



# Kátł'odeeche First Nation

{ Pine Point Mining Limited  
Land Use Permit and Water Licence Applications  
of the Confirmation and Exploration Program  
(MV2020L8-0012 MV2020C0017)  
MVLWB Public Hearing

# Kátł'odeeche First Nation's Perspective

- The Western portion of the Pine Point Mining Ltd (PPML) leases and claims area is within the Kátł'odeeche First Nation Traditional Territory which is important habitat for Boreal Caribou which is listed as Threatened under the Species at Risk Act.
- KFN also has serious concerns about contaminants emanating from PPML mining operations and damaging water quality and fish stocks on the Buffalo River and Great Slave Lake, thereby infringing KFN's inherent Aboriginal and Treaty rights.
- KFN's ultimate goal for participating in this process is to ensure that the water quality and overall ecological health of the Kátł'odeeche First Nation Traditional Territory is maintained.

# The Importance and Sensitivity of Boreal Caribou

- Boreal caribou (medzih) are very important to Kátł'odeeche Dene, from a spiritual, cultural and traditional harvest perspective. Kátł'odeeche Dene highly respect and value boreal caribou; their meat is eaten, and the hide is highly valued for making clothing and drums. This respect and value carry with it certain obligations not to unduly harm or disrespect this animal. Respecting rules about the use of meat and hide, including sharing harvests and not wasting meat, are also considered essential to this approach.
- In 2012, boreal caribou were assessed by the NWT Species at Risk Committee as threatened in the NWT. Boreal caribou were subsequently listed as a threatened species under the territorial Species at Risk (NWT) Act in 2014. This means boreal caribou are likely to become endangered in the NWT if nothing is done to reverse the factors leading to its extirpation or extinction. KFN will conduct a review and provide comments once the Groundwater Monitoring Plan when it is available for review.



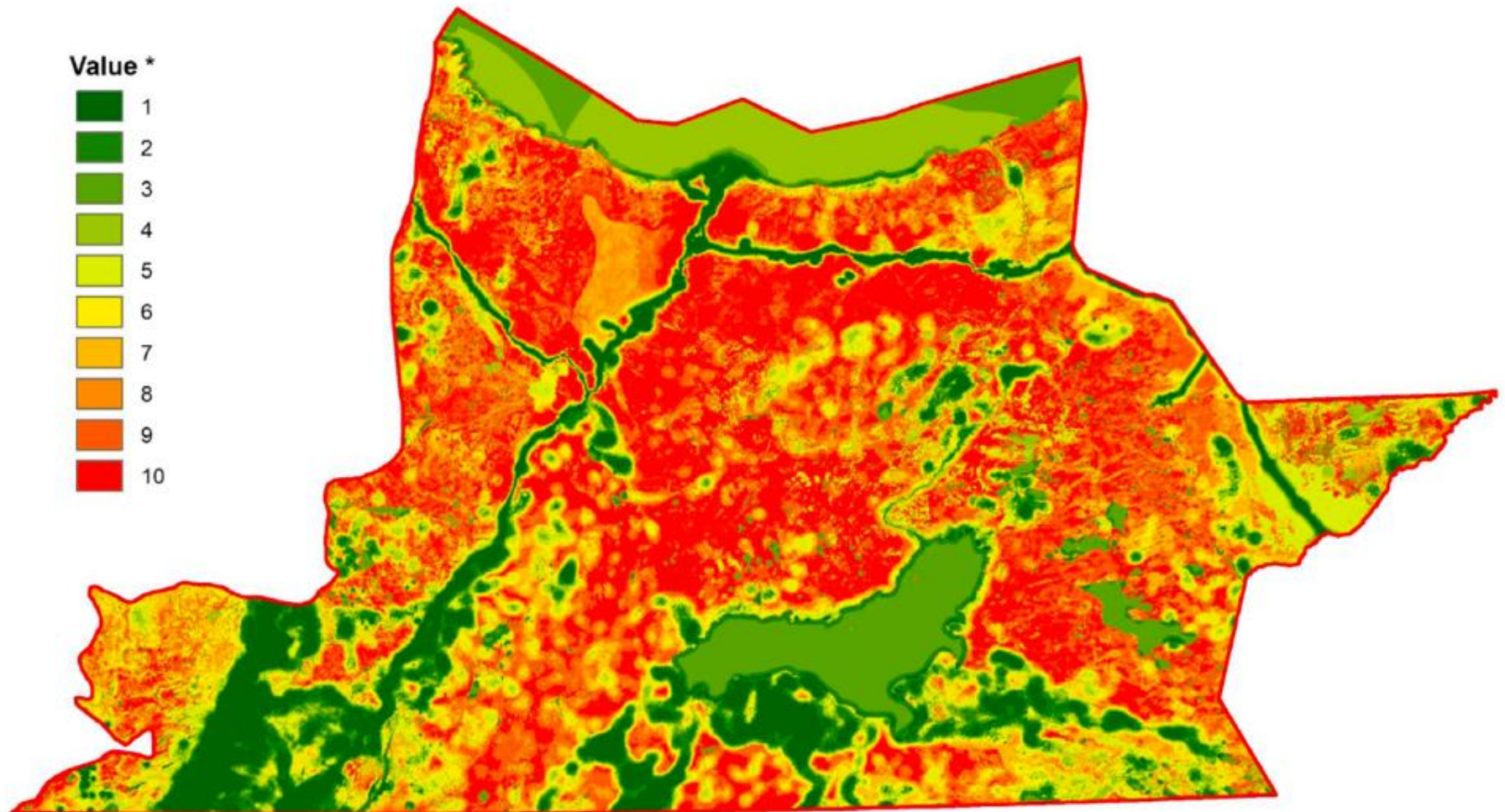








## ENR BC Critical Habitat Selection: All Years (Resource Selection Function (RSF) Analyses)



\* Bin 10 represents areas that are most likely to be selected by boreal caribou, and Bin 1 represents areas that are most likely to be avoided. In general, RSF bins 7-10 represent areas that are used by boreal caribou in greater proportion to their availability and bins 1-6 represent areas that are avoided or used in proportion to availability. The RSF maps represent the relative habitat selection pattern for an "average" adult female boreal caribou, based on analysis of location data from over 400 adult females from across the NWT boreal caribou range that were collared between 2004-2017. The predictive RSF maps are current to 2017.



# The Importance and Sensitivity of Boreal Caribou

As there is no baseline data of boreal caribou prior to 2015, it is challenging to understand what boreal caribou extent and population in the Pine Point area looked like prior to the former Pine Point mine. As a result, it is impossible to determine pre-development caribou population size and extent. The lack of boreal caribou in the heavily disturbed, eastern portion of the study area further demonstrates the vulnerability of boreal caribou in the Pine Point Study Area to development and disturbance.

## Recommendation:

- KFN supports the GNWT's recommendation that PPML work with the GNWT to conduct a population survey to determine how many boreal caribou occur within the project area. PPML has indicated that they will work with PPML on this issue. KFN recommends that a KFN member take part in these population surveys as they take part in any population survey that occurs within the KFN Traditional Territory.

# The Importance and Sensitivity of Boreal Caribou

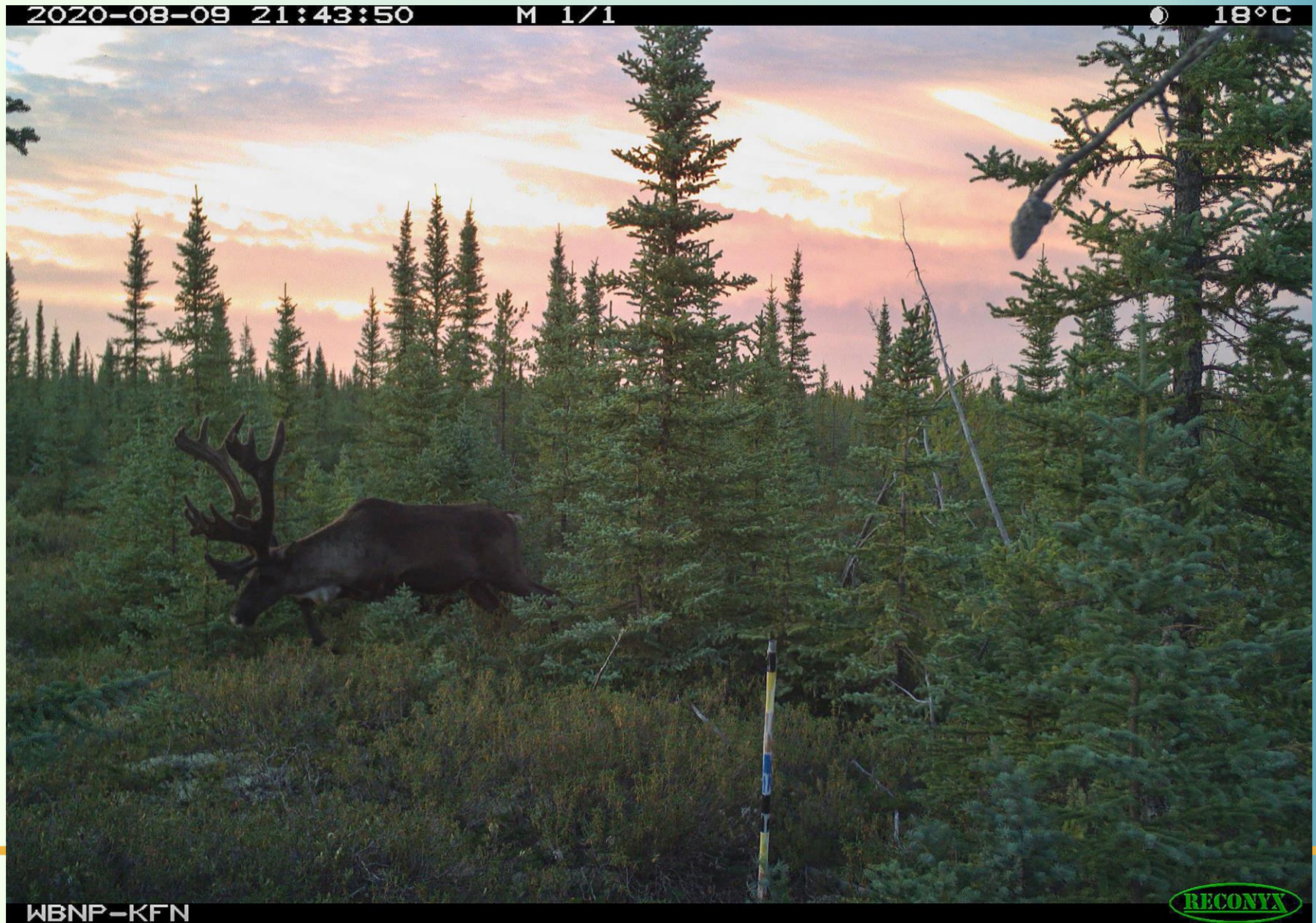
During the spring and over the summer, predator avoidance becomes a priority. At this time, boreal caribou space themselves out throughout the range, often where access is difficult for predators. They also seek out open, elevated areas exposed to the wind, to avoid insects. In the fall, during and after the rut, they move through various habitats (Conference of Management Authorities. 2017).

## Recommendation:

- PPML has not characterized the potential habitat loss from the Project. In particular, the effects to winter and calving habitat are not sufficiently characterized, the effects of impacts to seasonal movement corridors are not included, and the thresholds of significance for habitat loss and other pathways of impact are not sufficient. The proposed monitoring and mitigation measures are not adequate to address the project effects with respect to the potential impacts of the CEP on boreal caribou. KFN recommends that PPML complete a Wildlife Mitigation and Monitoring Plan that includes information on potential habitat loss from the project and effects to winter and calving habitat. The plan should include a Dene-centric perspective of the potential significance of habitat loss, fragmentation and mortality from the project on Boreal Caribou. The plan should further identify mitigation measures, program monitoring to assess if the mitigation measures are working and adaptive management.



# The Importance and Sensitivity of Boreal Caribou



# The Importance and Sensitivity of Boreal Caribou

Boreal caribou are also impacted by linear corridors (i.e. roads) by increasing predator access and hunting efficiency (Bergerud et al. 1984; James and Stuart-Smith 2000). Habitat disturbance increases tends to increase alternative vegetation which support more alternative prey; this results in a higher number of predators in boreal caribou habitat. Roads also increase predator hunting efficiency by increasing predator access, line of sight, travel speed, search efficiency, and encounter rates (James and Stuart-Smith 2000). Roads and development sites also impact caribou through avoidance, displacement and habitat fragmentation; caribou avoid new well sites by up to 1 km during calving and avoid old well sites up to 500 m during both calving and late winter.

## Recommendation:

- PPML provided KFN with information on where the drill sites/boreholes will be located, however, there is currently no information on where the road network to access the sites will be located. KFN further recommends that PPML indicate road location and if roads will be sited on linear disturbances (that have not been revegetated). If roads will be sited on linear disturbance, KFN further recommends that PPML indicate how many kms will be sited on previous linear disturbances versus new access.



# The Importance and Sensitivity of Boreal Caribou

## Recommendation:

- KFN recommends support for KFN and KFN community members to engage in ongoing collaboration with the proponent to further develop the monitoring plan and develop standards and conditions for minimizing project activities.





# The Importance and Sensitivity of Boreal Caribou

## Recommendation:

- KFN recommends that the first method for the protection of boreal caribou is avoiding damage and disturbance to boreal caribou habitat to the greatest extent possible. Recovery of usable habitat is questionable and can take a significant period of time. In the case of the reclamation of roads, PPML currently does not have any definitive plans on when or if roads will be reclaimed, KFN considers that the roads will be on the landscape for at least 20 years or potentially in perpetuity. Golder Associates developed a Boreal Caribou Habitat Restoration Toolkit for address restoration of boreal caribou habitat (<http://www.bcogris.ca/sites/default/files/bcip-2018-04-boreal-caribou-restoration-framework-final.pdf>). This toolkit contains a summary of habitat restoration treatments that area specific to disturbance features within boreal caribou habitat, designed to limit humans/predators/primary prey (i.e. moose) access and to allow for regeneration to native species. KFN recommends that Golder's approach be used for roads that are developed but are not going to be used in the future.

# Annual Report

## Recommendations:

KFN recommends that the Annual Report provides an update on the drill sites, roads and trails, boreholes and sumps or any other disturbance that has been developed over the last year. KFN further recommends that PPML provide an update on the amount of reclamation that has occurred onsite compared to the total amount of disturbance, which includes photos of the sites and their recovery.

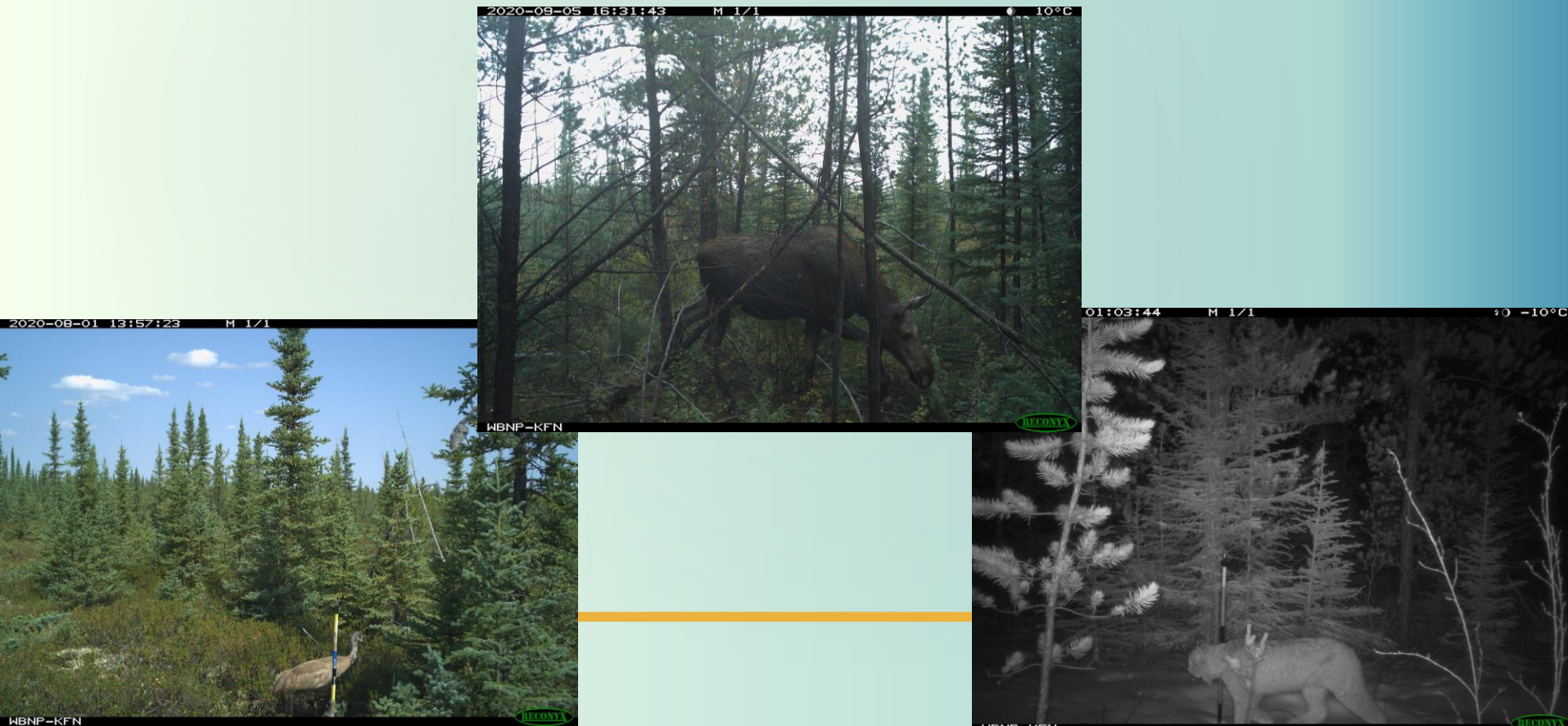




# Buffalo River

## Recommendations:

KFN continues to recommend that no disturbance areas occur within 500 metres of the Ejie Tue Dehe (Buffalo River) as per Condition 52 of the draft Land Use Permit. There is at least one drill site within 500 metres of the Buffalo River. KFN recommends that this site be removed from consideration.





Thank you for you time.  
Questions?

