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February 14, 2020

To: Nansen Weber
Canadian Arctic Holidays Ltd.
PO Box 1252 STN MAIN
Yellowknife, NT X1A 2N9

Tracey McCaie
Crown-Indigenous Relations and Northern
Affairs Canada
Government of Canada
PO Box 100
Iqaluit, NU X0A 0H0

Sent via email: nansen@arcticwatch.ca and traceymccaie@aandc.gc.ca

Re: Opportunity to address comments received regarding Canadian Arctic Holidays Ltd.'s "Clyde River Land Use Permit" project proposal

Dear Nansen Weber and Tracey McCaie:

On December 10, 2019 the Nunavut Impact Review Board (NIRB) received a referral to screen Canadian Arctic Holidays Ltd. "Clyde River Land Use Permit" project proposal from the Nunavut Planning Commission. On January 7, 2020 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by January 17, 2020 and later extended to January 31, 2020.

On or before January 31, 2020 the NIRB received comments from the following interested parties:

- *Qikiqtani Inuit Association*
- *Government of Nunavut Department of Environment (GN-DOE)*
- *Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)*
- *Clyde River Hunters & Trappers Association and the Ilisaqsivik Society*
- *Naujaaraaluit Hotel*
- *David Iqaqrialu*

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/125495.

As a result of concerns raised by parties through the public consultation period, the following summary of concerns and direction is provided to Canadian Arctic Holidays:

1) Project located in a designated special use area:

- a) The activities would occur within *Agguttinni Territorial Park*; a proposed special use area currently under the stewardship of the Government of Canada, with longer term management of this area delegated to the Government of Nunavut. Currently the Management framework has been initiated, but a Management Plan is not yet completed that would define the allowable uses for this area. Prior to the NIRB making its decision on the proposal, the proposed project should be brought to the Clyde River Community Joint Planning and Management Committee (CJPMC) for consideration as part of the development of the Management Plan.
- i) What consultation has been undertaken with regulators (especially CIRNAC and GN) to ensure that the project was planned in such a way to respect the development of this park management framework and ensure that it was eligible for permits?
 - ii) Considering the potential time required for the Committee to complete the required Management Plan for the territorial park, and the likelihood that this will not be completed prior to the Proponent's targeted operation season, please indicate if alternate locations have been considered for the temporary lodge proposed.
 - iii) Additional details were provided January 30, 2020 describing how the Clyde River hotel was previously used to support tourism activities for the company, and that the facility is no longer suitable for accommodating clients due to the number of guests associated with ongoing activities. What alternatives have been considered for guest accommodations if the temporary lodge (as initially proposed) and community hotel be unfeasible options?
- 2) Clarification of project scope:
- a) In the current application, the period of operations is defined from March 25, 2020 to May 13, 2020 including build-up and take down times, and states that the Proponent is applying for a land lease and permits for ski camp operations. However, it is unclear in the rest of the supporting documents the length of time that the Proponent is seeking for the lease and whether the camp would be demobilized completely by the end of the field season.
 - i) Clarification is required if the operations at this site would be limited to the one year, or if the Proponent is requesting a multi-year lease to access this site.
 - ii) If all infrastructure related to project is proposed to be demobilized at the end of the field season, then an Abandonment and Reclamation Plan is required.
- 3) Incomplete description of the environment and potential impacts from project activities as well as community concerns regarding inaccuracies in the proposal:
- a) Concerns were raised from both agencies and community members that the application either did not provide sufficient information, or the information provided did not accurately reflect traditional knowledge of the area, specifically:
 - i) Proposal as submitted does not accurately describe the physical environment, specifically there is a lack of information on the potential impacts on Polar Bears, fish and the aquatic environment.
 - ii) Proposal inaccurately reflects traditional land use in the area as well as Inuit harvesting activities. Discussion and planning of mitigation for potential impacts to local hunters is therefore incomplete, especially when Ayr Lake and the outflowing river are key fishing locations for Clyde River residents.
 - iii) Concerns regarding impacts to water quality, terrain and fish and their habitat, specifically from potential fuel spills into the surrounding aquatic environment.

- iv) Concerns with the methodology for sewage disposal and the potential impacts to waterbodies.
 - v) Within the “Environmental Impacts Matrix” positive impacts were noted to various environmental components (i.e. ground stability, permafrost, etc.) and it is unclear what would provide this positive impact.
 - vi) Concerns regarding limited community engagement on specific project activities, Proponent’s limited understanding of traditional activities occurring in the area, and no linkage of project design to address local concerns.
- b) The Proponent is encouraged to provide a more complete description of the existing environment and consider including sources of traditional knowledge in their description of the area and wildlife to further define potential impacts of the project. Recognizing the description provided in the application referenced conditions and presence of wildlife noted from previous operations, the information is a beginning, however a more thorough description of the environment, wildlife presence, and traditional uses are required to fully understand possible impacts from the project. Seeking traditional knowledge sources to understand or verify descriptions of the existing environment is recommend, to demonstrate appropriate mitigation is considered to reduce possible impacts to traditional harvesting and land use.
- 4) Items which have been recommended to be considered for project planning include:
- a) Incorporation of Inuit knowledge and Inuit Qaujimagatuqangit in the Project design;
 - b) Briefing community representatives on planned activities; and,
 - c) Training and economic opportunities for community members.

Directed to CIRNAC:

- 1) Concerns were raised by the Government of Nunavut and community organizations that the project would be based within *Agguttinni Territorial Park* and be conducted prior to the completion of the park’s Management Plan which is required to define acceptable land uses for this designated area. The current project descriptions reference that the Proponent may be interested in securing a Lease and possibly Land Use Permits for a lodge and associated tourism activities, as CIRNAC is currently the regulatory authority for this area, please confirm if permits or leases for operations in this area would be issued at this time.

The NIRB would like to provide Canadian Arctic Holidays Ltd. and CIRNAC with an opportunity to address comments prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister, and requests that a response be provided directly to the NIRB by **February 28, 2020**. If Canadian Arctic Holidays determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require additional clarification, please contact the undersigned directly at (867) 983-4612 or ekoide@nirb.ca.

Sincerely,



Emily Koide
Technical Advisor I
Nunavut Impact Review Board

cc: Distribution List
Richard Dwyer, Nunavut Water Board
Karen Kharatyan, Nunavut Water Board
Stephen Williamson Bathory, Qikiqtani Inuit Association
Jared Ottenhof, Qikiqtani Inuit Association
Natalie O'Grady, Government of Nunavut, Economic Development and Transportation
Jody Kusugak, Government of Nunavut, Economic Development and Transportation
Amy Robinson, Government of Nunavut, Department of Environment
Amy Brown, Government of Nunavut, Department of Environment
Tineka Simmons, Canadian Northern Economic Development Agency
Agnes Simonfalvy, Canadian Northern Economic Development Agency
Hamlet of Clyde River