

July 7, 2017

Tara Arko  
Director, Technical Services  
Nunavut Impact Review Board  
P.O Box 1360  
Cambridge Bay, NU X0B 0C0

**Sent VIA Email: [info@nirb.ca](mailto:info@nirb.ca)**

**RE: Comment Request for Indigenous and Northern Affairs Canada's (INAC) "Jericho Site Stabilization Project- Amendment" project proposal (NIRB File No. 16UN058)**

Dear Tara Arko,

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 Indigenous and Northern Affairs Canada's "Jericho Site Stabilization Project- Amendment" project proposal.

The GN has reviewed the proposed project and provides our comments in the following Appendix.

Should you have any concerns with our comments, please contact me by phone at 867-975-7830 or by email at [ezell@gov.nu.ca](mailto:ezell@gov.nu.ca).

Qujannamiik,

[Original Signed By]

Erika Zell  
*Avatiliriniq Coordinator*  
*Government of Nunavut*

GN-01: Blasting and wildlife	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Blasting and wildlife
References	<ul style="list-style-type: none"> <li>• Project_application_125150_as_of_2017-06-14</li> <li>• JERICOH-_1617-_REG-_NIRB_PERMIT_APPLICATION complete - Phase III removed</li> </ul>
CONCERNS	
<p>The Proponent has stated that they intend to add the potential for blasting as a back-up measure for the removal of the west dam at the project site. This additional project activity has the potential for the use of a maximum of 40,000kg of explosives.</p> <p>Under Section F of the original project proposal blasting was not listed as a planned activity. The addition of blasting raises concerns for potentially increasing wildlife disturbance. The Proponent's environmental screening report prepared by its consultant Matrix Solution Inc. has identified the project location along the migration path of the Bathurst Caribou herd and identified several species of special concern around the site (see quote below).</p> <p><i>"The location of the Project is particularly noteworthy because it is located along the migration path of the Bathurst Caribou Herd. Numerous mammals and birds have been observed at the site or have the potential to be at the site. Species of special concern observed or with potential to be at the site include grizzly bear, wolverine, dolphin, union caribou, peregrine falcon, red-necked phalaropes, and short-eared owls."</i></p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN recommends that the proponent undertake pre-blasting surveys for the identification of any wildlife dens prior to the commencement of blasting. The GN requests that the Proponent establish a no-blasting buffer for the presence of caribou and other wildlife prior to the commencement of this project.</p> <ul style="list-style-type: none"> <li>• The GN recommends that during the calving and post calving seasons for the Bathurst herd, which typically occurs between June 2-28, no blasting activity occur within a buffer zone of 5km from the proposed blast site for groups of 2 or more caribou per square kilometer occurring within the buffer area.</li> <li>• For all other times of the year, the GN recommends a buffer of 4km from the proposed blast site within which no blasting activity can occur for groups of 2 or more caribou per</li> </ul>	

square kilometer occurring within the buffer area.

- At any time of year, the GN recommends there can be no blasting activity when 1 or more caribou occur within a buffer of 1km from the project site or blast site.

The GN also requests additional detail on the methods of detection the Proponent plans to use for the detection and monitoring of wildlife during blasting operations.

#### **ADDITIONAL COMMENTS**

N/A