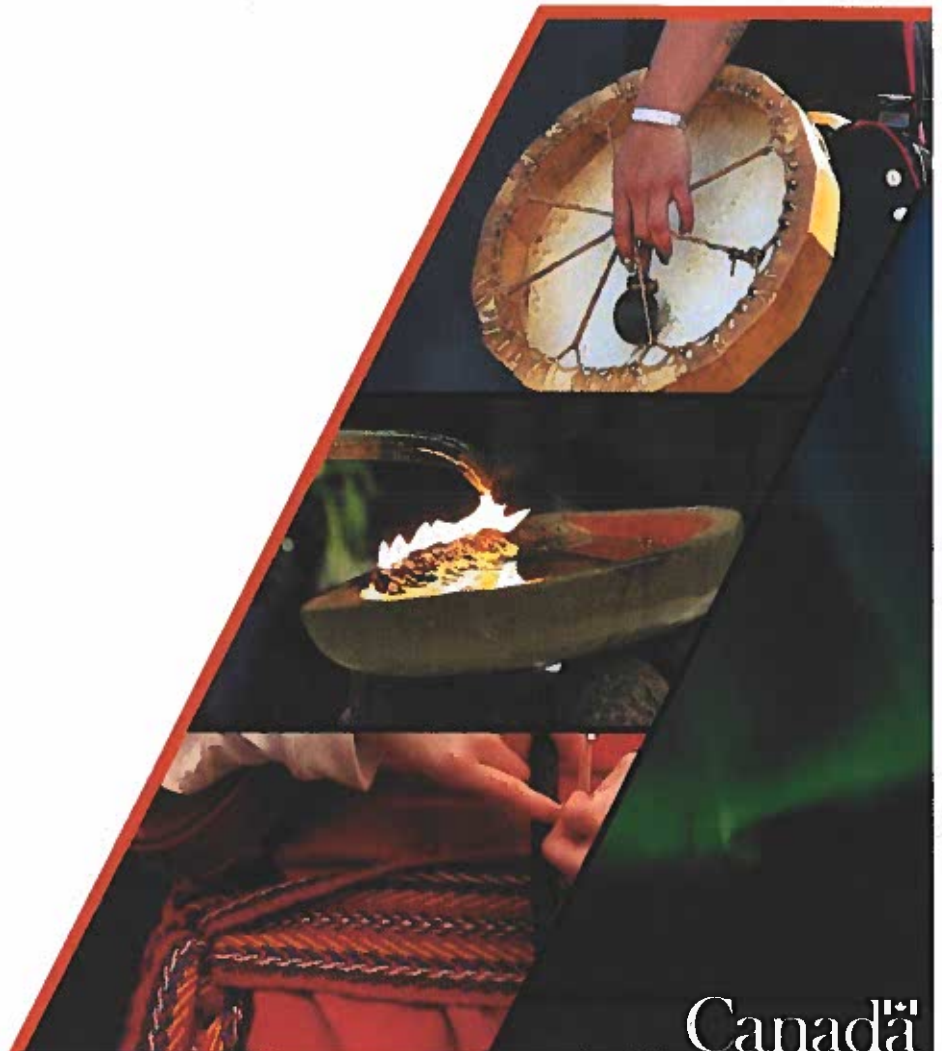




CIRNAC COMMENTS TO NIRB

Re: Notice of Screening for the Government of
Nunavut's "Arviat Fuel Capacity Increase" Project
Proposal



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

Your file - Votre référence
NIRB file #18XN049
Our file - Notre référence
CIDM #1251254

May 27, 2019

Keith Morrison
Technical Advisor II
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Screening for the Government of Nunavut's "Arviat Fuel Capacity Increase" Project Proposal

Dear Mr. Morrison,

On May 6, 2019, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut's (the proponent) "Arviat Fuel Capacity Increase" project proposal (the project). Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the project proposal and related documents and offers the responses below as it pertains to the NIRB's request:

Any matter of importance to the Party related to the project proposal:

In the project application the proponent indicates that a marsh will be filled in to facilitate construction of the tank farm. CIRNAC contacted the proponent for more information about this aspect of the project and confirmed that this statement was made in error; a marsh will not be filled in as part of this project.

CIRNAC also asked the proponent to clarify what mitigations will be used to minimize the impacts listed in the impact matrix as being negative and non-mitigatable. The proponent stated that the mitigation measures for the construction phase of the project could be found in the "Potential Construction Execution Plan". CIRNAC reviewed the plan and did not find any mitigation measures within the document.

The proponent also indicated to CIRNAC that a "Construction Safety Plan" will be required for the project by the successful contractor and that this plan will "further explain their mitigation plans if issues do occur during construction". CIRNAC



recommends that the NIRB include project specific terms and conditions should the project proceed that will require the plan to contain (at a minimum) mitigation measures to minimize the impacts related to: ground stability, permafrost, and water quality.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent, as necessary, throughout any further review of this project. If you have any questions, please contact Krista Pooley at (867) 975-4741, or by e-mail at krista.pooley@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

