



SAHTÚ RENEWABLE RESOURCES BOARD

P. O. Box 134, Tulita, NT, X0E 0K0

Phone (867) 588-4040

Mobile/Voicemail 406-966-4370

Skype deborahleesimmons

Fax (867) 588-3324

director@srrb.nt.ca

www.srrb.nt.ca

<http://www.facebook.com/SahtuWildlife>

Larry Wallace, Chair
Sahtu Land and Water Board

Delivered via email

November-19-13

RE: HRN Contracting Ltd., Vermillion Ridge Quarry Development, S13Q-004

Dear Mr. Wallace:

The Sahtú Renewable Resources Board (SRRB, or the Board) has reviewed the application by HRN Contracting Ltd. for quarry development at Vermillion Ridge, based on its mandated responsibilities under the Sahtú Dene and Métis Comprehensive Land Claim Agreement and provides the following comments and recommendations:

Wildlife disturbance

According to HRN's meeting notes from the community consultation in Tulít'a,¹ TRRC members expressed concern that caribou, moose, and beaver in the area would be affected. Boreal caribou, moose, and furbearers are important harvested species to local communities, and an integral part of the local traditional economy.

Boreal caribou

Boreal woodland caribou are listed as a *Threatened* species under the federal Species At Risk Act, and assessed as *Threatened* by the NWT Species At Risk Committee.

HRN's Environmental Protection Plan states: "An active caribou trail was also observed along the northeast border of the Project, with additional signs of caribou crossing observed throughout the Project area"². Last winter, an SRRB and ENR Caribou Populations Study found evidence of boreal caribou winter activity in the area of the proposed quarry, with fecal pellets collected from the area. HRN claims that since proposed activities are between December and March, they will not significantly affect boreal caribou since they are "unlikely to coincide with important boreal woodland caribou seasonal activities and movement through the area."³ HRN fails to acknowledge that overwintering habitat also forms part of critical habitat for boreal caribou.

1. The SRRB recommends that HRN conduct a more thorough study of overwintering habitat for boreal caribou within the project area, *before* beginning the project.

Furbearers

¹ Appendix 1-A Stakeholder Engagement, Section 3.0 Hamlet of Tulita Community Consultation.

² *Environmental Protection Plan*, Section 8.3.5.4.1, p. 39.

³ *Ibid.*

HRN's program has the strong potential to disturb furbearers such as the wolverine, grizzly bear, black bear, and marten, which are all important to traditional economy and culture. Wolverine and grizzly bear are both listed as *Sensitive* species in the NWT and are rated by COSEWIC as of *Special Concern*.

HRN states that "Wolves, black bears and (possibly) grizzly bears and wolverines may den in the area."⁴ Bear denning surveys were conducted for the project area in October 2013; however, results have not yet been made available to the SRRB.

2. If wolf, bear and/or wolverine dens are found in the project area, what will HRN do to make sure those dens are not disturbed?
3. Will HRN ensure that there is a buffer of at least 1 kilometre between all project activities and dens found in the area, as recommended in the grizzly bear study cited by HRN's Environmental Protection Plan?⁵

Cumulative impacts

HRN notes that the impact of this project on wildlife habitat (particularly for moose, caribou, muskox, grizzly bear, wolverine and wolf) is expected to be relatively high magnitude, and long-term.⁶ With regard to boreal caribou, HRN acknowledges that "the current linear corridor density in the RSA is 0.59 km/km². This current linear density is already above the current management threshold of 0.4 km/km²... 54% of the RSA is disturbed. This is above the 35% threshold suggested for the Northwest Territories range by Environment Canada."⁷ Moreover, HRN acknowledges that "[t]he effectiveness of mitigation of impacts on wildlife and wildlife species at risk is anticipated to be low."⁸

Traditional Ecological Knowledge (TEK) Study

In its Environmental Protection Plan, HRN lists several concerns contained in the TEK study; however, HRN does not indicate how it will mitigate many of those concerns, or how TEK information has been incorporated into project design. For example, the TEK study indicated that:

- "migrating woodland caribou and moose pass through or near the proposed project area and animal trails are still found alongside Vermillion Creek and area. It was noted that the area has been used for trapping by the communities in the past and continues to be used to present day"; and
- "Concern was raised by the cabin owner regarding the noise from the current operations within the area and potential noise from the proposed development."⁹

In addition, a concern was raised during the community consultation in Tulit'a that the nearby sinkhole may have sacred/cultural significance.¹⁰

4. What will HRN do to ensure that the noise and habitat disturbance from the project operations do not interfere with local trappers and harvesters?
5. The Board recommends that HRN conduct further study on the cultural and environmental significance of karst formations in the area, including the Vermillion sinkhole.

Thank you for this opportunity to comment.

Sincerely,

⁴ *Environmental Protection Plan*, Section 8.3.5.1, p. 33.

⁵ *Environmental Protection Plan*, Section 9.3.2.4, p. 73. While this buffer was specifically recommended for grizzly bears, wolverine are also known to be extremely sensitive to disturbance while denning (per ibid, p. 74).

⁶ *Environmental Protection Plan*, Section 9.3, p. 65.

⁷ *Environmental Protection Plan*, Section 9.3.2.4, p. 73.

⁸ *Environmental Protection Plan*, Section 9.3.2.6, p. 76.

⁹ *Environmental Protection Plan*, Section 6.2, Traditional Knowledge, p. 15.

¹⁰ Appendix 1-A Stakeholder Engagement, Section 3.0 Hamlet of Tulita Community Consultation.

A handwritten signature in black ink, appearing to read 'Deborah Simmons', with a stylized flourish at the end.

Deborah Simmons
Executive Director