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The under-ice water withdrawal described in the application poses a risk to the aquatic environment and could affect fish habitat by reducing water levels. Fish mobility may be entrained or impinged by lower under-ice water levels. The description of fish and fish habitat in the exploration area is limited and water withdrawal locations do not appear to be identified.

Finally, there is no information on closure procedures and plans describing what will be done at closure to ensure the site is fully cleared of debris and materials that are brought to site.

Given this and the close proximity to Kugluktuk of the project site, the Kitikmeot Inuit Association will continue to monitor this project closely. The size of the project does not warrant an Environmental Impact Statement (EIS) at this time, but several issues have been identified which need to be addressed in an updated and improved project submission to NIRB.

Thank you.

A handwritten signature in black ink that reads "John Roesch".

John Roesch, P.Eng.

Senior Project Officer  
Kitikmeot Inuit Association, Department of Lands, Environment and Resources

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment



## COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

<b>Project Proposal Title:</b> <u>Rae Copper Exploration Project</u>	
<b>Proponent:</b> <u>White Cliff Minerals Ltd.</u>	
<b>Location:</b> <u>Kitikmeot</u>	
<b>Comments Due By:</b> <u>November 15, 2024</u>	<b>NIRB #:</b> <u>24EN047</u>

**Indicate your concerns about the project proposal below:**

<input type="checkbox"/> no concerns	<input type="checkbox"/> traditional uses of land
<input type="checkbox"/> water quality	<input type="checkbox"/> Inuit harvesting activities
<input type="checkbox"/> terrain	<input type="checkbox"/> community involvement and consultation
<input type="checkbox"/> air quality	<input type="checkbox"/> local development in the area
<input checked="" type="checkbox"/> wildlife and their habitat	<input type="checkbox"/> tourism in the area
<input type="checkbox"/> marine mammals and their habitat	<input type="checkbox"/> human health issues
<input checked="" type="checkbox"/> birds and their habitat	<input type="checkbox"/> other: _____
<input type="checkbox"/> fish and their habitat	_____
<input type="checkbox"/> heritage resources in area	_____

**Please describe the concerns indicated above:**

The Rae Copper project is proposed as a temporary, tent-based exploration camp with up to three exploration drills. The number of people housed during the project will vary depending on the number of operating drills, however, it is projected to be between 12 and 45 people. The project could cause negative impacts to various wildlife species in the area or using areas proximate to the mine during sensitive life phases. Migrating or calving barren-ground caribou may avoid high disturbance areas, and disturbance of migrating caribou can affect the timing and route of migration. The project would interact with the Bluenose East barren-ground caribou herd, which is doing poorly and at a low population size. The project description mentions closing the exploration camp and ceasing exploration activities during the calving and post-calving seasons of the Bluenose East caribou herd (May 28 to July 3). However, this date range does not allow for variability in the timing of migration and potential earlier or later onset of calving. Other barren-ground caribou herds with calving grounds in Nunavut have changed their migratory and reproductive timing due to earlier green-up; therefore, calving and post-calving date ranges should be used as guidelines rather than rigid cutoffs.

Human use areas have the potential to attract grizzly bears and other carnivores and scavengers like wolverines to the area if waste is not carefully managed. Once bears are habituated to getting rewards when visiting human use areas, they tend to seek out other human use areas until they become nuisance bears that must be destroyed. The killing of a single female grizzly bear can have population level impacts due to the slow reproductive rates of grizzly bears; therefore, the creation of, and subsequent need to kill problem grizzly bears due to camp-bear interactions have the potential to be a significant impact. There are well-established mitigation measures that can be used to keep grizzly bears and other wildlife from obtaining food rewards when at camp; however, the implementation of such mitigation must be near perfect, or it tends to fail.

Helicopter noise can affect wildlife in multiple ways, such as by increased vigilance, reduced use of noisy habitats, and changing the structure of communities. Noisy areas can create zones of avoidance around the disturbance of wildlife such as birds. The wildlife management and monitoring plan (WMMP) for the Rae Copper project does not





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<b>Comments Due By:</b> <u>November 15, 2024</u>	<b>NIRB #:</b> <u>24EN047</u>

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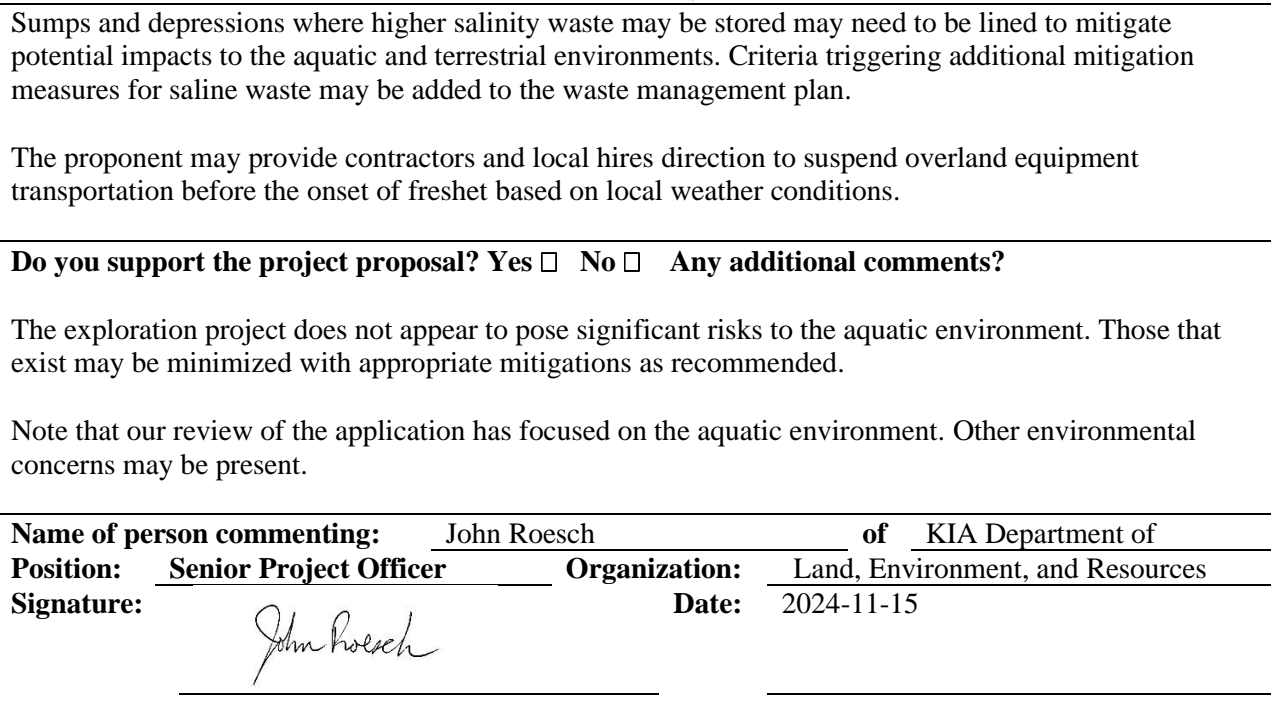
**Please describe the concerns indicated above:**

The proponent has indicated waste associated with drilling activities will be deposited into shallow sumps and depressions on the land. While the proponent indicates the standard mitigation of placing the waste at least 31 m away from waterbodies and watercourses will be followed, it is unclear how environmental risks associated with high salinity contact water and waste will be managed. Risks include direct damage to the tundra/local aquatic resources from salt burns, and the migration of conservative chloride ions through the shallow groundwater regime.

The proponent has also indicated that materials for the exploration project may be transported overland from Kugluktuk between March and May; the transportation route may include some water crossings. There is some risk as freshet approaches that ice/snow and ice rich permafrost conditions proximal to the water crossings may erode as a result of overland travel and cause an increase in the release of total suspended solids during freshet.

We further note that while the project poses some risk to the aquatic environment due to under ice withdrawal, the mitigations proposed by the proponent (including the use of the “Method for Determining Available Winter Water Use Capacity for Small-Scale Projects” from the Land and Water Boards of the Mackenzie Valley) appear appropriate. However, we highlight that waterbodies not meeting the criteria under that method may still be considered if required (e.g., insufficient water withdrawal locations are proximal to a drilling site) on a case-by-case basis.

**Do you have any suggestions or recommendations for this application?**





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<b>Proponent:</b> <u>White Cliff Minerals Ltd.</u>	
<b>Location:</b> <u>Kugluktuk</u>	
<b>Comments Due By:</b> <u>November 15, 2024</u>	<b>NIRB #:</b> <u>24EN047</u>

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**Please describe the concerns indicated above:**

- Water withdrawal described in the application could affect fish habitat by reducing water levels and could affect fish by entrainment or impingement.
- Least Risk Timing Windows for fish and the proposed water withdrawal periods are not presented in this application.
- The description of fish and fish habitat in the exploration area is limited. The distribution of fish species or the presence of important habitats is not discussed. Water withdrawal locations do not appear to be identified.

**Do you have any suggestions or recommendations for this application?**

- Description of water intakes should include specific reference to the Fisheries and Oceans Canada (DFO) Interim Code of Practice: End-of-pipe fish protection screens for small water intakes in freshwater, available at: <https://www.dfo-mpo.gc.ca/pnw-ppe/codes/screen-ecran-eng.html>
- Identify proposed water withdrawal locations, affected waterbodies, and fish species if possible.




Do you support the project proposal? Yes <input type="checkbox"/> No <input type="checkbox"/> Any additional comments?			
Name of person commenting: <u>John Roesch</u>		of <u>KIA Department of</u>	
Position: <u>Senior Project Officer</u>		Organization: <u>Lands, Environment and Resources</u>	
Signature: <u></u>		Date: <u>2024-11-15</u>	





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<b>Project Proposal Title:</b> <u>Grays Bay Road and Port</u>																			
<b>Proponent:</b> <u>West Kitikmeot Resources Corp.</u>																			
<b>Location:</b> <u>Kitikmeot</u>																			
<b>Comments Due By:</b> <u>October 15, 2024</u>	<b>NIRB #:</b> <u>24XN038</u>																		
<p><b>Indicate your concerns about the project proposal below:</b></p> <table border="0"> <tr> <td><input type="checkbox"/> no concerns</td> <td><input type="checkbox"/> traditional uses of land</td> </tr> <tr> <td><input type="checkbox"/> water quality</td> <td><input type="checkbox"/> Inuit harvesting activities</td> </tr> <tr> <td><input checked="" type="checkbox"/> terrain</td> <td><input type="checkbox"/> community involvement and consultation</td> </tr> <tr> <td><input type="checkbox"/> air quality</td> <td><input type="checkbox"/> local development in the area</td> </tr> <tr> <td><input type="checkbox"/> wildlife and their habitat</td> <td><input type="checkbox"/> tourism in the area</td> </tr> <tr> <td><input type="checkbox"/> marine mammals and their habitat</td> <td><input type="checkbox"/> human health issues</td> </tr> <tr> <td><input type="checkbox"/> birds and their habitat</td> <td><input type="checkbox"/> other: _____</td> </tr> <tr> <td><input type="checkbox"/> fish and their habitat</td> <td>_____</td> </tr> <tr> <td><input type="checkbox"/> heritage resources in area</td> <td>_____</td> </tr> </table> <p><b>Please describe the concerns indicated above:</b></p> <p>The creation of the pads for the camp and the drill sites can impact surface drainage conditions so that long-term impacts on the vegetation and permafrost may occur</p>		<input type="checkbox"/> no concerns	<input type="checkbox"/> traditional uses of land	<input type="checkbox"/> water quality	<input type="checkbox"/> Inuit harvesting activities	<input checked="" type="checkbox"/> terrain	<input type="checkbox"/> community involvement and consultation	<input type="checkbox"/> air quality	<input type="checkbox"/> local development in the area	<input type="checkbox"/> wildlife and their habitat	<input type="checkbox"/> tourism in the area	<input type="checkbox"/> marine mammals and their habitat	<input type="checkbox"/> human health issues	<input type="checkbox"/> birds and their habitat	<input type="checkbox"/> other: _____	<input type="checkbox"/> fish and their habitat	_____	<input type="checkbox"/> heritage resources in area	_____
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<p><b>Do you have any suggestions or recommendations for this application?</b></p> <p>The Proponent should ensure surface drainage is considered when creating the pads for the camp and the drill sites to avoid changing surface drainage that would lead to lasting impacts on the surrounding vegetation and underlying permafrost.</p>																			
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