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May 4, 2018

Kelli Gillard  
A/Director, Technical Services  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU, X0B 0C0  
Via electronic mail to: [info@nirb.ca](mailto:info@nirb.ca)

**Re: Draft Scope and Environmental Impact Statement Guidelines for the  
Kitikmeot Inuit Association's "Grays Bay Road and Port" Project Proposal**

Dear Ms. Gillard,

Thank you for your letter dated March 5, 2018, inviting interested parties to comment on the Draft Scope List and Draft Environmental Impact Statement (EIS) Guidelines for the Nunavut Impact Review Board's (NIRB) review of the Grays Bay Road and Port project proposal. Indigenous and Northern Affairs Canada (INAC) has conducted a review of the Draft Scope List, as well as the Draft EIS Guidelines, and would like to offer the following comments for the NIRB's consideration.

**Draft Scope List:**

**Scope of the Project**

***ii) Grays Bay Port Facility***

On page 2 of the Draft Scope List, it is noted "temporary accommodations of up to 60 personnel during construction". INAC recommends this be updated to 80 personnel, as it is stated on page 2.18 of the project proposal that the camps will accommodate up to 80 people, and Table 2-2 on page 2.17 lists "40-80 persons / camp" during construction.



## **Draft Environmental Impact Statement Guidelines:**

### **Section 10.4 Biophysical Environmental Plans**

As noted by the NIRB on page 71 of the Draft EIS Guidelines, the proposed project is anticipated to have an indefinite period of operation, and eventual use of project infrastructure by third party users. In order for the biophysical environmental plans to be most successful in eliminating or mitigating potential negative impacts on the biophysical environment, INAC recommends that the guidelines include:

- Description of the Proponent's approach to ensure third party users are aware of and comply with the Plans, where applicable. This description should be included in, but not limited to:
  - Risk Management and Emergency Response Plan
  - Spill Contingency Plan
  - Water Management Plan
  - Hazardous Material Management Plan
  - Road Management Plan
  - Port Management Plan
  - Aquatic Effects Management Plan
  - Wildlife Mitigation and Monitoring Plan

### **Section 10.6 Closure and Reclamation Plan:**

INAC recommends the following addition to the minimum requirements of the Closure and Reclamation Plan:

- Discussion of potential socio-economic impacts on communities from project closure (temporary or permanent). Consideration should be given to monitoring potential socio-economic impacts and developing measures to mitigate anticipated adverse effects (e.g., development of programs that provide transferable skills for Inuit workers).

In conclusion, INAC very much appreciates the opportunity to participate in the review of this project. Should you have any questions, please do not hesitate to contact Julia Prokopick at (867) 975-4567 or by email at [julia.prokopick@canada.ca](mailto:julia.prokopick@canada.ca).

Sincerely,

[Original Signed by]

Rachel Theoret-Gosselin  
A/Manager, Impact Assessment