



CIRNAC COMMENTS TO NIRB GN-CGS's "Renewal and Amendment of the Resolute Bay Utilidor System Water Licence #3 BM-RUT 1520 Type A for Ten (10) yrs. term" Project Proposal



Nunavut Regional Office
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Your file - Votre référence
19WN050
Our file - Notre référence
1283751

March 18, 2020

Emily Koide
Technical Advisor I
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via NIRB public registry

Re: Notice of Screening for Government of Nunavut – Community and Government Services’ “Renewal and Amendment of the Resolute Bay Utilidor System Water Licence #3 BM-RUT 1520 Type A for Ten (10) yrs. term” Project Proposal;

Dear Emily Koide,

On February 26, 2020, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut, Department of Community and Government Services’ “Renewal and Amendment of the Resolute Bay Utilidor System Water Licence #3 BM-RUT 1520 Type A for Ten (10) yrs. term” Project Proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB’s request:

Whether the project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);

CIRNAC is of the view that the potential impacts of the proposed Project can be mitigated with known practices or technology.

Some common practices include:

- Avoid unstable areas that may result in erosion or scouring (e.g., alluvial fans, meander bends, braided streams, active floodplains);
- Dispose or temporarily store all materials used or generated in a manner that mitigates their entry to waterbody;



- Prohibit or limit access to banks or areas adjacent to waterbodies to protect the structural integrity of banks and stream bed;
- Remove all construction materials from site upon project completion;
- Ensure machinery used on site arrives and is maintained in a clean condition free of fluid leaks, invasive species, etc.;
- Wash, refuel and service machinery and store fuel and other materials so as to prevent any harmful substances entering the water; and,
- Where dewatering is necessary treat discharge water by settling ponds, filter bags, etc.

Any matter of importance to the Party related to the Project proposal;

Community Involvement

The “Community Involvement & Regional Benefits” section of the Project Application references communication between the Proponent and the Municipality of Resolute Bay on January 17, 2020 but does not provide any further details. CIRNAC recommends that the Proponent provide a brief written summary of any interactions with community representatives regarding the Project proposal; the brief written summary should include descriptions of meeting dates, means of interaction (e.g., telephone call, email correspondence, in-person, etc.), discussion topics, and commitments.

CIRNAC recommends that the Proponent consider how it will involve residents of the Municipality of Resolute Bay in its project proposal. The following points should be explored:

- Briefing community members on the operational status of the Project;
- Briefing community members on planned activities (e.g., construction of a new wastewater treatment facility); and
- Training and employment opportunities for community members.

Spill Response Plan

Under Miscellaneous Project Information of the Project Application, the Proponent indicates that there is a Spill Contingency Plan which is approved by the Nunavut Water Board; however, no Spill Contingency Plan was submitted with the NIRB Application. CIRNAC recommends that the Proponent include the spill response plan to the NIRB as a part of the submission for the NIRB application.

Operation and Maintenance (O&M) Manuals

The Proponent states in the NIRB application that, “the O&M manuals will be submitted to the Water Board soon after the constructions of the all three structures are completed.” CIRNAC recommends that the Proponent provide the Operation and Maintenance Manual prior to the initiation of the Project buildings requiring O&M Manuals for review by the NIRB.



Activities Location

In the NIRB application under the Activities Table, the Proponent indicates that the project will be in “Within the town” in the first “Proximity to the nearest communities and any protected areas” box, and “Grise Fiord and Arctic Bay” as the second location. CIRNAC recommends that the Proponent clarify the Project’s location.

Potential Environmental Impacts

CIRNAC notes that the Proponent indicates in the Waste section that there will be no environmental impacts. CIRNAC also notes that, in the Identification of Environmental Impacts table in the Impacts section, the Proponent indicates that the project may result in negative impacts on the following:

- Construction: Municipal and Industrial Development;
 - Permafrost
 - Climate Conditions
 - Sediment and soil quality
 - Wildlife including habitat and migration patterns
 - Birds including habitat and migratory patterns
 - Aquatic species including habitat and migration/spawning

- Operation: Municipal and Industrial Development;
 - Eskers and other unique or fragile landscapes
 - Surface and bedrock geology
 - Sediment and soil quality
 - Tidal processes and bathymetry
 - Noise Levels
 - Wildlife including habitat and migration patterns
 - Birds including habitat and migratory patterns
 - Aquatic species including habitat and migration/spawning
 - Archaeological and cultural historic sites

Further, in the Additional Information Section;

- In each of the subsections of Description of Existing Environment: Physical Environment, Description of Existing Environment: Biological Environment, and Description of Existing Environment: Socio-economic Environment, the Proponent indicates the information “Safe”,
- In Section F1: Site Cleanup, the Proponent states “Always for easy and safe traffic movement”,
- In Section I1: Municipal Development, the Proponent states, “Yes, this system provides safe environment and community growth”,



- In the Identification of Impacts and Proposed Mitigation Measures section , the Proponent indicates “Safe supply of drinking water and disposal of wastewater into the sea by gravity”; and,
- In the Cumulative Effects section, the Proponent states “Good and healthy for the Public and environment”.

It is unclear what potential environmental impacts the Proponent has identified, and what mitigation measures the Proponent is proposing for the Project activities. CIRNAC recommends that the Proponent clarify:

- What potential environmental impacts were identified for the Project; and,
- What mitigation measures the Proponent proposes for each potential impact.

Water Quality

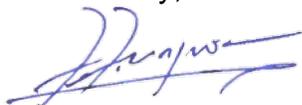
The Proponent has indicated in the Identification of Environmental Impacts table that the impacts on Water Quality by the Project activities will be positive. It is unclear what criteria the Proponent has used to determine that the Project will impact water quality positively. CIRNAC recommends that the Proponent clarify their criteria for this conclusion.

Sewage Treatment

In the Miscellaneous Project Information section of the Project application, the Proponent indicates that "sewage is treated in the accredited Lab in Ottawa and results are submitted to the NWB along with the annual report". CIRNAC recommends that the Proponent confirms if sewage is analyzed in accredited labs in Ottawa and provides the analyses results, as applicable.

CIRNAC appreciates the opportunity to provide comments and looks forward to working further with the NIRB and the Proponent, as necessary, throughout any further review related to this project. Should you have any questions, please contact Richard Bingley at (867) 975-4556 or by e-mail at Richard.Bingley2@Canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

