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Taloyoak

Kugaaruk

Kelli Gillard, B.Sc., P.Ag.
Manager Impact Assessment
Nunavut Impact Review Board

Sent via e-mail: kgillard@nirb.ca; info@nirb.ca

June 19th, 2026

Re: Conformity Review, GBRP Project - IRs.

Dear Kelli Gillard, KIA has reviewed West Kitikmeot Resources Corp. (WKR) *Draft Environmental Impact Statement (DEIS) for Grays Bay Road and Port (GBRP)Project*. The DEIS was reviewed by KIA's consultants in the areas if wildlife, aquatic sciences, fish sciences, hydrology, geotechnical engineering, geology, and geochemistry to generate a total of 64 Information Requests (IRs).

Of the 65 IRs, 18 (28%) came from our wildlife biologist who reviewed Volumes 1, 4, 5, 6, 11, and associated appendices focusing on impacts to terrestrial wildlife, marine wildlife, wildlife habitat, vegetation and atmosphere.

Our fish sciences consultant reviewed Volumes 5, 7, 11, and associated appendices in the areas of fisheries and hydrogeology. They have 13 IRs (20%). Our aquatic sciences consultant reviewed Volumes 1, 4, 7, 11 and associated appendices focusing on freshwater and marine water quality, surface water quantity and flow, hydrology, and geochemistry and have 11 IRs (17%).

Our geotechnical engineering consultants reviewed Volumes 6, and associated appendices in the areas of geotechnical engineering, permafrost, geology and geochemistry, hydrogeology, and ground and surface water and have 23 IRs (36%).

Overall, the information presented in the DEIS submission was clear and comprehensive. However, based upon our review of the information presented, the KIA believes that there are some significant data gaps that needs to be addressed to further enhance and improve the DEIS for GBRP Project.

KIA's information requests are attached with this letter in the format required by NIRB.

Yours Truly

John Roesch

John Roesch, P.Eng.
Senior Project Officer
Department of Lands, Environment, and Resources
Kitikmeot Inuit Association

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Information Requests for GBRP Project DEIS.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR1
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Climate and Meteorology
Reference:	Section 12.4, 12.4.3, 12.5, and Appendix A12B
Issue/Concern:	Section 8.1.2.2 of the concordance table (Appendix A) requires that the report include 'Discussion on the climate parameters that may change due to emissions from the proposed project [greenhouse gas, and criteria contaminants such as SO2, NOx, CO, Volatile Organic Compounds, O3, etc.]'. However, this requirement is not fully met. There is minor, indirect discussion of how atmospheric components influence climate in the Climate Profile (Appendix 12A). Contaminants are assessed with respect to air quality; however, the referenced sections do not explicitly analyze or discuss how project-related criteria air contaminants (e.g., NOx, SO_2, VOCs) may influence climate parameters.
Information Request:	Provide explicit discussion linking criteria air contaminants (NOx, SO2, VOCs, etc.) to climate parameters or justify exclusion.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR2
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Terrestrial Environment - Baseline Information
Reference:	Section 14.2, and Appendix A14A
Issue/Concern:	Section 8.1.4.1 of the concordance table (Appendix A) requires that the report include 'Description of the bedrock lithology, morphology, surficial geology (including soils and sediment and their thermal and ground ice conditions), and landform at proposed borrow and quarry sites, roads, infrastructure, and other areas where earthworks are proposed'. However, this requirement is not fully met. Section 14 and Appendix 14 provide descriptions and maps of regional geology and surficial geology; however, it does not identify site-specific information for proposed quarry or borrow areas.
Information Request:	Provide mapped and described geology for potential or proposed quarry/borrow sites or clarify project stage.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR3
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.

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Subject:	Terrestrial Environment - Impact Assessment
Reference:	Section 14.3.2
Issue/Concern:	Section 8.1.4.2 of the concordance table (Appendix A) requires that the report include 'Potential impacts on the abundance and distribution of unique or valuable landforms (e.g., wetlands, eskers and fragile landscapes) from the proposed project'. However, this requirement is not fully met. Section 14.3.2 quantifies the spatial impacts on eskers; however, it does not identify the expected magnitude and locations of other impacted fragile landscapes or wetlands.
Information Request:	Provide additional detailed and spatially explicit analysis of potential impacts on wetlands, eskers, and fragile landscapes. Provide clarification regarding fragility in the context of the Arctic environment and climate change.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR4
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Terrestrial Environment - Impact Assessment
Reference:	Section 14.3.4
Issue/Concern:	Section 8.1.4.2 of the concordance table (Appendix A) requires that the report include 'Potential impacts on physical and thermal stability of terrain (including that due to thaw of ice-rich permafrost) in the vicinity of project facilities and infrastructure. Discussion should focus on the potential for impacts arising from surface disturbances due to construction and operation of the proposed all-weather access road, port and Jericho station (e.g., overburden stripping, cuts/fills, excavation of the facility and infrastructure'. However, this requirement is not fully met. Section 14.3.4 describes general effects of terrain disturbance; however, it does not clearly link specific construction activities (e.g., excavation, embankment construction) to their potential impacts on terrain stability.
Information Request:	Provide more detailed assessment of how specific construction activities affect terrain stability, specifically in the context of changed surface water regimes

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR5
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Terrestrial Environment - Impact Assessment
Reference:	Section 14.3.4
Issue/Concern:	Section 8.1.4.2 of the concordance table (Appendix A) requires that the report include 'Assessment and prediction of permafrost behaviour (degradation and its rate) beneath relevant infrastructure and areas (e.g., all-weather road, storage areas, fuel tank farms, quarries). Long-term predictions of the thermal regime around relevant infrastructure the proposed project facilities should be conducted with the consideration of climate change. Numerical modelling should be employed for both

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	short term and long-term predictions of permafrost evolution including predictions of artesian inflow into any relevant the proposed project facilities if thawing of permafrost is envisioned Assessment and prediction of permafrost behaviour (degradation and its rate)'. However, this requirement is not fully met. Section 14.3.4 qualitatively describes potential permafrost degradation but does not include numerical modelling or quantitative predictions of permafrost behaviour beneath infrastructure. Additionally, predictions are not specific for each project component location (e.g. do the predicted behaviours change for Lupin compared to the Grays Bay Port).
Information Request:	Provide modelling or justification for exclusion of numerical permafrost predictions. Of particular interest is nears surface changes in permafrost conditions and how suprapermafrost taliks form their how they interaction with surface water regimes, changes in vegetation and infrastructure.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR6
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Terrestrial Environment - Impact Assessment
Reference:	Section 14.3.4
Issue/Concern:	Section 8.1.4.2 of the concordance table (Appendix A) requires that the report include 'Discussion of the potential for the occurrence, frequency, and distribution of terrain hazards, including ground instability (e.g. slope instability) and snow drifts and banks, as a result of construction activities (e.g., cut/fill, extraction of construction materials)'. However, this requirement is not fully met. The assessment identifies types and spatial distribution of terrain hazards; however, it does not evaluate the frequency of occurrence. Additionally, snow drift and snowbank formation processes are not addressed in a geotechnical context.
Information Request:	Include assessment of hazard frequency and discuss snow drift/bank formation impacts. Discuss how hazards (frequence / magnitude) may change over the design life in response to climate change.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR7
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Geological Features, Surficial and Bedrock Geology and Geochemistry Baseline Information
Reference:	Section 14.2, and Appendix A14A Section 4.3
Issue/Concern:	Section 8.1.5.1 of the concordance table (Appendix A) requires the report to include 'Physical thermal, mechanical and geotechnical characteristics of surficial material and bedrock (and if appropriate structural geology) where applicable to major infrastructure areas or where earthworks are proposed in the Project.', However, no

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	information on the salinity along the proposed corridor and at the port is provided, information that is critical for the design and long-term terrain behaviour.
Information Request:	Include an assessment on salinity along the corridor or justify why this is not required at this stage.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR8
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Geological Features, Surficial and Bedrock Geology and Geochemistry Baseline Information
Reference:	Section 14.2, and Appendix A14A Section 4
Issue/Concern:	Section 8.1.5.1 of the concordance table (Appendix A) requires that the report include 'Description of the geotechnical properties of bedrock and soil units, including ice content and thermal conditions of permafrost soils and rocks, as relating to slope stability, and bearing capacity of facility foundations'. However, this requirement is not fully met. Section 14.2 and Appendix 14A provide general descriptions of geology but do not include key geotechnical properties such as bearing capacity or detailed parameter values for soil and bedrock units. It is indicated that this information may be provided at a later design stage, resulting in a current information gap.
Information Request:	Provide geotechnical parameters (e.g., bearing capacity; creep properties) or confirm when and how this information will be available and measured.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR9
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Geological Features, Surficial and Bedrock Geology and Geochemistry Baseline Information
Reference:	Section 14.2, Appendix A14A Section 4, and Appendix A19B ML-ARD Risk Assessment
Issue/Concern:	Section 8.1.5.1 of the concordance table (Appendix A) requires that the report include 'Description of the geotechnical properties of bedrock and soil units, including ice content and thermal conditions of permafrost soils and rocks, as relating to slope stability, and bearing capacity of facility foundations'. However, this requirement is not fully met. Section 14.2 and Appendix 14A provide general descriptions of geology but do not include key geotechnical properties such as bearing capacity or detailed parameter values for soil and bedrock units. It is indicated that this information may be provided at a later design stage, resulting in a current information gap.
Information Request:	Provide geotechnical parameters (e.g., bearing capacity; creep properties) or confirm when and how this information will be available and measured.

Source:	Kitikmeot Inuit Association

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IR Number:	KIA-IR10
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Geological Features, Surficial and Bedrock Geology and Geochemistry Baseline Information
Reference:	Section 14.2, and Appendix A14A Section 4
Issue/Concern:	Section 8.1.5.1 of the concordance table (Appendix A) requires that the report include 'Acquisition of the in-situ stress either with in-situ investigation or from other sources with reasonable confidence'. However, this requirement is not fully met. The comment provided in the Concordance Table indicates that in situ stress evaluations have not been prepared due to the nature of the project (i.e. it is linear infrastructure and will be constructed above ground). However, given the presence of multiple infrastructure components that will require subsurface construction components (e.g. water crossing foundations), in situ stress evaluations are required for understanding of subsurface conditions critical to design.
Information Request:	Provide available data or justify exclusion based on project type and stage.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR11
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Geological Features, Surficial and Bedrock Geology and Geochemistry Impact Assessment
Reference:	Section 14.3.4
Issue/Concern:	Section 8.1.5.2 of the concordance table (Appendix A) requires that the report include 'Risk assessment and predictions, including proposed management measures'. However, this requirement is not fully met. Section 14.3.4 identifies potential risks and associated management measures; however, it does not present a structured or quantitative risk assessment. This limits the ability to evaluate likelihood and consequence of identified risks.
Information Request:	Provide the proposed risk assessment framework and additional risk assessment where appropriate.

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Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR12
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Hydrological Features and Hydrogeology Baseline Information
Reference:	Section 19.2, and Appendix A19A Section1.3.1
Issue/Concern:	Section 8.1.6.1 of the concordance table (Appendix A) requires that the report include 'Description of relevant hydrological regimes, drainage basins, watershed boundaries and site water balance in the Regional Study Area'. However, this requirement is not fully met. Section 19.2 provides a detailed description of hydrological regimes, drainage basins, and watershed boundaries within the Regional Study Area. However, while components of a water balance (e.g., runoff, seasonal flow patterns, and hydrological processes) are described, a comprehensive site water balance is not explicitly presented for the port site.
Information Request:	Provide a water balance for the port site or justification for omission.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR13
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Hydrological Features and Hydrogeology Baseline Information
Reference:	Section 19.2
Issue/Concern:	Section 8.1.6.1 of the concordance table (Appendix A) requires that the report 'Describe permafrost and talik distribution at shorelines and beneath waterbodies such as proposed water crossings'. However, this requirement is not fully met. Section 8.1.6.1 of the concordance table requires that the report "Describe permafrost and talik distribution at shorelines and beneath waterbodies such as proposed water crossings; " and references Section 19.2 of the report for the required information. The report includes information on permafrost and talik distribution; however, this information is not located within Section 19.2, as identified in the concordance table. This results in inconsistency and reduced traceability of information.
Information Request:	Update concordance table to correct section references. Further, describe how different types of taliks have changed and are anticipated to change with time

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR14
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Hydrological Features and Hydrogeology Baseline Information
Reference:	Section 19.2

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Issue/Concern:	Section 8.1.6.1 of the concordance table (Appendix A) requires that the report 'Describe potential locations of naturally occurring icings including those at potential water crossings'. However, this requirement is not fully met. Section 8.1.6.1 of the concordance table requires that the report "Describe potential locations of naturally occurring icings including those at potential water crossings" and references Section 19.2 of the report for the required information. The report includes information on potential locations of naturally occurring icings including those at potential water crossings; however, this information is not located within Section 19.2, as identified in the concordance table. This results in inconsistency and reduced traceability of information.
Information Request:	Update concordance table to correct section references. Further, describe how icings have changed and are anticipated to change with time

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR15
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Hydrological Features and Hydrogeology Impact Assessment
Reference:	Section 19.3.2
Issue/Concern:	Section 8.1.6.2 of the concordance table (Appendix A) requires that the report include 'Potential impacts to existing watersheds from surface water diversions or withdrawal associated with proposed project components or required by all-weather access road, port, Jericho Station, and winter ice road development and other Project components (e.g., quarries,)'. However, this requirement is not fully met. Section 19.3.2 provides a detailed description of regional watersheds and hydrological conditions and identifies locations where the Project may interact with surface water (e.g., watercourse crossings). However, it does not explicitly assess potential impacts to existing watersheds from surface water diversions or water withdrawals associated with project components such as the all-weather road, port, Jericho Station, winter road, or quarries. As such, this requirement is considered partially met, with notable gaps in the evaluation of project-specific alterations to watershed hydrology.
Information Request:	Provide evaluation of impacts from diversions/withdrawals on watershed hydrology.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR16
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Hydrological Features and Hydrogeology Impact Assessment
Reference:	Section 19.3.2
Issue/Concern:	Section 8.1.6.2 of the concordance table (Appendix A) requires that the report include 'Evaluation of stormwater runoff and surface water connectivity throughout the Local

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	Study Area and Regional Study Area, with consideration for potential impacts to receiving waters (e.g., flow rates and flow patterns)'. However, this requirement is not fully met. Section 19.3.2 describes baseline hydrological conditions but does not evaluate project-driven stormwater runoff or changes to surface water connectivity. Additionally, it does not assess potential impacts on receiving waters in terms of flow rates or patterns.
Information Request:	Provide analysis of stormwater runoff and changes to surface water connectivity.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR17
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Hydrological Features and Hydrogeology Impact Assessment
Reference:	Section 19.3.2
Issue/Concern:	Section 8.1.6.2 of the concordance table (Appendix A) requires that the report include 'Potential impacts to natural drainage patterns from the construction and operation of proposed from the construction and operation of Project infrastructure'. However, this requirement is not fully met. Section 19.3.2 provides a clear description of baseline drainage patterns and acknowledges that construction and operation of Project infrastructure may alter surface water flow and drainage pathways. General impacts related to road construction, water crossings, and ground disturbance are identified, along with mitigation measures such as culvert design and erosion control. However, the assessment does not provide a detailed or quantitative evaluation of how natural drainage patterns will be altered, nor does it clearly link drainage changes to specific project components.
Information Request:	Provide detailed or quantitative assessment linking infrastructure to drainage changes, including impact on snow accumulation and associated snow melt patterns or justify design-stage limitation.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR18
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Hydrological Features and Hydrogeology Impact Assessment
Reference:	Section 19.3.2
Issue/Concern:	Section 8.1.6.2 of the concordance table (Appendix A) requires that the report include 'Potential for ice damming and resultant effects on other resources'. However, this requirement is not fully met. The Impact Statement includes discussion of ice-related processes such as icings (aufeis) and their relationship to permafrost and drainage; however, it does not explicitly address the potential for ice damming within watercourses. No analysis is provided regarding the formation of ice dams, their

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	potential to affect flow conditions, or the associated impacts on infrastructure, hydrology, or other environmental components. Mitigation measures specific to ice damming are also not identified. As such, this requirement is not met.
Information Request:	Provide analysis of ice dam formation and associated impacts or justify exclusion.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR19
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Hydrological Features and Hydrogeology Impact Assessment
Reference:	Appendix A20A and A19C
Issue/Concern:	Section 8.1.6.2 of the concordance table (Appendix A) requires that the report include 'Assessment of each water crossing and in-stream work against the Canadian Navigable Waters Act (CNWA) and CNWA Minor Works Order to determine if Transport Canada approval is required, and potential impacts to the navigability and safety of the watercourses'. However, this requirement is not fully met. Appendix 19A or 20C do not explicitly assess crossings against the Canadian Navigable Waters Act (CNWA) or the Minor Works Order. Additionally, they do not determine whether Transport Canada approvals are required, nor evaluate potential impacts to navigability or safety of watercourses. As such, this requirement is not met.
Information Request:	Assess crossings against CNWA requirements and identify approval needs.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR20
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Hydrological Features and Hydrogeology Impact Assessment
Reference:	Section 14.3.4
Issue/Concern:	Section 8.1.6.2 of the concordance table (Appendix A) requires that the report include 'Potential changes to permafrost/talik distribution and subsurface flow in the vicinity of shorelines and water crossing including the potential for frost bulb or icing formation'. However, this requirement is not fully met. Section 14.3.4 provides limited discussion of icing processes but does not address frost bulb formation or provide a detailed assessment of icing risks near infrastructure.
Information Request:	Expand assessment of frost bulb formation and icing risk along proposed infrastructure, specifically near water crossings.

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Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR21
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Groundwater and Surface Water Baseline Information
Reference:	Appendix A19C Section 3.3
Issue/Concern:	Section 8.1.7.1 of the concordance table (Appendix A) requires that the report include 'Description of lake bathymetry and limnology in the Local Study Area'. However, this requirement is not fully met. Appendix 19C Section 3.3 includes minimal description of lake bathymetry, providing only basic depth ranges without explanation of data sources, methods, or broader limnological context.
Information Request:	Provide additional data sources, methods, and characterization details.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR22
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Groundwater and Surface Water Baseline Information
Reference:	Section 19.3.4.1
Issue/Concern:	Section 8.1.7.1 of the concordance table (Appendix A) requires that the report 'Provide maps and cross sections of the proposed study area indicating the extent of hydrostratigraphic units, permafrost, and lake taliks. Groundwater levels, potentiometric contours and groundwater flow directions should be included'. However, this requirement is not fully met. Section 19.3.4.1 discusses hydrostratigraphic conditions in general terms; however, it does not provide maps or cross-sections showing the spatial extent of hydrostratigraphic units. Additionally, cross sections showing talik likelihood of supporting infrastructure locations (i.e. not linear infrastructure) are not provided.
Information Request:	Provide maps/cross-sections of hydrostratigraphy, permafrost, and taliks.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR23
Request to:	West Kitikmeot Resources Corp
Reviewer:	BGC Engineering Inc.
Subject:	Groundwater and Surface Water Baseline Information
Reference:	Section 19.3.4.1
Issue/Concern:	Section 8.1.7.1 of the concordance table (Appendix A) requires that the report 'Provide hydraulic conductivity data for hydrogeologic units in the proposed study area'. However, this requirement is not fully met. Section 19.3.4.1 provides limited hydraulic conductivity estimates for select units (e.g., weathered and fresh bedrock);

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	however, it does not include values for other relevant materials, nor does it present this information in a spatially explicit context (e.g., maps or cross-sections). This limits the completeness of the hydrogeological characterization.
Information Request:	Provide conductivity values for all relevant units and supporting spatial context.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR24
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Model Selection
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 5: Atmospheric Environment, Appendix 11A: Air Quality Technical Modelling Report o Section 6.1, Page 51
Issue/Concern:	Clarification is needed regarding the rationale behind selecting to use the AERMOD modelling system over others, such as CALPUFF. On page 51 in Appendix 11A, useful information about the strengths of AERMOD is provided. However, it does not explain why this model was selected over other models.
Information Request:	The KIA requests the following: • Please add a short paragraph explaining why AERMOD was selected over other available models, such as CALPUFF, for this project.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR25
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Storage Tanks
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 5: Atmospheric Environment o Section 11.3.2.2, Page 11-29
Issue/Concern:	Clarification is needed regarding why storage tanks are not considered sources of pollutants. On page 11-29 it is stated that: *"The consideration of potential adverse health effects from exposure to volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons, and diesel particulate matter is described in the Human Health Risk Assessment Report (see Volume 9, Appendix 26A, Section 4.2.1)."* However, in Volume 9 storage tanks are not discussed as potentially a source of VOCs.
Information Request:	The KIA requests the following: • Please add a short paragraph justifying why storage tanks are not considered a source of VOC emissions.

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Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR26
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Emission Rate Calculation
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 5: Atmospheric Environment ○ Section 11.3.2.2, Page 11-30
Issue/Concern:	Clarification is needed regarding emission rate calculations. It seems that, in some cases, such as aircraft landing and takeoff or vessel emissions, the emission rates are based on emission factors suggested by non-Canadian organizations. However, Canadian resources are available for at least some of these cases: https://www.canada.ca/en/environment-climate-change/services/air-pollution/publications/emissions-inventory-report-2025/annex-2.html
Information Request:	The KIA requests the following: • For each source and pollutant, please add a sentence explaining why the specific reference was used to calculate emission rates.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR27
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Maximum Predicted Concentrations

Reference:	Grays Bay Road and Port Project Impact Statement
	• Volume 5: Atmospheric Environment
	  ○ Section 11.3.2.4, Page 11-45, Table 11.13
	  ○ Section 11.3.2.4, Page 11-46, Table 11.14
	  ○ Section 11.3.2.4, Page 11-49, Tables 11.15 and 11.16

Issue/Concern:	Report the absolute maximum predicted concentration in addition to percentile values. In the tables presenting the maximum predicted concentrations, the reported results are based on the applicable percentiles used for comparison with ambient air quality standards. However, reporting the absolute maximum predicted concentration for the same averaging period would also be useful to characterize worst-case conditions and better understand the potential short-term effects of the Project on air quality.
Information Request:	The KIA requests the following: • Within the report, please provide the absolute maximum predicted concentration, in addition to the applicable percentile-based concentration, for each pollutant and averaging period.

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Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR28
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Public Access Restrictions in the Project Area
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 5: Atmospheric Environment, Appendix 11A: Air Quality Technical Modelling Report o Section 2.2, Page 14
Issue/Concern:	A significant portion of the domain is excluded because it is within the "Facility Boundary." However, further clarification is needed in this regard. On page 14, it is stated that "the air quality assessment focuses on areas that are located outside industrial facility boundaries." Additionally, on page 58, it is stated that "grid receptors were chosen based on recommendations provided in Section 7.2 of the BC Air Quality Dispersion Modelling Guideline (ENVP 2022)." However, the B.C. guideline provides a specific definition of "plant boundary," as follows: 7.3 PLANT BOUNDARY Model output is typically compared to ambient air quality objectives. Although the areas of applicability of the BC ambient air quality objectives are not defined, often they are applied to areas where there is public access (i.e., beyond the plant boundary). The plant boundary is determined to be the following: ◆ The facility fence line or the perimeter of disturbed area that defines where public access is restricted. ◆ If a facility is located within another larger facility boundary, the plant boundary is the boundary of the encompassing facility. ◆ If a public access road passes through the plant, the plant boundary is the perimeter along the road allowance. There may be areas outside the plant boundary such as over a large body of water where public access is likely to be very rare. In this case, the human and environmental risk is low even though these areas may have predicted contaminant concentrations. The applicability of the model output and ambient air quality objectives for such areas is a matter to be discussed with the Ministry. As the project area is unfenced, and because in this report the PDA is defined based on arbitrary buffers around the project components (pages 11–13), further clarification is needed regarding the exclusion of the large area shown in Figure 6.5, AERMOD Receptor Grid. Inclusion of additional rationale text will help during the technical review process.
Information Request:	The KIA requests the following: • Please clarify the rationale for excluding the large area shown within the "Facility Boundary" in Figure 6.5 from the AERMOD receptor grid. • Please explain how this excluded area meets the applicable definition of a plant or facility boundary under the referenced B.C. guideline.

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Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR29
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Climate and Meteorology
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 5: Atmospheric Environment, Appendix 11A: Air Quality Technical Modelling Report o Section 3.2, Page 16
Issue/Concern:	There are some inconsistencies among the timeframes used for different climatic variables. On page 16, the date ranges used for different weather variables seems to be inconsistent. For some variables, such as extreme temperature, the data extend to 2025, while for others, such as freezing degree days, the data extend to 2020. Clarification will help during the technical review process.
Information Request:	The KIA requests the following: • Please clarify in this section why different timeframes were used for different variables.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR30
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	VOCs emission rates
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 5: Atmospheric Environment, Appendix 11A: Air Quality Technical Modelling Report o Section 4.3, Page 33
Issue/Concern:	Emission rate for VOCs is not calculated. It seems that in Section 4.3, VOCs were not considered as a pollutant in the emission inventory. This requires clarification, especially since the project includes multiple storage tanks. Clarification or additional rationale text will help during the technical review process.
Information Request:	The KIA requests the following: • Please clarify why storage tanks and VOCs are not included.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR31
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Source information
Reference:	Grays Bay Road and Port Project Impact Statement

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	• Volume 5 – Atmospheric Environment, Appendix 11A: Air Quality Technical Modelling Report ○ Section 6.1.2, Page 55
Issue/Concern:	More information is needed regarding the sources used in AERMOD. In AERMOD View, the application used for air dispersion modelling in this report, users can export all source information as a table. This table provides complete details of the sources used in the model. Adding this table to the report, even as supplementary material, would be useful to our ability to complete the technical review.
Information Request:	The KIA requests the following: • Please export the source characteristics from AERMOD View and add the table to either Section 6.1.2, Model Sources, or the supplementary materials.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR32
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Concentration Contour Plots
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 5: Atmospheric Environment, Appendix 11A: Air Quality Technical Modelling Report ○ Appendix C (to Appendix 11A)
Issue/Concern:	The concentration contour plots seem inconsistent with defined receptors. In the concentration contour plots, contours showing pollutant concentrations are presented within the PDA. However, Figure 6.5, AERMOD Receptor Grid, and the main text indicate that the PDA was excluded from the analysis. This is confusing because it is not clear how concentrations were calculated in areas where no receptors were included. Clarification will help during the technical review process.
Information Request:	The KIA requests the following: • Please clarify why the concentration contour plots show pollutant concentrations within the PDA, given that Figure 6.5 and the main text indicate that the PDA was excluded from the AERMOD receptor grid.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR33
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Wind Data
Reference:	Grays Bay Road and Port Project Impact Statement

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	• Volume 5: Atmospheric Environment., Appendix 11A: Air Quality Technical Modelling Report ○ Section 6.1.1, Page 54, Figure 6.2
Issue/Concern:	Windrose for relevant date range is needed. Figure 6.2 shows the windrose derived from the AERMET five-year meteorological dataset, while Figure 6.3 shows the same information based on data from the Grays Bay Meteorological Station for the period from August 19, 2024, to November 5, 2024. To assess how well the MMIF data represent actual site conditions, the windrose should also be presented for the same period, August 19, 2024, to November 5, 2024, using the data used in AERMET.
Information Request:	The KIA requests the following: • Please add a windrose based on AERMET data for the time of August 19, 2024, to November 5, 2024.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR34
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 6: Terrestrial Environment, Appendix 16A, Terrestrial Wildlife Baseline Report ○ Section 4.1.2.1, Page 27
Issue/Concern:	Missing settings used for running KDEs. On Page 27, it is stated that: “To delineate seasonal range boundaries, kernel density estimation (KDE) was implemented using a 1-km (cell size) standardized grid with a seasonally variable reference bandwidth (Nick Wilson [GNWT] 2024, pers. comm.).” These settings can highly impact the resulted UDs and should be included in the report. Inclusion of this information on settings is needed to assist us in performing a well-informed technical review.
Information Request:	The KIA requests the following: • Please include all the settings used for the KDEs in a table for the different seasons and explain the reason for choosing each specific bandwidth.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR35
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Peak Calving Period
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 6: Terrestrial Environment, Appendix 16A, Terrestrial Wildlife Baseline Report

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	○ Section 4.1.2.1, Page 28
Issue/Concern:	Some clarification is needed regarding the method used for finding the peak calving period to inform an independent technical review. On page 28, it is stated that: "Spatial and temporal attributes of the Bathurst caribou herd peak calving area (defined using the location of estimated calving events) were analyzed using methods similar to Gunn et al. (2008c)."
Information Request:	The KIA requests the following: • Please add a short justification as to why the Gunn et al. 2008c method was preferred over other alternate approaches.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR36
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Significance Determination
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 4: Effects Assessment Methodology ○ Section 9.4.1.4, Page 9-13 • Volume 6: Terrestrial Environment, Section 15: Assessment of Potential Effects on Vegetation ○ Section 15.1.5, Pages 15-12 to 15-14 ▪ Table 15.3, Pages 15-13 and 15-14 ○ Section 15.1.6, Page 15-14 • Volume 6: Terrestrial Environment, Section 16: Assessment of Potential Effects on Caribou ○ Section 16.1.6, Pages 16-20 to 16-24 ▪ Table 16.4, Page 16-20 to 16-22 ○ Section 16.1.7, Pages 16-26 to 16-27 ▪ Table 16.6, Page 16-26 ○ Section 16.7, Pages 16-157 to 16-158 • Volume 6: Terrestrial Environment, Section 17: Assessment of Potential Effects on Birds ○ Section 17.1.5, Page 17-14
Issue/Concern:	For some valued components, the Impact Assessment lists criteria and thresholds, if applicable, used to determine significance of an effect on the valued component in question. It is not always clear what changes are required for a finding of 'significant,' and how the measured parameters or models fit into the definition and determination of significance. If the significance determination is qualitative and based on professional judgement, this should also be stated.

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	The determination of significance of project effects on valued components is not clearly articulated. **Examples (including but not limited to):** Caribou: Section 16.1.6 in Section 16 of Volume 6 includes discussion of the seven criteria used to classify the residual effects of the Project on Caribou, including definitions of the categories for each criterion. Table 16.4 summarizes this information, listing the criteria as Direction, Magnitude, Geographic Extent, Timing, Duration, Frequency, and Reversibility. Section 16.1.7 then uses the assessment criteria to describe in Table 16.6 how significance of an effect is determined based on the categories assigned for three out of the seven criteria – Direction, Magnitude, and Timing; the remaining four criteria are listed as 'qualifiers'. The listed thresholds in Table 16.6 are Adverse Direction, High Magnitude, and Moderate to Very High Sensitivity Timing. It is not clear from the text, but it appears that all three of these thresholds must be met for a for a particular effect to be classified as 'significant.' Page 16-26 states that 'contextual' criteria qualify the primary criteria (Direction, Magnitude, and Timing), "in terms of permanency and spatio-temporal extent of Project effects," but does not describe if these four criterion factors in the determination of significance other than being descriptive terms. Vegetation: For Section 15, Assessment of Potential Effects on Vegetation, the significance determination procedure is more inscrutable. Section 15.1.5 and Table 15.3 outline the seven criteria used to characterize residual effects – Direction, Magnitude, Geographic Extent, Timing, Duration, and Reversibility – but, unlike for caribou, there is not a corresponding table for vegetation outlining thresholds or the role of each criteria (i.e., primary or qualifier) in making a significance determination. Section 15.1.6 (Page 15-14) states that a significant adverse effect on vegetation is one that threatens the long-term viability or persistence of plant species or communities, after the application of avoidance and mitigation measures. However, there is no description of how the seven criteria factor in to determining significance nor how the measurable parameters in Table 15.2 would indicate a threat to long-term viability or persistence of plant species and communities. Birds: The Impact Statement defines a significant adverse residual effect on birds "as a residual effect that is expected to result in an adverse change to bird population viability and persistence, of bird populations that interact with the RAA, beyond an acceptable level (e.g., where it is not sustainable or is unavailable to contribute to biodiversity and ecosystem function or is not available for managed harvest)." The assessment appears to evaluate residual effects using indicators such as habitat loss, habitat alteration, and changes in mortality risk. However, the Impact Statement does not clearly describe the analytical framework used to link the assessed indicators to this endpoint. It is unclear how predicted changes in habitat availability or mortality risk were translated into conclusions regarding long-term population viability, persistence, sustainability, or contribution to biodiversity and ecosystem function. the

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	Impact Statement does not identify quantitative thresholds or other measurable standards that define what constitutes an "acceptable level" of change. It is unclear how significance determinations were made or how the reasonableness of those determinations can be independently evaluated without more information. We reviewed Volume 4: Effects Assessment Methodology, and it did not provide clarification regarding these questions.
Information Request:	The KIA requests the following: • Please provide explicit descriptions of how significance was determined for each residual effect and VC, including the specific qualitative and / or quantitative findings required for a "significant" designation and a clear link between each criterion and measurement to the definition and determination of significance. If the significance determination is qualitative and based on professional judgement, this should also be directly stated. • Explain how the assessment endpoints were predicted in the effects analysis (e.g., for birds, how habitat loss and mortality risk are linked to the significance endpoint of population viability and persistence). • Define "acceptable level", where used, in the significance definition and identify any quantitative thresholds or other benchmarks applied in determining significance. • Please explain how herd vulnerability/resilience was considered in the significance ratings with justification.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR37
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Assessment of Herd-Level Change in Caribou Movement

Reference:	Grays Bay Road and Port Project Impact Statement
	
	• Volume 6: Terrestrial Environment, Section 16: Assessment of Potential Effects on Caribou
	  ○ Section 16.1.7, Pages 16-26 to 16-27
	  ▪ Table 16.6, Page 16-26
	  ○ Section 16.4.3, Pages 16-100 to 16-107
	
	Section 16.6.3.1, Pages 16-153 to 16-155

Issue/Concern:	According to Table 16.6, to be deemed 'significant,' an effect must meet the threshold of *High* Magnitude. For the effect of Change in Movement, Table 16.6 states that a *High* categorization requires the Project or a component to affect herd-level movements and reduce access to seasonal ranges, such as calving areas. Section 16.1.6.3 (Page 16-24) states that there are no prescribed thresholds to help determine the magnitude of effects on movement, but there is no explanation or justification

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	regarding the rationale behind the setting of Magnitude categories for Change in Movement within the report. It is also not clear how the analytical assessment would show herd-level changes to movement and restricted access to seasonal ranges. Section 16.4.3.1 lists two metrics used to assess Change in Movement: (1) annual exposure rate of caribou to disturbances, and (2) probability of caribou use of areas on the landscape during migration. Metric 2 involves using collar data to determine where migrations overlap with the project, which are in turn used to "infer Project-related pathways that may create physical and/or perceptual filters to caribou movement." The output of assessment (1) is the average number of days a caribou may be exposed to the Project; the output of (2) includes indications of where the Project may interact with caribou migration. It is not clear how these analyses would be extrapolated to indicate potential herd-level movement changes and restricted access to seasonal ranges. It is likewise unclear how the output from (2) was corrected for inclusion of the Project. Page 16-26 also includes a definition of 'significant': "The Project's effect on a caribou herd causes or exceeds conservation-based thresholds or threatens the long-term persistence and viability of the population despite the application of mitigation, management, and enhancement measures." It is not clear how long-term persistence and viability of caribou populations were assessed or how it was linked to changes in movement. Based on the definition of significance and the lack of available thresholds, changes in movement are implied to be required to conclude that there will be significant impacts on the long-term persistence and viability of caribou. Note: A part of the wildlife baseline report describes a Caribou Herd Vulnerability Model (CVHM), but Page 16-155 states that CVHM results do not contribute to the determination of significance.
Information Request:	The KIA requests the following: • Please describe the rationale for each of the Magnitude categories for Change in Movement. • Please describe how the data and analysis to assess Change in Movement are extrapolated to determine herd-level movement changes and/or access to seasonal ranges. • Please provide a description of how the data and analysis to assess Change in Movement would indicate a threat to long-term persistence and viability of a population.

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	Please explain how herd vulnerability/resilience was considered in the significance ratings with justification.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR38
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Documentation for Establishing Zones of Influence
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 6: Terrestrial Environment, Section 16: Assessment of Potential Effects on Caribou ○ Section 16.4.2, Pages 16-88 to 16-91
Issue/Concern:	The ERM (2025a) report cited to justify using a 1 km ZOI for all-season roads is not available for review. Understanding the reasoning for decisions regarding ZOIs or other values used in analysis is important for reviewing potential effects. Zones of Influence (ZOIs) are discussed in several places, including but not limited to Section 16.4.2.1. Page 16-89 states: *"the ZOI of the Project Road is expected to be 1 km … ERM Consultants Canada Ltd. (2025a) recommended a 1-km ZOI for all-season roads where traffic is managed or the road is closed when caribou are present."* A search for the report in question was conducted, but it could not be located.
Information Request:	The KIA requests the following: • Please provide the referenced document: "ERM Consultants Canada Ltd. 2025a. Bathurst Caribou Zone of Influence Literature Review. Prepared for the Government of Northwest Territories. 18 pp."

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR39
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Road Access Control Measures
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 4: Effects Assessment Methodology, Section 9.4.1.3, Pages 9-12 to 9-13

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	• Volume 6: Terrestrial Environment, Section 16: Assessment of Potential Effects on Caribou,
	  ○ Abbreviations, Pages V.6-xvii to V.6-xix
	  ○ Section 16.4.6, Pages 16-115 to 16-122

Issue/Concern:	It is not clear from the available information what type of mitigations will be implemented or what they will entail. It is difficult to discern whether mitigations will be sufficient or feasible to reduce project effects without a clear description. According to the Abbreviations list, TARP is defined as "Trigger Action Response Plan," and MCCM is defined as "Mobile Caribou Conservation Measures." Section 9.4.1.3 (Page 9-12) states that residual effects are those that remain after a mitigation or enhancement has been applied. Section 16.4.6 (pages 16-115 to 16-122) presents a summary of the findings of Project residual effects on caribou. Page 16-117, which summarizes the findings of project effects on change in caribou habitat includes the statement: *"The reduced ZOI for the Project (1 km) compared to the maximal potential ZOI (i.e., 5 km, the LAA) is a consequence of mitigation, management, and enhancement measures such as the caribou TARP, which includes MCCM-based adaptive road closures and traffic management (e.g., speed limits, wildlife right-of-way)."* TARP is also mentioned as an important mitigation for addressing changes in caribou movement and change in mortality risk to caribou. It appears that the TARP and its MCCM measures that will be responsible for effectively reducing the ZOI to 1 km, reducing the effects of change in habitat and movement, and reducing mortality risk are not yet developed or available for review. It is difficult to determine how effective and suitable the mitigations will be at reducing Project effects on habitat, movement, and mortality without a detailed description of these mitigation measures. In addition, controlled access is listed as a mitigation measure for reducing mortality risk, but details of this mitigation measure are also not provided. Access control can take many forms – from a manned checkpoint to a gate. It is difficult to assess how effective the mitigation would be without a more detailed description of how access will be managed. Access management seems to be related to establishment of an effective TARP / MCCM, since it is not clear how temporary shutdowns of the road would be relayed to those driving on the road without establishing communications with road users.
Information Request:	The KIA requests the following: • Please provide a description of how access will be controlled to the road, and how communications with road users will be established. • Please provide details regarding the TARP and MCCM.

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	Please provide a description of mitigation measures that are sufficiently thorough to be able to understand how measures will reduce potential project effects to a finding of "non-significant."

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR40
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Caribou Herd Vulnerability Assessment
Reference:	Grays Bay Road and Port Project Impact Statement • Appendix 16B, Vulnerability Assessment of the Bathurst, Beverly/Ahiak, and Dolphin and Union Caribou Herds to the Proposed Grays Bay Road and Port Project
Issue/Concern:	The caribou herd vulnerability assessment is missing some key information. Section 3 of Appendix 6B outlines three development scenarios used in the vulnerability assessment: no development, the Grays Bay Road and the Tibbitt to Contwoyto Winter Road (TCWR), and Grays Bay Road and a proposed all-weather road denoted as SGP. The bulleted list on Page 37 states for the final scenario, "we used the route with the lower number of encounters (i.e., Route 6 from Russell et al. 2024a)." It is not clear what is meant by this statement, as it was not described previous to this section if different route options were considered for the development scenario of Grays Bay Road plus the all-weather SGP road. It is also not clear what implications result from using a route with a lower number of encounters. It appears that Figures 18 and 19 (pages 34 and 35) include conflicting information, or there is an error in labelling one of the figures. Figure 18 shows that there are more overall encounters over a calendar year for the Gray's Bay Road plus SGP compared to Grays Bay Road plus TCWR, but Figure 19 shows more encounters per caribou for the Gray's Bay Road plus TCWR. Figure 20 (page 36) is not clear. There are vertical and horizontal lines on the figure panels that are not defined, it is not clear which scenario is depicted, and the time-period covering either figure panel is not described. Figures in Appendix 1 (to Appendix 16B) include acronyms or numbers as labels that are not clearly defined in the text, figure captions, or a glossary (See Figure S2-4 for an example), and other figures do not include axis labels (see Figure S2-7, S2-10). Lack of definitions or axis labels makes it difficult to interpret the figure. Ideally, a caption or notes section will include all the information necessary to interpret a figure or table without having to read the main text. The report includes several figures depicting kernel density analysis results. However, there are no details regarding the settings and data used in the kernel density

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	analysis. Since model settings can greatly impact the results, they should be included in the report.
Information Request:	The KIA requests the following: • Please provide details if multiple routing options were used in models or if route alternatives factored into the herd vulnerability analysis. • Please ensure that all necessary information to interpret a table or figure is included in the caption, table or figure notes, in the main text, or in another referenced table or figure. • Please include all the settings used for the KDEs in a table for the different seasons and explain the reason for choosing each specific bandwidth.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR41
Request to:	West Kitikmeot Resources Corp
Reviewer:	Zoetica Environmental Consulting Services
Subject:	Alternative Energy System
Reference:	Grays Bay Road and Port Project Impact Statement • Volume 1: Main Document, ○ Executive Summary, Page ES-10 • Volume 6: Terrestrial Environment Section 17: Assessment of Potential Effects on Birds • Section 17.3, Page 17-32, Table 17.9
Issue/Concern:	Aside from a single table entry, the assessment provides no discussion of potential impacts to birds or the future studies and assessment work that will be undertaken to evaluate avian effects once the alternative energy system design has been finalized. In the Grays Bay Road and Port Project Impact Statement Volume 1 – Main Document, it is stated, "An alternative energy system with capacity around 1 MW may be installed at the port area to offset diesel consumption and reliance on diesel-generated power. This may include a combination of wind turbines, solar PV, and/or battery storage. Phasing, number, size, and location of wind turbine(s) and/or solar array(s) will be determined later in the design process." The Grays Bay Road and Port Project – Impact Statement Volume 6: Terrestrial Environment Section 17: Assessment of Potential Effects on Birds contains little information of potential effects on birds, with impacts summarized in a single table (Table 17.9). It is noted that the project component will involve both changes in habitat and in mortality risk for birds. Beyond this single table entry, the documentation provides no assessment of potential effects on birds across all guilds, and does not identify the future work, studies, or assessment framework that will be used to characterize and evaluate these impacts once the alternative energy system design has been developed.

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	It is recognized that the type, number, size, and location of the alternative energy system have not yet been finalized. However, the documentation does not discuss what future avian studies, surveys, or assessment work will be undertaken once these design details are developed. Given the potential for wind turbines and solar infrastructure to affect birds through collision risk, displacement, and disturbance, clarification is requested regarding the future work to characterize and assess these potential effects.
Information Request:	The KIA requests the following: • A description of how the potential effects of the proposed alternative energy system on birds will be assessed, including the assessment, methodology and study design. • Information on how potential collision risk, displacement, disturbance, and cumulative effects associated with wind turbines, solar arrays, and associated infrastructure will be evaluated. • Is it anticipated that the alternative energy systems will be evaluated in a separate, future EIS or amendment application that will provide more detail? If so, can this be stated in the document?

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR42
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Wave Energetics and Marine Environment
Reference:	Volume 1 Main Document, P34
Issue/Concern:	WKR summarizes the effects on marine water quality and sediment as: *"The Project may temporarily affect marine water and sediment through activities such as dredging, blasting, infrastructure installation, desalination and wastewater treatment system discharge, and vessel traffic. Key measures include designing roads and water crossings to protect wildlife and water flow, controlling dust and emissions through equipment maintenance and dust suppression, limiting noisy activities during sensitive times for wildlife and land users, and managing waste, fuel, and wastewater to prevent contamination. With these measures, Project effects on marine water and sediment are predicted to be not significant."* WKR's characterization of effects explored throughout the rest of the application does not appear to consider the potential energetic changes in wave action within the marine environment as a result of permanent in-water infrastructure. It does not appear this effect pathway has been considered in the EIS.
Information Request:	How have potential impacts to wave energetics in the marine environment resulting from permanent in water infrastructure (e.g., two deep water wharves designed for large vessels up to 100,000 deadweight tonnes) been considered? Please discuss this

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	effect pathway in the context of changes in sedimentation patterns within the marine local assessment area and associated effects on sediment quality and aquatic habitat. Note the disturbances to marine sediment via construction activities are separately contemplated to this issue.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR43
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Desalination
Reference:	Volume 1, MD.2.6.2.10 Water Management P 104, MD.8.1.2 Project Effects P 156; Volume 11, Attachment H6, Water Management Plan, P317-330
Issue/Concern:	With respect to water treatment and discharges to the receiving environment, WRK indicates "If desalination is conducted, a prefabricated desalination plant will be installed on a prepared foundation at the port. The seawater intake would likely be on the east side of the Grays Bay peninsula near the Small Craft Harbour, and outlet likely on the west side of the peninsula near the Barge Landing area. Water withdrawal and treatment will be established during construction and maintained to the extent necessary during operations and maintenance." The application, including the Water Management Plan, includes no information on what kind of treatment may be pursued or potential effluent quality criteria. While we understand additional details will be provided during project licencing, sufficient detail is required during these proceedings to provide confidence that the EIS predictions of project effects can be met. Note the application suggests that "Modelling indicates that effluent discharges will rapidly dilute within small mixing zones (approximately 6 m during construction and 28 m during operations), maintaining water quality within acceptable limits, and thus limiting effects to sediment quality" but no substantiating evidence is included.
Information Request:	Provide details on the water treatment plants that are being investigated, discharge locations that are being considered and any effluent quality criteria that may be required. Sufficient detail should be included to demonstrate that that water treatment / desalination options are feasible for the settings in which they may be implemented (i.e., the Canadian Arctic), and that the volumes discharged at potential effluent concentrations will not substantially degrade the receiving environment. Further, substantiate the statement that *"Modelling indicates that effluent discharges will rapidly dilute within small mixing zones (approximately 6 m during construction and 28 m during operations), maintaining water quality within acceptable limits, and thus limiting effects to sediment quality".*

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Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR44
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Cumulative Effects from Water Crossings
Reference:	Volume 1, Section MD.7.1.2 Project Effects, Change in surface water and sediment quality, P149
Issue/Concern:	Changes in surface water and sediment quality do not appear to be contemplated in the context of impacts from water crossings. The proposed road alignment bisects multiple watersheds in which all watercourses will be impacted to some degree, be direct interactions with the watercourse or dust and debris from the potential traffic. The cumulative effects in downstream waterbodies where influences on multiple watercourses coalesce do not appear to have been considered in the effects assessment.
Information Request:	Please characterize the effects on downstream waterbodies/higher order watercourses where the influences of multiple watercourses/waterbodies impacted by the road alignment and associated water crossings coalesce.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR45
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Projected Activity on Roads
Reference:	Volume 4 Section 9.2.4.2 Temporal Boundaries P16; Volume 11 Appendix 37A Road Management Plan (Draft)
Issue/Concern:	WKR does not appear to provide concrete projections as to the expected use of the Road. Even in Temporary Care and Maintenance (which is not assessed in the Impact Statement), WKR assumes “that the activities occurring would be similar to operations and maintenance, but at lower levels”. Neither the projected operational use of the road nor those projected under Care and Maintenance are provided. This information is required to provide insight into potential volumes of dust that may be generated through road traffic, degradation of the road and surrounding permafrost from kinetic energy, and the likelihood / frequency that water crossings will be maintained both throughout the year and immediately prior to freshet.
Information Request:	WKR to provide projections of number of trips expected along the road both during standard operation and under Care and Maintenance. These projections should be specific to vehicle type (to the resolution of large/industrial vehicles and smaller personal use vehicles) and times of year during which variation of traffic may be expected.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR46

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Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Consideration of Culturally Important Areas in Aquatics Effects Assessment
Reference:	Volume 7, Section 19.1.1.4 Influence of Inuit, Indigenous, and Community Knowledge on the Assessment of Cumulative Effects P53; Volume 11 Appendix 37D AEMP
Issue/Concern:	WKR indicates that *"Through workshops and regional discussions, Kitikmiut Knowledge Holders, other Indigenous groups, and other potentially affected communities assisted WKR in identifying culturally important areas, species, and practices that may experience combined effects from the Project and other projects and activities in the Project's RAAs."* However, it is unclear how this feedback has been incorporated into the monitoring, management and mitigation of impacts to the aquatic environment within the rest of Volume 7 and the associated Aquatic Effects Monitoring Plan (in Draft) within Volume 11.
Information Request:	Please clarify how culturally important areas have factored into the road alignment, the selection of water crossing infrastructure, and monitoring efforts to evaluate impacts to those areas within the RAA.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR47
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Characterization of Residual Effects
Reference:	Volume 7 Section 19.1.5 Residual Effects Characterization, Table 19.3 Characterization of Residual Effects on Water Resources, P62-63; Appendix 19A Hydrology Baseline Report, Table 2.1 Number of Surface Water and Sediment Quality Samples Included in this Assessment
Issue/Concern:	WKR indicates that *"For the purposes of this assessment, a measurable change is defined as a change in water chemistry that can be quantified relative to the established range of baseline variability and evaluated using the criteria in Section 19.1.6"*. While some baseline data are available for the Effects Assessment, there are key deficits in water and sediment quality data within the LAA and RAA that will make it challenging or impossible to evaluate changes in water chemistry stemming from Project Activities. Notably, there appear to be sparse data available along the road alignment, with water quality data exclusively sourced from 2012 except the potential water intake sites where new data were collected in 2024 (Appendix 19A Table 2.1). Sediment data are similarly sparse. It is therefore unclear how these data and the sparse road alignment data will be used to confidently characterize "baseline variability" and evaluate project effects.
Information Request:	Please clarify if the data summarized in Table 2.1 of Appendix 19A represent the total available water and sediment quality data. If there are additional data available, please summarize those data points in a table (e.g., when the data

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	were collected and what parameters were assessed), provide a figure showing where those data were collected, and clarify how those data have been incorporated into the effects assessment. Further, please clarify WKR's position on whether the existing data are sufficient to define baseline variability under varying hydrological conditions that may be encountered once the road has been constructed. Also, provide a power analysis to define the effect size that is statistically distinguishable from baseline conditions given the available data. Specific consideration should be provided to define "baseline variability" within each watershed bisected by the road and project infrastructure. Finally, please outline WKR's plan to bolster the existing baseline dataset along the corridor, and the timeline under which these data will be collected with sufficient clarity to be developed into a commitment that can be referenced in the Project Certificate. Note we would expect at least three years pre-construction data from key locations (to be determined by WKR) to be collected as input into a water licence application to the NWB.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR48
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Drinking Water Sources on the Land
Reference:	Volume 7 Section 19.1.6 Significance Definition P64
Issue/Concern:	WKR notes that *"With respect to water resources, feedback received from [Inuit Advisory Group] members (IAG 2025b) identified the following priorities, when considering unacceptable changes as a result of the Project:* *• That Inuit perspectives are considered and addressed in Project design,* *• That the Project does not negatively affect peoples' ability to put food on the table, and* *• That water and wildlife are protected"* It is unclear if the collection of drinking water while on the land was considered with respect to the significance definitions for effects. Dust impacts from all-weather roads have been considered an ongoing risk to drinking water sources on the land by Inuit associated with the Baffinland project, and it is unclear whether a similar concern may be relevant to the Grays Bay Road and Port project.
Information Request:	Please clarify whether drinking water sources on the land were considered in WKR's definition of significance pertaining to effects, and how this understanding has been incorporated into the EIS.

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	Note this concern is particularly relevant as the Road will be open to private vehicles and the linear infrastructure corridor may therefore serve as a significant travel route for local Inuit in the future.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR49
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Representative Sediment Samples
Reference:	Volume 7 Section 19.2.2.3 Surface Water and Sediment Quality, P95; Volume 11 Appendix 37D AEMP.
Issue/Concern:	WKR provides a description in Volume 7 of where sediment samples were collected in streams and lakes and uses these samples to characterize baseline conditions therein. It is unclear how the depth from which the sediment samples were collected corresponds to the sedimentation rates at the respective locations. Additional clarity regarding what depths represent current conditions relative to those that have developed over time will be an essential component in future sediment sampling when those data will be used to evaluate project effects relative to pre-construction conditions. This concern is compounded as there are relatively sparse details within the AEMP to address this uncertainty both now as it pertains to baseline characterizations and in the future when effects-based sediment sampling will be undertaken.
Information Request:	What temporal period do the samples contributing to the baseline characterization of sediment in the RAA represent and on what evidence does WKR base their response? Clarify how future sediment sampling programs will address concerns regarding the period over which collected sediment samples are reflected and the measures that will be implemented to ensure future sediment sampling during project operations is not diluted with pre-operational / unimpacted sediment. Finally, what is the effect size that WKR expects to be able to detect as part of sediment sampling conducted through the AEMP.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR50
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Freshet Preparations and Snow Accumulation
Reference:	Volume 11 Appendix 37A Road Management Plan (Draft) Section 5.2.1.3 Snow Clearing P38

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Issue/Concern:	WKR indicates that "Winter maintenance activities will focus on managing snow accumulation to maintain safe and reliable road access. Due to strong winter winds, the Project area is expected to experience snow drifting along sections of the road. Routine snow management will include the removal of snow where accumulations compromise road safety or impede travel. Snow accumulation near watercourse crossings will be managed to ensure that water can move freely through culverts and waterways during freshet." However, the number of water crossings over the proposed 230 km road distance may introduce significant challenges ensuring the culverts are clear of snow during freshet to prevent ponding ahead of the culverts or melt water overtopping the roads. It is unclear if sufficient staff will be available at the frequency needed to maintain free passage of water under the road at all water crossings during freshet.
Information Request:	Please clarify how frequently water crossings will be inspected and cleared during the onset of freshet and as it progresses each year to ensure free passage of water (and fish as appropriate) underneath the road. Further, provide evidence to demonstrate this frequency is sufficient to maintain free passage of water underneath the road and that there will be adequate staff available to accomplish this task.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR51
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Underdeveloped Management Plans
Reference:	Volume 11, Management Plans
Issue/Concern:	The management plans presented in WKR's application appear to be in draft form without detail. While this is not necessarily a universal concern, there are key considerations that must be addressed as part of the EIS: Adaptive Management. Conceptual triggers and thresholds should be identified by the proponent and adaptive management responses defined to provide confidence that all measures that may be required to address deviations in EIS predictions can be implemented without going back to the NIRB for additional permitting.
Information Request:	Please update all relevant plans (in particular, the Adaptive Management Plan, AEMP and Environmental Protection Plan) with adaptive management tables and management associated responses that may be implemented to provide confidence to reviewers that those measures may be implemented without needing to resubmit to the NIRB.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR52
Request to:	West Kitikmeot Resources Corp
Reviewer:	Hutchinson Environmental Sciences Ltd.
Subject:	Monitoring Plan Details

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Reference:	Volume 11 Appendix 37D Aquatic Effects Monitoring Plan
Issue/Concern:	Insufficient details are provided within the AEMP to demonstrate that the proponent will be able to effectively monitor project effects at relevant locations with sufficient resolution to identify impacts in a timely manner and address those impacts with appropriate management options.
Information Request:	To support the technical review, please provide a full AEMP for both the marine and freshwater aquatic environments. We presume that this plan will be refined over the course of these proceedings with a requirement to submit a finalized version as a condition of the Project Certificate. We note that this is particularly important for marine components of the plan as those are not within the scope of future licencing applications before the NWB.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR53
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Water Withdrawal Thresholds and Low Flow Sensitivity
Reference:	Vol. 7 Freshwater Environment (Surface Water Quantity Assessment)
Issue/Concern:	The assessment concludes that water withdrawal effects are low where withdrawals remain below 10% of available streamflow or lake volume. While this threshold may be appropriate under average flow conditions, the Project area is characterized by highly seasonal hydrology, including short-duration freshet events, prolonged low-flow periods, and smaller systems that may experience little flow or freeze-to-bed conditions during winter. It is not clear from the assessment whether the proposed threshold remains protective under these conditions or how seasonal variability has been incorporated into the analysis.
Information Request:	Please provide the technical basis for application of the <10% withdrawal threshold. Evaluate withdrawal effects during low-flow and winter conditions and provide a description how water withdrawal will be seasonally managed.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR54
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Hydrologic Baseline Representativeness
Reference:	Appendix 19A Hydrology Baseline Report; Vol. 7 Freshwater Environment
Issue/Concern:	Hydrologic characterization of the Project relies heavily on regional hydrometric records and historical Izok Corridor datasets. Given the length of the corridor, the five watersheds crossed by the Project, and the 171 identified watercourse crossings, it is difficult to assess whether the available site-specific monitoring data adequately characterize the range of hydrologic conditions present along the alignment.

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Information Request:	Please summarize site-specific hydrometric monitoring completed along the current alignment, describe how regional stations were applied to ungauged crossings, and discuss how uncertainty was incorporated into the assessment. Describe any future work planned to be completed as the project progresses to better characterize hydrological conditions at watercourse crossing sites.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR55
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Groundwater, Permafrost and Climate Change
Reference:	Vol. 7 Freshwater Environment; Terrain, Soils and Permafrost Assessment
Issue/Concern:	The conclusions regarding groundwater protection and limited groundwater-related effects rely on the assumption that permafrost restricts groundwater movement and groundwater-surface water interaction. While this assumption is considered reasonable under current conditions, long-term climate-driven changes in active layer thickness, talik development, and permafrost degradation may alter groundwater conditions.
Information Request:	Please provide a commentary on how future hydrogeological conditions will be assessed and managed, and how it will be considered as part of the future Environmental Management Plans.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR56
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Freshwater Quality Baseline Coverage
Reference:	Appendix 19C Freshwater and Sediment Quality Data Summary Report
Issue/Concern:	The freshwater quality baseline is based on a relatively limited number of stream and sediment quality stations distributed across a large study area. While we consider this level of study detail reasonable given the length of the corridor and site access constraints, it is not clear that the dataset fully characterizes spatial and seasonal variability of site conditions along the Project alignment.
Information Request:	Please provide the rationale for monitoring locations, discuss seasonal and interannual variability, and confirm whether additional baseline monitoring is planned.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR57
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Naturally Elevated Copper and Monitoring Implications

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Reference:	Appendix 19C Freshwater and Sediment Quality Data Summary Report
Issue/Concern:	The baseline dataset identifies elevated dissolved copper concentrations at multiple locations, including concentrations exceeding applicable guideline values. While these appear to reflect background conditions, they may complicate interpretation of future monitoring results.
Information Request:	Please describe how naturally elevated copper concentrations will be considered when evaluating future Project-related changes.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR58
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Applicability of Historical ML/ARD Assessments
Reference:	Appendix 19B Izok Corridor ML/ARD Risk Assessment Report
Issue/Concern:	The geochemical assessment relies substantially on historical investigations completed for the Izok Corridor. It is not clear to the review team how these results have been updated to reflect the current Project alignment, quarry locations, borrow sources, and construction footprint.
Information Request:	Please summarize updates completed to validate historical ML/ARD datasets and provide updated risk classifications where available. A clearer description of how the Izok Corridor results have been incorporated into the current Project alignment would be beneficial.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR59
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Unresolved Geochemical Risk Areas
Reference:	Appendix 19B Izok Corridor ML/ARD Risk Assessment Report
Issue/Concern:	The ML/ARD assessment identifies multiple sections with variable or uncertain geochemical risk and recommends additional investigation. It is unclear whether these investigations have been completed and incorporated into the current or future project characterization and environmental management plans.
Information Request:	Please identify remaining geochemical risk areas and describe how uncertainty has been incorporated into Project planning. Describe any future work planned to reduce uncertainty around ML/ARD risks.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR60
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Geochemical Management of Quarries and Borrow Sources
Reference:	Appendix 19B ML/ARD Risk Assessment Report; Vol. 11 Management Plans

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Issue/Concern:	The Project will require development and long-term use of quarries and borrow sources. At many locations, limited information is provided regarding how potentially acid-generating or metal-leaching materials will be identified, segregated, managed, and monitored.
Information Request:	Please describe geochemical screening criteria, material management procedures, and runoff/seepage monitoring that are planned to be implemented during later project phases.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR61
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Water Management Plan Development
Reference:	Vol. 11 Management Plans
Issue/Concern:	Water management is identified as a key component of the environmental management framework; however, many supporting details appear to be deferred to future project planning and development.
Information Request:	While is recognized that additional detail regarding water sources, discharge locations, treatment requirements, monitoring criteria, and contingency measures will be provided in subsequent submissions, the project would benefit at this stage from receiving a more detailed framework or outline of what can be expected to be implemented to protect water quality and the aquatic environment.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR62
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Integration of Water Quality, Geochemistry and Adaptive Management
Reference:	Appendix 19B ML/ARD Risk Assessment Report; Appendix 19C Freshwater and Sediment Quality Report; Vol. 11 Management Plans
Issue/Concern:	The freshwater quality, geochemistry, and environmental management documents each identify monitoring and mitigation commitments. These commitments are intrinsically related, however, the linkage between these programs is not clear in the EMP.
Information Request:	Please describe how ML/ARD risk areas and sensitive freshwater environments will be linked in the EMP to monitoring locations, action thresholds, and adaptive management responses.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR63
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd

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Subject:	Fish and Fish Habitat (Benthic Invertebrates Community, Periphyton)
Reference:	Volume 7, Freshwater Environment Impact Statement Part 1, Section 20.2 (Baseline Conditions), Section 20.2.1 (Methods), Section 20.2.2.3. (Fish Habitat) - Page 168 – 182, Table 20.5, Table 20.6, Table 20.14
Issue/Concern:	There are 171 watercourse crossings across five watersheds within the LAA (Table 20.5). Of those, 91 watercourse crossings are identified as having fish species present (Table 20.6). The Fish and Fish Habitat baseline report (Appendix 20A) characterizes fish habitat and presence at the watercourse crossings. However, there is no baseline data or descriptive information for aquatic resources, namely benthic invertebrate and periphyton communities for the watercourse crossings. The NIRB concordance table (section 8.1.9.1) lists this as required baseline information.
Information Request:	Please provide baseline information as per section 8.1.9 of the concordance table, including characterization of aquatic resources (benthic invertebrates and periphyton).

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR64
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Fish and Fish Habitat (Fish Health)
Reference:	Volume 7, Freshwater Environment Impact Statement Part 1, Section 20.2 (Baseline Conditions), Section 20.2.1 (Methods), Section 20.2.2.3. (Fish Habitat), Section 20.3.3 (Change in Fish Health, Growth, or Survival) – Page 168 – 235, Table 20.5, Table 20.6, Table 20.14
Issue/Concern:	There are 171 watercourse crossings across five watersheds within the LAA (Table 20.5). Of those, 91 watercourse crossings are identified as having fish species present (Table 20.6). However, there is no baseline data or descriptive information for the fish health data or information of freshwater fishes that will be impacted by the Project within LAA.
Information Request:	Please provide baseline data and information for the fish health and contaminant loadings that will be impacted by the Project for all freshwater fish found within a total of 171 watercourse crossings that are identified to be affected by the Project within LAA, as per section 8.1.9 of the concordance table.

Source:	Kitikmeot Inuit Association
IR Number:	KIA-IR65
Request to:	West Kitikmeot Resources Corp
Reviewer:	SLR Consulting (Canada) Ltd
Subject:	Fish and Fish Habitat (Noise/blasting)

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Reference:	Volume 5: Atmospheric Environment Section 13: Assessment of Potential Effects on Noise and Vibration (Page 184)
Issue/Concern:	Section 13 (Assessment of Potential Effects on Noise and Vibration) does not list Freshwater Fish and Fish Habitat in the bullet list of ecosystemic and socio-economic environments that noise and vibration effects can affect.
Information Request:	Please add Freshwater Fish and Fish Habitat (Volume 7, Section 20) to the Noise and Vibration Valued Component (Section 13) for the potential effects of Project.