

COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: <u>Investigation of the Sensitivity of High Arctic Permafrost to Climate Change Project Proposal</u>	
Proponent: <u>Wayne Pollard</u>	
Location: <u>Kitikmeot</u>	
Comments Due By: <u>March 15, 2007</u> NIRB #: <u>07YN019</u>	
Indicate your concerns about the project proposal below:	
<input checked="" type="checkbox"/> no concerns <input type="checkbox"/> water quality <input type="checkbox"/> terrain <input type="checkbox"/> air quality <input type="checkbox"/> wildlife and their habitat <input type="checkbox"/> marine mammals and their habitat <input type="checkbox"/> birds and their habitat <input type="checkbox"/> fish and their habitat <input type="checkbox"/> heritage resources in area	<input type="checkbox"/> traditional uses of land <input type="checkbox"/> Inuit harvesting activities <input type="checkbox"/> community involvement and consultation <input type="checkbox"/> local development in the area <input type="checkbox"/> tourism in the area <input type="checkbox"/> human health issues <input type="checkbox"/> other: _____ _____ _____
If you have checked off a box in the above-section, please describe the nature of the concerns. Attach additional correspondence if required.	
Do you have any suggestions or recommendations for this application?	
<p>Environment Canada recommends that the following conditions be applied throughout all stages of the project:</p> <ul style="list-style-type: none"> ▪ The proponent shall not deposit, nor permit the deposit of any fuel, drill cuttings, chemicals, wastes or sediment into any water body. According to the Fisheries Act, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited. ▪ Any sumps, pits, spill basins and fuel caches shall be located at least 30 m above the high water mark of any water body and in such a manner as to prevent the contents from entering any water body frequented by fish. Further, all sumps shall be backfilled upon completion of the field season and contoured to match the surrounding landscape. ▪ The proponent shall not store materials on the surface ice of lakes or streams, except that which is for immediate use. ▪ The proponent shall ensure that any non-combustible and hazardous waste, including waste oil is disposed of appropriately at an approved facility. ▪ EC recommends the use of secondary containment with an impervious liner, such as self-supporting instalberms, for storage of all barreled fuel rather than relying on natural depressions to contain spills. 	

- All releases of harmful substances, regardless of quantity, are immediately reportable where the release:
 - is near or into a water body;
 - is near or into a designated sensitive environment or sensitive wildlife habitat;
 - poses an imminent threat to human health or safety; or
 - poses an imminent threat to a listed species at risk or its critical habitat.
 - spills should be documented and reported to the 24-hour spill line at (867) 920-8130

Please note that any material and equipment cached for this study must be removed at the end of the project.

The Canadian Wildlife Service (CWS) of Environment Canada has reviewed the above-mentioned submission and makes the following comments and recommendations pursuant to the *Migratory Birds Convention Act* (the *Act*) and *Migratory Birds Regulations* (the *Regulations*), and the *Species at Risk Act* (SARA).

- Section 6 (a) of the Migratory Birds Regulations states that no one shall disturb or destroy the nests or eggs of migratory birds. If active nests are encountered during project activities, the nesting area should be avoided to prevent disturbance (i.e. the young have left the vicinity of the nest).
- In order to reduce disturbance to nesting birds, Environment Canada recommends that aircraft used in conducting project activities maintain a flight altitude of at least 610 m during horizontal (point to point) flight during the nesting season.
- In order to reduce disturbance to resting, feeding, or moulting birds, CWS recommends that aircraft used in conducting project activities maintain a vertical distance of 1000 m and minimum horizontal distance of 1500 m from any observed concentrations (flocks / groups) of birds.
- Environment Canada recommends that camp waste be made inaccessible to wildlife at all times. Camp waste can attract predators of migratory birds (e.g., foxes and ravens) to an area if not disposed of properly.
- Section 35 of the *Migratory Birds Regulations* states that no person shall deposit or permit to be deposited, oil, oil wastes or any other substance harmful to migratory birds in any waters or any area frequented by migratory birds.
- The proposed project is not near any known Ivory Gull colonies. However, it is possible that Ivory Gull colonies exist in the High Arctic that have not yet been noted. Any observations of Ivory Gulls should be forwarded to Mark Mallory (Seabird Biologist, Canadian Wildlife Service, Environment Canada, Box 1714, Qimugjuk Bldg. 969, Iqaluit, NU, X0A 0H0, Ph: (867) 975.4637 or mark.mallory@ec.gc.ca). See attached fact sheet for more information on Ivory Gulls.

Do you support the project proposal? Yes No Any additional comments?

Name of person commenting: Cindy Parker **of** Environment Canada

Position: EA Technician **Organization:** EPOD

Signature: Cindy Parker **Date:** March 9, 2007