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Cambridge Bay  
Ikaluktutiak  
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Kugluktuk  
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Bathurst Inlet  
Kinaok  
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Bay Chimo  
Umingmaktok  
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Gjoa Haven  
Okhoktok  
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Taloyoak  
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Kugaaruk  
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Francis Emingak  
Screening Officer  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, Nunavut  
X0B 0C0

Sent by e-mail: [femingak@nirb.ca](mailto:femingak@nirb.ca), [info@nirb.ca](mailto:info@nirb.ca)

January 31, 2024

**RE: Screening of West Kitikmeot Resources Corp.'s (WKRC) Field Research Program for the Gray's Bay Road and Port Project.**

Dear Francis Emingak,

Kitikmeot Inuit Association has reviewed the proposed Field Research Program for the Grays Bay Road and Port Project ("Research Program") with consultants with experience in geotechnical engineering, wildlife, water quality and aquatic environment, and fish. KIA provides detailed comments and recommendations in the enclosed screening forms.

The purpose of the Research Program is to collect environmental data, install scientific instruments to support data collection, and support the creation of design related studies for the larger project of the Grays Bay Road and Port Project ("GBPRP"). KIA members are involved in traditional land use practices in the proposed GBPRP project area. KIA expects to be fully engaged and consulted about all aspects of the GBPRP so that any impacts to the environment and exercise of KIA rights are mitigated and accommodated.

The Research Program may impact Inuit Owned Land as well as Kitikmeot activities on and off Inuit Owned Land. The Research Program may impact terrain, surface water drainage, fish and aquatic habitat and migration, freshwater and marine water quality, quantity, hydrogeology and lower trophic levels, air quality, and wildlife and their habitat and vegetation.

**Key KIA Concerns and Recommendations**

We provide highlights of our concerns, recommendations below.



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Operations on drilling rigs and drill brines do incur environmental risk. Accidental spills and effluent discharges disproportionately affect fragile Arctic ecosystems.

KIA recommends that it and the Board conduct periodic inspections of drill sites, and waste storage areas to evaluate the implementation of spill and waste management plans. This is to ensure proper storage and containment of hazardous materials and waste that can negatively impact wildlife and marine ecosystems be mitigated.

KIA recommends that fuel storage and drill sites have maximum distance to ensure that accidental spills do not negatively impact fragile water bodies and ecosystems.

KIA recommends that it and the NIRB should be provided with criteria and locations where effluent will be discharged for review prior to proceeding with effluent discharges.

Prior to commencing the work KIA recommends that KIA be provided a plan detailing proposed drilling methods, including sampling, locations and associated instrumentation and monitoring.

Prior to commencing the work KIA recommends that KIA be provided an overview of proposed remote sensing techniques and how they will be used to complement drilling.

Waste management of solid and liquid waste resulting from the Research Program must be within proper containment and regularly backhauled to reduce risk to the environment.

Accommodation for field personnel while collecting scientific data is a primary issue when it comes to environmental and marine concerns. Camps can increase attraction to wildlife, so proper monitoring, personnel training around wildlife, and incineration practices are necessary. With proper seasonal closure practices, it is presumed these environmental impacts will be mitigated.

KIA recommends that best practices be implemented in relation to camps to minimize attractiveness to wildlife, and that KIA and the NIRB periodically inspect camps.

### **Monitoring**

Management, mitigation and monitoring of impacts are of primary importance to KIA.



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The mitigation chart for the Research Program does not provide any details for monitoring plans, programs or protocols.

As landowners and land users, KIA needs to be involved in monitoring impacts. These recommendations are in addition to the minimal monitoring requirements of the KIA Land Use License KTL224N003.

KIA recommends that monitoring plans be robust and accurately describe the predevelopment geographic and changes over time of the aquatic environment and development of infrastructure.

KIA recommends that the short and long-term effects of the Research Program on water, land and wildlife be monitored, and mitigated.

Prior to submission to the regulator, KIA recommends that KIA be provided for review and comment, all monitoring plans, protocols or programs that are developed for permits and approvals provided a description of the monitoring protocols including: methods of monitoring (eg. assessment parameters, frequency, duration), adaptive management strategies and reporting obligations.

KIA recommends that KIA and the Board receive all monitoring results as they become available.

### **Communications**

A strong communication strategy should also be pursued to ensure Inuit are aware of what, where and why samples will be collected to confirm there are no misunderstandings involved between the Research Program and Inuit. This strategy is also important to ensure safety for Inuit who are involved in traditional land use practices around the proposed land use area.

### **Conclusion**

The KIA conditionally supports the Research Program. Our support is conditional on our recommendations in this letter and the comment tables being incorporated into the Research Program.

KIA looks forward to conducting further reviews of the Research Program and participating in the NIRB process to determine impacts and potential mitigation measures for the environment and KIA rights.



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Thank you.

A handwritten signature in black ink, which appears to read "Jennifer Amagoalik".

Jennifer Amagoalik

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

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