

**February 20<sup>th</sup>, 2020  
19TN048**

**NIRB file No.:**

**NPC File No.149251**  
CIRNAC file no.: 1273222

**NIRB  
Cambridge Bay, NU**

**Re: Opportunity to address comments received by Canadian Arctic Holidays Ltd.'s  
“Clyde River land Use Permit” project proposal**

To all the parties concerned, Canadian Arctic Holidays and the Weber family are happy to provide more information and to explain more fully our proposal for skiing tourism near Clyde River.

**Request to Change the Land Use Permit to one year.**

Due to a number of factors we would like to drop our request for a land lease and apply for a land use permit for one year. This is because:

The management plan for the Agguttinni Park is not in place.

There are concerns from within the community, particularly the HTO and we want to address these concerns. So, we feel another year is required before applying for a more permanent lease.

**Concerns related to Agguttinni Territorial Park.**

Canadian Arctic Holidays has not consulted regulators of the Park. When we started to research this project in 2015 there was no park and no public information on any proposed park. Indeed, the first maps of this proposed park that we saw, sometime in 2018 did not include this area of Ayr Lake. It is only in the last number of months, that we became aware that our site is now inside the boundaries of the proposed Park.

Therefore, we could not have foreseen having to consider consulting park management regulators. The public framework for the park does not outline any outfitter development opportunities, joint partnership or consultation references.

[https://gov.nu.ca/sites/default/files/3213-025\\_clyde\\_eng.pdf](https://gov.nu.ca/sites/default/files/3213-025_clyde_eng.pdf).

According to the Nunavut's Territorial Parks mandate for territorial parks is to “protect and promote Nunavut's natural and cultural heritage; its biodiversity and integrity; and its significant, unique and valued natural and cultural landscapes and resources.

As one of the largest and most respected outfitters in Nunavut, what a better way to open a new territorial park with an already well-established operating service? Tessum and Nansen Weber are the third generation of our family to work in Nunavut. My father came to Pangnirtung from Switzerland in 1953. He spent six months in what is known today as Auyuittuq Park. He did first ascents of most of the peaks. He spent his professional life as a scientist in Nunavut. I have guided in Nunavut since 1993, our family has operated Arctic Watch Lodge on Somerset Island since 2000. Skiing is a sustainable type of activity should be exactly what a territorial park should include. We are promoting the area with skiing. Skiing activities protect and promote wilderness without endangering or exploiting the biodiversity and integrity of the fragile arctic landscape. Our activities, skiing does not compete or conflict with any Clyde community outfitting. In fact, we hire Clyde community members to take our guests dog sledding and for cultural events.

A successful ski operation demands a very specific minimum level of mountain elevation combined with snow quality and accessibility. There are only four mountain regions in Nunavut that offer acceptable ski elevation grade. Firstly, Ellesmere Island, which is out of the question due to the excessive remoteness and costs associated with operating that far north. Secondly Bylot Island, which is a National Park, so no helicopter landings are permitted. Thirdly, the mountains near Pangnirtung but this area is also a National Park – no helicopters permitted. Clyde River, which has accessible mountains and a community in relative proximity with sealift access and commercial flights available to public. We also chose Clyde because the community was friendly and supportive of our project. Another factor for a successful program is the feasibility to snow cat or ski tour directly from the camp location into the mountains. Alternative locations to Ayr Lake have been considered, and do not work for the following reasons. We have been intensely scouting the area and fiords of Clyde River for over five years. The fiords north of Ayr Lake (e.i Eglington and Sam Ford) are out of question due to the community and culture importance to the area. We had several community council meeting in which elders were supportive of our project, but only asked that we remain out of these regions - which we continue to follow. Secondly, they are substantially further from town and it is not economically feasible to fly that distance to ski, resupply the camp and emergency response. With the new park it would also now place the camp directly into the middle of future Aggutinni Territorial Park. A third alternative would have been the area of Twin Glacier south west of Clyde Inlet. This location is within distance; however, it is a popular camping location for community hunting. There are several well-established cabins in the area. The glaciers (ski terrain) are not favorable for skiing. The glaciers and terrain is too steep and heavily fractured with crevasses and therefore does support an appropriate ski program. The location on Ayr Lake supports all the needs and is a relatively close proximity to Clyde River infrastructure. It is not feasible to move the camp out of the proposed park as it would be too far from the mountains.

Recently we have been in touch with Park planners and we will continue to communicate with them. We plan to participate in the Park Planning meeting to be held in April 2020.

## **Concerns Regarding the Naujaaraaluit Hotel**

In May, 2018 Canadian Arctic holidays based an operational test season of one week from the Naujaaraaluit hotel. The conclusion after the season was the helicopter had to fly too far, too much flying time in each direction, which makes the program uneconomical to due flying costs. It also meant the operational team had to cash fuel down the fiords for the day heli-ski program. The longer distance to the mountains means that ski touring and cat-ski are not an option.

The Naujaaraaluit hotel is not an option for the following reasons. The hotel has only eight rooms, which is too few. Our operational needs and high level of service demanded by our clientele is simply more that the hotel capacity available in Clyde River. The kitchen facility is too small and is not designed for commercial use. The dining area is too small and shared openly with the community. Which is great, but not favorable for operational designated dinner service. The hotel is operated with an electronic key card door. It was a huge a safety issue for guests leaving the hotel after 5pm and having to communicate with desk services. There is little or no hotel management after hours. The community regards the hotel as a place to gather for coffee and connect with visitors. We support this; however, it does not support a facility for Weber Arctic staff and management to perform organizational daily responsibilities in a heli-ski program. Even with the combined hotel rooms of the Ilisaqsivik hotel, room availability is not adequate. The Ilisaqsivik hotel, was often out of water and had frozen sewage system. The Clyde River community has requirements for hotel rooms for their own purposes such as contractors, government employees, community programs, etc. It is not realistic to completely book both hotels for one month. Last season, during an emergency overnight in Clyde due to bad weather, the community hotels could not support our staff requirements. Some of our staff had to sleep over night in a van, as the town had no availably in two hotels and the cultural center.

At a minimum, we do book rooms each season for staff on either end of the operation and therefore continue to support the hotels.

## **Clarification of Project Scope.**

The proposed dates of operation are from April 8, 2020 to May 13, 2020. In the long term, it would be good to have a land lease. However, for this year, 2020, we are looking for a permit to operate.

This is a very basic camp, camping in the true sense. The location is a low peninsula on the shore of Ayr Lake, about thirteen kilometers from the outflow of the lake and more than 50 kilometers from where the river flows into the sea. The area is flat enough for a camp and above flooding levels. The actual footprint is about 100m x 100m. Skiers can

ski down from the mountains into the camp. Coordinates are: 70 degrees, 26 minutes, 26.5 seconds North and 69 degrees, 49 minutes, 50 seconds West. The camp is built from Pacific Domes. The domes are made of light metal frame on a plywood floor. Fabric is placed over the frame to make a tent. Everything is setup on the snow.

Human waste (not toilet paper) is collected using an outhouse, it is dumped several kilometers away on the rocky moraine where it will disintegrate naturally without affecting the environment. The fact there is no toilet paper will allow it to break down more quickly and naturally. Kitchen grey water is dumped several hundred meters away from the lake, much farther than the thirty-meter regulation from Environment Canada. **All** garbage, including toilet paper is transported back to town. Laundry services are done in Clyde River. At the end of the season, the camp is packed away into the two sea containers. These are not in any way permanent structures. There is no plan to build any permanent structure. We don't touch the ground, move any rocks or affect the local environment.

All the skiing that is done each day is carried out far up in the mountains. There is no skiing in the valleys (where wildlife might be found). Almost all of the skiing is done on glaciers. Most of the flying with the helicopter is done at above 4000 feet in order to safely be above mountain peaks. The area where we ski is the mountains around Mount Wordie.

The snow cat is used as another method to drive a group of skiers up the glaciers so they can ski back down. "Cat skiing" is a less expensive method of skiing than using a helicopter. The snow cat has a diesel engine, it is not noisy (less than a snow machine). It has very light footprint because the tracks are very wide. It only drives on snow, so there is no lasting environmental impact. When the snow melts, the tracks are gone, like a snow machine.

After May 13<sup>th</sup>, which is the end of the field season 2020, and every season, we will demobilize the camp and pack it into 2 to 3 sea containers. The tent structure (aluminum framing, no fabric) remains bolted together. The plywood floors are piled up and remain on the ground over summer and winter. (Please refer to images 3-5) The sea containers and tent frames are left at the top of the peninsula. This location was chosen in order to stay away from possible erosions, flash floods or soft ground. (Please refer to satellite images 1-2 for location) The containers are locked for the season; no other materials are left on the ground. No fuel will be stored.

Canadian Arctic holidays paid a community member from Clyde River to visit the location on Feb 2<sup>nd</sup> to ensure that everything was in good order. Canadian Arctic Holidays was updated with photographs and conditions of the gear. No damage or missing items are reported. Clyde River community is aware and has been aware of the gear in that location since last season. Attached below are recent photos of our gear at the site on Ayr Lake. As stated in our last message we encouraged town members to visit but throughout our last operational season, we only had one visitor.

## **Environmental Impacts and traditional Land Use**

The presence of our camp for one month each year on the shore of Ayr Lake does not prevent and is not detrimental to community members who wishes to fish. Our only contact with the water is to take some water out of the lake, manually with buckets for drinking and washing. Nothing is thrown into the lake. The camp will be on the land. The camp is setup in an ecologically sustainable manner as described in this letter. This camp will not affect any fish or habitat. As a result, Ayr Lake's ecological biodiversity is not at risk.

Regarding Polar bears: There are typically very few polar bears in that area at that time of year. At that time of year, mother bears with cubs have already left the dens to go hunting on the flow-edge. Last year, in one month, we saw only one set of polar bear tracks. At that time of year, bears are normally out on the flow edge. We are not searching from bears while skiing with the helicopter. If the helicopter while being used for skiing, would happen to see a polar bear, we will certainly not chase or approach it. Polar bear safety around camp is taken very seriously. All guides are equipped and trained in polar bear safety. They are equipped with shotguns and bear spray. We have a trained camp dog to alert us should a bear come at night. We assume the same bear safety precautions across all our operation; Arctic Watch Lodge, Arctic Haven Lodge and Weber Arctic guiding. We have many years of experience dealing with polar bears, we have encounter / seen hundreds of bears. After 35 years of guiding in Nunavut are happy to say we have not had an incident resulting in client or bear injury or death.

We spent considerable effort to inform ourselves of local town knowledge. We understood that Eglinton Fiord and Sam Ford Fiord are historically, and still today, deeply connected to the community roots of Clyde River. We took it upon ourselves, since first arriving in the community to regularly consult with the locals who cherish the importance of the area. We strongly recognize the importance of cultural food, access to hunting and Inuit land use in the area both Eglinton and Sam Ford fiords. The community members use Samford Fiord as a spring community gathering area for fishing, dogsledding and camping. Thus, we decided to not situate ourselves in those areas nor have we ever operated in those areas.

Canadian Arctic Holidays is aware of the importance in traditional land use for hunting. We are not evolved in Inuit harvesting activities; we do not prevent community members from hunting or fishing. We are impartial to the hunting activates in the area. Community members have told us that no one fishes in Ayr Lake in April or May and we have not witnessed anyone fishing. We do understand that some people may fish in the lake and the river during the summer. However, as we noted previously, our camp will not affect the fish in the lake, nor fishing during the summer or other times of the year.

We were told by community members that is very little or no done hunting in this part of the Lake or in the higher mountains and on the glaciers around the lake. (We are aware that the lake was previously used as a route to go caribou hunting but no longer as there are no caribou.) If caribou were to return, the presence of the camp doesn't prevent anyone from driving down the lake. (The camp cannot be seen from the trail as it is behind a low hill.) If someone wishes to hunt during our operation, we are not against it nor would it impact our operations. We have not had any complaints or suggestions regarding wildlife or hunting. Would future concerns arise, we will make a point to address them effectively.

We do not ski in the valley bottoms but up on the glaciers and mountain tops. We ski in the mountains above Ayr Lake and around Mount Wordie. This high alpine terrain is not caribou habitat or polar bear habitat, it is all rock and ice. We do not ski or fly over the far end (west) of the Lake. We do not operate skiing on the outflow of Ayr Lake, nor do we drive on the river. It's a flat, wind-blown area with no snow. One of the considerations when choosing this spot was that it is not popular with community members. We specifically looked for an area that community members did not use regularly. It is out of the way and doesn't conflict with their activities.

Fuel: We will not store fuel at the site when the camp is not operational. All fuel that is on site is in containment. We are familiar with fuel containment because we deal with this at our lodges. In season, fuel storage will be approximately about 5 drums in containment. If we were to have a fuel spill, then we would clean it up and report it. We have previously done this at Artic Watch Lodge when there was a small accidental fuel spill. However, we do take care not to spill fuel as we know how complicated it is to clean up.

### **Concerns from the HTO**

There are some specific points that coming from the HTO that need addressing.

Firstly, it has been our mistake not to meet directly with the HTO, we have been meeting the hamlet and town council. This spring we will try to meet with the HTO.

The insinuations that we have no experience is factually incorrect. Personally, I have spent more than 600 days and nights walking on the ice of the Arctic Ocean to and from the North Pole, I have spent 20 summers on the land of northern Somerset Island and I have skied thousands of kilometers across Baffin, Ellesmere and Axel Heiberg Islands. I am a member of the Order of Canada for my work in the Canadian North. That is just me, all our team are very experienced with decades of experience in Nunavut. My wife and sons have spent years, a good part of their lives out on the land in Nunavut. We know how to deal with polar bears and wildlife, we know how to camp in an ecologically sustainable manner.

The story about hotel rooms is no accurate. In order to have the Dome tents in Clyde River for spring 2019, the tents had to be in Montreal on the ship in July 2018, they were

ordered in 2017. The plan for Dome tents was decided far in advance. Any room cancellations were within the hotel cancellation policy.

The HTO called our contributions to the community “minimal and tokenistic”. Last year, our season was only two weeks long. We hired as many people as possible. I think that the people who we hired were happy for the work. The HTO goes on to say there is a “strong workforce” in Clyde and list all the skills of people who live in Clyde. We receive job applications (from our web site) from people all across Canada, even around the world. No one from Clyde has ever asked for a job. We would be happy to interview anyone who is looking for work that has a “Red Seal” culinary certificate. The said, we are looking for someone to learn to drive the snow cat. We are also looking for someone to help us setup and take down the camp. Perhaps the HTO can help us find these people?

The HTO was concerned that we replaced renting snow machines with the snow cat. The snow cat is used to carry (drive) a group of (up to 12) skiers up the glacier, drop the off and they ski back down. Then they climb back into the snow cat for another ride up. It is called “cat skiing”. It is a form of skiing used around the world. Our clients specifically requested it. It is not a replacement for snow machines, it is a different activity. Driving snow machines up the glaciers to carry skiers is not logistically possible. Once at the skiers arrive at the top, then the snow machines would be left behind when the skiers head down. It is not practical to have an extra driver to each skier. This being said, we continue to rent snowmobiles from community members as part of our operational needs.

## **Community Involvement**

We have, from the beginning always briefed the town council, mayor and other members of the community with our plans. As outlined in our previous letters, we are constantly communicating with community members to ensure that they are satisfied with our camp location and operations. We have hired community members regularly to perform various tasks. This past winter, we paid a local resident to fix our snow machine. We hired someone to check the gear in our sea containers. We hired people to fix the snow-cat cover and deal with our sea lift materials. Every season, we hire local residents for fuel runs, laundry service, mechanical services, guiding tours on the ice, we rent snow-machines and dog sleds. We purchased fish, art & crafts, rent hotel rooms at the Naujaaraaluit and cultural center. We spend money in the store buying groceries. At the end of each season, we donate a substantial amount of food to the community. It was noted we donated the second largest contribution after Baffin Land – more than 1000 pounds of food donated.

We are actively searching for a community member who wants to work on this project. Specifically, we want to train someone to drive the snow cat. There is no one qualified to be a ski guide (under ACMG standards) but there is no reason that a community member can't become the snow cat driver. We are also looking for someone to help put up and take down the camp.

We have begun inquiries with the hamlet for a permit and a location to build a garage to store and service our machinery. (There is no public garage in Clyde River). We are ready to invest in the community. We will require someone to look after and work in this garage.

Community members have told us that safety training in mountain terrain would be beneficial to residents. We would be happy to provide an avalanche safety course for members of the community. During our camp take down (May 8 to 12, 2020) one of our staff who has avalanche training can run a basic safety course. This is normally a two-day course.

This is the first heli-ski operation in Nunavut. It is also a first operation of this type for us. It has already taken us five years and we are just beginning. It is difficult to incorporate more people from the community when we are learning ourselves. As our project becomes more stable it will be easier to involve more people. We ask for the community to be patient. In 2018, our season was one week. In 2019, two weeks, this is a tiny operation, in its infancy. We have always iterated that this would be a multi-year investment. As tourism operators in Nunavut for 30 years, we have invested our careers and much of our lives in Nunavut. We believe that this project is of positive economic and conservation value to the Nunavut and its people.

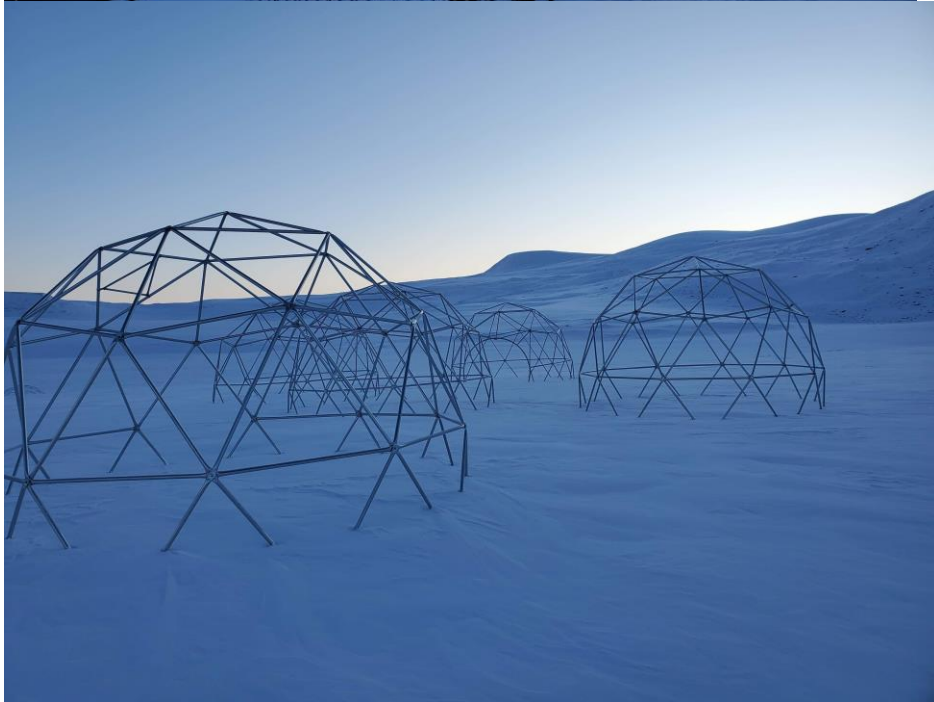
Sincerely

Richard Weber



Images: Camp gear on Ayr Lake.





### **Abandonment and Reclamation plan**

The camp site is located on the shore of Ayr Lake about 55 kilometers from Clyde River. The site consists of two sea containers, six metal tent frames and six wood floors. If the site were to be abandoned, Canadian Arctic Holidays would use the snow cat to tow the sea containers back to Clyde River. Snowmobiles would also assist towing gear on qamutiits. This would have to take place during the April as this is the only time the ground has enough snow covered to tow the sea containers overland back to Clyde River. The tent frames exhibited in the photos can be disassembled and packed on to qamutiits and returned to town. The wooden floors could be taken apart and the wood brought back to town or burnt on site. We do not displace, move rock or ground material when erecting the camp. Everything is built using snow and ice, making it simple and easy to disassemble to return to its original state.