vehicle mortality.
- Record all locations and dates that salt is applied to the road and include in annual WEMP review.
- This will aid the GNWT in adaptive management of wildlife-vehicle collisions, e.g. warning signs around high-risk locations.

Thank You