

The Inuvik-Tuktoyaktuk Highway EIS

Technical Submission Summary

by

The Wildlife Management Advisory Council (WMAC)

Key Elements Required by the EIRB Process:

- **Cumulative Effects – Appropriate Spatial and Temporal Boundaries**
- **Cumulative Effects on VECs – e.g. Caribou, Grizzly Bear, Husky Lakes**
- **Worst Case Scenario and Compensation**
- **Mitigation and Remediation**
- **Follow-Up and Monitoring**

Cumulative Effects - Spatial Boundaries

The Developer's EIS	WMAC's Position
<ul style="list-style-type: none">• Boundaries are arbitrarily selected• Considers only the area directly affected by the road surface itself• Does not include the effects of new borrow pits and their roads• Does not include the effects of other past and proposed future developments in the region such as the McKenzie Gas Project	<ul style="list-style-type: none">• Needs to be grounded in a science-based approach• Needs to encompass key life history characteristics of VECs, e.g. home range and/or herd range• Needs to also include the indirect effects of the road such as caribou avoidance, increased wolf predation, and increased human harvest• Needs to also include the effects of new borrow pits and other past and proposed future developments

Cumulative Effects – Temporal Boundaries

The Developer's EIS	WMAC's Position
<ul style="list-style-type: none">• Boundaries are arbitrarily selected• Considers only the effects of the road for 10 years after construction• Does not include the effects of other past and proposed future developments in the region such as the McKenzie Gas Project	<ul style="list-style-type: none">• Needs to be grounded in a science-based approach• Needs to encompass key life history characteristics of VECs, e.g. average life span and/or population turnover• Needs to also include the effects of other past and proposed future developments• Needs to be at least 50 years post-construction as per EIRB's direction for gravel resources

Cumulative Effects – VECs

The Developer's EIS	WMAC's Position
<ul style="list-style-type: none">Based on the inadequate spatial and temporal boundaries, the cumulative effects on caribou, grizzly bear, and the Husky Lakes area are assumed to be non-significant	<ul style="list-style-type: none">Without a science-based, cumulative effects assessment with appropriate spatial and temporal boundaries, it is not possible to predict the effects of the ITH on these important species and areasHowever, the effects are very likely underestimatedAn appropriate science-based cumulative effects assessment needs to be conducted for these species and important areas like the Husky Lakes

Worst Case Scenario (WCS) and Compensation

The Developer's EIS	WMAC's Position
<ul style="list-style-type: none">• Worst case scenario is a diesel truck spilling its load into the Husky Lakes from a bridge crossing• The estimated cost of compensation for lost fishing is \$486,025 for one season only	<ul style="list-style-type: none">• In the absence of an appropriate science-based, cumulative effects assessment for caribou, the WCS could be the severe disruption or loss of caribou harvesting within the region• The estimated cost of compensation for lost caribou, as a food source, is \$0.75 million annually for an unknown period of years• Without an appropriate cumulative effects assessment and a follow up monitoring plan, the identification of factors causing caribou population changes cannot occur; hence, the assigning of responsibility for any level of compensation will be very difficult, if not impossible

Mitigation and Remediation

The Developer's EIS	WMAC's Position
<ul style="list-style-type: none">• As a consequence of the inadequate cumulative effects assessment, both the mitigation and remediation measures presented are only local, short-term, or non-existent	<ul style="list-style-type: none">• Without an appropriate cumulative effects assessment, effective mitigation and remediation measures are impossible to formulate• An appropriate science-based cumulative effects assessment needs to be conducted for the proposed highway

Follow-Up and Monitoring

The Developer's EIS	WMAC's Position
<ul style="list-style-type: none">• No pre- or post-construction regional monitoring plan presented• Assumes that cumulative effects monitoring will be conducted by the NWT CIMP• Does not contain an Environmental Management Plan (which provides the detailed methodology for monitoring) as required by the EIRB	<ul style="list-style-type: none">• NWT CIMP is not due to begin collecting data for several years by which time the project could be complete• A science-based cumulative effects monitoring plan is needed for the project

Conclusions

- **The Developer's EIS is scientifically weak and does not fully address the potential effects of the road on wildlife, especially over the long-term**
- **Of particular concern is the lack of a science-based cumulative effects assessment, including appropriate spatial and temporal boundaries**
- **Also of great concern is the Developer's conclusion that the effects of the road on VECs such as caribou and grizzly bear are not significant**
- **In the absence of a valid cumulative effects assessment, the Developer's Worst Case Scenario is considered to be unrealistic**
- **Given the critical importance of caribou, WMAC believes that a more realistic WCS is the loss of caribou harvesting at an estimated minimum cost of \$0.75 million per year over an unknown number of years**
- **In the absence of a valid cumulative effects assessment, the Developer's mitigation and remediation measures are likely inadequate**
- **The Developer has no long-term monitoring plan, especially for cumulative effects. This is another critical omission**