



GN # 01	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeology
References	NIRB 126292/25XN041: Notice of Screening and Comment Request for City of Iqaluit's "Long Term Water Project (LTWP)" proposal
CONCERNS	
<i>Project Summary</i> The City of Iqaluit proposes to construct and operate the Long-Term Water Project (LTWP), a municipal and industrial infrastructure project intended to support the City's long-term potable water supply. Proposed Project components include new raw water intake structures and pump stations, conveyance pipelines, a new reservoir and associated outflow works, access roads, quarries and borrow areas, construction staging and laydown areas, and ancillary infrastructure. Project construction is proposed to occur over multiple years, and certain Project components, construction methods, and areas of ground disturbance may be refined, expanded, or modified as detailed design advances and construction progresses. All Project components are located within the municipal boundaries of the City of Iqaluit. The Government of Nunavut (GN) acknowledges that an archaeological impact assessment has been completed in association with this project under a permit issued by the Department of Culture and Heritage (CH), and that archaeological sites have been identified and addressed within defined areas of impact. GN notes, however, that project planning is ongoing and that preliminary design drawings may be refined as the Project advances, including revisions to Project components that could result in ground disturbance outside the assessed footprint. GN notes that the assessment does not authorize ground disturbance outside the assessed footprint, including any areas that may be modified, expanded, or newly affected as Project design and construction progress. Accordingly, statements regarding the completion of archaeological surveys should be understood as applying only to the areas assessed under permit. GN further notes that archaeological sites have previously been recorded within the Iqaluit area and surrounding landscape. The absence of recorded sites within specific portions of the proposed Project footprint does not preclude the presence of undocumented archaeological resources. GN notes that archaeological sites in the Iqaluit area are associated with a range of landforms and settings, including shorelines and coastal margins, raised beach features and former shorelines, river corridors, waterbodies, and other landforms that have historically supported travel, harvesting, and settlement. Based on landscape-level considerations, including proximity to shorelines, coastal margins, raised beach features, river systems, and waterbodies, and in light of the component-specific nature of prior archaeological assessment, GN considers that there are reasonable grounds	

to believe that there could be sites of archaeological significance on the lands affected by the Project, pursuant to Article 33.5.12 of the Nunavut Agreement.

Project-Specific Concerns

GN notes that the proposed Project includes activities involving terrestrial ground disturbance, which constitute potential impacts to archaeological resources. Activities requiring archaeological assessment include, but are not limited to:

- construction and operation of raw water intake structures, pump stations, and associated excavation and foundation works;
- construction of reservoirs, dams, berms, spillways, and associated earthworks;
- installation of pipelines, including trenching, bedding, backfilling, and associated linear disturbance;
- construction, development, and use of access roads, service corridors, and construction routes;
- development and use of quarries, borrow areas, and material sources;
- establishment and operation of construction camps, laydown areas, staging areas, fuel storage areas, and other temporary or permanent Project infrastructure; and
- any additional excavation, grading, blasting, or surface or subsurface disturbance associated with Project construction, operation, or maintenance.

Any ground disturbance occurring outside areas that have been cleared for disturbance through an archaeological impact assessment conducted under a permit issued by CH constitutes a potential impact to archaeological resources.

RECOMMENDATIONS

1) Requirement for Archaeological Assessment (Proponent responsibility)

The Proponent shall retain a qualified archaeologist eligible to hold a Class 2 Nunavut Archaeologist Permit to conduct an archaeological impact assessment of any Project activities involving ground disturbance that occur outside areas previously assessed under a permit issued by CH.

- Archaeological assessment shall be completed prior to the commencement of ground disturbance in the affected areas and under conditions that provide sufficient surface visibility for CH to accept the areas for proposed disturbance.
- The Proponent shall implement the recommendations of the qualified archaeologist, including avoidance, buffering, and/or mitigation measures, as applicable.

2) Adaptive Management for Project Modifications

Where Project components are modified, expanded, relocated, or newly identified during detailed design, construction, or subsequent phases, the Proponent shall ensure that archaeological assessment and permitting are completed prior to ground disturbance in any newly affected areas.

3) Standard Protective Measures

- **Site protection:** All heritage sites (archaeological and palaeontological) in Nunavut are protected by law. No Project activities shall occur within 50 metres of any known or suspected heritage site. The Proponent must understand that it is their responsibility to ensure that no heritage sites are disturbed during the course of Project activities.
- **Chance finds:** If archaeological and/or palaeontological materials or features are encountered, all activities shall cease immediately within the 50 metre buffer area. The

site shall be documented (including coordinates, description, and photographs) and reported to CH, and work shall not resume within the buffer area until direction is provided by CH.

- **General protections:** No alteration, disturbance, artifact removal, littering, or defacement of archaeological sites is permitted. No collection or disturbance shall occur unless authorized through the appropriate permitting process. The Proponent shall ensure that all staff and contractors are informed of these legal obligations. The construction of inuksuit is not supported.

ADDITIONAL COMMENTS

Under the *Nunavut Act*, the *Nunavut Archaeological and Palaeontological Sites Regulations* provide for the protection, care, and preservation of archaeological and palaeontological resources. The Department of Culture and Heritage (GN-CH) is the Designated Agency responsible for the administration of the archaeological and palaeontological permitting system, in close coordination with Inuit land claim partners, including the Inuit Heritage Trust (IHT), which serves as the Designated Organization under Article 33 of the *Nunavut Agreement*. All archaeological and palaeontological sites in Nunavut are protected by law. It is illegal to search for, survey, excavate, alter, or otherwise disturb any archaeological or palaeontological site without a valid permit issued by the Government of Nunavut.