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Building *Nunavut* Together
Nunavut liuqatigiingniq
Bâtir le *Nunavut* ensemble

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Government of Nunavut
Nunavut Kavamat
Gouvernement du Nunavut

March 20, 2019

Talia Maksagak
Junior Technical Advisor
Nunavut Impact Review Board
P.O Box 1360
Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

RE: Notice of Screening for Ekaluktutiak Hunters and Trappers Organization's "ESHL Sports Hunts" Proposal (19AN015)

Dear Talia Maksagak,

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 Ekaluktutiak Hunters and Trappers Organization's "ESHL Sports Hunts" proposal. The GN reviewed the proposed project and has prepared 2 comments (see Appendix) for your consideration.

Should you have any concerns with our comments, please contact me by phone at 867-975-7808 or by email at cspencer@gov.nu.ca.

Qujannamiik,

[Original Signed By]

Chris Spencer
Avatiliriniq Coordinator
Government of Nunavut

Appendix

GN-01: ENVIRONMENTAL IMPACTS AND MITIGATION	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Environmental Impacts and Mitigation
References	<ul style="list-style-type: none"> • NIRB Notice of Screening for Ekaluktutiak Hunters and Trappers Organization’s “ESHL Sports Hunts” Project Proposal • NIRB Application for Screening #125451 ESHL Sports Hunts 2018 Ahiak (Queen Maud Gulf) Migratory Bird Sanctuary • Management Plan Final Draft for Nunavut Wildlife Management Board Approval • 2016 Inuit Impact and Benefit Agreement for National Wildlife Areas and Migratory Bird Sanctuaries in the Nunavut Settlement Area
CONCERNS	
<p>The program is proposed to take place between March 2019 and October 2022 in the area of the Queen Maud Gulf Migratory Bird Sanctuary. It appears that the proposed Project area may overlap with caribou calving grounds, and may potentially affect wildlife migratory routes.</p> <p>As stated in the project application, the proposed activity dates are March 1 to April 15, and August 1 to October 1, which are outside calving period (June 01- June 20). Still, the Proponent should minimize the potential disturbance that the Project activities could cause to wildlife.</p> <p>The proposed Project will only use existing infrastructure. The potential adverse effects related to wildlife disturbance are predictable and can be mitigated using standard best practices. Likewise, potential adverse impacts on soils and vegetation can be mitigated using standard best practices.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<ol style="list-style-type: none"> 1. The proponent should not harass or disturb wildlife; 2. The Proponent should apply standard fueling and fuel storage practices, such as: <ol style="list-style-type: none"> a. Conducting fueling operations away from water bodies; b. Establishing a designated fueling area if practical; c. Preventing spillage on or around the fueling site; d. Using drip pans or absorbent pads; e. Having a spill kit readily available; 3. The Proponent should install a secondary containment for fuel storage; 4. The Proponent should store its garbage in bags placed in a closed metal container to 	

avoid wildlife attraction;

5. The Proponent should conduct proper maintenance of equipment (free of leaks) to minimize impacts on soils and vegetation;
6. The Proponent should clean up and restore camping sites upon completion of the activities;
7. The Proponent should receive an Outfitter Licence, Guide Licence, and Harvesting Licence with the appropriate species authorization tags as required under the Nunavut Wildlife Act and Nunavut Hunting Regulations.

GN-02: Archaeological Resources	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeological Resources
References	NIRB Notice of Screening
CONCERNS	
<p>A search of the Nunavut Archaeological Site Database indicates that there are no recorded archaeological sites near the proposed campsite or activity area. This however does not preclude the presence of unrecorded sites or cultural features as the area has not been the object of systematic archaeological surveys.</p> <p>The applicant plans to conduct tourist activities during the spring, summer and fall seasons from 2019 to 2022. Activities include the use of snowmobiles and all-terrain vehicles to transport personnel, equipment and supplies to an existing camp at Ellis River. The timing of the operation is a concern as snow cover might mask recorded and unrecorded archaeological sites.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The Department of Culture and Heritage recommends that:</p> <ol style="list-style-type: none"> 1. The applicant avoids conducting activities in the vicinity (50 m buffer zone) of 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 Territorial Archaeology office. <p>All archaeological and palaeontological sites in Nunavut are protected under the Nunavut Act. The applicant must understand that it is their 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. Moreover, the building of inuksuit is not recommended.</p>	