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Building *Nunavut* Together
Nunavut liuqatigiingniq
Bâtir le *Nunavut* ensemble

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Government of Nunavut
Nunavut Kavamat
Gouvernement du Nunavut

March 17, 2016

Kelli Gillard
Technical Advisor II
Nunavut Impact Review Board
P.O Box 1360
Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

**RE: NIRB File No. 16DN004: Notice of Part 4 Screening for Joint Task Force (North)'s
"Operation Nunalivut" Project Proposal**

Dear Ms. Gillard,

The Government of Nunavut (GN) would like to thank the NIRB for the opportunity to provide comments regarding the Part 4 Screening for Joint Task Force (North)'s "Operation Nunalivut" project proposal.

The GN has reviewed the proposed project and provides our detailed comments as it pertains to Archaeological Sites specific to the project location in the attached Appendix.

The GN appreciates this opportunity to provide feedback in the assessment process for this project. Should you have any questions regarding this submission, please contact me at 867-975-7830 or by email at asimonfalvy@gov.nu.ca

Qujannamiik,

[Original Signed By]

Agnes Simonfalvy
Avatiliriniq Coordinator

APPENDIX

A search of the Nunavut Archaeological Site Database indicates that there are 483 protected archaeological sites within the proposed operation areas. This, however, does not preclude the presence of unrecorded archaeological sites or cultural features.

The Department of Culture and Heritage has concerns with the current project proposal as ground disturbance activities are proposed and the potential impact to archaeological/historical sites and features is high. Concerns specifically relate to:

- The presence of several hundred personnel maneuvering in the vicinity of archaeological/historical sites
- The transportation and movements (vehicle and on foot) within and between the operational zones
- The timing of the operation and associated snow cover might mask recorded and unrecorded archaeological sites.
- The applicant's project description provides the location and dimensions of four Operational Boxes; Bathurst Island (62,000km²); Resolute (550km²); Grise Fiord (113km²); Alert (718km²); this is an extensive territory and in order for the Department of Culture and Heritage to assess the current proposal, further information is required about the precise locations of camps, travelled routes and specific locations of any activities areas.

Recommendation

The applicant needs to provide detailed information with regards to the locations of activities areas.

An archaeological overview assessment needs to be conducted in order to determine sensitive archaeological areas and move activities away from these locations.

All archaeological and palaeontological sites in Nunavut are protected under the Nunavut Act. The Proponent must understand that it is their responsibility to ensure no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site without the proper authorizations. Additionally, the building of inuksuit is not recommended.