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Arctic Bay

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**Cape Dorset**

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Clyde River

Grise Fiord

**Re: Request for Comments on Notice of Part 4 Screening of 09DN018 - Department of National Defence's "Nanisivik Naval Facility" project proposal.**

Hall Beach

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Igloolik

On September 12, 2011 the Nunavut Impact Review Board (NIRB) invited interested parties to comment on the Department of National Defence's (DND or the Proponent) "Nanisivik Naval Facility" project proposal (NIRB file: 09DN018). The Qikiqtani Inuit Association (QIA) is concerned by this proposal because it has aroused significant public concern and has the potential to cause significantly adverse eco-systemic and socio-economic effects especially if approved as is.

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Iqaluit

Kimmirut

QIA feels that communication between the proponent and the community of Arctic Bay has been inadequate and many of the issues brought up in the following document could have been avoided if the proponent had committed to a proper consultation process with Arctic Bay residents. Based on this review of documents provided to NIRB and our own consultation with the residents of Arctic Bay, certain elements of the project proposal could be modified to greatly reduce impacts and ease public concern while many questions and concerns remain to be answered by the proponent. The following is a summary QIA's concerns, questions, and recommendations regarding specific aspects of the Nanisivik Naval Facility project proposal.

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## Arctic Bay Airport and All-Weather Road

The proponent has stated that it plans to use both the Arctic Bay Airport and the existing all-weather road between Arctic Bay and the project site during construction and operation to transport personnel and materials to the project site, and to access health, police and other community services in Arctic Bay (Section 2.4 - Project Specific Information Requirements, PSIR).

Resolute Bay

Sanikiluaq

The limited space on scheduled airlines is a concern to the residents of Arctic Bay as they fear an influx of military personnel may increase the likelihood of being “bumped”. The proponent

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has not proposed any mitigation strategies for this problem. QIA questions whether the proponent has considered utilizing chartered airlines and the still in place Nanisivik runway. Another issue is the proposed use of the Arctic Bay – Nanisivik all-weather road. In section 3.2.3 of the PSIR, DND states that they have not yet determined if the road will be maintained yet provides no indication that the local labor force could be used. There is an opportunity to create several jobs for residents of Arctic Bay maintaining the all-weather road and also transporting personnel to and from the project site to the airport.

## **Emergency Services and Plans for an Unmanned Facility**

In section 5.3.2 of the PSIR, and as stated earlier, DND notes that they may call on Arctic Bay to utilize their emergency services such as fire, police and medical services. During consultation on September 28<sup>th</sup> 2011, residents of Arctic Bay voiced their concern with this arrangement due to the limited availability of emergency service infrastructure in Arctic Bay. This concern grew as the residents learned that DND planned to operate the Nanisivik Naval Facility seven months of the year with no one stationed at the facility. According to the project summary and section 2.2.3 of the PSIR, the facility will be unmanned from November to June each year. When the facility is unmanned, heat and power will be maintained to the minimum required to maintain equipment and provide site security. The consultation in Arctic Bay highlighted that there are presently many break and enters by the younger generation of residents and an unmanned facility may incite further criminal activity. The residents suggested that local people could be hired to check in on the facility during the unmanned season. According to those present during the consultation, there were once plans to let local rangers use the facility during the unmanned season and in doing so protect it from theft, fire, malfunctions, etc. This idea is currently not part of the project description submitted to NIRB.

In the *Emergency Response Plan* (Appendix E) the proponent has listed some mitigation measures to be implemented in the event of an emergency such as a fire. Specifically, the responsible manager/contractor is instructed to deploy additional crew and machinery as needed from Arctic Bay if applicable and current resources are found to be inadequate. The proponent has not described what machinery and crew will be stationed in Arctic Bay. Based on consultation on September 28<sup>th</sup> 2011, the Hamlet presently has only one operational fire truck. This leads QIA to ask the following questions:

- If a fire were to occur and the only Arctic Bay fire truck is dispatched to Nanisivik, what will happen if there is an accident on the way or if there is a fire back in the Hamlet?
- Since Arctic Bay is located in the High Arctic and is often subject to adverse weather conditions, what will happen if a blizzard prevents the travel of emergency personnel from Arctic Bay to the naval facility? The emergency response plan fails to describe a plan for this likely event.
- Will the proponent pay for a second back up fire truck to be stationed in Arctic Bay?





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In section 3.2.2 of the PSIR, DND states that local aggregate is expected to be used during construction. However, even at this advanced stage of planning, the location of the aggregate quarry has not yet been determined. DND also states that aggregate sites will be investigated for carving stone. The following locations are known to have carving stone and should remain

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off limits to the developer: Right below the old Nanisivik mine entrance and within the mine and also in the Kuhulu Lake area east of the naval facility.

## **Invasive Species Monitoring**

In section 3.2.3 of the PSIR, DND states that water will be used at the wharf for wash-down of equipment to remove “marine growth”. This practice may increase the risk of introducing invasive species to the area especially considering the number of vessels potentially using the naval facility. The proponent has not stated this as a problem nor have they introduced a mitigation strategy. QIA notes that the proponent has proposed to use a “wildlife log” to monitor wildlife in the region. This may be adequate to record terrestrial wildlife movements however it is insufficient to monitor the wharf area for changes to the ecosystem including the presence of new species. Will the proponent commit to monitoring for eco-systemic changes?

## **Spill Response Center and Search & Rescue**

As climate change continues to lengthen the navigable season in the Northwest Passage, there is an equal increase of commercial naval traffic in those waters. Furthermore, as oil, gas and mineral development in this region continues to grow it has become apparent that our infrastructure will be heavily tested if a major emergency were to occur. It is well known that no military search and rescue resources are permanently based in the High Arctic nor are communities equipped to deal with major oil spills off the Nunavut Coast. According to section 4.2.7 of the PSIR, nearby Lancaster Sound has been designated as a Marine Area of Importance and a proposed National Marine Conservation Area. QIA would like to ask the proponent whether they will designate the Nanisivik Naval Facility as a spill response and search and rescue center with adequate equipment, resources and personnel on site to deal with an emergency of such magnitude as a major oil spill in Lancaster Sound and the high arctic.

## **Consultation with Arctic Bay**

In the project description, the proponent states that “an objective of the Nanisivik Naval Facility is to build a sustainable relationship with the community of Arctic Bay”. At this point, QIA and residents of Arctic Bay feel that consultation between the proponent and stakeholders in Arctic Bay has been entirely inadequate. The Arctic Bay Community Liaison Officer and Community Lands and Resources Committee have met with Rodney Watson from DND several times and they feel that talks have been meaningless because plans are always changing. For example, residents claim that DND once proposed building a facility in Arctic Bay that could be used by cadets and residents. Then those plans were subsequently cancelled and no longer found within the project description.

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## Conclusion

As previously stated, on September 28<sup>th</sup> 2011, QIA undertook consultation in Arctic Bay to collect comments and questions for submission to NIRB. We feel that many concerns were brought up during this meeting that should have been addressed before an application was sent in to NIRB. This document has listed several questions, comments and concerns for your review and consideration. QIA cannot support this project until the proponent addresses these questions, comments and concerns.

Should you require more information about these comments, please do not hesitate to contact Joel Fortier, QIA Project Coordinator at 867 975 8425 or by electronic mail to [projcoord@qia.ca](mailto:projcoord@qia.ca)

We look forward to NIRB's response.

Sincerely,

Robert J. St. Eloi  
Director of Lands  
Qikiqtani Inuit Association

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