



## Wildlife, Lands and Environment Department

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Ryan Fequet  
Executive Director, Wek'èezhii Land and Water Board  
1-4905 48th Street Yellowknife, NT  
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### **Re: Closing Comments on the Point Lake Project**

Dear Ryan Fequet,

Łútsël K'é appreciated the opportunity to present a case to the Board. However, we are disappointed that more isn't be considered to minimize the impact associated with this project. When you see all parties agree that this project is located in a very important caribou corridor, and then move on from that knowledge thinking the status quo will be just fine, we're forced to ask – what is it we're doing? We have watched the herds decline and continue to cite industry as a factor, but here we are again, permitting development in *more* critical habitat than previous developments, and somehow expecting different results.

We believe we've made our position clear on the importance of limiting impacts to caribou as the number one priority for all development at this point. With all of the range planning, management planning, and recovery planning, the focus is always on "helping decision-makers" and decision-making processes lean toward to side of recovery of the herd. Our arguments we presented were in the hopes that the Wek'èezhii Land and Water Board, as a decision-maker on permitting activities on the land, would venture beyond the current standard land use permit conditions template, to implore the proponent to take responsibility for the long-term, significant damages that this caribou crossing is about to sustain, and take real steps to mitigate them.

The company's plan to consider minor, ineffective changes to the waste rock pile fails to address the key concerns of our nation and our members. The permanent alteration to the landscape at this location is a lack of stewardship and creativity. We understand the economic constraints of this project, but ultimately it matters little to our nation. We've seen no sign that the company cares about the impacts to our traditional economy. So, we continue to hope that the Board or government will mandate and enforce stronger measures to help the caribou we depend on. After reviewing the company's response to the suggestions and recommendations from other First Nations and Indigenous peoples – more or less a blanket no to anything not academic – its clear that the project isn't interested in addressing the core concerns. Decision-makers must.

The lack of balance between industrial developments and Indigenous interests continues to weigh on us. We're not optimistic that the proponent-led WEMP discussions will result in any

meaningful mitigation effort. We will participate to the best of our capacity, but the parameters have already been set, and this seems like a token exercise for the Indigenous parties, check the consultation box, make no real changes, move forward.

So much positive momentum was built in the past number of years, through collaboration, discussion, and development of plans that on the surface, look to aid the caribou. The situation is dire, with the GNWT releasing a recovery plan to rescue the herd from elimination. One of the goals – *one of the four overall goals of this rescue plan* – is to ensure that caribou are free to move and migrate. And yet we permit a project that creates a large waste rock pile in the middle of a historic route that leads to a water crossing that allows for access to the rest of the range.

We are now approaching the outcome our members have been warning about for decades – our elders warned that the mine would come and the caribou would disappear. Plans to rescue the herd last less than a year before GNWT supports industrial development that runs contrary to the goals. When this project was not referred for an EA, the choice was made. Industry over caribou. Development over people.

LKDFN will continue to participate in these processes with the hopes that at some point, the equation will start to balance. At some point, maybe there will be a board or government that seeks stewardship goals for the generations to come instead of short-term economic gain. Again, we stress that development doesn't have to happen at the cost of wildlife, industry doesn't have to exist at the expense of stewardship, these ideas aren't mutually exclusive, they can co-exist... but they cannot if one side of the argument is that a diamond mining company can't afford to be good stewards, and that's just accepted by decision-makers.

Łútsël K'é wishes to thank the Board, and the Indigenous parties for spending resources on trying to make this project better.

Sincerely,



Laura Jane Michel

A/WLED Manager

Łútsël K'é Dene First Nation