# GNWT Response to: MVEIRB IR#11

## **Topic**

Vulnerable groups, young women

#### Comment

The Tłęcho Government stated that "young women could be much more vulnerable with an on land road, and that there could be more abuse of women...there could be more hitchhiking and then women going missing, or increases in teen pregnancy...higher STIs [sexually transmitted infections]" (PR#96 p 59). The developer acknowledges that the project would introduce several risks to women (PR#110 p 5-41) and that negative residual effects are likely to occur (PR#110 p 5-55 and 5-59). The developer's position is that "potential effects to vulnerable groups ...are not appropriately assessed through the assignment of residual effects criteria" due to the complexities of individuals' responses to the project (PR#110 p 5-55). Given that position, uncertainty remains regarding the magnitude, extent and duration of residual effects to women from a community perspective, including those effects that may be outside of any one individual's control. Even with this uncertainty, strategies at the community scale have been proposed to address effects to women, including:

- increasing focus on STIs, sexual health and on the land programming at nursing stations, and continued education (PR#96 p 59)
- annual coordination between Whatì and Behchokò to address emerging impacts (Mitigation 13, PR#96 p59, PR#110 p 5-20)
- continuation of the Whatì inter-agency committee (PR#110 p 5-20)
- continuing education provided by the Community Government of Whatì to ensure travelers report their travel plans (PR#110 p5-20)
- investigating the establishment of a Community Bylaw Officer (PR#110 p5-20)
- aims to increase cell coverage along the Tłıcho All-season Road (PR#110 p5-20)

#### Recommendation

The Review Board requires additional information on the risks to the health and safety of women, residual effects to women, and mitigations. Please explain specifically how the proposed mitigations (including those listed above) address adverse residual effects to the health and safety of women (including those referenced above) during the following periods: a) construction b) the predicted pulse of adverse social effects during the first year or two the road is in operation c) remaining operations d) if the NICO mine opens.

## **GNWT Response**

#### IR Preamble

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

Please note, if further questions emerge on any of these issues at hearings or technical sessions, the GNWT may turn to the Tłįchǫ Government for comment because of their authority in this area.

### IR Response

At the outset, we would like to make note that the Tłįchǫ Government will not be responding to the portion of the question that asks to address potential impacts from the NICO mine. The NICO mine had its own EA conducted in 2012, and its construction commencement date remains unknown. As such, additional impact assessments from the NICO mine will not be carried out by the Tłįchǫ Government, or included in the TASR project IR responses.

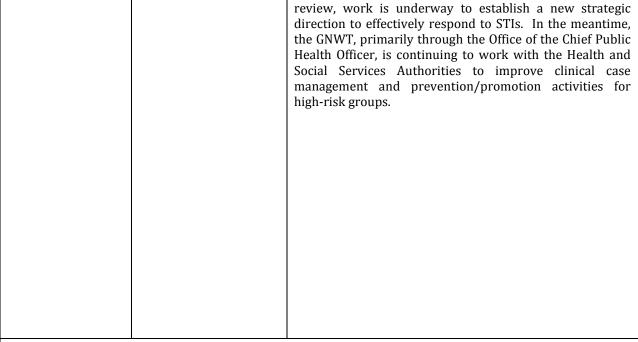
The Review Board has asked for additional information on the risks to the health and safety of women, including the residual effects and mitigations. We would like to refer the Review Board to the Tłįchǫ Government's initial responses in PR#96, IR1, Table 1-1 (p. 7), Table 1-2 (p. 16) and IR2, Table 2-1 (p. 37). A great deal of research and resources were invested into developing these responses from a number of Tłįchǫ Government agencies, leadership and staff. The Tłįchǫ Government and the GNWT are confident that the work done to investigate these risks and potential residual effects to women has identified what can reasonably be known in this area.

That being said, we can provide the Review Board with several examples of programs and strategies that the Tłįchǫ Government is undertaking to proactively address issues pertaining to women's health and safety in the community (see Table 1 below). These are initiatives in addition to those already discussed in <a href="PR#96">PR#96</a> IR1, Table 1-1. No further negative residual impacts have been identified, and therefore are not included.

Table 1: Potential impacts and programming identified by the Tłįchǫ Government, CGB and CGW

Table 1: Potentia TASR Project	Potential impact(s)	ng identified by the Tłįchǫ Government, CGB and CGW Programming and strategies*	
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Phase Construction; continuous operations Construction; continuous operations	Increase in family violence  Increased Risk to Aboriginal women's safety	Interagency family violence and youth protocol. The Community Government of Behchokò has recently reactivated this interagency program, which will be meeting on a monthly basis to discuss community approaches to family violence, as well as youth participation in problem identification and resolution. This is a proactive approach to dealing with violence within community households. If successful, a similar program could be implemented in Whatì. The interagency working group, which includes the CGB and CGW, continues to address the needs of vulnerable groups on an ongoing basis. In addition to the programs being developed by the	
Continuous operations	Youth (especially) accessing drugs and alcohol	Tłįcho Government, the GNWT continues to actively address community responses in the NWT to sexual violence against women and girls. For example, the GNWT supports ongoing research by academics and NGOs in the NWT on family violence. The GNWT "Policy and Guidelines for Health Professionals providing Care to Survivors of Sexual Assault" is expected to be completed in 2017, which will provide additional support to nurses who provide care to survivors of sexual assault.	
Continuous operations	Children left at home alone or without	Partnership between Tłįchǫ Communities and the RCMP. Presently, a formal partnership is being established between the CGW, TG, TCSA, Aurora College and the RCMP to develop a plan that reduces harm in the community. The purpose of this partnership, and this future programming, is to reduce criminal activity in Whatì, educate and build life skills to promote positive, lasting change in the community. The parties are working towards developing	
	proper parental supervision	and implementing a plan that provides proactive education courses to community members on sexual violence, family violence, parenting, and alcohol additions.  The intention of this partnership is to offer courses to any member of the community, with the intention of addressing the root causes of addictions and general violence within the community. The courses in Whatì are considered to be a Pilot Project, which will aim to expand to the wider Tłįcho region a year after implementation.	
Continuous operations	Increased stress-load on caregivers due to safety concerns	Resiliency plan. The Community Government of Whati Disaster Resilience Plan (2013) outlines the community's ability to anticipate, prevent, and minimize the potential of a disaster. While this plan focuses primarily on emergency response and preparedness, a central piece of the plan involves supporting families, new mothers and their children in the community. This involves providing essential services for women in the community, such as:  • Proactive prenatal care; • Positive parenting skills;	

Continuous operations	Increased public drunkenness, fights, abuse	<ul> <li>Day care support;</li> <li>Fostering &amp; custom adoption;</li> <li>Child safety &amp; nurturing; and</li> </ul>
Construction;	STIs, sexual health, on	• Addictions counselling.  These services require the Council's engagement with elders, official leaders, and informal leaders to ensure the work and support services are meeting the needs of families and new mothers in the community. It is anticipated that these programs, which take a proactive approach to supporting families and new mother's wellbeing, will continue to benefit the Aboriginal women in
continuous operations	the land programming at nursing stations,	Whati and other Tłįcho communities.
operations	at nursing stations, and continued education	Working Conditions. One notable measure the Community Government of Whatì has undertaken is the promotion of women's safety in employment. The community recently hired 20 women and men for garbage disposal positions. Measures taken to ensure women's safety in this environment include working in gender-balanced teams (i.e., two women and two men), women-only teams, and not working alone (i.e., with or without a male team member). Employment interventions such as these have proven to work successfully in Whatì for employing and maintaining women employees, which will be applied to future job opportunities with the TASR. See MVEIRB IR#9 for further detail on safe and equitable employment for Aboriginal women.  The GNWT is not aware of research or evidence to support the claim in PR#96, 59 that higher STIs are a likely negative impact of TASR. Information collected by the
		GNWT did not show a link between STI rates and increased community access during the periods of the winter road over a three year intervals tracked from 2005-2016.
		The TCSA provide STI programs that provide testing and treatment for STIs throughout the region, as well as client education. The TCSA often spends time educating people that are tested and treated for STIs, including contact people with whom an infected individual had sexual contact with and provide the opportunity for these individuals to ask questions and receive further education on STI. Community Health Representatives (CHRs) conduct school visits in the fall of each year to discuss STIs and condom use with youth. Further education specifically for women is provided in the Well-Women Clinics. These programs and services are expected to continue throughout the periods this IR references.
		In addition to the work done by the TCSA, the Department of Health and Social Services (DHSS) has recently completed a review of STI rates, underlying factors, best practices and populations at risk in the NWT. Based on that



\*Programs listed in this table are in addition to the discussion and mitigations previously outlined in <u>PR#96</u>, IR1, Table1-1

Ongoing monitoring and adaptive management through the Whati Interagency Committee will continue to take place in order to effectively work through any issues that may arise, particularly as they pertain to women's health and safety.

The extent of proactive programming and mitigations identified in Table 1 above and in PR#96, IR1, Table 1-1 (p.7), Table 1-2 (p.16) and IR 2, Table 2-1 (p. 37), reveal the degree to which the Tłįchǫ Government is taking serious measures to minimize the potential for impact on Aboriginal women's health and safety. The Tłįchǫ Government will continue to work closely with the GNWT, RCMP and TCSA on this issue.

#### References

Community Government of Whatì. 2013. Disaster Resilience Plan. Provided by the Senior Administrative Officer of Whatì on June 8, 2017.

Tłįchǫ Government, RCMP, Government of the Northwest Territories and Aurora College. 2017. Memorandum of understanding between Whatì Community Government, The Tłįchǫ Government AND Tłįchǫ Community Services Agency, Child and Royal Canadian Mounted Police, Probation Services. Draft MOU provided by the TCSA on June 8, 2017.

# GNWT Response to: MVEIRB IR#12

## **Topic**

**Substance Abuse** 

#### Comment

In response to a Review Board information request, the Tłycho Government provided evidence that substance abuse issues are currently at a level that is causing significant concerns in Whatì and Behchokò (PR#96 p7, 17, 37). The Tłycho Government anticipates the all-season road will increase adverse effects such as crime and other social issues for a short period of time (the "spike") during the first year of operations (PR#96 p7). The Tł<sub>1</sub>cho Government stated that mitigations are required for this spike in effects and provided a suite of mitigations that, if implemented, would reduce the negative effects associated with substance abuse. In response to an October 28, 2016 Review Board IR the Tłıcho Government identified that it is confident in the existing data collection systems for monitoring change in socio-economic indicators as a result of the project (PR#96 p54). However, it also stated that "there could be better coordination, sharing and mobilization of data" (PR#96 p53). The document further states that the Department of Industry, Tourism and Investment took the lead in coordinating a meeting that took place at end of January 2017 among the Department of Education, Culture and Employment, the Department of Industry Tourism and Investment, the Department of Health and Social Services, the Thcho Government and community governments regarding monitoring data, and that this monitoring data will be used to inform how mitigations are applied through adaptive management.

#### Recommendation

Please describe adverse socio-economic effects to communities from substance abuse using cases where communities get new access via all season roads, including Wrigley or other applicable examples from Northern Canada. Explain key areas of comparison and contrast between those examples and this project. Highlight key strategies, based on lessons learned, that would mitigate likely significant adverse effects from this project.

## **GNWT Response**

IR Preamble

Upon review of this IR, the GNWT and Tłįchǫ Government recognized that it would be of greater benefit to work together in developing a response as the Tłįchǫ Government and its citizens have greater authority in responding to community driven programing and mitigations. A focus group was held on June 8, 2017, with all the senior leaders of the Tłįchǫ Government, Tłįchǫ Community Services Agency,

and Senior Administrative Officers from Behchokò and Whatì. This focus group 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 Tłįcho Government for comment.

## IR Response

The Tłącho Government has considered this question, and focused specifically on the opening of Behchoko, which is our most recent experience of a road coming into a community. In Helm (2000), a full chapter was devoted to the experience of the road coming into the region. For this reason, rather than focus on Wrigley, we are focusing on the experience in Behchoko, then known as Rae-Edzo.

What the Tłįchǫ Government can draw upon is their experience with the road opening to Rae in 1967, a comparative scenario wherein a Tłįchǫ community was faced with similar social pressures as a result of all-season road access. While we acknowledge that the social and economic contexts between 1967 and present-day differ, the potential for social impacts to occur as a result of the TASR will happen under similar conditions as they did in 1967. As such, it is more appropriate for the Tłįchǫ Government to draw on its previous experience with road openings in a Tłįchǫ community to predict and better understand the social impacts of an all-season road.

The physical connection of the road increases the risk during the spring, summer and fall of alcohol and drugs coming into the community. The Tłįchǫ Government does acknowledge that there was an increase in the bootlegging industry, access to alcohol and drugs, and negative activity associated with the road opening back in 1967. The literature that was examined is less instructive about lessons learned because it was more focused on the experience of the community than on the governance response.

The Tłıcho Government and Whati Community Government are taking a very active role in addressing the issue through collaboration. Specifically, a recently signed MOU will lead to new programming to address addictions in Whati. This MOU is described at length below.

As stated in Table 3B-1 of PR# 96, Whatì is exposed to drug and alcohol trafficking and usage in the community, and there is potential for TASR to increase access to these substances. The RCMP note that bootlegging seizures spike during the winter road season, and when snow mobile trails open. We expect the TASR to reduce the spike that occurs with the winter road over the long term. The novelty of an all-

season road may decline over time and the spikes in adverse community cohesion and well-being effects may flatten out (and reduce the pressures on policing).

After reviewing this referenced in this IR, the Tłįchǫ Government and the GNWT have come to the conclusion that no further work is required on Wrigley to inform our understanding of impacts. The direct experience and knowledge of the 1967 road changes (Helm, 2000) is sufficient. Besides the examples outlined in this information request, the GNWT is not aware of any further data, case studies, or information describing the relationship between substance abuse and all season roads.

Table 1: Comparison of positive socio-economic impacts of the highway to Rae (1967) and the

proposed all-season road<sup>1</sup>

proposed an-season road-							
Beneficial Impacts	<b>Highway to Rae*</b> (*All terms and categories are those of Nancy O. Lurie (1968) at the time of her writing)	TASR to Whatì					
Benefits to traditional practices	<ul> <li>In wintertime, dog teams appreciated having the highway department "break trail";</li> <li>Using vehicles to help transport hunted goods.</li> </ul>	Vehicles on the road will allow people to harvest between the communities of Whatì and Behchokò and decrease travel distances.					
Employment and economic opportunities	<ul> <li>Increase in employment opportunities, especially for those able to drive;</li> <li>Tourism industry became a new source of income.</li> </ul>	Employment opportunities will be increased for community members in Whatì.					
Introduction of other forms of travel	<ul> <li>Increased vehicles and vehicle use in Rae;</li> <li>Causal hitchhiking opportunities increased;</li> <li>Bicycle travel became more popular among youth.</li> </ul>	Hitchhiking could increase.					
Introduction of government services	- Delivery truck access allowed for the implementation of a new sanitary plan for Rae.	New capacity will be available, cheaper and easier to access.					
Less isolation	<ul> <li>The area became less isolated from the larger society;</li> <li>More connection to family and friends by an increased amount of visiting between Rae, Yellowknife and Dettah;</li> <li>Created an opportunity to travel outwards to other gatherings (e.g., Fort Providence centennial celebration) and contact other Dene and Cree people.</li> </ul>	Whatì will become less isolated.					

<sup>&</sup>lt;sup>1</sup> Information regarding the Rae highway taken from:

Lurie, Nancy O. 1968. "Effects of the Highway, Rae, 1967." In *The People of Denendeh: Ethnohistory of the Indians of Canada's Northwest Territories*, eds. Helm, Lurie and Carterette, 2000, pages 95–100. McGill-Queen's University Press: Montréal, QC.

Beneficial Impacts	<b>Highway to Rae*</b> (*All terms and categories are those of Nancy O. Lurie (1968) at the time of her writing)	TASR to Whatì
Political inclusion	- A representative of the Indian-Eskimo Association from Yellowknife was able to drive to Rae as needed;	Many people have talked about the ability to connect much more frequently and freely between the communities.

Table 2: Comparison of the negative socio-economic impacts of the highway to Rae (1967) and the proposed all-season road<sup>2</sup>

proposed an-season road <sup>2</sup>						
Adverse Impacts	<b>Highway to Rae*</b> (*All terms and categories are those of Nancy O. Lurie (1968) at the time of her writing)	TASR to Whatì				
Changes to traditional crafts and practice	- Beadwork replaced silk embroidery and new "junk jewellery" and bone carvings were produced purely for sale to white visitors (this change was instigated by a local Grey Nun, who thought beadwork was "more typically Indian" and would appease white women more than silk embroidery).	Ability to market goods will be increased with a strategy and greater tourism.				
Control of white institutions	- The road increased the control of white institutions and created more anti-white sentiment because of the controlling interest those white institutions took (e.g., Roman Catholics, competing missionaries, Hudson's Bay store, etc.)	Could be increased.				
Dependency on a cash economy	- Increased dependency on a cash economy	There is already substantial dependency.				
Leakage of economic opportunities and benefits	- Business opportunities were taken advantage of by those outside of the community, meaning the benefits were also outside of the community (e.g., taxi/bootleg services by the "frontier-type" white-business man, Grey Nun/Cooperative Union of Canada handcraft shop).	May also be increased.				
Population/visitation changes	- Influx of white visitors, "visitors now arrived by car or on the thrice-weekly bus".	Tłįcho Government aims to have more visitors.				
Reactive behaviour to white control and presence	- During this time there was a systemized anti-white sentiment.	No prediction				

Lessons learned from the highway to Rae experience is well reflected through the following statement from the author Nancy Lurie:

• History does not really repeat itself, but recurrent social processes develop out of similar conditions. Noteworthy is the fact the despite massive technological acculturation and pressure to assimilate, Indian Identity, values, and attitudes among the Indians of southern Canada and the United States endure, and the long-expected 'disappearance' of the Indians seem less likely than ever to occur at any predictable future time. Herein lies the major implication of the parallels between Rae from 1962 to 1967 and the western Great Lakes from 1820 to 1920 (Lurie 1968, p. 100).

In addition, MacDonald (2014, page 16) found that when reviewing the environmental assessment for the road to Tuktoyuktuk, the GNWT concluded that "existing departmental monitoring and management programs would be adequate to deal with any likely changes to the social environment." In addition, further mitigations were not issues because Tuktoyuktuk was a high capacity community with the appropriate resources to deal with change in the community. However, these findings from the GNWT are not representative of what may happen for the proposed all-season road.

"Given differences in climate, geography, culture and socioeconomic conditions between the Arctic Coast and the Tłącho Region, it should not be assumed that the effects outcomes of an all-weather road to Whatì would exactly mirror the ones reported here" (MacDonald 2014, p. 16).

The Tłıcho Government has identified a number of relevant mitigations to effectively manage potential socio-economic impacts, which have been specifically crafted in response to the TASR project. These mitigations were outlined in detail in PR#96, Table 1-1 and have also been addressed in the current round of IRs in response to the Review Board-issued IR#13.

## Community Government of Whatì Mitigations (PR# 96, Appendix D)

## Community Safety

- 1) The Community Government of Whatì is considering the option of hiring a Community Bylaw Officer. This is an issue that needs to be addressed jointly by the Tłıcho Government and the Community Government of Whatì, as well as other supportive agencies.
- 2) There is a need to provide on-the-land treatment for substance abusers, using the healing-power of the elders and the land. This is a social issue that needs to be addressed collectively, and one recommendation is to introduce the Nishi Program by accessing a variety of funding sources. In most cases, social issues are "community issues" that at the very least require community input into the solution.

- TCSA should be viewed for a tool or an organization that has resources to help communities.
- 3) There is currently an alcohol prohibition in place in Whatì. Alcohol enforcement requires significant resources, and there continues to be challenges with effectively enforcing the alcohol prohibition. The Community Government of Whatì would like to review the possibility of revisiting the prohibition ban, in favour of more proactive resilience strategies for managing alcohol and drug consumption in the community.

## Community Preparedness

6) The Community Government of Whatì is an active supporter of a local Inter-Agency Committee which includes the RCMP, various TCSA agencies, and the Tłįchǫ Government. Whatì Inter-Agency responds to issues related to community preparedness. Issues such as emergency response, social programs, and the community & lands concerns are all brought to this monthly forum. Reasonable discussions about costs, liabilities and insurance will need to be addressed at this forum. Both parties commit to continuing this community forum in order to coordinate among agencies.

#### **TCSA**

12) The Tłıcho Community Services Agency commits to providing more information for local health nurses on a range of health issues, such as sexually transmitted infections, among other issues.

## Municipal Collaboration

13) There will be annual coordination between the Councils of Whatì and Behchokò to ensure that any changes and impacts are being collectively considered, addressed, and managed.

#### **References:**

- Helm, June. 2000. *The People of Denendeh: Ethnohistory of the Indians of Canada's Northwest Territories.* McGill-Queen's University Press: Montréal, QC.
- Lurie, Nancy O. 1968. "Effects of the Highway, Rae, 1967." In *The People of Denendeh:* Ethnohistory of the Indians of Canada's Northwest Territories, 2000. Ed. June Helm, pages 95–100. McGill-Queen's University Press: Montréal, QC.

MacDonald, Alistair. 2014. "Eleke tse di – watch each other: A Socio-Economic Issues Scoping Study for a Potential All-Weather Road to Whatì, Tłįchǫ Region, Northwest Territories." Submitted to Sjoerd van der Wielen, Lands Manager, Tłįchǫ Culture and Lands Protection Department, on June 10, 2014. Available online at http://reviewboard.ca/upload/project\_document/EA-1617-01\_Appendix\_B\_\_A\_Socio-Economic\_Issues\_Scoping\_Study\_for\_a\_Potential\_All-Weather\_Road\_to\_Whatì\_\_Tłįchǫ\_Region.PDF

# GNWT Response to: MVEIRB IR#15

## **Topic**

**Traffic Estimates** 

#### Comment

During a meeting with the developer, the Review Board asked the developer to elaborate on traffic estimates and patterns (PR#50). The developer provided additional information in the ASR Appendix C. However, there remain outstanding concerns with the traffic estimates. In the PDR and ASR the developer estimated 20-40 vehicles per day, averaged over a 24-hour period. This average traffic scenario was used in the developer's assessment of effects and led to a conclusion of no significant effects to any assessed VC; the residual effects assessment was no effect or negligible. For instance, the developer states,

"Thus, noise, or visual stimulus from traffic will be periodic and unlikely to result in permanent barrier effects that will reduce survival and reproduction." (PR#110 p4-177 and 4-183)... "the likelihood of collision is low given the low speed limit and low predicted traffic volume of the road." (PR#110 p4-18)

However, the developer's averaged traffic scenario of 1.7 vehicles per hour will not actually occur in any given hour. Rather, traffic is likely to fluctuate on a daily and seasonal basis. How vehicles are likely to actually use the road is important in understanding potential effects and should form the basis of the effects assessment. A more detailed estimation of traffic should include a consideration of activities that may cause pulses in usage, such as: Thcho Government assemblies, bingos, hand games, weekends, or moose hunting season. The estimates should also consider daily traffic patterns including maximums, and seasonal patterns including maximums. A further consideration of how many vehicles may use the road is required. The developer and Tłıcho Government have stated many positive benefits of the road that can only be realized if people drive on the road. This includes access to other communities, shopping, health care, education, increases in tourism, hunting and fishing. Also, community members from Whatì who currently own cars but leave them Yellowknife may have not been accounted for in the developer's estimates. It is not clear if these potential inputs to the daily and yearly traffic estimates were considered.

#### Recommendation

1. Please provide an updated quantitative estimate of traffic that considers a realistic scenario of use including daily and seasonal variations and maximums.

2. Please apply these updated traffic estimates, including maximums, in the effects assessment including, but not limited to, the effects on: wildlife VCs, traditional use of the land, perception of the land, and public safety/emergency response.

## **GNWT Response**

The positive benefits of the Tłıcho All-Season Road (TASR) do require that people use it, and this was acknowledged in Appendix C of the Adequacy Statement Response (ASR). The estimate of up to 40 vehicles per day on the TASR represents an average number of vehicles per day over the course of a year; it does not represent a prediction of traffic volume on a daily basis. Daily and seasonal variation in number of vehicles using the road is expected.

Although specific details about when people would drive to and from Whatì on the TASR are not available to predict exact daily and seasonal variation in traffic volume, some generalizations are possible based on data from other roads and anticipated broad patterns of expected use for of the TASR. For example, seasonal traffic patterns for Highway 3 indicate peak traffic volume occurs during June, July and August (DOT, 2016). Hourly traffic patterns on Highway 3 indicate that 79% of daily volume occurs between 8:00 am to 8:00 pm (DOT 2016). Similar patterns may occur for the TASR for those travelling between Whatì and Yellowknife. However, unlike Highway 3, peak traffic volumes on the TASR are predicted to occur during winter when winter roads north of Whatì are open (ASR, Appendix C).

Traffic volume estimates for the Project were predicted to be up to 40 vehicles per day on average during operation if the Fortune Mineral's NICO project was developed. There will be periods when greater than 40 vehicles travel the road in single day. However, there will also be corresponding periods where there is little to no traffic. Although pulses of higher traffic are likely to occur and may result in a higher effect magnitude (e.g., greater risk of wildlife-vehicle collision), the higher effect magnitude will be offset over a given year by a reduced magnitude during periods of little to no traffic. Over the course of the year the effect will average to typical daily traffic volume.

The ASR (PR#110) wildlife assessment assumed traffic volume of up to 40 vehicles daily (i.e., a daily average) would occur continuously in the Application Case to maximize the predicted effect of the Project, and account for uncertainty in daily and seasonal variation. This value represents a traffic volume greater than expected under many circumstances (i.e., traffic volumes are not expected to reach 40 vehicles per day unless the NICO project is developed), resulting in a precautionary assessment.

The GNWT acknowledges that road volumes may change over time (ASR, Appendix C) and will use adaptive management when managing and monitoring wildlife in the vicinity of the proposed TASR alignment. Additionally, the GNWT is considering locations to where traffic counters could be installed along the TASR alignment.

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. Additionally, the Tłįchǫ Government (PR# 97) references no innate perception of contamination of animals harvested near existing roads, nor stigma against harvest along or in proximity to existing roads for Tłįchǫ citizens.

#### References

DOT (Department of Transportation, Government of the Northwest Territories). 2016. 2015 Highway Traffic Report. Prepared by the Department of Transportation, Government of the Northwest Territories, Yellowknife, NWT, Canada.

## GNWT Response to: MVEIRB IR#21

### **Topic**

**Updated Commitments List** 

#### Comment

The developer's Adequacy Statement Response provides several lists of commitments. However there are concerns with the information submitted to date including:

- the concordance table references some but not all developer commitments found in the ASR and PDR
- the Review Board is aware of additional developer commitments that have occurred since the submission of the ASR including a "habitat suitability model", "wildlife effects monitoring program for boreal caribou", and "GNWT commits to consider opportunities to restore other linear disturbances to offset the TASR" (PR#99)
- GNWT is undertaking a collaring program for boreal caribou (PR#107)

On May 8, 2017 the developer submitted an updated concordance table which stated that an updated list of commitments would be provided prior to the hearing. The Review Board considers commitments as a vital part of the EA process. Commitments are often mitigations for adverse effects that allow parties and the Review Board to focus attention on remaining issues. This helps to focus the process and allows for a timely and efficient EA. The Review Board agrees with the developer that an updated list of commitment should be provided before the hearing. However, an updated list provided prior to the technical session is also required.

### Recommendation

Can the developer please provide two separate lists of consolidated and updated commitments for both the construction phase and the operational phase?

## **GNWT Response**

Two tables of commitments made in relation to the TASR to date are provided below: Table MVEIRB-IR21-1 for construction and Table MVEIRB-IR21-2 for operation. A final list of corporate commitments will be submitted prior to the closure of the Public Registry. All the commitments described here will be implemented by the GNWT or Project Co., unless otherwise indicated. The general subject area, discipline, and source of the commitment (for context) are indicated for each commitment.

Commitments listed below include actions, practices, procedures or undertakings that will be completed specifically to mitigate or address an issue. Typically, actions that are legally required (for example under the *Fisheries Act, Navigable Waters Act,* the *Wildlife Act* or the *Migratory Birds Convention Act*) are not included as commitments.

	Subject	Discipline	uction Commitments Source	Commitment Description
	Subject	Discipline	Source	•
1	Avian Species at	Terrestrial	PR#132. Meeting between	<ul> <li>GNWT/Golder will assess ECCC's avian monitoring data from Highway 3 when it is received and update their effects assessment with the data incorporated, or provide an explanation as to why the data will not be included.</li> </ul>
1	Risk	Environment	GNWT and ECCC. 9 June 2017	<ul> <li>GNWT will post the decision to use additional data or not to the public registry once available.</li> </ul>
			ACD Costion 2 Assessment of	
2	Blasting	Aquatic	ASR Section 3 Assessment of Effects to Fish and Fish	• Blasting is not likely to be needed to clear the route. Should explosives be required for blasting within borrow sources or along the proposed corridor in close proximity to fish-bearing waters, blasting plans designed to avoid or minimize blasting impacts to fish and fish habitat will be provided to the
2	Diasting	Environment	Habitat	appropriate authorities.
			Traditae	
		Aquatic	ASR Section 3 Assessment of	<ul> <li>Blasting operations will avoid or minimize impacts to fish by following DFO Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk and DFO Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters, including setback distances from</li> </ul>
3	Blasting	Environment	Effects to Fish and Fish	fish-bearing water bodies and avoiding use of explosives in or near water. No explosive will be detonated in or near fish habitat that produces, or is
			Habitat	likely to produce, an instantaneous pressure change greater than 50 kPa in fish-bearing water in efforts to avoid direct impacts to fish.
		Aquatia	ASR Section 3 Assessment of	
4	Blasting	Aquatic Environment	Effects to Fish and Fish	To reduce the potential for introducing nutrients into water bodies or watercourses, ammonia management best practices will be implemented during storage and transport of ammonia explosives, should ammoniam nitrate explosives be used.
		Environment	Habitat	during storage and transport of ammonia explosives, should ammonium nitrate explosives be used.
		Aquatic	ASR Section 3 Assessment of	To reduce the potential for introducing blasting residue into fish habitat, only the required amount of explosive will be used as necessary for the
5	Blasting	Environment	Effects to Fish and Fish	amount of rock or borrow material to be blasted. The use of ammonium nitrate-fuel oil mixtures will not occur in or within 30 m of fish bearing water
		211711 0 11111 0 111	Habitat	(FFHPP 2016 [ <u>PR#7, Appendix X</u> ]).
		Aquatic	ASR Section 3 Assessment of	• For large camps, erosion and sediment control structures will be installed where needed to avoid impacts to fish habitat (FFHPP 2016 [PR#7].
6	Camps	Environment	Effects to Fish and Fish Habitat	Appendix X]).
			ASR Section 3 Assessment of	
7	Camps	Aquatic	Effects to Fish and Fish	• Sewage waste generated from large camp construction/use will be stored in a leak-free container before being transported to an approved disposal
,	Camps	Environment	Habitat	facility to avoid impacting fish and fish habitat (FFHPP 2016 [ $PR\#7$ , Appendix X]).
			ASR Section 3 Assessment of	
8	Camps	Aquatic	Effects to Fish and Fish	• All materials brought to camp sites will be removed at camp closure to avoid impacts to fish and fish habitat. Some materials may be incinerated
	_	Environment	Habitat	(FFHPP 2016 [PR#7, Appendix X]).
9	Culture	Socio-Economics	Section 5 Assessment of	<ul> <li>Implement the Archaeological Site Find Protocol to provide guidance to employees and contractors conducting ground disturbing operations</li> </ul>
,	Guitare	and Land Use	Socio-Economic effects	
10	Disturbance to	ance to Socio-Economics	Section 5 Assessment of	• The Tłįcho Government will investigate the need for regulations and policies to manage the construction of cabins and design of hunting, trapping,
10	Wildlife	and Land Use	Socio-Economic effects	and fishing in the area, in order to minimize impacts on local animal populations. The Tłįchǫ Government will work to provide clear guidance on this
	District the second	m	G II A FIG. II ANN NG	topic. (Mitigation 10 of PR#96, Appendix D Motion 2015-018).
11	Disturbance to	Terrestrial	Section 4 Effects to Wildlife and Wildlife Habitat	Disturbance of significant wildlife features, such as nests and dens will be avoided using pre-construction monitoring and set-back distances    Application of the Mildlife Management and Manifesting Plan
	Wildlife	Environment		described in the Wildlife Management and Monitoring Plan.
12	Disturbance to Wildlife	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	The mitigation strategies recommended by the Northern Land Use Guidelines will be considered, which includes best practices for avoiding,      The mitigation strategies recommended by the Northern Land Use Guidelines will be considered, which includes best practices for avoiding,      The mitigation strategies recommended by the Northern Land Use Guidelines will be considered, which includes best practices for avoiding,      The mitigation strategies recommended by the Northern Land Use Guidelines will be considered, which includes best practices for avoiding,      The mitigation strategies recommended by the Northern Land Use Guidelines will be considered, which includes best practices for avoiding,      The mitigation strategies recommended by the Northern Land Use Guidelines will be considered, which includes best practices for avoiding,      The mitigation strategies recommended by the Northern Land Use Guidelines will be considered, which includes best practices for avoiding,      The mitigation strategies recommended by the Northern Land Use Guidelines will be considered, which includes best practices for avoiding the Northern Land Use Guidelines will be considered, which includes best practices for avoiding the Northern Land Use Guidelines will be considered, which includes best practices for avoiding the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered, which includes the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will be considered to the Northern Land Use Guidelines will
	wiidille	Environment	and whome nabitat	minimizing and rehabilitation of impacts to vegetation and topography.
13	Disturbance to	Terrestrial	Section 4 Effects to Wildlife	• Destruction of bat roosts will be avoided by managing, to the extent possible, the incremental removal of vegetation so that it occurs outside of spring
13	Wildlife	Environment	and Wildlife Habitat	through fall. If vegetation clearing is required within this time, pre-clearing surveys and no-work zones for identified active maternity roost sites will be conducted to avoid disturbance.
	Disturbance to	Terrestrial	Section 4 Effects to Wildlife	<ul> <li>Avoid disturbance of hibernating bats by surveying for sites of hibernacula potential (i.e., abandoned buildings and mines and caves) within 200 m of</li> </ul>
14	Wildlife	Environment	and Wildlife Habitat	• Avoid disturbance of fibernating bats by surveying for sites of fibernacula potential (i.e., abandoned buildings and mines and caves) within 200 m of ROW for bat use prior to construction.
				<ul> <li>Avoid disturbance to migratory birds by clearing land outside of the bird nesting and fledging season (May to mid-August); however, if vegetation</li> </ul>
15	Disturbance to	Terrestrial	Section 4 Effects to Wildlife	• Avoid disturbance to migratory birds by clearing land outside of the bird nesting and fledging season (May to mid-August); nowever, if vegetation clearing is required within this time, pre-clearing nest surveys will be completed and no-work zones for identified active nesting sites will be used to
_	Wildlife	Environment	and Wildlife Habitat	minimize disturbance.
		Terrestrial	Section 4 Effects to Wildlife	Dust suppression techniques (as per the GNWT Guideline for Dust Suppression and GNWT-DOT's Erosion and Sediment Control Manual) will be
16	Dust	Environment	and Wildlife Habitat	utilized to reduce dust emissions onto vegetation outside of the ROW.
	п		ASR Section 3 Assessment of	
17	Erosion and	Aquatic	Effects to Fish and Fish	• The effects of erosion will be minimized by implementing best management practices for erosion and sedimentation control (described in the
	Sediment Release	Environment	Habitat	GNWT-DOT Erosion and Sediment Control Manual, e.g., silt curtains, runoff management), where necessary.

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	Subject	Discipline	Source	Commitment Description
18	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	<ul> <li>Sediment releases into watercourses will be mitigated by using isolation methods when completing in-stream construction. Isolation methods will be used for work below the high water mark for streams with flowing water at the time of construction (DFO Measures to Avoid Causing Harm to Fish and Fish Habitat).</li> </ul>
19	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Where isolations are required for construction in flowing watercourses, bypass pumps will pump water through or onto a diffuser to disperse the force of the pumped water and avoid scour of the watercourse bed and banks. Any grey water removed from the isolation will be pumped away from the watercourse and onto a vegetated area to prevent sediment from reaching the watercourse (DFO Measures to Avoid Causing Harm to Fish and Fish Habitat). Where an adequate vegetated area is not available, grey water will be filtered before returning to the watercourse or pumped into a container and removed from site.
20	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Additional erosion mitigation (i.e., rock reinforcement or armouring) will be applied at watercourse crossings where needed to minimize future erosion, as per the GNWT-DOT Erosion and Sediment Control Manual (PR#7, Appendix W).
21	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Materials installed below the high water mark (i.e., riprap) will be clean to avoid adding deleterious substances to watercourses (DFO Measures to Avoid Causing Harm to Fish and Fish Habitat).
22	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Disturbed areas along the streambanks will be stabilized and allowed to re-vegetate upon completion of work to minimize future erosion (FFHPP 2016 [PR#7, Appendix X]).
23	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Environmental Monitors will be onsite during construction to monitor the installation of crossing structures. Turbidity will be conducted at crossings with flowing water at the time of construction as per the In-Field Water Analysis Plan to meet regulatory requirements (PR#7, Appendix AA).
24	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Removed vegetation/debris will be removed from site to prevent them entering the watercourse, and grading of the stream banks at approaches will not occur (FFHPP 2016 [PR#7, Appendix X]).
25	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Disturbed areas along the streambanks will be stabilized upon completion of work to minimize erosion (GNWT-DOT Erosion and Sediment Control Manual, DFO Measures to Avoid Causing Harm to Fish and Fish Habitat).
26	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Debris and excess materials resulting from construction will be removed from the work site to prevent them reaching water bodies, as per the GNWT-DOT Erosion and Sediment Control Manual (PR#7, Appendix W).
27	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• To reduce potential for sediment release, areas for cleaning equipment will be a minimum of 30 m away from watercourses and will not drain into or toward watercourses.
28	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	<ul> <li>Excess soils resulting from construction will be removed from the work site to prevent them reaching water bodies and impacting fish and fish habitat.</li> </ul>
29	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Turbidity monitoring will be conducted at crossings with flowing water at the time of construction as per the In-Field Water Analysis Plan to meet regulatory requirements (PR#7, Appendix AA).
30	Erosion and Sediment Release	Aquatic Environment	WLWB Preliminary Screening	• The In-Field Analysis Plan can be updated to indicate the management actions that would be implemented depending on the difference between the upstream and downstream turbidity levels (including immediate response triggers such as more frequent monitoring and assessment of mitigation measure). The In-Field Water Analysis Plan will be updated to include an appendix with the locations of the watercourse crossings and associated station numbers to be set up at the commencement of construction. The In-Field Water Analysis Plan will be updated to include one set of confirmatory TSS (during construction around immediate water crossing) to identify the ballpark relationship of TSS and turbidity at each site.
31	Erosion and Sediment Release	Aquatic Environment	WLWB Preliminary Screening	<ul> <li>Water quality grab samples upstream and downstream of the four major water crossings can be added to the In-Field Water Analysis Plan to demonstrate best water quality management practices. The plan will be updated to include grab samples of TSS at select sites/time periods over the course of construction to ensure turbidity testing remains comparable. Baseline data will be collected upstream of the construction activity at the same time as the downstream samples to provide surety of any difference in turbidity levels.</li> </ul>
32	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• In-stream works where water is present will be conducted to avoid critical periods for spring-spawning fish, such as Arctic Grayling. In-stream work completed during the open water season will only take place between July 16 and September 14 as identified in the DFO Fish Timing Windows for the NWT to avoid impacting fish during critical life stages. In-stream works will be conducted when watercourses are dry or frozen to bed where possible.

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	Subject	Discipline	Source	Commitment Description
33	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	<ul> <li>Disturbance of fish and fish habitat below the high water mark will be minimized by using snow bridges/ice fills or temporary bridges (with no fill below the high water mark) as construction access and work platforms instead of fording (DFO Measures to Avoid Causing Harm to Fish and Fish Habitat).</li> </ul>
34	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	<ul> <li>Pumping rates will be matched to watercourse flow rates in order to maintain fish habitat upstream and downstream of isolations (DFO Measures to Avoid Causing Harm to Fish and Fish Habitat). Backup pumps will be kept available to ensure flows and fish habitat are maintained in the event of a malfunction of the primary pump(s).</li> </ul>
35	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	<ul> <li>To avoid fish entrainment/impingement, fish screens on pumps will be designed according to DFO guidelines, kept clean and free of ice and debris, and inspected for damage prior to each withdrawal. A backup fish screen will be kept available to be used if the primary screen is frozen or damaged (DFO Measures to Avoid Causing Harm to Fish and Fish Habitat).</li> </ul>
36	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Culverts will be designed and installed to avoid creating fish movement barriers and to meet normal flow velocities for all seasons; culvert slopes will be optimized during construction to reduce velocities at the outlet (FFHPP 2016 [PR#7, Appendix X]).
37	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Temporary snowfill/ice bridge crossings will be constructed to not restrict or block flow at any time to maintain fish habitat and ensure fish passage. Prior to spring break-up, ice bridges will be physically v-notched in the middle to allow it to melt from the centre (FFHPP 2016 [PR#7, Appendix X]).
38	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	<ul> <li>Project staff will not be allowed to hunt or fish during construction or operations while on their work rotation to minimize overexploitation of fish populations.</li> </ul>
39	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	Only water sources identified using DFO Protocol for Winter Water Withdrawal in the Northwest Territories will be used for winter withdrawal to avoid impacts to fish and fish habitat. Withdrawal volumes and rates will not exceed guidelines in order to maintain fish habitat.
40	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• All water use will be monitored and tracked and, if required, regulated through a water license to avoid impacts to fish habitat (FFHPP 2016 [PR#7. Appendix X]).
41	Health and Well- Being	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The TCSA commits to providing more information for local health nurses on a range of health issues, such as sexually transmitted infections, among other issues (Mitigation 12 of PR#96, Appendix D Motion 2015-018).
42	Health and Well- Being	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The TCSA will be participating in the Healthy Living Fairs in each community in order to provide community specific information and education to all community members. These fairs increase awareness of common infections, diseases and illnesses, and promote a healthy lifestyle.
43	Invasive Plants	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Cleaning and inspection of Project vehicles and equipment prior to entering the NWT to avoid introducing noxious and invasive plants.
44	Invasive Plants	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	<ul> <li>Re-cleaning Project vehicles and equipment if an area of weed infestation is encountered, prior to advancing to a weed-free area to minimize the spread of noxious and invasive plants.</li> </ul>
45	Invasive Plants	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Locating and managing cleaning locations on the Project site to avoid the spread of noxious and invasive plants.
46	Invasive Plants	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Any required reseeding will be done so with an approved native, non-invasive, seed to avoid the introduction of noxious and invasive plants.
47	Labour	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	<ul> <li>Project construction and operations will be funded through the P3 procurement process, and so will be exempt from the GNWT Business Incentive Policy requirements. However, the GNWT will include conditions in bid contracts that include a requirement for Tłįchǫ and Northern hires. Contractors should demonstrate how local labour and businesses will be sourced, plans to provide and maximize on-the-job training for local residents, and an approach to communicating and collaborating with local governments and Aboriginal organizations regarding local involvement in construction and operations.</li> </ul>
48	Labour	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• In the event that incidental Project activities are funded extra to the P3 process, the GNWT Business Incentive Policy will be applied, as appropriate.
49	Land Use	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The GNWT, in collaboration with the Tłącho Government and other planning partners, is in the process of working towards the development of a land use plan for public lands in the Wek'èezhìı Management Area.
50	Land Use	Socio-Economics and Land Use	PDR, Section 5.1.2	During final design phase, consideration will be taken to ensure a safe snowmobile crossing is established near bridge near km 45.2.

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	Subject	Discipline	Source	Commitment Description
51	Land Use	Socio-Economics and Land Use	PDR, Section 7.1.2	<ul> <li>Verify that the cabin sites near the Project footprint are at least 50 m away. May need to double check coordinate locations with TG prior to construction and ensure that the two cabins that will be rebuilt (burnt as a result of 2014 fire) are far enough away.</li> </ul>
52	Land Use	Socio-Economics and Land Use	PDR, Section 5.1.2	• Maintain safe access to T'oohdeèhoteè, an important portage site at the La Martre River.
53	Land Use	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	<ul> <li>Annual coordination between the Councils of Whatì and Behchokò to ensure that any changes and impacts are being collectively considered, addressed and managed (Mitigation 13 of PR#96, Appendix D Motion 2015-018).</li> </ul>
54	Management and Enforcement	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• Continuation of the Whatì Inter-Agency Committee. The Whatì Inter-Agency Committee responds to issues related to community preparedness. Issues such as emergency response, social programs, and the community & lands concerns are all brought to this forum. Reasonable discussions about costs, liabilities and insurance will need to be addressed at this forum (Mitigation 6 of PR#96, Appendix D Motion 2015-018).
55	Seepage	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Runoff from quarry areas will be directed away from fish habitat and sediment control measures will be installed. Where natural topography is modified for quarry areas, natural contours will be reconstructed and the area will be revegetated upon closure.
56	Seepage	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Only non-acid generating material will be used for construction of the road and watercourse crossings to avoid impacting fish habitat with deleterious substances; testing will verify lack of acid rock drainage and metal leaching potential.
57	Seepage	Aquatic Environment	WLWB Preliminary Screening	Should concrete be required (and cannot be precast), un-cured/partly cured concrete will be isolated from watercourses.
58	Seepage	Aquatic Environment	WLWB Preliminary Screening	• The Quarry Operations Plan will follow Lands' Guidelines. Should pit drainage be planned, appropriate management techniques will be utilized. This includes designing and constructing the quarry to drain naturally without ponding or the requirement for pumping, ensuring water exists naturally through diffuse flow back into the natural environment with the avoidance of distinct run-off channels and ensuring buffer zones of undisturbed land and vegetation for water to flow exists.
59	Seepage	Aquatic Environment	WLWB Preliminary Screening	• A consultant will be hired to analyze laboratory results and will indicate what parameters should be analyzed prior to sending samples to the laboratory during in-field geotechnical investigations.
60	Spills	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Emergency Response Plan and Spill Contingency Plan (PR#7) will be developed and implemented, including ready access to an emergency spill clean-up kit for cleaning up any spills during construction or maintenance of the TASR. Drivers and construction crews on site will be familiar with the spill contingency plan and appropriately qualified to minimize impacts resulting from spills and leaks.
61	Spills	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Fuels, lubricants and hydraulic fluids for equipment used will be carefully handled to prevent spillage, properly secured against unauthorized access or vandalism, provided with spill containment and disposed of in accordance with the Waste Management Plan to avoid spillage impacts on fish and fish habitat. Fuel caches will be located on flat stable terrain or in natural depressions away from slopes to water bodies, and caches will be clearly marked and drums will be placed on their sides and spaced to facilitate inspections (FFHPP 2016 [PR#7, Appendix X]).
62	Spills	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Construction equipment will be regularly maintained and inspected to ensure it is free of leaks (FFHPP 2016 [PR#7, Appendix X]).
63	Spills	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Machinery used for work below the high water mark will use only biodegradable hydraulic fluid, and drip pans/trays will be placed under all equipment while not in use (FFHPP 2016 [PR#7, Appendix X]).
64	Spills	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• All stationary fuel storage containers will have integrated 110% secondary containment, and refueling and servicing of machinery and storage of fuel and other materials for the machinery will occur a minimum of 30 m away from any water body, where possible, to avoid impacts to fish and fish habitat (FFHPP 2016 [PR#7, Appendix X]).
65	Spills	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Equipment used in or near water will be clean and free of oil, grease or other deleterious substances. Vehicles travelling on the road will be properly loaded and loads appropriately covered where necessary (FFHPP 2016 [PR#7, Appendix X]).
66	Spills	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	Accidental spill impacts will be minimized by posting and enforcing speed limits on the road.
67	Spills	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Any spills will be reported immediately to the NWT Spill Line to minimize spillage impacts, as per the Spill Contingency Plan (FFHPP 2016 [PR#7, Appendix X]).

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	Subject	Discipline	Source	Commitment Description
68	Spills	Aquatic Environment	WLWB Preliminary Screening	• In instances where fuel storage does not already incorporate 110% containment (such as drums and jerry cans vs. the larger double-walled storage tanks), containment pads will be provided for all fuel storage, dispensing and transfer sites
69	Spills	Aquatic Environment	WLWB Preliminary Screening	• DOT will be using the DOT ESC Manual as guidance in the development of an ESC plan, including monitoring, reporting and adaptive management. These plans will be finalized by the contractor ensuring the contractor is fully aware and capable of the requirements in that plan, while DOT provides oversight while remaining accountable
70	Spills	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	<ul> <li>Hazardous materials and fuel will be stored according to regulatory requirements to avoid contamination to the environment and workers (i.e., Hazardous Substances Management Plan).</li> </ul>
71	Spills	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• An approved Spill Contingency Plan will be followed by Project staff to prevent spills and if they were to occur as a result of an accident, that they will be controlled to minimize the area impacted.
72	Spills	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	<ul> <li>Emergency spill kits will be available wherever toxic materials or fuel are stored and transferred during construction to minimize effects to vegetation and wildlife habitat.</li> </ul>
73	Spills	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Spill response and containment will be completed expeditiously in accordance with the approved site-specific Spill Contingency Plan to reduce the area impacted.
74	Spills	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Construction equipment, machinery, and vehicles will be regularly maintained to avoid accidental spills.
75	Spills	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• GNWT-DOT's Erosion and Sediment Control Manual, in conjunction with a suitable road design, will be utilized for erosion and sediment control and slope stabilization, which should minimize damage to riparian, stream, wetland and lake habitat from altered hydrology.
76	Spills	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Domestic and recyclable waste and dangerous goods will be stored on-site in appropriate containers to avoid exposure until they are shipped off-site to an approved facility.
77	Spills	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Fuel storage areas will be equipped with spill kits, will be located at least 30 m away from water bodies and large fuel storage tanks (2,000 to 50,000 L) will be double walled.
78	Water crossings	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Culverts will be embedded as appropriate to maintain species and habitat present, and will be installed parallel to the existing channel to minimize changes to channel morphology.
79	Water crossings	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	<ul> <li>Water crossing structures (e.g., culverts, bridges, ice bridges/snow fills) will be installed and maintained using best management practices (DFO Measures to Avoid Causing Harm to Fish and Fish Habitat) and following environmental approval conditions to minimize impacts to fish and fish habitat.</li> </ul>
80	Water crossings	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Disturbed areas along the streambanks will be stabilized and allowed to re-vegetate upon completion of work to rehabilitate damage caused to fish habitat (DFO Measures to Avoid Causing Harm to Fish and Fish Habitat).
81	Water crossings	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Permanent bridges will not contact water bodies to minimize impacts below the ordinary high water mark, bridge abutment installation will span the active channel. Pier installation will be outside the active channel and within the floodplain (1 in 5 year flood).
82	Water crossings	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Impacts to riparian vegetation at temporary crossings will be minimized by using structures such as snow fills and single-span bridges instead of fording, especially where banks are susceptible to erosion. Trees/shrubs removed at these crossings will be cut >10 cm above the ground level to maintain root structure and stability (FFHPP 2016 [PR#7, Appendix X]).
83	Wildlife Habitat	Terrestrial Environment	WLWB Preliminary Screening	The Wildlife Management and Monitoring Plan will be updated to be consistent with the proposed Wood Bison recovery strategy to the extent feasible.
84	Wildlife Habitat	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• The current layout of the Project footprint will minimize the amount of new disturbance by primarily following the existing Old Airport Road route to Whatì and intersecting areas previously burned.
85	Wildlife Habitat	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Lights will be positioned to shine downwards and/or will be fixed with shielding to minimize the distribution of peripheral light and shut off when not in use.
86	Wildlife Habitat	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Construction will be temporarily suspended when species at risk, moose and barren-ground caribou are known to be within construction activities to minimize sensory disturbance. Environmental Monitors will be used to help identify the presence of wildlife.
87	Wildlife Habitat	Terrestrial Environment	WLWB Preliminary Screening	• The GNWT (via ENR) will approach the Barren-Ground Caribou Technical Working Group, regarding possible approaches for monitoring wildlife harvest in relation to TASR.

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	Subject	Discipline	Source	Commitment Description
88	Wildlife Safety	Terrestrial Environment	WLWB Preliminary Screening	• Gentle moving of caribou during construction activities will be considered when deemed safe and effective by ENR and will involve the slow approach of environmental monitors to the caribou encourage them to move. If caribou are unwilling to leave the area, operations should be suspended and people should leave the area. This may only be done when the safety of the caribou, workers or equipment are at imminent risk, otherwise operations should be suspended to allow caribou to move away on their own accord.
89	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Construction activities will be limited during sensitive periods to minimize effects on wildlife. For example, surface blasting will be suspended when caribou are identified within a 'danger zone' and the period for no harm or disturbance to migratory birds and their nesting habitat will be observed.
90	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Wildlife will have the right-of-way on all roads during construction.
91	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• In the event that an active den or nest is identified during construction, GNWT-ENR will be consulted to determine an appropriate strategy to avoid or minimize disturbance.
92	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Observations of caribou and species at risk will be reported to Environmental Monitors. Any next steps will be actioned as per the directions outlined in the WMMP.
93	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Harassment and feeding of wildlife by Project staff will be prohibited.
94	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Project staff will be provided with environmental awareness training.
95	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Environmental Monitors will be on site to document wildlife and manage and minimize risks to wildlife and workers.
96	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Exposure of wildlife to contaminants will be avoided by use of appropriate deterrents (e.g., temporary fencing, noise makers) to discourage wildlife from entering an affected area.
97	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	No hunting or fishing by Project staff will be permitted to avoid wildlife harvest.
98	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Development and implementation of a Waste Management Plan to avoid access to food waste by wildlife
99	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Food wastes will be collected in suitable receptacles that minimize attraction or impact to wildlife.
100	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Waste products will be stored in secured containers and transported to appropriate facilities to avoid access by wildlife.
101	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	Littering and feeding of wildlife will be prohibited to avoid wildlife attraction to the site.
102	Wildlife Safety	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	<ul> <li>All workers and visitors will be educated on waste management practices for the Project site to avoid wildlife attraction. Waste management practices will be enforced.</li> </ul>
103	Caribou	Terrestrial Environment	GNWT Response to MVEIRB IR #3 – Boreal Woodland Caribou	• A draft Wildlife Effects Monitoring Program (WEMP) will be provided prior to the technical sessions and a revised draft Wildlife and Wildlife Habitat Protection Plan (WWHPP) will be provided to reviewers prior to the public hearing. Together, the WEMP and WWHPP constitute a Wildlife Management and Monitoring Plan (WMMP), which will outline caribou management specifics.
104	WMMP	Terrestrial Environment	GNWT Response to ECCC IR#10 – WMMP	• 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. Together, the WEMP and WWHPP constitute a WMMP.

 Table MVEIRB-IR21-2:
 Thicho All Season Road Operation Commitments

	Subject	Discipline	Source	Commitment Description
1	Avian Species at Risk	Terrestrial Environment	PR#132. Meeting between GNWT and ECCC. 9 June 2017	<ul> <li>GNWT/Golder will assess ECCC's avian monitoring data from Highway 3 when it is received and update their effects assessment with the data incorporated, or provide an explanation as to why the data will not be included.</li> <li>GNWT will post the decision to use additional data or not to the public registry once available</li> </ul>
2	Culture	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	The Tłıcho Government and/or the CGW will erect signage to prevent damage to culturally significant areas (such as the La Martre Falls)

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	Subject	Discipline	Source	Commitment Description
3	Disturbance to Wildlife	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The TłıchQ Government 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 TłıchQ Government will work to provide clear guidance on this topic. (Mitigation 10 of PR#96, Appendix D Motion 2015-018).
4	Dust	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Dust entering fish habitat will be minimized by enforcing speed and load limits to preserve the road bed, and regular road maintenance will be conducted to suppress dust production (as per the GNWT Guideline for Dust Suppression).
5	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Riparian areas will be maintained whenever possible to minimize erosion and impacts to fish habitat, with vegetation removal limited to the width of the ROW. At watercourse crossings, a riparian buffer will be maintained along the width of the ROW except at the actual crossing location (FFHPP 2016 [PR#7, Appendix X]).
6	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Watercourses will be inspected upstream and downstream of the crossings for erosion, scour, and flow blockages during the spring freshet and through the open water season, as required. Impacts will be minimized by culvert maintenance, including removal activities of debris (e.g., ice, beaver dams), following DFO guidance (i.e., gradual removal such that flooding downstream, extreme flows downstream, release of suspended sediment, and fish stranding can be avoided).
7	Erosion and Sediment Release	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Snow will be ploughed off of the road in such a manner that it melts into vegetated areas in the spring to filter out sediment, minimizing downstream sedimentation impacts to fish and fish habitat (FFHPP 2016 [PR#7, Appendix X]).
8	Fisheries	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• The Tłıcho Government may control access to Tłıcho lands to conserve and protect areas used for harvesting by Tłıcho citizens to minimize overexploitation impacts (PR#74).
9	Health and Well- Being	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The TCSA commits to providing more information for local health nurses on a range of health issues, such as sexually transmitted infections, among other issues (Mitigation 12 of PR#96, Appendix D Motion 2015-018).
10	Health and Well- Being	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The TCSA will be participating in the Healthy Living Fairs in each community in order to provide community specific information and education to all community members. These fairs increase awareness of common infections, diseases and illnesses, and promote a healthy lifestyle.
11	Health and Well- Being	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	Speed limits aimed at maintaining safe driving speeds for vehicles.
12	Health and Well- Being	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• There are no shelters in the Tłıcho region, however the TCSA and the GNWT are engaging with the communities to create community specific family violence protocols and response teams. This is done via a contribution agreement between the Department of Health and Social Services and the TCSA to cover the costs associated with community engagement and development of the protocols by a consultant.
13	Health and Well- Being	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The CGW will continue public education locally to ensure that travellers of the road report when they depart, and when they arrive to track road users in the event of inclement weather (PR#96 TG IR 2.3).
14	Infrastructure	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	<ul> <li>Investigate, with NorthwesTel, areas of no cellular coverage along the road with an aim to increase cell coverage to the full TASR, allowing for emergency communication in the event of an accident.</li> </ul>
15	Labour	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	<ul> <li>Project construction and operations will be funded through the P3 procurement process, and so will be exempt from the GNWT Business Incentive Policy requirements. However, the GNWT will include conditions in bid contracts that include a requirement for Tłįcho and Northern hires. Contractors should demonstrate how local labour and businesses will be sourced, plans to provide and maximize on-the-job training for local residents, and an approach to communicating and collaborating with local governments and Aboriginal organizations regarding local involvement in construction and operations.</li> </ul>
16	Labour	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• In the event that incidental Project activities are funded extra to the P3 process, the GNWT Business Incentive Policy will be applied, as appropriate.
17	Labour	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	<ul> <li>Mobilization of the Economic Development Officers in communities to prepare the workforce for employment opportunities (Mitigation 4 of PR#96, Appendix D Motion 2015-018).</li> </ul>
18	Labour	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	<ul> <li>Development of a training strategy by the Tłıcho Regional Economic Development Working Group (TREDWG), in conjunction with Aurora College and the Mine Training Society, that identifies available skilled labour for construction employment opportunities in each of the communities (PR#96 TG IR 1).</li> </ul>
19	Labour	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• To avoid inequitable distribution of employment to regional or migrant labour forces, the TREDWG has identified that the local labour force required for construction is available (PR#96 TG IR 1).
20	Labour	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	<ul> <li>Planning for employment and local opportunity catchment is expected to reduce a surge in the required out-of-territory labour force during construction, reducing the potential for in-migration into the region. (PR#96 TG IR 1).</li> </ul>

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	Subject	Discipline	Source	Commitment Description
21	Labour	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• Implementation of the Tłıcho Regional Economic Development and Training Strategy, and community action plans. These identify priorities and actions that target specific training needs and help to fill those gaps.
22	Land Use	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The GNWT, in collaboration with the Tłıcho Government and other planning partners, is in the process of working towards the development of a land use plan for public lands in the Wek'èezhìı Management Area.
23	Land Use	Socio-Economics and Land Use	PDR, Section 5.1.2	Maintain safe access to T'oohdeèhoteè, an important portage site at the La Martre River.
24	Land Use	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	<ul> <li>Annual coordination between the Councils of Whatì and Behchokò to ensure that any changes and impacts are being collectively considered, addressed and managed (Mitigation 13 of PR#96, Appendix D Motion 2015-018).</li> </ul>
25	Land Use	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• GNWT-ENR will enforce the NWT's hunting regulations which are in place to ensure that wildlife is conserved for future generations and that hunting is done safely.
26	Land Use	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• Suitable road crossings, pullouts and signage should be installed at access points of winter snowmobile trails, or summer ATV trails that intersect the TASR, to ensure that travel is not impeded (PR#28).
27	Land Use	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	The Tłįchǫ Government will continue to manage cabin construction on Tłįchǫ lands.
28	Management and Enforcement	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• Continuation of the Whatì Inter-Agency Committee. The Whatì Inter-Agency Committee responds to issues related to community preparedness. Issues such as emergency response, social programs, and the community & lands concerns are all brought to this forum. Reasonable discussions about costs, liabilities and insurance will need to be addressed at this forum (Mitigation 6 of <a href="PR#96">PR#96</a> , Appendix D Motion 2015-018).
29	Management and Enforcement	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The CGW is investigating the establishment of a Community Bylaw Officer to support policing efforts during Project operations to mitigate activities that could result in accidents or emergencies along the road.
30	Management and Enforcement	Socio-Economics and Land Use	Section 5 Assessment of Socio-Economic effects	• The Tłįcho Government has the authority and jurisdiction to write laws, develop its own strategies, and maintain a balance between subsistence harvesting and industrial development on its lands (see the Tłįcho Agreement and Tłįcho Land Use Plan). The Tłįcho Government will work with the GNWT to review the mitigations that are developed and considered for managing harvesting impacts that occur as a result of the new all-season access of the TASR (PR#96 IR 4.3, page 69).
31	Seepage	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Drainage from quarries will not flow directly into any water bodies or watercourses and a minimum of 30 m of undisturbed land will be maintained between a quarry and any fish bearing water body to avoid impacts to fish habitat (FFHPP 2016 [PR#7, Appendix X]).
32	Spills	Aquatic Environment	WLWB Preliminary Screening	• In instances where fuel storage does not already incorporate 110% containment (such as drums and jerry cans vs. the larger double-walled storage tanks), containment pads will be provided for all fuel storage, dispensing and transfer sites.
33	Spills	Aquatic Environment	WLWB Preliminary Screening	• DOT will be using the DOT ESC Manual as guidance in the development of an ESC plan, including monitoring, reporting and adaptive management. These plans will be finalized by the contractor ensuring the contractor is fully aware and capable of the requirements in that plan, while DOT provides oversight while remaining accountable.
34	Spills	Aquatic Environment	ASR Section 3 Assessment of Effects to Fish and Fish Habitat	• Road maintenance equipment will be regularly maintained and inspected to ensure it is free of leaks to avoid impacts to fish and fish habitat (FFHPP 2016 [PR#7, Appendix X]).
35	Wildlife Habitat	Terrestrial Environment	WLWB Preliminary Screening	• The GNWT (via ENR) will approach the Barren-Ground Caribou Technical Working Group, regarding possible approaches for monitoring wildlife harvest in relation to TASR.
36	Wildlife Habitat	Terrestrial Environment	PR#99. Meeting between GNWT, ECCC, WRRB and CANNOR. 10 November 2016	• Establish a wildlife effects monitoring program for boreal caribou to assess their response to construction and operation of the TASR and to assess population trend for boreal caribou in the region.
37	Wildlife Habitat	Terrestrial Environment	Section 4 Effects to Wildlife and Wildlife Habitat	• Signs indicating the daily wildfire risk will be posted at the TASR junctions at Highway 3 and the existing Whati community access road to minimize the risk of accidental fires.
38	Caribou	Terrestrial Environment	GNWT Response to MVEIRB IR #3 – Boreal Woodland Caribou	• A draft Wildlife Effects Monitoring Program (WEMP) will be provided prior to the technical sessions and a revised draft Wildlife and Wildlife Habitat Protection Plan (WWHPP) will be provided to reviewers prior to the public hearing. Together, the WEMP and WWHPP constitute a Wildlife Management and Monitoring Plan (WWMP), which will outline caribou management specifics.
39	WMMP	Terrestrial Environment	GNWT Response to ECCC IR#10 - WMMP	• 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. Together, the WEMP and WWHPP constitute a WMMP.

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