

NIRB File No.: 12XN020
 NPC File No.: 148746
 Related to NPC File No.: 148232
 INAC File No.: N2017N0017
 NWB File No. 8BC-EUR1621

May 15, 2018

Re: Opportunity to address comments received regarding Environment and Climate Change Canada's "Amended Land Use permit application for Eureka Weather Station" project proposal

Dear Sophia Granchinho,

This letter is in response to;

Project Name: The amended land use permit application for Eureka Weather Station.
NIRB File No.: 12XN020
Application No.: 125295

On May 1, 2018, the NIRB submitted the following comments to ECCC and requested that ECCC provide a written response to these comments before or on May 15, 2018. ECCC has included their response in the table below.

NIRB Comment	ECCC Response
Camp Services	
<p>The 24 person tent camp that is proposed to be established at the site for the project and will house 50 contract workers will require review under the Public Health Act as the camp will be providing food, water and waste systems to service the camp.</p>	<p><i>There has been a change in file number 12XN020 since the first submission. ECCC's current plan is now to operate the hardwall camp at its current location (at Blacktop Creek), utilizing the Station water supply and sewage disposal facilities. ECCC no longer plans to set up a tent camp at Remus Creek.</i></p>
Wildlife Mitigation	
<p>Concerns the project potentially would result in wildlife disturbance.</p>	<p><i>As per email & phone correspondence (May 4th, 7th & 14th, 2018) with Erika Zell, Government of Nunavut, ECCC advised that an environmental impact assessment (EIA) (Arcadis, 2015 & 2018) was completed in respect to the proposed project. The mitigation measures included within this EIA are to be adhered to by the site contractor. The provided mitigation measures for wildlife in general, caribou and raptors will also be adhered to, with the exception of the GN's recommendation for "...the Proponent to undertake localized surveying to determine the composition of local plant and animal species..." As discussed with Erika Zell, it was determined that a WMP and staff conducting onsite reconnaissance surveys would fulfill this recommendation.</i></p>
<p>Minimal information on the area with respect to the composition of plant and animal communities and population abundances, and</p>	<p><i>As per email & phone correspondence (May 4th, 7th & 14th, 2018) with Erika Zell, Government of Nunavut, ECCC will agree to develop a Wildlife</i></p>

<p>recommended the Proponent undertake localized surveying to determine the composition of local plant and animal species and their habitats that may be affected by project construction and operations.</p>	<p><i>Management Plan (WMP), which will be developed by a professional biologist. The WMP will specify that onsite staff will be educated on specific wildlife and vegetation (including caribou, polar bears and migratory birds). Staff will be instructed to complete a reconnaissance survey of these specific species (as well as the SARA Listed Porsild's Bryum moss) prior to commencing the construction work. If any species or habitat are identified, ECCC will report to the GN immediately.</i></p>
<p>Recommended the Proponent take precautions to ensure no undue stress to wildlife is caused from the project activities by providing suggested mitigation measures for wildlife in general, caribou and raptors.</p>	<p><i>As per email & phone correspondence (May 4th, 7th & 14th, 2018) with Erika Zell, Government of Nunavut, ECCC advised that an environmental impact assessment (EIA) (Arcadis, 2015 & 2018) was completed in respect to the proposed project. The mitigation measures included within this EIA are to be adhered to by the site contractor. The provided mitigation measures for wildlife in general, caribou and raptors will also be adhered to, with the exception of the GN's recommendation for "...the Proponent to undertake localized surveying to determine the composition of local plant and animal species..." As discussed with Erika Zell, it was determined that a WMP and staff conducting onsite reconnaissance surveys would fulfill this recommendation.</i></p>
<p>Concerns noted that the proposed project area may overlap with or affect Polar Bear denning activities or sites. Further, concerns were noted that the project activities could result in Polar Bear encounters and disturbance of denning sites. Recommended mitigation measures in the event Polar Bears and/or dens are encountered during the project activities. Concern that earth moving (e.g. blasting, grading, piling gravel and other debris) activities may influence snow drifting, drift direction, drift thickness, etc. which may affect whether Polar Bears would find suitable denning habitat or not; and recommended that before any activities are conducted, the Government of Nunavut, Department of Environment (GN-DoE) be consulted.</p>	<p><i>As per email & phone correspondence (May 4th, 7th & 14th, 2018) with Erika Zell, Government of Nunavut, ECCC advised that site records have indicated that polar bears are very rare in this area. As a result, the GN noted "This correspondence received from ECCC satisfies the GN's the concern/recommendation. The concern originated due to requirements under the Wildlife Act. The GN would like to receive any polar bear data (including reports of incidental observation) that may be collected by ECCC." ECCC will provide the GN with any polar bear data that is collected.</i></p>
<p>Species at Risk</p>	
<p>Limited information on the presence of Porsild's Bryum which is listed as a threatened species under the Species at Risk Act and recommended the Proponent conduct a survey of the project location. If any Porsild's Bryum colonies are identified, the Proponent would be required to contact the GN-DoE prior to commencing construction</p>	<p><i>As per email & phone correspondence (May 4th, 7th & 14th, 2018) with Erika Zell, Government of Nunavut, the GN identified that due to the local environmental conditions and photographs sent by ECCC, "...DOE reviewers are more confident that the species is less likely to be present on the Project site". The GN did request that trained, onsite staff conduct a reconnaissance survey prior to commencing the construction work. ECCC</i></p>

activities.	<i>will ensure that onsite staff are educated and conduct a survey prior to construction work.</i>
Archaeological Resources	
<p>Concern that the new infrastructure components as proposed would be in conflict with a number of archaeological sites in the area as identified in the Archaeological Impact Assessment.</p> <p>Recommended the Proponent applies for a Class 2 permit in order to mitigate any potential impact to archaeological sites located within the project footprint.</p>	<p><i>ECCC will be hiring the author of the Archaeological Impact Assessment report (Stantec, 2017). The Archaeologist has applied for a Class 2 permit and plans to return to the project site. Onsite, the Archaeologist will identify the archaeological sites to the contractor prior to construction work. The specific recommendations provided Sylvie LeBlanc, Government of Nunavut, will be followed.</i></p>

If you have any further questions or require clarification, please contact Jean-Philippe Cloutier-Dussault at jean-philippe.cloutier-dussault@canada.ca.

Sincerely,



Jean-Philippe Cloutier-Dussault

Property Manager

Cc: Distribution List
 Sophia Granchinho, Nunavut Impact Review Board
 Erika Zell, Government of Nunavut