



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

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CIDMS # 1167446

August 04, 2017

Sophia Granchinho
Manager, Impact Assessment
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Screening for Government of Nunavut's "Iqaluit Marine Infrastructure – Small Craft Harbour" Project Proposal

Dear Ms. Granchinho,

On July 17, 2017 the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut's "Iqaluit Marine Infrastructure – Small Craft Harbour" project proposal. Indigenous and Northern Affairs Canada (INAC) appreciates the opportunity to provide comments and offers the response below as it pertains to the NIRB's request:

- ***Whether the project proposal is likely to arouse significant public concern; and if so, why;***

PSIR Section 1.1.1 - Project Overview, Page 1, paragraph 5.

Issue: The project description states that the project is designed to serve existing small boat users and "does not include any increase in marine use or economic development that may take place at the Small Craft Harbour (SCH) in the future."

The proposed harbour improvements will provide opportunity for increased vessel traffic in Koojesse Inlet (tourism, pleasure craft etc.) which may increase the potential for adverse effects such as vessel - vessel collisions, vessel - marine mammal collisions, and increased potential for the introduction of contaminants (bilge water, spills, etc.).

Despite the intended goals of the project to serve existing users, there is a potential for increased use of the local marine environment as a result of the harbour improvements. It is difficult to determine if the project will have residual adverse effects on the marine environment and members of the community without quantifying the potential increase in vessel traffic and identifying appropriate mitigation measures to address the additional risks this may pose for Koojesse Inlet.



PSIR Sections 1.9, page 17, and 5.3.2, Pages 80-81

Issue: Insufficient detail on employment benefits to Inuit

Inuit employment has been set as a priority within Nunavut, as set out in the Government of Nunavut's Nunavummi Nangminiaqtunik Ikajuuti (NNI) policy. The Proponents do not provide sufficient detail in determining how the NNI policy will be followed with respect to the workforce during the construction and operation phases of the project.

The Proponent states that they aim to maximize Inuit employment; however there is insufficient detail on employment targets within the workforce, no explanation of the type and number of jobs which will be designated for local Inuit employment and those designated for other external specialists. Furthermore, there is no discussion of means to meet these targets and measures to be taken in the event employment targets cannot be met.

- ***Whether the project proposal is likely to cause significant adverse eco- systemic or socio-economic effects; and if so, why;***

PSIR Section 5.1.5 Marine Sediment and Water Quality, Page 69:

Issue: There is no recognition that construction must take place during the wettest months of the year (June, July, August, and September) and minimal discussion on erosion and sediment control of onshore activities.

Construction must take place during the wettest months of the year, where precipitation is more likely to fall as rain vs snow. At the proposed site, storm water runoff drains directly into the ocean and may negatively impact the water quality of the surrounding ocean environment.

Terrestrial and Human Environment Baseline Report, Section 3.3.1, Page 11:

Issue: Insufficient detail regarding methods for testing ARD potential in rock cut area.

Acid Rock Drainage (ARD) potential in the rock cut area was determined to be low by the proponent based on the results of the baseline study. Based on this conclusion the proponent does not provide further mitigation for the potential of encountering material with a higher potential for ARD during construction activities.

Methods describing the collection of rock samples for analysis of ARD potential did not provide sufficient detail to determine from what depths the rock samples were collected. It is unclear from the information provided if sample depths match those required for construction and in fact represent material that will be exposed as a result of project activities.

CEMP Section 3.2.2 Emergency Response, Page 15:

Issue: There is insufficient detail related to the types of emergency situations anticipated during construction and operation of the SCH.



The CEMP states that an emergency response plan will be developed during construction but there is no indication of what types of emergencies the proponent anticipates could occur as well as no discussion on emergency response during operation.

It is uncertain if the proponent has considered all potential emergency situations that may result in significant adverse effects to the environment and members of the community should they occur.

CEMP Section 4, Monitoring and Reporting, Page 29:

Issue: It is unclear what data will be included in the Environmental Monitoring Reports and if these will be submitted to applicable regulatory agencies.

Various monitoring activities will take place throughout the construction phase (e.g. underwater noise, marine mammals, TSS/turbidity, etc.). Various compliance monitoring/sampling may also be required as a condition of approval under various permits associated with the project.

This section does not reference how data collected during compliance monitoring and/or environmental effects monitoring will be made available to regulatory agencies as well as at what frequency and what types of data would be included.

PSIR Section 1.7 – Fuel, Page 16:

Issue: Section 1.7 states that refueling of mobile equipment will take place at designated fueling areas, or at the mobile equipment's location on the project site.

The reason for the establishment of designated fueling areas is to mitigate the risk of spills during refueling as these areas would typically be constructed in a manner that would contain a potential fuel spill and/or allow for a rapid response to a spill should one occur. Designated refueling areas are also typically situated in areas away from environmentally sensitive areas and as such act to further reduce the potential for accidental spills of fuel into areas such as streams and wetlands.

Refueling mobile equipment outside of designated refueling areas increases the risk of introducing fuels and other deleterious substances into the environment.

Section 4.1.5 Hydrology, Page 42 (with reference to Figure 1-1, Page 4 and Figure 4-2, Page 48)

Issue: Potential unauthorized modification to Unnamed Creek at SCH, not identified.

In the second paragraph of Section 4.1.5, an Unnamed Creek is identified, which discharges between the proposed breakwaters of the SCH and flows over the tidal flats. It is also stated that the project does not involve any changes to this creek. Based on the proposed development presented in Figure 1-1 and Figure 1-3, as well as Figure 4-2, which outlines the existing channel, it seems there will be modification to the Unnamed Creek. Two primary impacts were identified: (i) dredging (although only an option at this point) is planned within the current creek limits and (ii) the breakwater extension crosses the downstream portion.



The current creek alignment may need to be modified prior to the any proposed (optional) dredging or construction of the breakwater extension.

- ***Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; if so, why;***

PSIR - Section 5.3.3, Page 81:

Issue: Proponent acknowledges that hunters can adapt to changes resulting from construction activities, but not how construction can adapt to hunters needs or requirements.

The proponent states that hunting, fishing, trapping and gathering are essential activities for Inuit culture and livelihood. The Inuit continue to rely on these activities as a source of nutrition and clothing. In consideration of the potential impacts on Inuit harvesting rights, the following factors have been taken into consideration:

- Harvesting locations in and around the SCH Study Area;
- Access to ice and water (navigation);
- Timing of construction activities; and
- Potential impacts to harvested wildlife, especially Arctic char, which are harvested by gillnet in and around the SCH Study Area.

The proponent notes hunter's statement that they can adapt to the construction activities but does not state how the project will adapt to hunter's need/requirements.

INAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact David Zhong at (867) 975-4556 or by e-mail at David.Zhong@aandc-aadnc.gc.ca.

Sincerely,

[Original Signed by]

Felexce Ngwa
A/Manager, Impact Assessment