

July 4, 2016

Kelli Gillard B.Sc., P.Ag.
Manager, Project Monitoring
Nunavut Impact Review Board
P.O Box 1360
Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

RE: Comment Request on Canadian Armed Forces' "Operation Nanook 2016" project proposal (NIRB File No. 16DN031)

Dear Ms. Gillard,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on the Canadian Armed Forces' (CAF) "Operation Nanook 2016" project proposal.

The GN has reviewed the proposed “Operation Nanook 2016” project and provides our comments in the attached Appendix.

Should you have any concerns with our comments, please contact me by phone at 867-975-7837 or by email at tprice@gov.nu.ca.

Qujannamiik,

[Original Signed By]

Tina Price
Avatiliriniq Coordinator

APPENDIX (2 Comments)

NIRB SCREENING COMMENTS # 1 (of 2)	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeological Resources
References	16DN031- NIRB Application
CONCERNS	
<p>A search of the Nunavut Archaeological Sites Database indicates that there are 67 protected archaeological sites within the proposed Operations Boxes. This however does not preclude the presence of unrecorded archaeological sites or cultural features in these areas.</p> <p>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:</p> <ul style="list-style-type: none">• The presence of several hundreds of personnel maneuvering in the vicinity of archaeological/historical sites is a concern.• The transportation and movements (vehicle and on foot) within and between the operational zones is a concern. <p>The applicant's project description provides the location and dimensions of four Operational Boxes; Chesterfield Inlet (278km²); North of Rankin Inlet (3,674km²); South of Rankin Inlet (1,255km²); Rankin Inlet (13km²). The application covers 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.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<ol style="list-style-type: none">1. The applicant is required to provide detailed information with regards to the locations of specific activity areas.2. The applicant should avoid conducting activities in the following locations: (1) Northeast corner of OP Box Plan B (South of Rankin); (2) Western fringe of OP Box Plan B (North of Rankin); (3) Along the southern shoreline of Chesterfield Inlet (OP Box Chesterfield Inlet).3. Caution should be exercised when conducting exercises in OP Box Rankin Inlet as several sites are recorded in this area.	

4. No activities may be conducted in the vicinity (50 m buffer zone) of any archaeological/historical sites. If archaeological sites or features are encountered, activities should immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Government of Nunavut Territorial Archaeology Office.

ADDITIONAL COMMENTS

All archaeological and palaeontological sites in Nunavut are protected under the *Nunavut Act*. The applicant must understand that it is its responsibility to ensure that 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.

NIRB SCREENING COMMENTS # 2 (of 2)	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Air Traffic - Noise
References	16DN031- NIRB Application
CONCERNS	
With the use of aircraft as personnel transport for this project the GN is concerned about the potential disruption this may cause for terrestrial wildlife in the project's vicinity within Nunavut.	
SUGGESTIONS AND RECOMMENDATIONS	
The potential for increased noise may have an impact on terrestrial wildlife; therefore the Proponent is advised to avoid low altitude flights to ensure that disturbance and noise reduction are limited. The GN recognizes that this may not be possible in all circumstances due to concerns towards aircraft and human safety.	
ADDITIONAL COMMENTS	
N/A	