



## 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>Field Research Program for the Grays Bay Road and Port Project</u>	
<b>Proponent:</b> <u>West Kitikmeot Resources Corp.</u>	
<b>Location:</b> <u>Kitikmeot</u>	
<b>Comments Due By:</b> <u>January 31, 2025</u>	<b>NIRB #:</b> <u>24YN049</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 checked="" 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 type="checkbox"/> birds and their habitat	<input checked="" type="checkbox"/> other: <u>vegetation</u>
<input type="checkbox"/> fish and their habitat	
<input type="checkbox"/> heritage resources in area	

**Please describe the concerns indicated above:**

**1. Concerns Related to Fuel Caches and Storage of Hazardous Materials:**  
 Accidental spills from fuel caches and of drill brine can impact vegetation, water quality, and aquatic life. As outlined in the Spill Contingency Plan and any areas subject to spills would need to be restored (if applicable), however, restoration in the context of Arctic ecosystems is not always possible. The effects of spills on vegetation will be relatively localized but likely long-term. Spills that reach waterbodies can be more problematic, and can affect water quality, fish, water dependent birds, invertebrates, marine mammals, and other terrestrial species that may drink from or move through the water. We encourage the maximization of distances that fuel storage and drill site are from waterbodies and fragile ecosystems, to minimize risks resulting from an accidental fuel or brine spill caused by human error, equipment malfunction, and sump failure or inadequacy. While listed as mitigation, it is unlikely that the use of salt can be avoided or minimized during diamond drilling through permafrost.

**2. Concerns Related to Temporary Camps**  
 Temporary camps can increase the probability of attracting wildlife to areas, creating human-wildlife conflict and can cause other species to avoid areas of human use. Camps locations should be chosen carefully to minimize their potential interaction with caribou in the region, and frequent monitoring and audits of the camp's attractant management, personnel training around human-wildlife attraction risk, and incineration practices should be done. It will be particularly important to ensure that food waste is incinerated immediately and that high quality incinerators capable of full and high throughput combustion at low temperatures are used.






- Assessments of potential quarries should include an assessment of habitat suitability for wildlife species by a wildlife biologist within the planned quarry area and in the area that would be impacted by noise and mechanical activity in and around the quarry. Geotechnical assessments should ideally be planned to occur after the estimated date of den emergence for most northern, denning mammals in and around features that could support dens.
- Conduct AERMOD or CALPUFF models to ensure generators and fuel storage are placed at a safe distance from human use areas (e.g., construction camps) and areas of high importance to biodiversity.
- Ensure that the camp does not let food waste build up – use a high-quality incinerator with an adequate throughput capacity to prevent the need to hold wastes for incineration.
- Conduct frequent monitoring and audits of temporary camps and their practices to ensure they are not attracting wildlife, leading to human-wildlife conflict and the eventual destruction of habituated wildlife.
- Maximize distances between fuel storage, drilling, and waterbodies wherever possible.

**Do you support the project proposal? Yes ☒ No ☐ Any additional comments?**

KIA provides conditional support for the project proposal. KIA supports the Field Research Program for the Gray's Bay Road and Port Project provided that the recommendations above are incorporated into the project.

**Name of person commenting:** Jennifer Amagoalik **of** Kugluktuk, NU

**Position:** Acting Senior Project Officer **Organization:** Kitikmeot Inuit Association

**Signature:**  **Date:** January 31, 2025



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**Please describe the concerns indicated above:**

Overall, the potential impacts to fish and aquatic habitats described in the Application Form and the Impact Mitigations Summary appear to be reasonable for the research program. These impacts are associated with drilling, fuel and chemical storage, waste disposal, and marine-based activities. Section 4.3 of the Environmental Management Plan provides a summary of these potential impact pathways to fish, habitat, and migration.

The mitigation measures described in the management and mitigation plans appear adequate to address the potential impacts to fish and fish habitat. Section 4.3 of the Environmental Management Plan describes several reasonable mitigation measures that will be implemented during the research program to reduce the likelihood of sediment release, spills to the aquatic environment, water withdrawal affecting fish or fish habitat, and impacts to marine life during drilling.

Environmental monitoring measures are described at a high level in the Environmental Management Plan and the Impact Mitigations Summary documents. *Section 3.2 Water, Aquatic and Marine Environment* of the Environmental Management Plan states that, “Applicable monitoring parameters and objectives to be determined during licensing and permitting.” The Impact Mitigations Summary document states that monitoring of *Aquatic species, habitat and migration* will be conducted, “In accordance with authorization terms and conditions, where applicable”. In the absence of detailed information, it is currently difficult to evaluate whether the monitoring protocol will be sufficient to gauge the effectiveness of the proposed mitigation measures.



We recommend that KIA request from WKRC a description of the monitoring protocols that provide information on the monitoring of the aquatic environment. This description of the monitoring program should detail methods of monitoring (e.g., assessment parameters, frequency, duration), adaptive management strategy, and reporting obligations. This information should be provided as it becomes available and with sufficient time for KIA to review and comment.

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

**Do you support the project proposal? Yes ☒ No ☐ Any additional comments?**

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<b>Please describe the concerns indicated above:</b>	
<p>It is noted that the proponent is planning to complete extensive drilling program, which includes up to six (6) various drills for geotechnical, geochemical, terrain, and permafrost data collection (see project scope provided to the NIRB). However, no details have been provided regarding the type of drilling equipment, size, drilling depths, sampling methods, in-hole testing, instrumentation, platform preparation, or drill site closure, beyond general comments provided in the Closure &amp; Reclamation Plan (Version 1.1, October 15, 2024) and the Waste Management Plan (Version 1.0, October 15, 2024). Given the potential for drilling activities to substantially impact the terrain and cause long-lasting effects, such as on surface water drainage, it is essential to provide more information on the proposed drilling.</p> <p>Geotechnical drilling and sampling are often the only method that allows to collect the information needed, and the boreholes allow for the installation of monitoring equipment, such as thermistor strings, which provide valuable information on the subsurface, including temperatures. However, significant advancements have been made in characterizing permafrost using less invasive geophysical tools. These tools, used in conjunction with geotechnical drilling, can often help reduce the number of boreholes that need to be drilled. Based on the available information on the field research program is not clear if the proponent is proposing to use any remote sensing technique, including geophysics, how these results will complement the proposed geotechnical drilling program, and whether additional optimization may be possible.</p> <p>The proponent indicates that the boreholes are used to collect permafrost data. However, no further specifications or details have been provided. Without these details it is impossible to evaluate if the proposed field research program will provide adequate information to accurately evaluate the project's</p>	



potential environmental impacts in the future. Insufficient or inadequate data collection (and instrumentation & monitoring) may hinder KIA's ability to evaluate the proponent's project in the future.

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


It is suggested that the proponent provides a plan to the KIA detailing the proposed drilling methods, including sampling if planned, locations and associated instrumentation and monitoring. In addition, the proponent shall provide an overview of remote sensing techniques proposed and how they will be used to complement geotechnical drilling.

**Do you support the project proposal? Yes ☒ No ☐ Any additional comments?**

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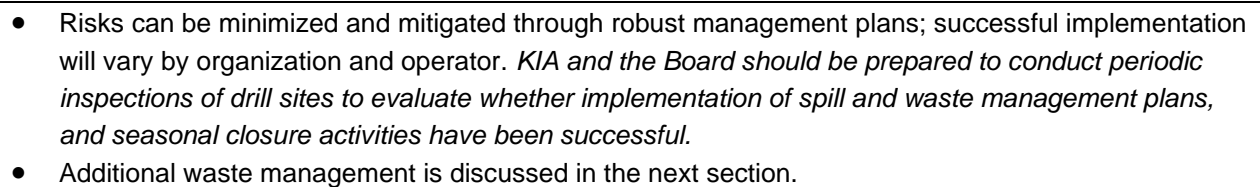
**Please describe the concerns indicated above:**

**Baseline data collection: Collection of samples from water courses, waterbodies and the marine environment to develop robust baseline dataset;**

- Primary environmental concern is associated with accommodations for field personnel. However, risks are likely to be adequately mitigated through seasonal closure practices, minimizing interannual effects.
- Short- and long-term environmental impacts are not expected from collecting samples in the aquatic environment samples (noting fisheries sampling programs are discussed separately by Palmer/SLR).
- Primary consideration should be ensuring the monitoring plans are robust and accurately characterize the predevelopment geographic and temporal variability of the aquatic environment along the infrastructure corridor, particularly proximal to where future development may be expected and where long-term camps may be situated. *When available, plans with specific details on where and when samples will be collected should be reviewed through this lens.*
- A strong communication strategy should be pursued to ensure Inuit are aware where and why samples are being collected to minimize chances field programs will be misinterpreted to indicate there are hazards in the aquatic environment that should be avoided when conducting traditional land use practices.

**Drilling: Operation of drilling rigs and drill brines; and**

- Operation of drill rigs incurs some environmental risk associated with residual bore holes and brine. Some residual scarring from salt brines are likely inevitable.



- Plans indicate waste and hazardous materials (primarily fuels) will be stored within containment infrastructure (e.g., on appropriate laydowns and within berms when possible. Waste will also be backhauled on a regular basis, minimizing risks to the environment.
- Effluent will be discharged as per as yet unspecified discharge criteria. *The KIA and Board should be provided with these criteria and the locations where effluent will be discharged for review prior to proceeding with any effluent discharges.*
- Spills associated with these activities are expected but unlikely to cause widespread and long-term environmental degradation based on the scale of operations proposed. *The KIA and Board should be prepared to inspect waste storage areas and camps periodically to ensure any damage to the environment is appropriately reported on and remediated.*

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

KIA and the Board should be prepared to conduct periodic inspections of drill sites to evaluate whether implementation of spill and waste management plans, and seasonal closure activities have been successful.




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