



April 15, 2024

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Submitted via upload to LUPIT and email

Re: File No. 150391 - 2024 Field Research Program for the Grays Bay Road and Port Project

West Kitikmeot Resources Corp. (WKR) is applying to conduct field research programs in 2024 in support of the anticipated future environmental review of the Grays Bay Road and Port Project (the Project). The Project was previously proposed, in whole or in part by various proponents and most recently, by the Kitikmeot Inuit Association (KIA) as a deep-sea port on the Coronation Gulf at Grays Bay, and a 230-kilometre (km) road from Grays Bay to the site of the former Jericho Mine in Nunavut.

WKR benefits from previous studies screened by the Nunavut Impact Review Board (NIRB)¹ completed by the KIA and others in support of the Project, but several studies need to be updated or revised in anticipation of re-initiating the review process under the *Nunavut Planning and Project Assessment Act*. Those field studies proposed to be conducted in summer 2024 (the Program) are the subject of this submission. While additional future studies are reasonably anticipated, those programs will be addressed in a subsequent future submission.

The study area includes a 4 km wide corridor centered on the road alignment plus a buffer around the port site (Study Area). Generally, the Program involves workers accessing land and waters within the Study Area during the summer months in order to collect biophysical environmental data, and both maintain existing and install new scientific instrumentation required to support environmental data collection. Workers will travel to the study locations by helicopter, and carry out their work on foot or by boat. Instrumentation may remain in place at least until the end of the summer in 2025.

While the majority of these activities have been the subject of various NIRB screenings, have been undertaken in the Study Area in the past, and are not a significant modification of prior screened activities, additional detail on Program components is provided below, to inform the NPC's decision on whether or not to refer the Program, in part or in whole, to the NIRB for screening.

¹ 04YN073 Baseline Study Program for the High Lake Project; 07YN055 Biophysical Baseline Study Program, Izok to High Lake Road; 17YN067 2017/18 Research Program for the Grays Bay Road and Port Project.

Accordingly, WKR expects the following Program components to proceed, exempt from NIRB screening:

- a) **Wildlife and Bird Remote Observations:** Setup and deployment of approximately 60 posts for wildlife trail cameras and automated recording units (ARUs) is planned along the road corridor between Jericho Mine and Grays Bay for wildlife and bird observation. The work will be completed via helicopter access and foot traverses. The posts, cameras, and ARUs will remain in place until at least the summer of 2025.
 - **Justification:** *Exempt per NUPPAA Schedule III, Item 4(i), as one or more Wildlife Research Permits issued by the Government of Nunavut Department of Environment under the Wildlife Act will be required.*
- b) **Noise Assessment (Terrestrial):** Sound level meter with audio recording capabilities will be deployed for five days in the port area, while baseline meteorology data from three monitoring locations will be collected. The assessment will be accomplished via helicopter access and foot traverses.
 - **Justification:** *Previously screened in 2017 (File: 148610/17YN067). The noise monitoring program described in the “2017/18 Research Program for the Grays Bay Road and Port project” included the installation and removal of noise monitoring equipment to collect noise data.*
- c) **Servicing of Existing Meteorological Station:** Meteorological sensors, solar panels, and electronics affixed to an existing meteorological tower at Grays Bay require servicing and potential replacement with newer equipment on the same tower. The assessment and servicing will be completed via helicopter access.
 - **Justification:** *Exempt per Nunavut Agreement Schedule 12-1 (no new license is required; WKR’s understanding is that there is an existing Scientific Research License from the Nunavut Research Institute in place)*
- d) **Marine Sediment and Benthic Community Sampling:** At approximately 20 locations in the port area sediment grab samples, subtidal and intertidal samples to characterize benthic invertebrate communities present, and water samples from various depths will be collected. The sampling area will be accessed via helicopter and boat.
 - **Justification:** *Previously screened in 2017 (File: 148610/17YN067). Scope included collection of zooplankton, benthic and sediment samples using a motor vessel.*
- e) **Fish and Fish Habitat Studies:** Habitat mapping and fish sampling will be undertaken at watercourses in the port area. The assessment will be completed via helicopter access, boat and foot traverses.
 - **Justification:** *Previously screened in 2017 (File: 148610/17YN067). Scope included assessment of fish habitat and assessment and sampling of fish at the port site and proposed road route.*

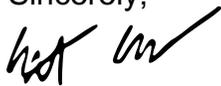
WKR plans to undertake the following additional activities:

- a) **Vegetation Assessments:** A rare plant assessment will be undertaken in the port area to evaluate and record presence, abundance and extent of any rare plants observed, as well as abundance of common plants, traditionally used plants, and non-native/invasive plants. The assessment will be completed via helicopter access and foot traverses.
- b) **Fish habitat and fish habitat studies, bathymetric mapping:** Habitat mapping and fish sampling will be undertaken at watercourses in the port area at the water intake location. Bathymetry data will be collected using a boat-mounted depth sounder, while fish collection may employ various methods depending on the type of habitat. Water samples may also be collected for both eDNA analysis to determine general presence/absence of fish in the lake, and for analysis of standard physical parameters. Sediment samples may also be collected. The assessment will be completed via helicopter access and boat.

For greater certainty, WKR does not propose to establish any additional infrastructure (camps, airstrip, bulk fuel storage, etc.) at this time. WKR will establish small temporary fuel caches for helicopter use and may utilize emergency shelters for crews working away from already permitted base camps. Any emergency shelters established will be removed at the end of the individual program.

Based on the above description of the Program scope, WKR respectfully requests the NPC's careful consideration of this application in light of prior screened activities undertaken within the Study Area and their related significance.

Sincerely,



Elliot Holland
Chief Operating Officer
West Kitikmeot Resources Corp

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