



Western Arctic Field Unit
P.O. Box 1840
Inuvik, NT X0E 0T0

September 6, 2012

Mr. Eli Nasogaluak
Environmental Assessment Coordinator
Environmental Impact Review Board
PO Box 2120
Inuvik, NT X0E 0T0

RE: Parks Canada Submission - *Construction of the Inuvik to Tuktoyaktuk Highway, Northwest Territories*

Dear Mr. Nasogaluak,

I am pleased to provide the following comments for consideration by the Environmental Impact Review Board in its review of the proposed Inuvik to Tuktoyaktuk highway.

Parks Canada is not a regulator for this proposed project. However, it is an operational policy of Parks Canada to participate in environmental assessments for proposed developments that are outside sites managed by Parks Canada that may impact the commemorative or ecological integrity of the site.

Parks Canada's interest in the proposed Inuvik to Tuktoyaktuk all-weather highway pertains to our management responsibilities for the Pingo Canadian Landmark (PCL) and potential impacts to the cultural and ecological resources within the PCL. The "*Pingo Canadian Landmark Memorandum of Agreement (2001)*" provides an overview of these resources. Under this Memorandum of Agreement, as approved by Parks Canada and the community of Tuktoyaktuk, the purposes of the PCL are:

1. To protect the special natural characteristics of the Landmark, including the pingos and the natural ecosystem of which they are a part;
2. To protect the cultural heritage associated with the Landmark and to ensure the continued use of the area by Inuvialuit;
3. To encourage visitor and local appreciation, understanding and enjoyment of the natural and cultural environment of the Landmark;
4. To encourage compatible visitor activity in the Landmark and the surrounding area and to manage those activities in the long-term interests of the Landmark's resources.

The proposed highway would include an upgrade to the Tuktoyaktuk to Source 177 Access Road, by way of building up the existing road embankment to meet the highway's design criteria. This Access Road would then become the northernmost



section of the proposed Inuvik to Tuktoyaktuk Highway. On April 1, 2010, Parks Canada conducted a site visit to the PCL and confirmed that the Access Road is approximately 260m from the PCL boundary at its closest point and is partially separated by a narrow inlet from the Beaufort Sea (see attached map).

Parks Canada recently constructed a boat launch and boardwalk to the PCL to improve visitor access, direct visitor traffic, mitigate visitor footprint and provide a business opportunity for local tour operators who offer pingo tours from Tuktoyaktuk. The proposed highway may create additional points of access away from the boardwalk for highway travellers who wish to get a closer look at the pingos. At the very least it can be anticipated that tourists will stop on the shoulder of the highway to photograph the pingos. Parks Canada has initiated discussions with the GNWT Department of Transportation regarding the location of a pull-out near the Pingo Canadian Landmark. The pull-out would allow for safe viewing of the two prominent pingos (Ibyuk and Split Pingos). It will also provide a location for interpretive signage that will, among other things, encourage visitors not to hike to the pingos from the highway to reduce the risk of long-term damage to tundra terrain over time and to also encourage the use of local tour operators that can provide a closer visit to the PCL from Tuktoyaktuk via the boat launch and boardwalk. The pullout would be within the 60m Right-of Way for the highway and would be similar in design and size to other standard pull-outs that may be located along the highway.

Noise from construction and post-construction highway activities could disrupt bird species known to feed and nest in the PCL. Provided the mitigations and commitments provided by the proponent related to noise are followed, Parks Canada does not propose any additional mitigations.

Dust associated with summertime highway construction activities and post-construction usage could have a negative impact on air quality, aquatic resources, vegetation and aesthetics in areas adjacent to the right of way, including the PCL. According to the project description, water from nearby lakes will be used to control dust as per the *NWT Guideline for Dust Suppression (1998)* and in accordance with Fisheries and Oceans Canada requirements. The *NWT Guideline for Dust Suppression (1998)* permits the use of three dust suppressants. It is our understanding that of these three suppressants, only calcium chloride would be used where deemed necessary. Calcium chloride can be toxic to vegetation and therefore must be used in strict accordance with the guideline.

Thank you for the opportunity to comment.

Sincerely,

Diane Wilson
Superintendent, Western Arctic



Parks Canada Parcs Canada



cc Bill Fisher, Vice-President, Operations, Parks Canada
Nellie Cournoyea, Chair & CEO, Inuvialuit Regional Corporation
Jim Stevens, Director, Mackenzie Valley Highway, GNWT Department of
Transportation

