



P.O. Box 18
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Cambridge Bay
Ikaluktutiak
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Kugluktuk
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Bathurst Inlet
Kingaok
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Bay Chimo
Umingmaktok
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Gjoa Haven
Okhoktok
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Taloyoak
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Kugaaruk
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Francis Emingak
Screening Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, Nunavut
X0B 0C0

Sent by e-mail: femingak@nirb.ca, info@nirb.ca

October 30th, 2024

RE: Screening of West Kitikmeot Resources Corp.'s (WKRC) Gray's Bay Road and Port Project.

Dear Francis Emingak, the Kitikmeot Inuit Association's (KIA) consultants in geotechnical engineering, wildlife, water quality and aquatic environment, and fish have reviewed the proposed Grays Bay Road and Port Project, and their comments are in the enclosed screening forms.

Our consultants' comments pertain to the areas of wildlife and their habitat; marine mammals and their habitat; birds and their habitat; dust; invasive plant species; terrain; water quality; hydrology; Inuit harvesting activities; and local development in the area.

In summary, the construction and operation of the road and port could have significant impacts on a variety of species of wildlife ranging from terrestrial mammals such as caribou, muskox, moose, grizzly bears and wolverines as well as birds and their habitat to marine mammals such as seals, whales, narwhal and polar bears.

The construction and operation of the port could disturb sediment and generate total suspended solids that degrade the aquatic environment of the ocean while construction and operation of the road would alter terrain impacting eskers, snow accumulation and distribution, surface drainage and water flow, and permafrost.

The road requires several culverts to be installed which could alter hydrology, microclimate, and soil moisture leading to localized flooding affecting vegetation type and availability and permafrost.

The road can be a means of introducing invasive species of plants from vehicles which would also generate dust that would fall upon existing native species of



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plants. Consideration would need to be given to this as well as to potentially deleterious substances entering water courses.

The road can also provide greater access to the harvesting of wildlife and fish from previously isolated areas and lakes. This alteration in harvesting activities would have cumulative environmental effects over the lifetime of the project. This may also affect Inuit way of life and the exercise of section 35 rights under the Nunavut Agreement.

The purpose of the road is to facilitate local development leading to more mining projects, further infrastructure is expected to be developed for power distribution, communications, and mine access. Increased vehicle and air traffic is expected from development which would required consideration be given to accumulative effects.

The KIA recommends a Part 5 Review under the Nunavut Planning and Project Assessment Act (NuPPAA). All issues identified along with the potential for accumulated effects over the lifetime of the project warrants such a review by NIRB.

The KIA looks forward to conducting further reviews of the project and participating in the NIRB process to determine impacts and potential mitigation measures for the environment and KIA rights.

Thank you.

Jennifer Amagoalik

Acting Senior Project Officer
Kitikmeot Inuit Association, Department of Lands, Environment and Resources

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment



COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: Grays Bay Road and Port	
Proponent: West Kitikmeot Resources Corp.	
Location: Kitikmeot	
Comments Due By: October 30, 2024	NIRB #: 24XN038

Indicate your concerns about the project proposal below:

<input type="checkbox"/> no concerns	<input type="checkbox"/> traditional uses of land
<input type="checkbox"/> water quality	<input checked="" type="checkbox"/> Inuit harvesting activities
<input type="checkbox"/> terrain	<input type="checkbox"/> community involvement and consultation
<input type="checkbox"/> air quality	<input checked="" type="checkbox"/> local development in the area
<input checked="" type="checkbox"/> wildlife and their habitat	<input type="checkbox"/> tourism in the area
<input checked="" type="checkbox"/> marine mammals and their habitat	<input type="checkbox"/> human health issues
<input checked="" type="checkbox"/> birds and their habitat	<input checked="" type="checkbox"/> other: <u>Dust, invasive plant species</u>
<input type="checkbox"/> fish and their habitat	
<input type="checkbox"/> heritage resources in area	

Please describe the concerns indicated above:

The Kitikmeot Inuit Association's (KIA) wildlife consultant was retained to complete a high-level review of West Kitikmeot Resources Corporation's (WKR) project proposal and nontechnical summary submitted to the Nunavut Impact Review Board (NIRB). The review was discipline specific within the focus on wildlife and habitat, marine mammals, and birds quality.

Grays Bay Road and Port is a deep-water port and an all-weather road that is 230 km in length. The construction phase of the road, which will require 4 moving camps, each housing 80 people, could cause significant impacts to various species of wildlife moving through the area or using the area for sensitive life history phases. Migrating or calving barren-ground caribou, for example, may be expected to avoid high disturbance areas during construction, and the timing of caribou migration and areas of high use for sensitive life history phases like calving and post-calving would need to be well understood to ascertain the likelihood of such negative effects. The project would interact with the Bathurst, Dolphin and Union, Bluenose-East, Ahiaik and Beverly caribou herds; however, it would interact most meaningfully with the Bathurst and Dolphin and Union caribou herds, both of which have been doing poorly and are at historically very low population sizes. The Dolphin and Union herd has been designated as endangered under NWT legislation and the Bathurst herd has experienced the steepest decline of all migratory barren-ground caribou herds. Further stress to these herds has the potential for a significant adverse effect or could hinder recovery efforts. The most reliable mitigation for reducing impacts would include avoiding areas and time periods of high use; however, based on the Project description, it does not sound like avoidance is possible and the Bathurst herd would interact with the project area from April to October, during the calving, post-calving, and summer periods. These interactions have the potential for significance, so the degree of overlap would need to be considered.

Once operating, the road has the potential for significant impacts to caribou and other ungulates in the area, such as muskox and moose, if the road attracts more hunters travelling along it to hunt. Typical mitigation measures used to reduce hunting access along roads include hunting restrictions, the installation of check stations, gating, and



could draw wildlife closer to the roads, vegetation that will be avoided by wildlife) should be considered alongside impacts to wildlife and traditional land use for its potential to be significant.

Construction of the road will require the installation of over 50 culverts. Culverts can affect terrestrial wildlife habitat by altering hydrology, microclimate, soil moisture, and physical structure, leading to localized flooding and shifts in vegetation type and availability. Increased erosion and sedimentation may also compromise habitat quality by smothering plants or inundating roots. Culverts also facilitate the movement of pollutants from roadways into the broader ecosystem, which can degrade soil and water quality. The effects of culverts on terrestrial wildlife habitat may be significant, depending on the scale and the affected species.

Marine mammals such as ringed seal, bearded seal, beluga whale, bowhead whale, narwhal and polar bear may be impacted by the project at the port and along the extent of the vessel traffic route. Likely impacts may include interactions between the infrastructure and ringed seal lairs, and interactions between high use marine mammal areas and vessel traffic. Vessels can strike marine mammals and create underwater noise that can impede communication between whales, which can cause marine mammals that rely on underwater vocalizations to move out of such zones of higher use. More would need to be known about vessel types and traffic volume to understand the potential impacts to marine mammals.

The presence of an all-season road is likely to facilitate the development of more mining projects, provide a connecting route for power lines and other infrastructure, and can be expected to accelerate development, vessel traffic, air traffic, and use of the area in general. The most likely risk for significant impacts to wildlife in the region, in general, would include these cumulative impacts. A full examination of potential projects that would benefit from Grays Bay Port and Road and the time scale over which they would likely come online would need to be analyzed to glean an understanding of cumulative impacts.

Do you have any suggestions or recommendations for this application?

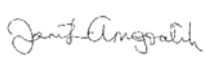
The KIA recommends a Part 5 Review under the Nunavut Planning and Project Assessment Act (NuPPAA).

Do you support the project proposal? Yes ☒ No ☐ Any additional comments?

The KIA has always supported the Grays Bay Road and Port Project and continues to do so with West Kitikmeot Resources Corp as the proponent.

Name of person commenting: Jennifer Amagoalik **of** Kugluktuk, NU

Position: Acting Senior Project Officer **Organization:** Kitikmeot Inuit Association

Signature:  **Date:** October 21, 2024



COMMENT FORM FOR NIRB SCREENINGS

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Comments Due By: October 30, 2024	NIRB #: 24XN038

Indicate your concerns about the project proposal below:

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Please describe the concerns indicated above:

The Kitikmeot Inuit Association's (KIA) water quality consultant was retained to complete a high-level review of West Kitikmeot Resources Corporation's (WKR) project proposal and nontechnical summary submitted to the Nunavut Impact Review Board (NIRB). The review was discipline specific within the bailiwick of freshwater and marine water quality, quantity, hydrogeology and lower trophic levels. The proposal contains three major components – we summarize our assessment of potential environmental interactions and associated issues of concern with each. We note that the targeted design life of the project is currently 75 years, so long term feasibility of the project will be an ongoing concern.

Component 1: In water works and facilities to support a deep-water port suitable for large cargo ships and a small craft harbour accessible to community users;

- Construction of the in-water facility comes with relatively standard risks associated with disturbance of the sediment and generation of total suspended solids that may degrade the aquatic environment. These effects are relatively well understood at a generic level, and management and mitigation plans mentioned in the application (e.g., Nearshore Construction Management Plan, Erosion and Sediment Control Management Plan) are likely sufficient to manage ongoing significant effects.
- Once installed, in water works are likely to alter the energetic patterns of wave action in the vicinity of the port. These changes may cause either increases or decreases in sedimentation patterns, changing sediment chemistry, potentially water quality, and impacting aquatic habitat for lower trophic levels and other aquatic life. Design considerations must address these potential effects, and a habitat offsetting plan will likely be required.
- The operation of long-distance cargo vessels with ballasts increases the likelihood of introducing aquatic invasive species, some of which may occupy biological niches that influence water quality (e.g., mussel species that filter feed). These interactions can be mitigated to some degree by appropriate ballast exchange and hull cleaning procedures.

- Note all risks are likely to be exacerbated by climate change which is likely to cause some alteration in thermal constraints on invasive species, increase the open water period when wave action is more apparent, and prolong the longer shipping season in which cargo ships may operate.

Component 2: Supporting ‘landside’ port infrastructure consisting of accommodations, fuel storage, laydown areas and contact water management infrastructure); and

- The ‘landside’ port infrastructure itself poses relatively generic risks similar to those considered by KIA at the Bathurst Inlet port associated with the Back River Project. There are likely to be some alterations to local surface hydrology and shallow groundwater regimes that may have impacts on marine water and sediment quality but can be mitigated through management and mitigation plans (e.g., Port Operations Management Plan) and appropriate licencing requirements for effluent from site camps and runoff.
- Potential impacts associated with materials from 3rd party users of the port that may be stored on site do not appear to have been contemplated in the application. It is reasonably foreseeable that bulk mineral projects such as the High Lake and Izok project (zinc / copper) may become economically viable with an all-weather road and deep-water port to support their operations. These projects may propose operations similar to the Mary River project on Baffin Island where ore is stockpiled at the Milne Port facility year-round. If this occurs, contact water and dust management will become a significant issue in Grays Bay. Consideration of this interaction pathway should be included in the scope of the project to ensure associated potential effects to the aquatic environment are mitigated. Note that significant deposition of dust from stockpiled ore on ice and snow proximal to the facility may also lower the albedo leading to faster snow and ice melt, and deposition of particulate matter in the marine environment.

Component 3: A 230-kilometre all-season access road.

- Construction and operation of the all-season access road will incur relatively well understood environmental interaction pathways that may influence the aquatic environment. However, specific monitoring and management plans will need to be developed to address these effects.
- Quarries and mobile camps will require water management plans and effluent quality criteria both to support construction and the operation of the road.
- Water crossings must be installed during appropriate timing windows to minimize the release of sediment laden water that can degrade water quality. They must also be appropriately maintained to prevent degraded performance which may increase mobilization of sediment laden waters (e.g., overtopping the road when snow upgradient of blocked culverts melt). Climate change over the life of the project is likely to exacerbate the challenges associated with appropriate water crossing design and maintenance, and associated interactions with the aquatic environment.
- Snow management will require ongoing consideration to mitigate the impacts of dust entrained (i.e., with elevated total suspended solids) snow from melting into watercourses and waterbodies.
- While not addressed in the application, it is unknown what items may be shipped along the all-season access road. Spills of those materials and dust from uncovered shipments may bring, as yet, unknown potential impacts to water and sediment quality.
- A nuanced aquatic effects monitoring program will likely be required, particularly considering water chemistry may vary with proximity to mining projects along the route (e.g., High Lake, Ulu).

The application does highlight the likelihood of cumulative effects with other projects in the region. We suggest that an all-season access road throughout the Kitikmeot and associated deep water port will significantly change the economic viability of many projects in the region. A regional or strategic environmental assessment coupled with a detailed cumulative effects assessment may be required to fully understand the potential effects to the aquatic environment in the Kitikmeot Region. However, this type of study may be outside the scope of work that should be undertaken by a single proponent, and better handled by the Government of Nunavut, Federal Government or Nunavut Impact Review Board.



Do you have any suggestions or recommendations for this application?


The Kitikmeot Inuit Association recommends a Part 5 Review under the Nunavut Planning and Project Assessment Act (NuPPAA).

Do you support the project proposal? Yes ☒ No ☐ Any additional comments?

The Kitikmeot Inuit Association has always supported the Grays Bay Road and Port Project and continues to do so with West Kitikmeot Resources Corp as the proponent.

Name of person commenting: Jennifer Amagoalik **of** Kugluktuk, NU

Position: Acting Senior Project Officer **Organization:** Kitikmeot Inuit Association

Signature:  **Date:** October 21, 2024



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Please describe the concerns indicated above:

The Kitikmeot Inuit Association's (KIA) ecological and environmental consultant was retained to complete a high-level review of West Kitikmeot Resources Corporation's (WKR) project proposal and nontechnical summary submitted to the Nunavut Impact Review Board (NIRB). The review was specific within the focus on watercourse crossings, freshwater fish and fish habitat.

The project summary mentions the presence of freshwater and marine fish in the project area, describes planned mitigation measures, and commits to producing an Environmental Protection Plan (EPP).

Section 2.1.2.2 Description of Watercourse Crossings - The level of detail provided in the proposed plan for the approximately 230 watercourse crossing structures is low. The authors acknowledge this limitation and commit to providing refined crossing designs in the Environmental Impact Statement (EIS). Section 2.1.2.2 includes a commitment that crossing structures will be designed to "meet requirements related to flow, fish passage, and fisheries protection where applicable". The potential impacts to fish and fish habitat due to watercourse crossings cannot be thoroughly evaluated based on the available information.

Section 5.10 and Section 5.12 Freshwater Fish and Fish Habitat and Marine Fish and Fish Habitat - The summaries of existing conditions provide a very high-level description of the fish community and fish habitat in the project area. The authors commit to providing additional information in a Technical Data Report to support the EIS. In the absence of detailed information about assessment methods and key results such as descriptions of fish distribution, habitat quality, habitat use, and key life history events, it is not possible to evaluate the adequacy of the characterization of the existing conditions.

Section 8.10.1 Potential Effects for Freshwater Fish and Fish Habitat - The construction of the Grays Bay Road and associated crossing structures may increase the accessibility of previously isolated bodies of water for people. As a



result, fish capture may increase. Consideration should be given to evaluating potential effects of increased harvesting on sensitive or ecologically important species during road operation.

Section 8.10.2 Effects Pathways for Freshwater Fish and Fish Habitat - In the operations and maintenance periods, introduction of sediment or other deleterious substances to watercourses may occur during grading or crossing repair. This pathway of effect could be identified in this section and carried forward to the mitigation section for inclusion in the Road Management Plan.

Section 8.10.3 This section lists several mitigation measures that will minimize the potential effects on fish and fish habitat. These measures and plans must be further developed before their adequacy can be evaluated. This section doesn't include a description of pre-construction fish salvage for watercourse crossings, which can reduce the chance of instream construction causing death of fish. It is recommended that instream site isolation and pre-construction fish salvage be implemented where conditions allow.

Do you have any suggestions or recommendations for this application?


The Kitikmeot Inuit Association recommends a Part 5 review under the Nunavut Planning and Project Assessment Act (NuPPAA).

Do you support the project proposal? Yes ☒ No ☐ Any additional comments?

The Kitikmeot Inuit Association has always supported the Grays Bay Road and Port Project and continues to do so with West Kitikmeot Resources Corp as the proponent.

Name of person commenting: Jennifer Amagoalik **of** Kugluktuk, NU

Position: Acting Senior Project Officer **Organization:** Kitikmeot Inuit Association

Signature:  **Date:** October 21, 2024



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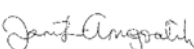
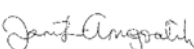
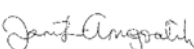
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Please describe the concerns indicated above:

The Kitikmeot Inuit Association's (KIA) geotechnical engineering consultant was retained to complete a high-level review of West Kitikmeot Resources Corporation's (WKR) project proposal and nontechnical summary submitted to the Nunavut Impact Review Board (NIRB). The review was discipline specific within the focus on permafrost, geology, geochemistry, hydrogeology and climate.

The proposed all-weather road and the airstrip cross challenging permafrost terrain, including ice-rich glaciolacustrine deposits, ice wedge polygons, massive ground ice, etc., that is susceptible to impacts from the construction activities, operations as well as climate change. The proposed alignment of 230 km crosses about 230 watercourses, which will require culverts and bridges. The road embankment will change surface drainage conditions and therefore additional culverts will be required to address local drainage as failure to adequately manage it will have negative impacts on the permafrost from newly developed ponding, for example. Considering the proposed design life of 75 years, the design must accommodate major uncertainties in the how environmental conditions, including extrema, may change, specifically air temperatures, precipitation patterns, and runoff. These changing conditions will directly or indirectly impact on the infrastructure as foundation conditions and geohazards will alter over time. Hazards to the proposed infrastructure may originate from thermokarst, sinkholes, flooding, bank erosion, sea level rise, icings, or mass movements, such as active layer detachments, retrogressive thaw slumps, debris flows or rock fall.

In order to mitigate adverse effects that the construction of the proposed project in combination with future environmental changes may cause, it is critical that sufficient geotechnical site investigations, terrain mapping and geohazard assessments are completed prior to detailed design and the initiation of construction. A solid understanding of the current subsurface and climatic conditions and how those may change during the proposed design life is required for understanding risks to the environment, the project and its users, which forms the basis for developing appropriate infrastructure design and hazard mitigation measures.

<p>The proposed project schedule (Table 1.3 of the Project Proposal) allocates a 6-month period for detailed design. KIA's engineering consultant understands that there is currently limited geotechnical information available for bridge crossings, alignment design, airstrip, port, and borrow sites. Consequently, KIA's engineering consultant identifies the lack of subsurface data as a significant risk, potentially hindering the design's ability to address challenging on and offshore foundation conditions effectively. This could lead to adverse environmental impacts in the future if the proposed design does not adequately address permafrost and hydrological conditions which are inherently variable along the road alignment. A detailed design of an appropriate cross-section, such as an embankment or a road cut, is feasible only if the subsurface conditions are thoroughly understood.</p> <p>Similarly, a thorough understanding of potential quarries and other borrow sites is essential for detailed design. This understanding should be based on in-situ sampling to facilitate construction planning and mitigate adverse environmental impacts, particularly if the materials are prone to metal leaching or acid generation.</p> <p>The proposed all-weather road, airstrip, and port facilities will impact surface water flow, snow accumulation, and snow redistribution. With climate change expected to alter precipitation patterns substantially during the life of this project, it is crucial for the proponent to assess how these changes will affect surface water and snow patterns over time. This assessment is vital not only to address potential adverse effects on subsurface conditions but also assess how vegetation within the road corridor may change and how such changes may potentially impact wildlife.</p>	<p>Do you have any suggestions or recommendations for this application?</p> <p>The Kitikmeot Inuit Association recommends a Part 5 Review under the Nunavut Planning and Project Assessment Act (NuPPAA).</p>												
<p>Do you support the project proposal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Any additional comments?</p> <p>The Kitikmeot Inuit Association has always supported the Grays Bay Road and Port Project and continues to do so with Kitikmeot Resource Corp as the proponent.</p>													
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