

constraints are one of the Project's most significant challenges; the Goose Property Airstrip Extension will allow Sabina to more efficiently construct, operate, and close the Project. This longer all-weather airstrip will also improve medivac capabilities at the Goose Property." (Sabina 2020, Section 2.1.1)

The Proponent's assessment of this modification discusses changes in the footprint of the airstrip and effects on wildlife habitat (Modification Package, Section 2.1.6). However, the assessment does not discuss any changes in air-traffic that may occur because of this modification. Specifically, will lengthening and widening the Goose property airstrip result in any changes in the type of aircraft, timing, and frequency of air traffic at the Goose Property relative to those predicted and assessed in the FEIS? (Volume 2, Section 6.2, Table 6.3-2)

For example, noise modelling calculations detailed by Sabina in the 2013 Noise and Vibration Modelling Report (FEIS Volume 4, Appendix 2-B) indicated that typical days in the most active period of production see 3 arrivals, 3 departures of Twin Otter aircraft and 1 arrival, 1 departure of a helicopter each day at the Goose Property. In lengthening and widening the airstrip, it appears the Proponent may be planning for use of larger aircraft to provide greater operational flexibility but, it is unclear how many aircraft will be used and during which seasons. Increased air traffic and larger aircraft may lead to increased disturbance of caribou, particularly if increased traffic occurs during migratory periods or seasons when caribou are more sensitive to disturbance.

As such, the GN recommends the Proponent clarify whether lengthening and widening the Goose Property Airstrip will result in any increase in the type, timing and frequency of air traffic at the Goose Property relative to those predicted and assessed in the FEIS; in particular, changes in air traffic during the summer period when caribou are most frequently observed at the Goose property.

2. MLA Airstrip Extension

Section 4.2 of the Modification Package describes a plan to extend and widen the Marine Laydown Area (MLA) Airstrip. The stated rationale for this modification is:

"Sabina intends to extend the permitted all-weather airstrip to 5,000 ft by 200 ft, which would allow aircraft to land year-round with an increased degree of success. This modification will provide greater flexibility in the movement of freight and people and improve medivac capabilities at the MLA. Seasonal logistical constraints are one of the Project's most significant challenges;" (Sabina 2020, section 4.2.1)

The Proponent's assessment of this modification discusses changes in the footprint of the airstrip and effects on wildlife habitat (Modification Package, Section 2.1.6). However, it does not discuss any changes in air-traffic that may occur because of this modification. Specifically, will lengthening and widening of the MLA airstrip result in any changes in the type, timing, and frequency of air traffic at the MLA relative to those predicted and assessed in the FEIS? (Volume 2, Section 6.2, Table 6.3-2)

For example, the FEIS indicates that access to the MLA will be by float planes during the summer months and wheel/ski turboprop planes during the winter months. A landing strip will be prepared on the Inlet for the winter months. During the shoulder seasons, the MLA will be serviced by helicopters (Volume 2, Section 6.3)

With lengthening and widening the airstrip it appears the Proponent may be planning to use larger aircraft to provide greater operational flexibility but, it is unclear how many aircraft and during which seasons. Increased air traffic and larger aircraft may lead to increased disturbance of caribou dependent on season.

The GN recommends the Proponent clarify whether lengthening and widening of the MLA airstrip will result in any changes in the type, timing and frequency of air traffic at the MLA relative to those predicted and assessed in the FEIS, specifically, changes in air traffic during the summer period when caribou are most frequently observed at the MLA.

3. Winter Ice Road Subbase Upgrade

Section 6.1 of the Modification Package describes a plan to quarry, crush and place aggregate material over approximately 10 km of the Winter Ice Road (WIR) alignment to a depth of up to 1 m to address construction problems associated with uneven, rugged terrain, and a scarcity of snow and/or water at some sections of WIR. As the lay down of aggregate material was anticipated in the FEIS (Volume 10, Chapter 14, Section 4.1), the proposed modification appears within the scope of the FEIS. However, the report does not state when the quarrying, crushing, and laying down of subbase would occur.

The Local Study Area (LSA) for the WIR overlaps with the spring migration corridor and several other seasonal ranges for regional caribou herds. Quarry blasting, crushing and road construction that overlaps with periods of peak caribou migration has the potential to disrupt movement and displace caribou from important seasonal ranges.

The GN recommends the Proponent clarify when these activities will be taking place relative to the seasonal movements of caribou through the LSA and the Proponent provide specific details regarding how disturbance of caribou will be avoided during subbase

upgrades in order for the GN to assess whether this modification is within the scope of the FEIS.

4. Clarification of Project Phase

In the 2018 and 2019 Annual Reports, the Project is described as in the “pre-construction phase”. However, in 2018 there were a series of construction activities at the Goose site including access road construction, stream crossing construction and quarry development. There was also construction activity at the Marine Laydown Area (MLA) including:

- Addition of a 1,500 m ice airstrip
- 45-person all season camp
- 730,000 litre fuel storage depot
- Desalination water plant
- Waste management infrastructure
- Satellite communications
- Power generation
- Heavy equipment roads
- Barge offloading shore ramp
- 6 hectare storage/laydown

In 2019, the Proponent constructed and operated the Winter Ice Road (WIR) which resulted in delivery of equipment, supplies, and other goods to the Goose Property necessary for construction at the Back River Project. Several earthworks were also completed at the MLA and construction of a bulk fuel storage tank at the MLA was undertaken (2019 Annual Report).

These activities appear to constitute the construction phase. Therefore, the GN is seeking clarification whether the Project is in the pre-construction or construction phase. This clarification is important as the Project moves into the construction phase because a series of important wildlife monitoring and mitigation measures are triggered, including measures to mitigate effects on caribou (WMMP, Table 6.2-1 and Section 7.1.5). In the context of reviewing the Modification Proposal, this is important because some modifications involve construction activities that could take place under the pre-construction and/or the construction phase, with varied wildlife monitoring and mitigation regimes specified in the WMMP for each phase. Monitoring and mitigation requirements in the WMMP are less during the preconstruction versus construction phase. Thus, it is important to the GN for understanding what regime will be in place during these modifications in order to render an opinion about their significance.

The GN recommends the Proponent clarify its definitions of “pre-construction” versus “construction” phases for the Project and identify where these distinctions are provided in the FEIS. Accordingly, the Proponent should clarify which of the proposed modifications in the Modification Package will be carried out under pre-construction versus construction phase conditions.

Though the GN is seeking several clarifications from the Proponent concerning this Modification Package, we ultimately defer to the authority of the Nunavut Planning Commission (NPC) and the Nunavut Impact Review Board (NIRB) to determine whether the Proponent’s proposal constitutes a significant modification to the existing Back River Project.

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