



**NIRB File No.: 09DN018**  
DFO File No.: NU-11-0037  
EC File No.: 4704 004 029

November 1, 2011

Rodney Watson, Project Manager  
Nanisivik Naval Facility  
Directorate Construction Project Delivery  
Department of National Defence  
101 Colonel By Drive,  
Ottawa, ON K1A 0K2

*Sent via email: [Rodney.Watson@forces.gc.ca](mailto:Rodney.Watson@forces.gc.ca)*

**Re: Opportunity to address comments received regarding Department of National Defence's "Nanisivik Naval Facility" project proposal**

Dear Rodney Watson:

On September 12, 2011 the Nunavut Impact Review Board (NIRB or Board) invited interested parties and municipalities potentially affected by the Department of National Defence's (DND or the Proponent) "Nanisivik Naval Facility" project proposal to provide comments directly to the NIRB by October 3, 2011. At the request of commenting parties, this deadline was later extended to October 17, 2011. Comments were received from the following interested parties on or before October 17, 2011:

- Qikiqtani Inuit Association
- Nunavut Tourism
- Fisheries and Oceans Canada
- Government of Nunavut
- Transport Canada
- Environment Canada

All comments and documents received pertaining to this project proposal can be obtained from the NIRB's ftp site at:

<http://ftp.nirb.ca/01-SCREENINGS/ACTIVE%20SCREENINGS/09DN018-DND-Nanisivik%20Naval%20Facility/02-DISTRIBUTION/COMMENTS/>.

Please be advised that the NIRB requires project proposals to be sufficiently developed to permit proper screening within the timelines established by the Nunavut Land Claims Agreement. Following its review of all documentation submitted by DND in support of the Nanisivik Naval Facility proposal and all comments submitted by parties, the NIRB requires clarification on a number of topics related to this project proposal to facilitate its assessment. Accordingly, the Board is requesting that DND review and respond to all the points raised in the complete public comment submissions received by the Board to date and available at the FTP link noted above. The response should include, but not be limited to, clarification regarding the following *summary* of outstanding information requirements:

- Further information on the DND's summary of the public consultation strategy including consultation completed to date, plans for future consultation with communities and public, and measures that would be employed to address concerns raised.
  - The project proposal identified that consultation occurred in 2007 and 2008 with interested parties but there was no reference to consultation conducted with the community of Arctic Bay or how the concerns were addressed or incorporated within the project design. Detailed reports should be provided on the consultation completed to date and information on planned future consultation.
- Further information on how traditional knowledge was obtained and considered in the development of this proposal.
  - Timelines should be provided on when new consultation and traditional knowledge studies will be initiated, and whether a Nunavut scientific research license has been applied for.
- More information on potential impacts to community services in Arctic Bay, including the airport, health, police, and other services.
  - Provide mitigation strategies for the potential additional use of Arctic Bay's airport and community services.
- Discussion on the potential impacts to Arctic Bay from arctic offshore patrol ships patrolling in and around the area and potential future marine tourism with the use of the proposed Nanisivik Naval facility.
- Clarification on whether the proponent plans on using the access road between Arctic Bay and the future Nanisivik Naval facility on a long term basis and who would be in charge of maintaining the road.
- Further discussion on the potential impacts and mitigation strategies for wildlife and wildlife habitat (both terrestrial and marine), and migratory birds from the construction of facility, roads, upgrades to wharf and increase naval activity in the area, and the potential impacts to Inuit harvesting.
- Information on the location of the rock and aggregate quarries that would be required. Discussion to include:
  - Avoidance of areas used for carving stone
  - Conceptual design
  - Type and volume of material to be extracted
  - Depth of overburden
  - Identify any carving stone deposits

- Any existing evidence of and/or potential for thermokarst development, ice lenses, flooding, erosion, sedimentation, and slumping, as well as related control measures
- Relative moisture content of the ground
- If blasting, describe methods employed
- Describe the explosive type(s), hazard class, volumes, uses, location of storage (show on map), and method of storage and facility to be used
- Methodology used to determine acid rock drainage (ARD) and metal leaching (ML) potential and associated results
- Proposed safety measures.
- Potential impacts to the marine environment and mitigation strategies from:
  - Potential release of suspended solids during wharf upgrades
  - Increased noise levels during the wharf upgrades
  - Use of cathodic protection system to control erosion on the wharf
  - Introduction of invasive species to the area from washing-down of equipment.
- Further discussion on the potential socio-economic effects from proposal, including the potential use of the site by non-naval or commercial industry (cruise ships or yachts) and marine tourism.
- Update the Emergency Response Plan and the Spill Contingency Plan, and develop a Fish Habitat Offsetting Plan, Sludge Management Plan, Oil Pollution Prevention/Emergency Plan, Abandonment and Restoration Plan, and Incineration Management Plan.
- Further discussion on the potential designation of the proposed Nanisivik Naval Facility as a spill response and search and rescue centre.

Prior to rendering its decision on this file, the NIRB respectfully requests clarification from DND be provided regarding the public comment submissions on or before **November 22, 2011**. Failure to address the noted information deficiencies in sufficient detail may result in DND's project proposal being returned for clarification in accordance with Section 12.4.4(c) of the Nunavut Land Claims Agreement. If DND requires additional time to prepare its response, please do not hesitate to contact the NIRB with a proposed alternate timing.

Please forward any forthcoming submission materials to the NIRB at:

Attn: Technical Services Department  
 Nunavut Impact Review Board  
 P.O. Box 1360  
 Cambridge Bay, NU  
 X0B 0C0  
 Email: [info@nirb.ca](mailto:info@nirb.ca); fax: (867) 983-2594

Following receipt of DND's response, the NIRB anticipates distributing the information received in order to allow parties a final opportunity to comment on the information provided.

If you have any questions or require clarification, feel free to contact Sophia Granchinho, NIRB Technical Advisor, at [sgranchinho@nirb.ca](mailto:sgranchinho@nirb.ca) or (867) 793-4633.

Sincerely,



Amanda Hanson  
Director, Technical Services  
Nunavut Impact Review Board

cc:      Distribution List  
         Phyllis Beaulieu, Nunavut Water Board  
         Robert St. Eloi, Qikiqtani Inuit Association  
         Jeff Mercer, Aboriginal Affairs and Northern Development Canada  
         Robert Bedingfield, Fisheries and Oceans Canada  
         Paula Smith, Environment Canada  
         John Cowan, Transport Canada, Environmental Affairs  
         Tamara Van Dyck, Department Construction Canada  
         Louis Lemay, Department Construction Canada