



# CIRNAC Comments to NIRB

Re: Notice of Screening for Chesterfield Inlet's "Access Trail Project Chesterfield Inlet" Project Proposal



Nunavut Regional Office  
918 Nunavut Drive  
Iqaluit, NU, X0A 3H0

Your file - Votre référence  
20AN020  
Our file - Notre référence  
GCdocs# 118982349

November 23, 2023

Francis Emingak  
Technical Advisor I  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU, X0B 0C0  
via NIRB public registry

**Re: Notice of Screening and Comment Request for Chesterfield Inlet's "Access Trail Project Chesterfield Inlet" Project Proposal**

Dear Francis Emingak,

On November 3, 2023, the Nunavut Impact Review Board (NIRB) invited parties to comment on Hamlet of Chesterfield Inlet "Access Trail Project Chesterfield Inlet" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

**Any matter of importance to the Party related to the project proposal.**

**CIRNAC #1: Access Trail**

CIRNAC notes the Proponent has identified three separate access roads, with a total length of 57.9 km. CIRNAC notes the proposed length of the road is more than four times the current access road length. The Proponent has identified the road will be used regularly for rock trucks hauling materials from the aggregate site(s) to the community.

CIRNAC recommends the Proponent provide clarification on whether this is a 35km ATV trail or three separate access roads for rock trucks, and if so specifications for the proposed roadway is recommended.

**CIRNAC #2: Project Phases and Timeline**

CIRNAC notes that the Proponent indicated in the Access Road Project NIRB Application, dated 19-Oct-23, that the project construction may occur gradually over a period of 10 years, but the approximate work days needed for completion is only 40 days. It also states that the construction will be undertaken during 12 hour day shifts, seven days a week. CIRNAC notes it



is hard to assess potential direct impacts and cumulative impacts for the duration of the project without having schedule of construction and operation.

CIRNAC recommends the Proponent clarify the timeline with a more refined schedule that clearly indicates when construction is planned to start and end with each segment of access road, as well as a clear timeline for when each road segment is scheduled to be in operation for the proposed purpose of the access road.

### **CIRNAC #3: Quarry Information**

CIRNAC notes the stated purpose of the access trail is to provide the Municipality of Chesterfield Inlet access to potential aggregate sites in order to develop gravel production. CIRNAC is concerned that no information related to the development, use/exploitation, and closure/reclamation of these potential quarry/ borrow sites has been provided, nor information regarding how operational activities at these sites will have an additional set of impacts associated. No description of adverse effects related to quarry use, or monitoring and mitigation of these effects is included within the application.

CIRNAC recommends that the Proponent provide quarry/borrow management plans for each potential site if new quarry and borrow sources are developed and utilized for the use of the proposed road.

Quarry/Borrow Management Plans should include:

- Geotechnical assessments to evaluate the stability of potential sites and acid generating potential;
- Type of materials present and approximate volume to be removed;
- Permafrost assessment to reduce degradation and erosion;
- Water management (drainage, dewatering, freshet, potential alteration of water courses, etc.;
- Soil and sediment erosion management and mitigation
- Public access safety and restrictions;
- Wildlife monitoring plan;
- Ancillary activities required at each site
- Closure and reclamation plan

### **CIRNAC #4: Reclamation, Closure, and Site Management Plans**

CIRNAC notes the Proponent has identified ten years for the project construction to be completed. The Proponent has not clarified operation activities of the roads; activities at the quarries, use of the roads, and expected traffic associated with these activities. The Proponent has identified that the use of the road is for rock trucks. When within the 10 years it is estimated to open to begin work at the aggregate sites.

CIRNAC recommends that the Proponent provide its reclamation, closure, post-closure, and site management plans to the NIRB as they become available, to facilitate a comprehensive assessment of potential impacts to valued ecosystem components. These plans should consider how the Proponent intends to:

- Manage substances (e.g., storage and use of fuel, explosives, chemicals for equipment and soil);



- Manage non-hazardous and hazardous waste, including storage and segregation measures (e.g., on-site storage locations, separating and storing hazardous waste from other waste products);
- Monitor potential impacts to terrestrial and freshwater environments; and
- Respond to unanticipated impacts of its project activities (e.g., ARD/ML, groundwater contamination).

#### **CIRNAC #5: Consultation with Interested Parties**

CIRNAC recommends that the Proponent consult with relevant interested Inuit, community members, and community organizations in Chesterfield Inlet and Rankin Inlet who may have an interest in the project.

As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- The experience of community members who participate in traditional and non-traditional activities within or in close proximity to the project area;
- Mitigation measures designed to prevent disturbance to sites with cultural, archaeological, and/or environmental significance;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further phases related to this project. Should you have any questions, please contact Courtney White by e-mail at [courtney.white@rcaanc-cirnac.gc.ca](mailto:courtney.white@rcaanc-cirnac.gc.ca).

Sincerely,



Alexandre Chaikine  
A/Manager, Impact Assessment

