



Independent Environmental Monitoring Agency

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Nicole McCutchen
Manager, Wildlife Research and Management
Wildlife Division
Environment and Natural Resources
Government of the Northwest Territories
Box 1720
Yellowknife NT X1A 2L9

Dear Ms. McCutcheon

Re: Zone of Influence (ZOI) Requirement for Caribou Monitoring Programs

We are responding to your letter of 2 May 2013 regarding zone of influence (ZOI) requirements for caribou monitoring programs at Ekati and Diavik. It is apparent that there has been an agreement between the mines and ENR to discontinue aerial surveys, with options for related contributions by the mines to monitoring work that ENR is planning, in part to determine the cumulative effect of human activity on barren-ground caribou.

We are quite concerned with this decision. Our first concern is to question the process that lead to this decision. We are of the view that there should have been some effort at consultation with communities and the relevant monitoring agencies. The Agency has found that such collaboration almost always improves monitoring programs. Secondly, we suggest that monitoring and adaptive management need to be applied to evaluate the efficacy of mitigation for wildlife effects, particularly for the Ekati Mine. We provide further rationale below. Finally, although ENR recommend re-visiting the ZOI in the future for such purposes, the conditions under which ZOI assessment should re-commence are not clear.

Progress has been slow in offering alternative programs to mitigate and monitor the influence of mine-related activities on the relative abundance and distribution of caribou. Although the developing remote camera program at Ekati may provide effective monitoring of some aspects of the development, the mines appear to be sliding away from programs designed to lead to improved mitigation measures. For example, a ZOI of approximately 14 km surrounding mine infrastructure within which caribou abundance is lower than expected now appears to be generally accepted by mining companies and governments. This ZOI is a residual effect after mitigation (e.g., noise and dust suppression efforts undertaken to date). However, there seems to be no effort to

determine if mitigation can be improved to reduce the 14 km ZOI. Movement by the mines on studies to identify mechanisms (possibly dust or fine particulate deposition) that may be influencing the distribution of caribou relative to the mine footprint, followed by changes to mitigation measures and further evaluation of the ZOI – in effect adaptive management – is not evident. This is particularly true as the Bathurst caribou herd is in a less resilient state as it just starts to recover.

While we do not advocate continual aerial monitoring without a specific purpose, we do recommend re-evaluating the ZOI when there is a change in mine site activity that may affect the ZOI, or to test a mitigation strategy meant to reduce the ZOI. Traffic along Misery Road is expected to increase substantially starting in 2013 during the operation of Misery Pit as ore will be hauled to Main Camp for processing. Although some use of the Misery Road occurred during the 2003–08 period covering the calculation of the 14 km ZOI, future truck traffic on the road should be substantially higher and more sustained than occurred in the 2000s. Aerial surveys, conducted when caribou are present, have been proven to provide the most robust data to establish a ZOI related to mine activity.

While the list of monitoring work that ENR hopes to receive contributions from the mines is comprehensive, there are few projects that examine potential influences on caribou at the mine scale. Given the changes in Bathurst caribou numbers (low and presumably soon to be increasing) and activity on the Misery Road, we strongly suggest that the mines should either restart the aerial survey flights, or provide an alternative monitoring program design that examines the distribution and abundance of caribou relative to mine infrastructure, which is the agreed upon objective for caribou monitoring.

We strongly recommend that ENR work collaboratively with interested parties to develop clear statements on the conditions under which monitoring and mitigation of the ZOI for caribou will re-commence.

Sincerely,



Bill Ross
Chairperson

cc. Society Members

Claudine Lee, Dominion Diamond Ekati Corporation
Mark Fenwick, Environmental Monitoring Advisory Board
David White, Snap Lake Environmental Monitoring Agency