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Kavamaliqiyikkut

Ministère de l'Exécutif et des Affaires Intergouvernementales

Department of Executive & Intergovernmental Affairs

October 17, 2011

Sophia Granchinho
Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU
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via Email to: sgranchionho@nirb.nunavut.ca

RE: NIRB FILE # 09DN018 – Department of National Defence's "Nanisivik Naval Facility" project proposal

Dear Ms. Granchinho:

As requested by NIRB on September 12, 2011, the Government of Nunavut (GN) has considered the "Nanisivik Naval Facility" project proposal, submitted for NIRB screening by the Department of National Defence's (DND) and have attached the following comments and recommendations under Appendix A.

We thank NIRB for giving us the opportunity to review and provide comments on this screening and we look forward to receiving further information on this project. If you have any questions or comments please contact me, Pauloosie Suvega, at (867) 975-6022 or psuvega@gov.nu.ca.

Qujannamiik,

Original signed by

Pauloosie Suvega
Assistant Deputy Minister, Sustainable Development
Department of Executive and Intergovernmental Affairs

Appendix A

Consolidated Comments from the Government of Nunavut

Nunavut Research Institute

Section 2.2.4: Regulatory Framework

The Nunavut Scientists Act should be added to the table of applicable legislation. The proponent would require a Nunavut scientific research license issued pursuant to the *Scientists Act* to collect traditional knowledge as part of planned public consultation/engagement process. A scientific research license may also be required for environmental field studies carried out as part of monitoring efforts.

Section 2.1.2: Public Involvement/Traditional Knowledge (TK)

The proposal indicates that DND and Defence Construction Canada (DCC) consulted with interested parties in 2007 and 2008. A detailed report on these consultations should be included in the project application. Community preferences/concerns/knowledge documented during the 2007/2008 consultations should be fully incorporated and addressed in the project design. There is no indication that the current proposal considers local knowledge and perspectives in the selection of VECs VSECs, identification of impacts, the development and consideration of project alternatives, or in the development of mitigation and monitoring measures.

The proposal also outlines plans to undertake new consultation and traditional knowledge collection activities to identify concerns and determine potential impacts of the project on the community. Whether these consultations have already been initiated is unclear (no timeline is provided) given the intention to start construction in 2012, the proponent must provide NIRB a detailed timeline and detailed plans for completing consultations and TK studies. The proponent should also justify the value of these consultations from its perspective and explain why they are occurring so late in the planning process, after most of the key project designs are finalized. If the project does proceed as planned in 2012 there would be very little ability to modify project designs based on concerns and recommendations documented through the consultations.

The proposal should include more detailed plans for local training and employment to be generated by the project.

Similarly a more detailed description of anticipated requirements for services from the nearest community (Arctic Bay) such as medical care, policing, fire-fighting, education, etc. particularly for the construction phase when 100 people are expected to be on-site year round.

The proposal is unclear whether the road connecting Arctic Bay to the Naval facility will be maintained (3.27). Proponent should outline plans for consultation with the GN to determine how this critical road will be maintained.

Department of Economic Development and Transportation (ED&T)

The Department of Economic Development and Transportation has reviewed the following documents distributed by the Nunavut Impact Review Board for the Nanisivik Naval Facility proposal:

- NIRB Part 1 Application Form (Revised)

- NIRB Part 2 PSIR Application form (Revised) and Appendices

- Non Technical Project Summary

- NPC Conformity Determination

Relevant correspondence

ED&T understands that the proposed activity is to use the existing Nanisivik site to establish a deep-water docking and refueling facility. Proposed Project activities include construction of storage and laydown areas, cargo marshalling area helicopter landing area, beach land and launching area, and camp services/utilities. Additionally, upgrades to the berthing infrastructure, fuel system, and roads are proposed. The construction phase is expected to last ~3 years, and the site may be fully operational by 2015. The facility will be manned and operated from June to October of each year, and left unmanned for the remainder of the year. The life of the facility is predicted to be at least 40 years.

Potential socio-economic effects of the Project:

ED&T requires clarification on what commercial or non-naval use may be permissible for the site. In the NIRB Part 2 revised PSIR Screening Form, the proponent noted that cruise ships, though once using Nanisivik, now arrive in Arctic Bay (pg. 4.66), and imply that Nanisivik is no longer used. However, there is current use of the Nanisivik site by commercial and private yachts during the open water season. For example, in 2009, Cruise North's itinerary included a stop at Nanisivik for refueling, and passengers disembarked and hiked the surrounding mountains with local guides during the 7 hour stop. More recently, in 2011 a private yacht carrying 6 tourists tried refueling in Arctic Bay, but waters by the breakwater were not deep enough. The fuel truck met the yacht at Nanisivik to refuel, and the travelers spent the day in Arctic Bay, making purchases at local businesses. These examples demonstrate the future potential for marine tourism near Arctic Bay, and the role that Nanisivik has recently played. Access to a fueling station between Greenland and Alaska is necessary to developing a marine tourism economy in Nunavut waters.

Furthermore, in Section 3.3.1 of the PSIR form, the proponent notes that "the Nanisivik Naval Facility may also serve to receive, marshal, hold and distribute cargo and goods from commercial vessels..." (pg. 3.34), and Table 3.2 notes several vessels that may use the Naval Facility. The application does not consider cruise ships or yachts that may need to refuel, resupply, and disembark.

Therefore, ED&T would like to confirm whether stops for cruise ships or yachts will be allowed at the proposed naval facility.

The proposed project may result in employment of local residents during construction or the operations/maintenance of the facility. This is noted by the proponent, and ED&T wishes to express our expectations that the proponent will aim to hire local residents and utilize local businesses whenever possible. Further, as this is a multi-year operation, any effort to build technical capacity and improve job skills with local residents is strongly encouraged. ED&T also requests clarification on whether local residents hired for construction of the facility will remain in the 100-person camp during their work rotation, or will travel to and from Arctic Bay.

Other matters related to the Project proposal:

In their NIRB Part 2 PSIR Revised Screening Form, DND proposes to use the Arctic Bay airport during the construction phase to transport personnel and to receive materials and goods. The all weather road will be used during both construction and operations to transfer and resupply goods, move personnel, and to access the community health center, police, fire, and other community services (pg. 2.22).

However, the proponent states in Section 3.2.3 of the NIRB Part 2 PSIR Form that "at this time, it has not been determined whether the road between the Nanisivik Naval Facility and Arctic Bay will be maintained" (pg. 3.30). Further, the proponent notes in a letter to DCC dated August 23, 2011, that "long-term maintenance of the road during operation of the facility is being negotiated between DND and the

GN". ED&T has been in communication with DND and understands some of the constraints they may be under regarding ownership of the all weather road. As such, ED&T and DND have discussed possible funding arrangements that would enable ED&T to maintain the road seasonally. ED&T requires clarification on whether the proponent plans on using the road for the long term, and, if so, respectfully requests that the proponent provide assurances that a long term funding arrangement has been determined for the continued maintenance and operation of the all weather road between the facility and Arctic Bay.

Department of Community and Government Services. (CGS)

The GN also requests clarity on where solid waste will be disposed of. In the NIRB Part 2 PSIR Screening Form, Appendix C, the proponent suggests that all wastes will be transported off-site (pg. 3.3). The GN wishes to confirm whether this will include any transport of solid waste to the municipal land fill.

The GN requests the proponent to indicate if they will draw water from a secondary water source, and what the storage or transfer may entail, and what the potential usage may be. In addition, the GN requests the proponent develop a sludge management plan. Communication with the CGS can assist with responding to these requests, and may include an MOU to outline certain responsibilities.