



**Parks
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January 8 2015

Nunavut Impact Review Board
Box 1360
Cambridge Bay, Nunavut, X0B 0C0
via email: info@nirb.ca

RE: Request for Comments for Environment Canada's "Airborne Observations in Support of NETCARE: Part II" project (NIRB 14YN025)

To Whom It May Concern:

Thank you for the opportunity to comment on the amendments to Environment Canada's proposal to amend its NETCARE project to include aerial observations and research activities around Alert and Eureka.

The proposed amendment notes that some low level flying (approximately 200 feet) is involved. While most of this flying will occur in areas where open water is available, the original project identifies that some flying may be over land, depending on wind direction in relation to source locations. The area of interest around Alert includes much of Quttinirpaaq National Park which administered by Parks Canada. Parks Canada is mandated to protect and present nationally significant examples of Canada's natural and cultural heritage and foster public understanding, appreciation and enjoyment in ways that ensure their ecological and commemorative integrity for present and future generations.

While the survey activities do not involve landing in the national park and therefore do not require a Parks Canada Research and Collection Permit, low level survey flights do have the potential to disturb wildlife populations, which contravenes the *National Parks Wildlife Regulations*. Section 4(1)(a) states "no person shall hunt, disturb, hold in captivity or destroy any wildlife within, or remove any wildlife from, a park". The cooperative management committee for Quttinirpaaq National Park has identified muskox and Peary caribou as species of concern with regard to disturbance from low flying aircraft. Peary caribou is listed as endangered under the Species at Risk Act.

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Parks Canada is submitting the following comments and recommendations to reduce to potential impacts of the proposed project on wildlife.

- No fuel caches or landings are permitted inside the park boundaries. The applicant has not been authorized to land in the park and survey participants should be aware of the park boundaries (Appendix 1)
- Aircraft should maintain a normal flying altitude of 2000 feet when not conducting survey activities while in the air space over the park.
- Do not circle, chase, hover over, pursue or in any other way harass wildlife. Do not alter the flight path to approach wildlife, and avoid flying directly over animals.
- Avoid congregations of animals.
- Avoid disturbing Peary caribou. Caribou (especially pregnant cows) are particularly vulnerable to increased stress during the late winter and early spring period due to range restriction and reduced forage. See attached maps (Appendix 2) for known Peary caribou locations in the park area.
- The inclusion of community observers on survey flights to help prevent wildlife disturbance is recommended.
- The submission of GPS track logs of flight routes and altitudes with research reports to the Nunavut Research Institute and communities is recommended, particularly if including community observers on the survey flights is not practicable.

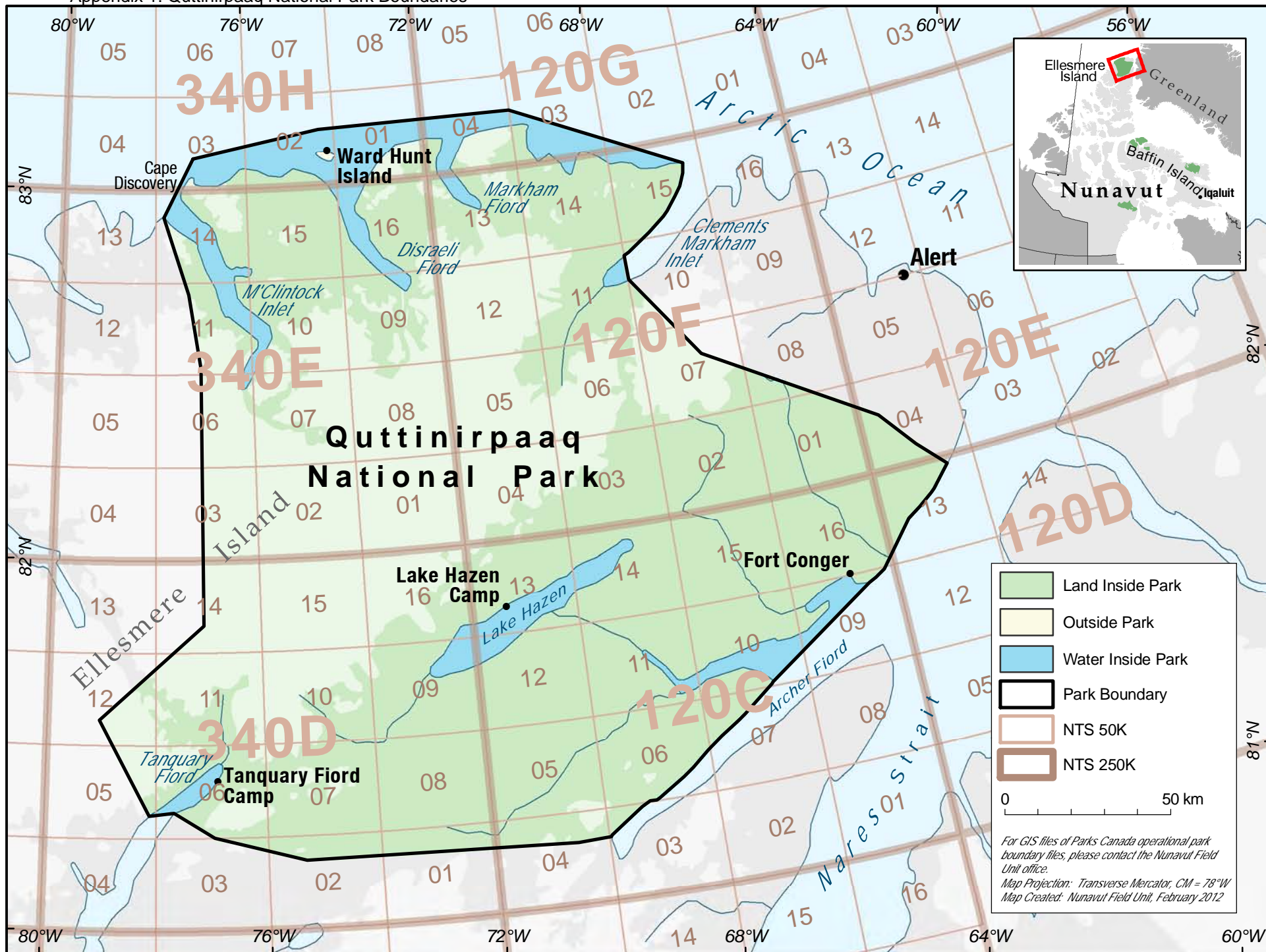
If you have any questions regarding Parks Canada's comments, please contact Jane Chisholm (867-975-4762, jane.chisholm@pc.gc.ca).

Sincerely,



Andrew Maher
Resource Conservation Manager

Appendix 1: Quttinirpaaq National Park Boundaries



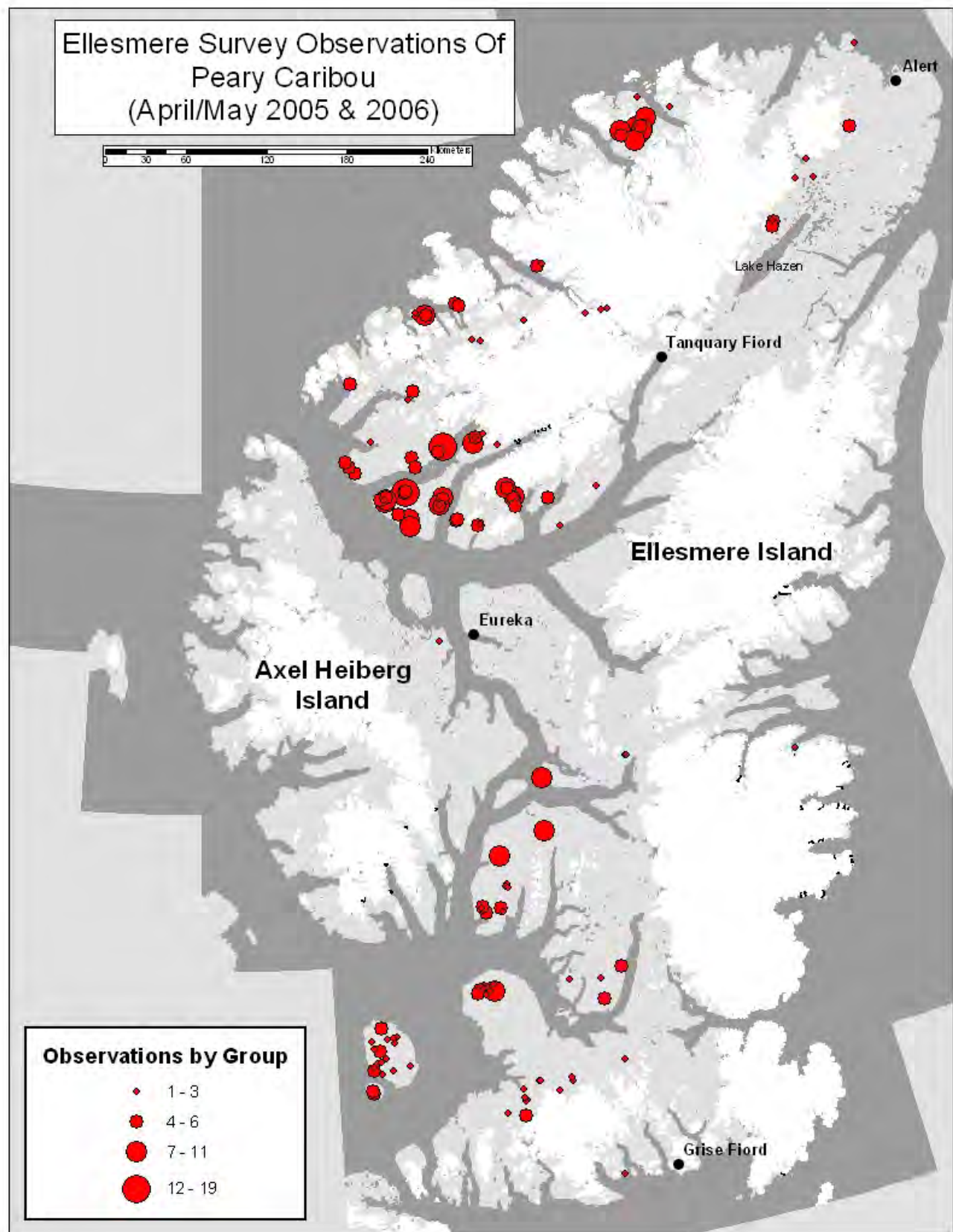


Figure 3 Observed distributions and relative abundance of Peary caribou on Ellesmere Island in April/May 2005 & 2006..

Appendix 2: Known locations of Peary Caribou

