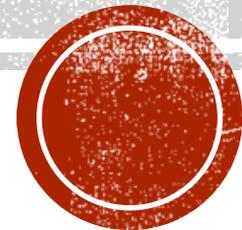


# **ŁÚTSĚL K'É DENE FIRST NATION**

**SUSTAINABLE DEVELOPMENT BASED ON DENESOLINE BELIEFS AND TRADITIONS**

**PUBLIC HEARING PRESENTATION FOR THE POINT LAKE PROJECT – LAND USE PERMITS (W2020L2-0004) AND TYPE A LAND USE PERMITS (W2021X0004 AND W2021D0005)**

**November 23-26, 2021**



# POSITION

- LKDFN has been experiencing significant impacts to our spiritual, cultural, and practical livelihoods for years
- The current status of the barrenground Caribou is dire and permeates all aspects of LKDFN's participation in regulatory processes
- The lack of attention to Caribou in this application signifies a lack of understanding of the Dene culture, and what is important to its sustainability
- This project should not proceed until the until the Bathurst Herd is restored to a sustainable population



# POSITION

- “Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment and is not a cause of public concern.”
- “Mackenzie Valley Environmental Impact Review Board (the Review Board) decided not to exercise its discretion under subsection 126(3) of the Mackenzie Valley Resource Management Act and will not order an environmental assessment”
- LKDFN argues that the mitigations are not adequate, the project is likely to have a significant impact, and is undeniably a cause of public concern.



# “MITIGATIONS”

- Our Elders said in the 90’s that mines would have an impact on Caribou
  - Ekati proponents have always said they could mitigate the impacts
- The current proponent relies heavily on failed mitigations
  - Wildlife Management and Monitoring Program (WWMP),
  - Wildlife Effects Monitoring Program (WEMP),
  - Caribou Compensatory Mitigation Plan (CCMP), and
  - the Caribou Road Mitigation Plan (CRMP)
- Decline of 97% in 25 years (IEMA, mid 90s to late 2010s)
- Many factors impact the decline of caribou, but each cumulative effect at this stage in considerable, and this development in its current form, at a valuable, and strategic caribou crossing cannot be viewed as a minor impact



# PUBLIC CONCERN

- TG, NSMA, FRMG, DKFN, LKDFN, all raised serious concerns about caribou impacts, and suggested mitigation measures for the board to consider
- IEMA identified several important issues for caribou that need to be addressed
- GNWT mentioned caribou once in their intervention, when referencing what other stakeholders raised concerns about
- The proponent is unwilling to accommodate beneficial recommendations, continuously explaining that they can't suffer financial hardships on this project
- Indigenous focus on limiting human impacts to caribou is a constant, but in 2016 and 2018, COSEWIC and the Conference of Management Authorities listed barrenground caribou as threatened, western science has a concern now as well



# LIMITING IMPACTS

- This is a clear opportunity for the Board to limit human impacts on the herd:

## Recommendations:

- Utilize existing WRSA or brownfields for waste rock piles, limiting barriers to caribou movement
- Utilize a team of First Nation Guardians to evaluate mitigation plans, and conduct behavioural monitoring that the proponent is unwilling to conduct
- Require removal of existing barriers, i.e. Jay Road to offset impact



# SECURITY

- The proponent has made it clear that the money they'll profit from this project is barely enough to justify the operation
- A proponent like this will say whatever they have to at this stage to receive approvals, the commitments and promises are hollow, unless the board requires securities for every promise
- LKDFN's faith in the commitments of the proponent is minimal, but the Board can ensure the commitments will be addressed when this company inevitably leaves/sells the mine without addressing the commitments they're currently making



# WATER QUALITY

- High level of concern with other intervenors
- Lack of expertise on LKDFN team
- The lack of LKDFN comment on these issues until now should not be taken as support for the project
- We know what the proponent and the GNWT value
- LKDFN values clean water



# CLOSING

- Accountability
- Experience
- Value
- Future
- Reconciliation

