

# Nanisivik Naval Facility (NNF)

Comments Received from Stakeholders in Response to NIRB Part II Submission

March 06, 2012

	Comments	Stakeholder Suggested Mitigation	DND RESPONSE TO ORIGINAL COMMENTS	DND RESPONSE FOR REDUCED SCOPE
1. Department of Fisheries and Ocean				
1-1	<ul style="list-style-type: none"><li>- This project will result in the harmful alteration, disruption and destruction of fish habitat.</li><li>- Prohibited unless authorized by DFO</li></ul>	<ul style="list-style-type: none"><li>- No authorizations will be issued unless acceptable measures for any fish habitat loss’ are developed and implemented by the proponent</li><li>- The proponent should develop a <i>Fish Habitat Offsetting Plan</i> to compensate for the fish habitat that will be destroyed or harmfully altered as a result of the wharf upgrade</li></ul>	<i>A Fish Habitat Assessment</i> has been completed. The document was not available when the Part 2 form was first submitted, and will be provided to the NIRB. To address the <i>Fish Habitat Offsetting Plan</i> , DND will collaborate with DFO to determine these requirements and complete this work in the next design Phase.	The existing wharf structure will be used, as is (no expansion), with very minor improvements to maintain or improve its functionality. Very little work will be carried out in or near the water. DND will collaborate with DFO to determine if a <i>Fish Habitat Offsetting Plan</i> is still required.
2. Transport Canada				
2 -1	<ul style="list-style-type: none"><li>- <i>Navigable Waters Protection Program (NWPP)</i></li></ul>	<ul style="list-style-type: none"><li>- All proponents must deal directly with <i>NWPP</i> for any work(s)</li></ul>	DND will comply with the requirements of the <i>NWPP</i> as applicable.	DND will comply with the requirements of the <i>NWPP</i> as applicable.
2-2	<ul style="list-style-type: none"><li>- Canada Shipping Act</li></ul>	<ul style="list-style-type: none"><li>- Requirement of an <i>Oil Pollution Prevention/Emergency Plan</i>; regulations stipulate what is required in the plan</li></ul>	An NNF site specific plan will be developed as the design nears completion. For reference, similar documentation from other DND sites, such as the east and west coast Naval bases, will be reviewed.	An NNF site specific plan will be developed.
3. Environment Canada				
3-1	<ul style="list-style-type: none"><li>- If dredging is required for this project than a permit would need to be obtained from EC prior to the commencement of such work</li></ul>	<ul style="list-style-type: none"><li>-</li></ul>	DND acknowledges this requirement. At present, no dredging is expected to occur. If the situation changes, then an application for a permit will be submitted.	Very little work will be carried out in, or near, the water, and dredging is not expected.
3-2	<ul style="list-style-type: none"><li>- EC suggests that prior to pile driving for the wharf upgrades, bubble curtains should be installed to prevent impacts</li></ul>	<ul style="list-style-type: none"><li>-</li></ul>	DND will discuss this with the Engineering Design Consultant and incorporate the recommendation into the work plan, if necessary.	Pile driving is no longer required and very little work will be carried out in, or near, the water. Impacts will be minimal.
3-3	Quarrying	<ul style="list-style-type: none"><li>- EC recommends an <i>Abandonment and Restoration Plan</i> be prepared for the proposed quarry sites</li></ul>	<i>An Abandonment and Restoration Plan</i> will be developed in the next design Phase. It will include the identification of sites that are sources of carving stone, which will be off limits for quarrying. The plan will also address concerns of design, type and volume of material, explosives and safety, ground moisture content, and other items of interest raised by the reviewers.	<i>An Abandonment and Restoration Plan</i> will be developed but aggregate requirements will be much less with the reduced scope.

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3-4	Oily Wastewater - EC supports the proponents plans for off-site treatment and disposal of oily wastewater		Oily Waster Water will be stored in a tank. There will be no treatment on site. Oily Waste Water will be returned to the south for treatment.	Oily Waster Water will be stored in barrels or a tank (volume significantly reduced). There will be no treatment on site. Oily Waste Water will be returned to the south for treatment.
3-5	Waste Management	- EC suggests an <i>Incineration Management Plan</i> for the facility be developed; EC would like the opportunity to review this plan prior to implementation	DND will prepare an <i>Incineration Management Plan</i> in the next design Phase. The current concept is to incinerate all material that is permissible, and for remaining waste residue to be transported off site to an approved disposal facility in the south. The plan will be available for review prior to implementation.	There will no incinerators and a new <i>Waste Management Plan</i> will be developed.
3-6	<i>Emergency Response Plan</i> - List of potential emergencies does not include air or ship emergencies or disasters	- EC recommends all potential disasters/emergency situations be considered in the <i>ERP</i> including extreme weather events	An <i>Emergency Response Plan</i> will be developed for the specific operations of the NNF.	An <i>Emergency Response Plan</i> will be developed for the specific operations of the NNF.
3-7	<i>Wildlife Mitigation and Monitoring Plan (WMMP)</i>	- EC recommends that the proponent consider what steps would be taken to protect wildlife (including marine birds) in the event of a spill	A <i>WMMP</i> will be developed for the specific operations of the NNF.	A <i>WMMP</i> will be developed for the specific operations of the NNF.
3-8	Species at Risk	- EC recommends as a minimum; proponent should record any wildlife observations (location, date, behaviour, and any action taken to avoid contact)	DND will comply with obligations in legislation and agreements for wildlife monitoring and species at risk. An NNF site specific plan will be prepared.	DND will comply with obligations in legislation and agreements for wildlife monitoring and species at risk. An NNF site specific plan will be prepared.
<b>4. Government of Nunavut – Department of Executive &amp; Intergovernmental Affairs</b>				
4-1	Nunavut Research Institute - Nunavut Scientists Act	- The proponent would require a <i>Nunavut Scientific Research License</i> issued to collect traditional knowledge as part of planned public consultation/engagement process	The NRI has recently clarified that a <i>Nunavut Scientific Research License</i> is not required for the project.	A permit is not required.

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4-2	<p>General Comments GN</p> <ul style="list-style-type: none"> <li>- Community preferences/concerns/knowledge documented during the 2007/2008 consultations should be fully incorporated and addressed in the project design</li> </ul>	<ul style="list-style-type: none"> <li>- Request timeline for all public consultation and a more detailed plan</li> <li>- 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</li> </ul>	<p>DND has visited the community many times since the project was announced in 2007, to advise of the concept and plans for the site. Most of the meetings were held with the Mayor and Council of the Hamlet of Arctic Bay. At a meeting in October 2008, representatives of various community organizations were present. In February 2011, an 'Open House' was held at the Community Centre, which provided an opportunity for residents to learn more of the project, to ask questions and provide comments. DND has made every effort to maintain an open line of communication with the Mayor and Council, as well as the local Member of the Legislative Assembly. DND has listened carefully to comments and questions and these concerns have been taken into account for the design of the site – for example, the community's capacity to provide services to the site; the skill sets available in the community for construction, and for potential employment in the operation phase. A record of DND's visits will be provided to the NIRB.</p>	<p>DND has already contacted the community about the project's reduced scope. A visit to the Hamlet of Arctic Bay is being planned for the spring 2012. The purpose of the visit is to brief Council on the new scope for the NNF and respond to any questions or concerns they may have.</p>
4-3	<ul style="list-style-type: none"> <li>- The proposal should include more detailed plans for local training and employment to be generated by the project</li> </ul>	-	<p>DND is developing an <i>Inuit Participation Plan (IPP)</i> for the project. The intention of the <i>IPP</i> is to identify where employment opportunities will exist during construction and post-construction. We have visited the community to discuss and determine what skill sets are available, as well as what businesses exist. Once the design is completed and a strategy for construction is developed, areas for employment opportunity will be identified. It is expected that the <i>IPP</i> will be finalized near the completion of the design.</p>	<p>DND will continue to develop the <i>Inuit Participation Plan (IPP)</i> for the project based on the new scope and requirements.</p>
4-4	<ul style="list-style-type: none"> <li>- A more detailed description of anticipated requirements for services from the nearest community (Arctic Bay)</li> </ul>	-	<p>The facility is being designed to be self-sufficient. It is anticipated that DND will require persons from the community to assist in the operational work.</p>	<p>The NNF is no longer required to be self-sufficient. Miscellaneous services and support from the local community will be considered in the design process.</p>

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4-5	<ul style="list-style-type: none"> <li>- The proposal is unclear whether the road connecting Arctic Bay to the Naval facility will be maintained</li> </ul>	<ul style="list-style-type: none"> <li>- Proponent should outline plans for consultation with the GN to determine how this critical road will be maintained</li> </ul>	<p>It is DND's intent to find a solution to have the road maintained for use during the summer months, but exactly how that will happen has not been determined yet. Over the past few years, DND has held productive discussions with the GN regarding the status of the road and these are expected to continue. Although specifics are not yet available, DND will continue to work with the GN to find a solution to maintain the road, for the time period required.</p>	<p>DND will continue to work with the GN to find a solution to maintain the road for use during the summer months.</p>
4-6	<p>Department of Economic Development and Transportation (ED&amp;T)</p> <ul style="list-style-type: none"> <li>- ED&amp;T requires clarification on what commercial or non-naval use may be permissible for the site</li> </ul>	<ul style="list-style-type: none"> <li>- Mention is given of two different events that occurred at the site with commercial/private vessels using the site to refuel and moor</li> </ul>	<p>The NNF is intended for use primarily by Government of Canada vessels; e.g. Royal Canadian Navy (RCN) and Canadian Coast Guard (CCG). Commercial vessels will use the wharf to provide fuel to the facility. Other commercial vessels expected are cargo ships, similar to those that use the facility now.</p>	<p>The NNF is intended for use primarily by Government of Canada vessels; e.g. Royal Canadian Navy (RCN) and Canadian Coast Guard (CCG). Commercial vessels will use the wharf to provide fuel to the facility. Other commercial vessels expected are cargo ships, similar to those that use the facility now.</p>
4-7	<ul style="list-style-type: none"> <li>- ED&amp;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.</li> </ul>	<ul style="list-style-type: none"> <li>-</li> </ul>	<p>It is expected that residents of Arctic Bay will travel to and from the Hamlet for the work day.</p>	<p>It is expected that residents of Arctic Bay will travel to and from the Hamlet for the work day.</p>
4-8	<ul style="list-style-type: none"> <li>- Mention is given to the GN and DND discussing the possibility of a funding arrangement that would enable ED&amp;T to maintain the road to Arctic Bay</li> </ul>	<ul style="list-style-type: none"> <li>-</li> </ul>	<p>A funding arrangement is being considered. The details of such an arrangement are being explored.</p>	<p>A funding arrangement is being considered. The details of such an arrangement are being explored.</p>
4-9	<p>Department of Community and Government Services (CGS)</p> <ul style="list-style-type: none"> <li>- The GN requests clarity on where solid waste will be disposed of, referencing the NIRB submission; the proponent suggests that all waste will be transported off-site. The GN wishes to confirm whether this will include any transport of solid waste to the municipal landfill.</li> </ul>	<ul style="list-style-type: none"> <li>-</li> </ul>	<p>All waste that is not incinerated will be transported off site to a location in southern Canada. There is no intention to use the Arctic Bay landfill for waste disposal.</p>	<p>All waste will be transported off site to a location in southern Canada.</p>

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4-10	<ul style="list-style-type: none"><li>- 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</li></ul>	-	The only water source currently planned to be used to supply the facility with potable water and fire water is Twin Lake. This is the same lake that was previously used by the former community of Nanisivik. We are planning to transport water to the site via water truck. Water is for site use only.	With the reduced scope, the water requirements for the NNF will be considerably less. Support from the local community of Arctic Bay may be required for potable water. The requirement will be confirmed in the next design phase.
4-11	<ul style="list-style-type: none"><li>- The GN requests the proponent develop a <i>Sludge Management Plan</i></li><li>- Communication with the CGS can assist with responding to these requests and <b>may include an MOU to outline certain responsibilities</b></li></ul>	-	A <i>Sludge Management Plan</i> will be developed in the next design Phase.	There will be no lagoons or wastewater treatment on site. Support from the local community of Arctic Bay may be required for wastewater. The requirement will be confirmed in the next design phase.
4-12	Nunavut Tourism <ul style="list-style-type: none"><li>- Having the port facility available to the cruise ship industry is VERY important to help develop that sector of the tourism economy</li></ul>	-	DND is responsible for the operations of NNF as it pertains to RCN and other Government of Canada ships.	DND is responsible for the operations of NNF as it pertains to RCN and other Government of Canada ships.
5. Qikiqtani Inuit Association (QIA)				
5-1	<ul style="list-style-type: none"><li>- This proposal has aroused significant public concern and has the potential to cause significantly adverse eco-systemic and socio-economic effects especially if approved as is</li></ul>	-	DND will comply with the applicable provisions of the NLCA.	DND will comply with the applicable provisions of the NLCA.

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5-2	- QIA feels that communication between the proponent and the community of Arctic Bay has been inadequate and many of the issues could have been avoided if the proponent had committed to a proper consultation with Arctic Bay residents	-	DND has visited the community many times since the project was announced in 2007, to advise of the concept and plans for the site. Most of the meetings were held with the Mayor and Council of the Hamlet of Arctic Bay. At a meeting in October 2008, representatives of various community organizations were present. In February 2011, an 'Open House' was held at the Community Centre, which provided an opportunity for residents to learn more of the project, to ask questions and provide comments. DND has made every effort to maintain an open line of communication with the Mayor and Council, as well as the local Member of the Legislative Assembly. DND has listened carefully to comments and questions and these concerns have been taken into account for the design of the site – for example, the community's capacity to provide services to the site; the skill sets available in the community for construction, and for potential employment in the operation phase. A record of DND's visits will be provided to the NIRB.	DND has contacted the community about the reduced scope of the NNF... A visit to the Hamlet of Arctic Bay is being planned for the spring 2012. The purpose of the visit is to brief the Hamlet Council on the new changes and respond to any questions or concerns they may have. The HTA will be advised of the timing of the visit.
5-3	- Limited space on commercial aircrafts may cause local residents to be "bumped"	- QIA questions whether the proponent has considered utilizing chartered airlines and the Nanisivik runway rather than over burdening the Arctic Bay facility	This concern was first raised at the October 2008 meeting with the community and periodically since then. DND acknowledges and respects the concern. It is the intent of DND to utilize chartered aircraft for personnel transport to the site, both during construction and operation. If it does not make financial sense to use charters (e.g. one or two people coming to the site), then commercial aircraft must remain an option. There are no plans to use the old Nanisivik Airport at this time.	This concern was first raised at the October 2008 meeting with the community and periodically since then. DND acknowledges and respects the concern. It is the intent of DND to utilize chartered aircraft for personnel transport to the site, both during construction and operation. If it does not make financial sense to use charters (e.g. one or two people coming to the site), then commercial aircraft must remain an option. There are no plans to use the old Nanisivik Airport at this time.
5-4	- 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	-	DND acknowledges the potential for employment for maintenance of the road, as well as for the transport of personnel to and from the site. However, it is premature to state detailed plans on how and when this will occur. Note that DND does not require the road to be maintained other than in the navigable (summer) season.	DND acknowledges the potential for employment for maintenance of the road, as well as for the transport of personnel to and from the site. Note that DND does not require the road to be maintained other than in the navigable (summer) season.

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5-5	<ul style="list-style-type: none"> <li>- Residents of Arctic Bay are concern that the facility will be unmanned; they feel that this may incite break and enters</li> </ul>	<ul style="list-style-type: none"> <li>- The residents suggest that local people could be hired to check in on the facility during the unmanned season</li> <li>- There were once plans to let local rangers use the facility during the unmanned season and protect it from theft, fire, malfunctions, etc.</li> </ul>	<p>The current design concept incorporates strategies to address the security of the site:</p> <ul style="list-style-type: none"> <li>a. Secure building with appropriate panels over windows</li> <li>b. Facility will have alarms and have security cameras that will be monitored year round (on site and remotely during the unmanned season)</li> <li>c. Routine ranger security patrols</li> </ul>	<p>The design will incorporate strategies to address the security of the site:</p> <ul style="list-style-type: none"> <li>a. Secure building with appropriate panels over windows</li> <li>b. Routine ranger security patrols</li> </ul>
5-6	<ul style="list-style-type: none"> <li>- In the event of a fire or other emergency if additional crew or machinery is required from the Arctic Bay community the proponent has not described what machinery and crew will be stationed in Arctic Bay</li> <li>- Will the proponent pay for a second back up fire truck to be stationed in Arctic Bay?</li> </ul>	-	<p>With the proposed design, there are no longer any plans to use Arctic Bay resources. The site is intended to be self-sustainable. DND has incorporated the following elements into the design to minimize and prevent loss of infrastructure:</p> <ul style="list-style-type: none"> <li>a. For the fuel tanks, there will be a passive system. Tanks shall be kept within individual berms, to contain a fire and limit it to one tank</li> <li>b. An active system (sprinklers) will be used in the buildings.</li> </ul> <p>DND does not expect residents of Arctic Bay to respond to a fire or other emergency.</p>	<p>DND does not expect residents of Arctic Bay to respond to a fire or other emergency at the NNF. The following elements will be incorporated into the design to minimize and prevent loss of infrastructure:</p> <ul style="list-style-type: none"> <li>a. For the fuel tanks, there will be a passive fire protection system. Tanks shall be kept within individual berms, to contain a fire and limit it to one tank.</li> <li>b. An active system will be used for the power plant.</li> </ul>
5-7	<ul style="list-style-type: none"> <li>- What fire suppression system is in place? Passive – foam would possibly prevent the need to call in responders from Arctic Bay</li> </ul>	<ul style="list-style-type: none"> <li>- More consultation between DND and the Hamlet is required to determine responsibility in emergency situations and to further develop plans for the unmanned operating season</li> </ul>	<p>Foam systems were considered early in the design process, but it was decided that these were not the best solution for the NNF. A passive system will be used for outdoor tanks, and a sprinkler system will be used for buildings.</p>	<p>For the most part the design will include passive fire protection systems. An active fire protection system will be considered for the high risk areas such as the power generation system.</p>
5-8	<ul style="list-style-type: none"> <li>- QIA has learned that hunting conditions have begun to change since the mine has ceased operations; waters around Nanisivik are used to hunt for whales and seals and that the lands around the naval facility are traversed to hunt for caribou and geese</li> </ul>	<ul style="list-style-type: none"> <li>- This project will undoubtedly have a negative effect on the Inuit ability to harvest wildlife in the region. Yet, the proponent has not presented any strategies to mitigate the negative effect of increased naval activity on local harvesting</li> </ul>	<p>This submission is focussed on the NNF infrastructure only. The infrastructure project team does not have the mandate or authority to comment on operations at sea. Local persons from the community will not be prevented from crossing the land area as they require.</p>	<p>This submission is focussed on the NNF infrastructure only. The infrastructure project team does not have the mandate or authority to comment on operations at sea. Local persons from the community will not be prevented from crossing the land area as they require.</p>



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5-9	- In the <i>Wildlife Monitoring and Mitigation Plan (WMMP)</i> the proponent does not explicitly state that they shall be liable for any loss of wildlife due to project activities	-	Work at the site will occur over three (3) seasons, and only during the time of suitable weather. The work shall be contained to the immediate area only. During the construction season, 2-3 supply ships are expected. Coast Guard activity will continue as usual. It will be a standard operating procedure that all effort will be taken to avoid wildlife and hunting will not be permitted at the NNF. DND will comply with the applicable provisions of the NLCA.	Work at the site will occur over three (3) seasons, and only during the time of suitable weather. The work shall be contained to the immediate area only. During the construction season, 2-3 supply ships are expected. Coast Guard activity will continue as usual. It will be a standard operating procedure that all effort will be taken to avoid wildlife and hunting will not be permitted at the NNF. DND will comply with the applicable provisions of the NLCA.
5-10	- 6.3.1 of the NLCA states “ A developer is liable, without proof of fault or negligence, for present and future loss of income from wildlife harvesting and present and future loss of wildlife harvested for personal use...”	- The proponent should be aware that they will be liable to compensate the community if this is the case - QIA feels that the <i>WMMP</i> would be more complete if the proponent were to hire experienced local Inuit to act as wildlife monitors.	For work that has taken place over the past few seasons, DND typically hires local Inuit to act as wildlife monitors, and will do so during the construction phase of the work.	DND typically hires local Inuit to act as wildlife monitors, and will do so during the construction phase of the work.
5-11	- There has yet to be any discussion between the proponent and the Hamlet’s Hunters & Trappers Association (HTA) regarding boat paths through sea ice and reduction of impact to Inuit hunters	-	This submission is focussed on the NNF infrastructure only. The infrastructure project team does not have the mandate or authority to comment on operations at sea.	This submission is focussed on the NNF infrastructure only. The infrastructure project team does not have the mandate or authority to comment on operations at sea.
5-12	- Residents claim that this project is already increasing disturbance in the area and they are slowly losing their authority in decision making	- The Hamlet would like to be informed in advance of what type or exercises or missions will occur in specific areas - The hamlet has suggested that there shouldn’t be any need to patrol past Arctic Bay deeper into Admiralty Inlet	There has been minimal activity to date, at the site. In the past two years, geotechnical drilling, wharf condition studies and the construction of an interim site office have been the only significant activities. For these activities, the Hamlet had been advised and the personnel involved stayed in Arctic Bay, contributing to the local economy.	The NNF project team will continue to work closely with the Hamlet of Arctic Bay to advise if and when any further site investigation work is required.
5-13	- QIA questions whether the proponent has plans to only use the naval facility as a refuelling station or whether DND is planning to travel further down into Admiralty Inlet for patrolling or exercises. This is not clear in the project description.	-	This submission is focussed on the NNF infrastructure only. The infrastructure project team does not have the mandate or authority to comment on operations at sea.	This submission is focussed on the NNF infrastructure only. The infrastructure project team does not have the mandate or authority to comment on operations at sea.



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5-14	- Stemming from the wash down equipment used for the removal of marine growth and the risk to introducing invasive species	- Will the proponent commit to monitoring for eco-systemic changes?	The purpose of this facility is for refuelling and berthing; de-fouling and washing down of equipment will be performed elsewhere.	The purpose of this facility is for refuelling and berthing; de-fouling and washing down of equipment will be performed elsewhere.
5-15	- 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.	-	There is no intention at this time to designate the NNF for these roles. The mandate of the NNF is a refuelling and berthing facility only for the RCN and the CCG.	There is no intention at this time to designate the NNF for these roles. The mandate of the NNF is a refuelling and berthing facility only for the RCN and the CCG.
5-16	- QIA cannot support this project until the proponent addresses these questions, comments and concerns.	-	DND will continue to address any questions, comments and concerns voiced by the QIA.	DND will continue to address any questions, comments and concerns voiced by the QIA.