

May 1, 2024

Francis Emingak
Screening Officer
Nunavut Impact Review Board
P.O Box 1360
Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

Re: Notice of Screening for Pulaarvik Kablu Friendship Center’s “Access Trail to campsite” project proposal


Dear Francis Emingak,

The Government of Nunavut (GN) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments regarding the Pulaarvik Kublu Friendship Center's "Access Trail to campsite" project proposal, NIRB File # 22AN060.

The GN has reviewed the proposed project and related documents and has provided three (3) comments, which are appended to this letter.

The GN appreciates participating in the screening of this project through the NIRB process. Should there be any concerns or need for follow-up, please do not hesitate to contact me at jbuller@gov.nu.ca.

Qujannamiik,


Justin Buller

Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN-01: Wildlife Impacts	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Potential Impacts of Linear Infrastructure on Wildlife and Wildlife Habitat
References	<ul style="list-style-type: none"> • Revised “NIRB Application for Screening #125847 Access Trail to campsite”. NIRB File No. 22AN060 (2024) • 230810-22AN060-Map of Road-IA1E.jpg • Blagdon, D. & Johnson, C.J. (2021) Short term, but high risk of predation for endangered mountain caribou during seasonal migration. <i>Biodiversity Conservation</i>, 30(3), 719-739. https://doi.org/10.1007/s10531-021-02114-w • Boulanger, J., Kite, R., Campbell, M., Shaw, J., Lee, D., & Atkinson, S. (2024) Estimating the effects of roads on migration: barren-ground caribou case study. <i>Canadian Journal of Zoology</i>, 00, 1–18. https://doi.org/10.1139/cjz-2023-0121 • Leblond, M., Dussault, C., & Ouellet, J-P. (2013) Avoidance of roads by large herbivores and its relation to disturbance intensity. <i>Journal of Zoology</i>, 289(1), 32-40. https://doi.org/10.1111/j.1469-7998.2012.00959.x • Plante, S., Dussault, C., & Côté, S.D. (2017) Landscape attributes explain migratory caribou vulnerability to sport hunting. <i>Journal of Wildlife Management</i>, 81(2), 238–247. https://doi.org/10.1002/jwmg.21203 • Smith, A. & Johnson, C.J. (2023) Why didn't the caribou (<i>Rangifer tarandus groenlandicus</i>) cross the winter road? The effect of industrial traffic on the road-crossing decisions of caribou. <i>Biodiversity and Conservation</i>, 32, 2943-2959. https://doi.org/10.1007/s10531-023-02637-4 • <i>Wildlife Act</i>, S.Nu. 2003, c.26
CONCERNS	
<p>The Pulaarvik Kablu Friendship Centre (the Proponent) is proposing to build an access road (the Project) near the community of Rankin Inlet. The Proponent’s screening application states that the proposed access road will be approximately 3 km long, beginning at km 9 of the existing All-Weather Access Road (infrastructure associated with Agnico Eagle Mine Limited’s Meliadine Gold Mine Project) and end at the Proponent’s existing campsite.</p> <p>The GN is concerned with the unidentified source of the gravel (aggregate) used for the Project. The Proponent indicates in their screening application that “...no land will be dug up, gravel will be brought to site and put onto the tundra to create an access trail...” (Page 6). The</p>	

GN notes that the Proponent's screening application does not indicate where aggregate would be sourced. Eskers (natural deposits of sand and gravel) are often used as a source for granular material for road construction and maintenance. However, the GN notes that eskers are important habitat for a variety of denning animals (e.g., wolves, arctic and red foxes) and nesting habitat raptors found in Nunavut. Furthermore, eskers are also important landscape features for migrating caribou as they provide important refuges from insect harassment. The GN notes that the Project is in the range of the Qamanirjuaq herd of barren-ground caribou. Habitat is protected under Nunavut's *Wildlife Act* (the Act), for example s.65(2) of the Act states that, "No person shall, without legal justification, substantially alter or damage or destroy any habitat."

The GN is concerned with the unclear timing of the Project's construction. The Proponent indicates in their screening application that access road construction could take 4–6 weeks and would entail the use of vehicles such as dump trucks, loaders, dozers, and graders. However, the Proponent does not provide a clear timeframe for when construction would occur. For example, the Proponent's screening application states construction would start "...as soon as we get approval by NIRB. Would like to start early August 2023..." (Page 2). The GN notes that construction during early August could expose caribou to sensory disturbance (e.g., visual, and auditory) during their post-calving period. Wildlife in Nunavut are protected from disturbance. For example, s.73(1) of the Act states, "No person shall, unless authorized by a licence, (a) engage in any activity, other than harvesting, that is likely to result in a significant disturbance to a substantial number of wildlife;..."

The GN notes that access roads are forms of linear infrastructure (e.g., roads, trails, and railroads) that can elicit negative cumulative effects to wildlife and wildlife habitat. Linear infrastructure causes direct habitat loss or degradation; Additionally, linear infrastructure can act as semipermeable barriers to caribou movements and lead to the fragmentation of habitat (Boulanger et al. 2024; Leblond et al. 2013). The presence of linear infrastructure can also increase hunting pressure by both humans and other predators due to increased access (Blagdon and Johnson 2021; Plante et al. 2017; Smith and Johnson, 2023). Ultimately, cumulative effects to caribou generated by linear infrastructure could reduce harvesting opportunities for Inuit over the longer term.

REQUESTS / RECOMMENDATIONS

The GN requests that the Proponent revise their screening application to include information regarding where aggregate would be sourced.

The GN requests that the Proponent revise their screening application to include specific information regarding when construction would take place to ensure disturbance to wildlife, particularly caribou, is minimized.

The GN recommends that the Proponent provide an assessment of the potential cumulative impacts of the proposed Project. The GN recommends the Proponent accomplish this through the collection of knowledge from multiple caribou experts, wildlife boards/organizations, as well as from existing scientific data including GN telemetry data.

GN-02: Socio-economic Impact Assessment	
Department	Economic Development and Transportation
Organization	Government of Nunavut
Subject/Topic	Pulaarvik Kablu Friendship Center's "Access Trail to campsite"
References	NIRB File No 22AN060
CONCERNS	
<p>According to the Proponent, there already exists an ATV trail to the camp site. Staff and emergency personnel use this trail, which the proponent claims is unreliable.</p> <p>The proposal for a more reliable trail can enhance the positive socio-economic effects of the Addictions Treatment Camp for the community of Rankin Inlet and the Kivalliq region.</p> <p>The goals of this project are aligned with the GN mandate, Katujjiluta, to consider "Access to mental health support" as crucial to wellbeing".</p> <p>Due to the fact that various stakeholders will use the road, the GN cautions that use of AWAR and this access road should be aligned, and that appropriate safety measures are in place.</p> <p>The project proponent should create mitigation measures, such as a trail management plan or schedules, to ensure that AEM and the public can use the road safely without posing risks or hazards.</p> <p>Construction Materials – The proponent should ensure that construction materials for the road are obtained/extracted from approved sources (see GN comment 01).</p> <p>Spill Contingency Planning – The GN's review noted there was no spill contingency plan for the Project. As several pieces of heavy equipment and other vehicles will be on site, the proponent should ensure that there are measures in place to manage spills involving hazardous substances.</p>	
RECOMMENDATIONS	
<p>The GN recommends that the proponent develop a management plan for the access trail that aligns with AEM's AWAR and its management and mitigation measures.</p> <p>The GN recommends that the proponent also develop a spill contingency and response plan.</p>	
ADDITIONAL COMMENTS	
N/A	

GN-03: Archeology	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Pulaarvik Kublu Friendship Center's "Access Trail to campsite" Project Proposal
References	NIRB 125847 / 22AN060
CONCERNS	
<p>The Proponent intends to build an access road to support an on-the-land additions treatment program held at cabins approximately 30km from Rankin Inlet. The road will branch off the existing Agnico Eagle all-weather road located 11.5 km outside of Rankin Inlet. The project activities include the construction of a road (large enough to support emergency vehicles, such as ambulance and pick-up trucks for personnel transportation in and out of camp location); the use of heavy equipment such as excavator, front-end loader, grader, dozer, and compactor/roller; dump trucks and pick-up trucks.</p> <p>A search of the Nunavut Archaeological Site Database indicates that there are ten (10) archaeological sites recorded in the vicinity of the proposed development area. This does not preclude the presence of unidentified sites or cultural features as no systematic archaeological reconnaissance has been conducted in this specific area. The project area may potentially yield significant archaeological/cultural resources as it geographically overlaps the northern limit of Qamanirjuaq herd and the southern limit of the Lorillard Herd.</p>	
RECOMMENDATIONS	
<p>A Class 2 Archaeological Permit is required.</p> <p>Based on the presence of archaeological sites in the vicinity of the proposed access trail and that no systematic archaeological survey has been conducted in this area and that it overlaps with two caribou ranges, the Department of Culture and Heritage (CH) considers that there are reasonable grounds to believe that there could be sites of archaeological significance on the lands affected by the current project (NA 33.5.12).</p> <p>The Department of Culture and Heritage recommends that a field archaeological assessment program be initiated prior to any land disturbance activities.</p> <p>Thus, the GN recommendations are the following:</p> <ol style="list-style-type: none"> (1) A qualified archaeologist must apply for a Class 2 permit in order to conduct a field archaeological assessment of any areas subject to ground disturbance activities (access road, camp location and associated components); 	

(2) Assessment of any borrow sources/quarries that will be used to obtain aggregate for construction.

The GN recommends that the applicant avoids conducting activities in the vicinity (50 m buffer zone) of archaeological/historical sites. If archaeological sites or features are encountered, activities should immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to our office.

ADDITIONAL COMMENTS

All archaeological and palaeontological sites in Nunavut are protected by law. The applicant must understand that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site. Moreover, the building of inuksuit is not recommended.