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Building Nunavut Together
Nunavuliuqatigiingniq
Bâtir le Nunavut ensemble

July 28, 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

RE: Comment Request for the Government of Nunavut's "Iqaluit marine infrastructure – deep sea port" project proposal (NIRB File No. 17XN022)

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 the Government of Nunavut's "*Iqaluit marine infrastructure – deep sea port*" 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.

Qujannamiik,

[Original Signed By]

Erika Zell
Avatiliriniq Coordinator
Government of Nunavut

GN-01: Opportunities for Nunavummiut	
Department	Family Services (Career Development)
Organization	Government of Nunavut
Subject/Topic	Opportunities for Nunavummiut
References	NIRB Notice of Screening

CONCERNS

Regarding this entire Project, Career Development recognizes the workforce and human resources related objectives outlined in Section 1.9 of the PSIR document. In particular, we hope the Project makes all efforts needed to comply with the NNI Policy and continues to prioritize making these economic opportunities accessible to local Nunavummiut.

SUGGESTIONS AND RECOMMENDATIONS

There are a variety of Career Development Services available to Nunavummiut. One of which are the locally working Career Development Officers (CDOs) within the Career Development division at Family Services. These CDOs are available to support the human resources activities of the Project including connecting a work ready population with new labour market opportunities. Baffin region CDOs can be reached at 1-800-567-1514.

ADDITIONAL COMMENTS

Thank you for your consideration.

GN-02: Dredging and soil testing	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Dredging and Soil Testing
References	• Project_application_125146_as_of_2017-06-27 • 02a_IQ_BL-Marine_02-EN-REP-0003_R1-Part1_29May17 • Conlan et al., Ice Scour Disturbance to Benthic Communities in The Canadian High Arctic, Marine Ecological Press Series, Vol. 166: 1-16, 1998

CONCERNS

The Proponent has listed in their Project Application, Section D: Offshore Infrastructure: Facility Construction, that they intend to conduct dredging over the course of the project.

"Deepening of the boat basin would extend the usable hours of the SCH but deepening to provide all-tide access is not feasible for the current layout. Conceptually, deepening the boat basin to approximately +3.5 m CD is considered realistic. This would result in the excavation of up to 30,000 m^3 of sediment that would be reused as fill material for the extended parking area at the SCH".

Section 6.4.2.1 of the Marine Baseline Report discusses the methods used to sample the marine sediment for baseline contamination testing.

"*Samples were collected from each sampling location using a Ponar grab sampler deployed from an 8.5 m survey vessel. The Ponar was lowered over the side of the vessel to the seabed and then retrieved to the surface, with an intact sample, using a winch. The Ponar collects a sample approximately 8 cm in depth over an area of 225 cm2 (15 cm x 15 cm area)".*

The Project area is an area that regularly freezes over in winter and undergoes ice scour. The project area is also subject to significant tides and has a bottom characterized by soft sediment. Ice scour disturbance to soft sediments is a regular, predictable event on polar coasts. It differs from other such disturbances by ploughing and overturning the sediment and altering seabed topography, sometimes considerably (Conlan et al. 1998).

A sample depth of 8cm is not adequate enough to fully assess the possibility of contamination that may be contained within the sediment. The project area has been utilized as an active port and suffered from urban runoff and refuse collection for a number of decades. Therefore, the site has the potential for significant contamination that was not detected by the Proponent's sampling methods.

SUGGESTIONS AND RECOMMENDATIONS

The Government of Nunavut (GN) requests that the Proponent conduct additional testing on the

dredged soil prior to its disposal or use as fill, for the same contamination that was listed in the Marine Baseline Report:

- Total organic carbon (TOC)
- Total metals (suite of 32)
- Polycyclic aromatic hydrocarbons (PAHs)
- Polychlorinated biphenyls (PCBs)
- Sediment grain size

If contamination is discovered during this testing, the GN recommends that the proponent contact the appropriate regulatory body to coordinate appropriate disposal.

ADDITIONAL COMMENTS
N/A