P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

Kugluktuk
ᖁᑦᓗᖅᑐᖅ

Bathurst Inlet
Kingaok
ᖃᖏᓴᐅᓕ

Bay Chimo
Umingmaktok
ᐅᒥᖏᓚᒃᑐᖅ

Cambridge Bay
Ikaluktutiak
ᐃᖅᓗᒃᑐᑎᑎᐊᖅ

Gjoa Haven
Okhoktok
ᐅᖅᓱᖅᑐᖅ

Taloyoak
ᒪᓗᕐᔪᐊᖅ

Kugaaruk
ᑰᑌᕐᔪᒃ

September 29, 2026

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O Box 119
Gjoa Haven, Nu
X0B 1J0

Re: Rascal Stream East Fish Diversion Berm Construction for 2AM-BRP1831.

Dear Richard,

Thank you for the opportunity to review and comment on the construction of the Rascal Stream East Fish Diversion Berm for 2AM-BRP1831.
After reviewing the construction plans provided by B2Gold Nunavut, KIA and its consultants do have several comments and recommendations.

KIA has identified significant areas requiring further supporting information or changes to construction, which may be required:

- Within the memorandum and the specification (Appendix B), I'm missing, however, a clear definition of, and consistency in ground ice containing soil. For example, in Section 4.1.1 (p. 7), WSP writes: "*Any visible ice structures encountered within the RSE Fishway and Diversion Berm footprint should be removed during construction and replaced with granular material at the direction of the Engineer.*" Excess ice that causes major thaw settlement doesn't have to be visible. Soils can also contain non-visible ice in excess that shall also be removed and replaced with granular material (which should be called non-frost susceptible granular fill). Later in the specifications (Table 4.1), visual inspections shall be completed as follow "*Inspect foundation preparation for suitability of material and presence of high moisture or ice*." with Section 7.2, point 3, clarifying that "*Excavated subgrade conditions shall be inspected for the suitability of material placement. Saturated fine-grained soils, ice-rich fine-grained soils in the thawed active layer, or ice structures shall be stripped until competent subgrade material is found, subject to approval by the engineer.*" First, there is some inconsistency about the ground ice, and no definition of "ice-rich", and secondly, within the thawed active layer there is no

P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

ground ice, i.e. there can't be any ice-rich soil. The ice-rich soil, which is now limited to only fine-grained soils, will be encountered in the permafrost below the active layer. Following these inconsistencies, it is recommended that B2Gold simply state in the specifications that the foundation shall be inspected by an Engineer and all excess ice, as defined in the 2025 Permafrost Glossary (Lewkowicz et al., 2025), shall be removed prior to foundation approval. Resulting excavations shall be backfilled with non-frost-susceptible NAG fill. I think that makes it clear and leaves very little room for discussions.

- Note: the Memorandum, nor the drawings have been signed or stamped by a P.Eng. as would be required for construction.

Review Comment Number	KIA 1-A
Subject/Topic	Figure 1 map requires more detail
Importance	Moderate
References	Rascal Stream East Fishway Design Technical Memo (September 4, 2026). • Section 1, p.3. • Section 5.1, p.11
Summary	The map in Figure 1 should show the current extent of the airstrip and the proposed airstrip extension. The proposed construction access road should also be shown on the map.
Detailed Review Comment	Figure 1 provides an overview of the location of the proposed Rascal Stream East fishway location and diverted waterways. The airstrip, as shown in the map, crosses sections of the Main Goose Pit Stream and Rascal Stream East. We assume that the airstrip shown on the map includes the extended area, but there should be a clear representation on the map of the current airstrip footprint and the extension footprint to clarify the need for the fishway diversion. Figure 1 does not show the proposed access road required to access the north portion of the RSE fishway as indicated in Section 5.1. This road should be shown on the project map, as it is integral to fishway construction and will be retained to serve as a maintenance access road post-construction.

P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

Recommendation/ Request	• Outline the current air strip footprint and the proposed air strip extension footprint on Figure 1 in the technical memo for clarity on the need for the fishway. • Include the RSE fishway access road in Figure 1.

Review Comment Number	KIA 2-A
Subject/Topic	Details on where the technical memo and WSP Golder (2022) differ with respect to construction during open-water conditions should be outlined for transparency
Importance	Moderate
References	Rascal Stream East Fishway Design Technical Memo (September 4, 2026). • Section 5.2, p. 11 Workplan for Airstrip Extension and Diversion Construction Monitoring Draft Technical Memorandum (WSP Golder 2022) DFO 2013. Nunavut Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat. Projects Near Water - Nunavut Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat
Summary	A table of the differences in construction monitoring under open-water conditions for the RSE fishway, as described in the technical memo and the previous report (WSP Golder 2022), should be provided, along with a rationale for the change. Instream work timing windows should be provided in Section 5.2 as a mitigation measure to avoid working during Arctic Grayling spawning.
Detailed Review Comment	Section 5.2 indicates that there are differences between the monitoring plan described in the RSE Fishway Design Technical Memo and the Workplan for Airstrip Extension and Diversion Construction Monitoring Draft Technical Memorandum (WSP Golder 2022). Specific differences should be outlined in a table in this section, and a rationale for the change in monitoring protocol should be included for clarity. This would be helpful since the WSP Golder (2022) is not available to review after a search of the NWB database or online.

P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

	The timing window during which instream work should be avoided for spring-spawning fish, such as Arctic Grayling, should be specified. Section 5.2 does not specify that open-water construction will take place to avoid such timing windows. This section should acknowledge the restricted activity timing window and either confirm that the timing window for construction activities will be respected or provide a rationale and evidence of DFO approval for the exception to the guideline.
Recommendation/ Request	• Provide a table in Section 5.2 that outlines the differences in monitoring protocol and rationale for the changes for construction during open-water conditions in the RSE fishway technical memo compared to WSP Golder (2022). • Indicate the restricted activity timing window for spring spawning fish will be followed or provide information on DFO approval for allowance to work during the restricted period.

Review Comment Number	KIA 3-A
Subject/Topic	Turbidity monitoring details
Importance	High
References	Rascal Stream East Fishway Design Technical Memo (September 4, 2026). • Section 5.2.2, p. 11-12
Summary	Environmental Monitor should be specified as a QEP in good standing with the College of Applied Biology. Additional information on water quality monitoring during construction of the RSE should be provided in the memo, including the minimum number of sampling locations, sampling frequency, water quality guidelines to be followed, mitigation measures used, and the rationale for monitoring only turbidity.
Detailed Review Comment	Section 5.2.2 states that sampling locations, parameters, frequencies, and turbidity monitoring guidelines are dictated by the Environmental Monitor. Given that the Environmental Monitor will determine critical monitoring data to collect, it should be stated that the Environmental Monitor must be a QEP in good standing with the College of Applied Biology. Sampling locations, parameters, frequencies, and guidelines for turbidity monitoring should be outlined in this document, as it is critical to

P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

	understanding the thoroughness of construction monitoring. The document could state that the Environmental Monitor may make changes in the field as conditions dictate, but there should be a minimum number of sampling locations upstream and downstream of the fishway, a minimum sampling frequency, and a turbidity threshold that, if exceeded, would result in a construction slowdown or stoppage. There is no mention of mitigation measures to reduce turbidity during fishway construction, or of applying additional mitigation if turbidity exceeds thresholds during construction monitoring. This information should be added in Section 5.2.2, with reference to a water quality monitoring plan for construction monitoring, which should include all relevant information on water quality monitoring during RSE fishway construction. The section mentions that "the scope assumes that total suspended solids (TSS) monitoring is not required." No rationale is provided for the parameters to be monitored during construction.
Recommendation/ Request	• State in Section 5.2.2 that the Environmental Monitor must be a QEP in good standing with the College of Applied Biology. • Include information in Section 5.2.2 on the sampling locations, parameters, frequency of sampling and guidelines to follow for water quality sampling during RSE fishway construction and reference/develop a water quality construction monitoring plan. • Provide rationale for not monitoring other water quality parameters (e.g., TSS, water temperature, DO) during construction. • Please provide the actual turbidity ranges and numbers defined in the CCME guidelines, including the threshold that will be used to slow or halt the construction. Please provide additional details on the conditions when/how it will be determined to resume construction. • Please provide frequency, schedules of turbidity monitoring.

Review Comment Number	KIA 4-A
Subject/Topic	Post-construction monitoring
Importance	High
References	Rascal Stream East Fishway Design Technical Memo (September 4, 2026).

P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

	• Section 5.4, p. 12-15 DFO (2011) Long-term monitoring protocols for new and upgraded hydropower projects in British Columbia and Yukon Territory
Summary	The post-construction monitoring period should be longer
Detailed Review Comment	Post-construction monitoring is scheduled to span 6 years, but not necessarily 6 years in total. Typical effectiveness monitoring occurs up to10 years according to DFO long-term monitoring protocols for hydro projects in other provinces (DFO 2011). Thus, it would be more conservative to conduct biological monitoring over a longer time period than 6 years. Functional monitoring (annual inspections) should likely occur over the lifetime of the project, given that various issues (debris, sedimentation, changes in flow etc.) could cause the fishway to lose function after high-flow, storm events, or natural disasters (e.g., wind or earthquake).
Recommendation/ Request	• Consider longer (10-year) biological monitoring. • Functional monitoring should occur annually for the life of the fishway to determine that it is functioning properly. • Please clarify or provide additional details and/or conditions that will determine additional serious harm to Arctic Grayling not previously assessed under this Authorization.

Review Comment Number	KIA 5-A
Subject/Topic	Construction Environmental Monitoring Plan
Importance	High
References	Rascal Stream East Fishway Design Technical Memo (September 4, 2026). • Appendix B, Section 2 DFO measures to avoid and mitigate risks to fish and fish habitat. June 2026 Measures to avoid and mitigate risks to fish and fish habitat
Summary	A Construction Environmental Monitoring Plan should be developed and referenced throughout the technical memo, with specific reference in Appendix B, Section 2: Environmental Protection.

P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

Detailed Review Comment	There are no details of a Construction Environmental Monitoring Plan to be followed during the construction of the RSE fishway. This document should be developed to include appropriate avoidance and mitigation measures to protect the environment during construction. For example, fueling machinery should be completed away from the water. There is a mention that "Environmental compliance monitoring shall be completed in accordance with the site-specific erosion sediment control plan (ESCP) and construction and fisheries monitoring plan" in Appendix B, Section 3.0 General Requirements, #7, there is no reference to the construction monitoring plan that indicates it has been developed and there is no reference to this plan in the main body of the technical memo. Measures to avoid and mitigate risks to fish and fish habitat
Recommendation/ Request	• Develop a Construction Environmental Monitoring Plan that follows DFO guidance on measures to avoid and mitigate risks to fish and fish habitat and cite the guidance in the RSE fishway technical memo. If the plan already exists, state this in the memo and reference or append it, as was done for the ESCP. • Please provide additional details on how block nets will be monitored such as how, frequency, duration, by staff after installation to prevent fish passage between RSE Fishway Diversion outlet to Gosling Pond 1 until completion of the RSE Fishway and Diversion Berm.

Review Comment Number	KIA 6-A
Subject/Topic	Provide relevant background material/references as appendices.
Importance	Moderate
References	Golder (Golder Associates Ltd.). 2020a. Rascal Stream Fishway Hydrotechnical Assessment. Report No. 18114181-060-R-Rev0. Prepared for Sabina Gold & Silver Corp. June 30, 2020. Golder. 2020b. Fish Passage Evaluation, Mitigation, and Monitoring for the Rascal Stream Diversion. Technical Memorandum No. 18114181-062-TM-Rev0. Prepared for Sabina Gold & Silver Corp. June 29, 2020. Golder. 2020c. Rascal Stream Fish Passage Evaluation – Addendum. Prepared for Sabina Gold & Silver Corp. August 11, 2020.

P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

	SRK (SRK Consulting Inc.). 2021. Back River: Updated Feasibility Study – Hydrology Update. Memorandum prepared for Sabina Gold and Silver Corp. Project No. 1CS020.020. July 16, 2021. WSP (WSP Canada Inc.). 2026a. Rascal Stream East Fishway Design Basis. Reference No. CA0069616.1932-208-PP-RevA-5000. Dated June 26, 2026. WSP. 2024. Back River Project Rascal Stream West Arctic Grayling Monitoring – 2024 Field Summary Report and Fish Passage Characterization. Prepared for B2Gold Back River Corp. December 20, 2024. WSP Golder. 2022. DRAFT Workplan for Airstrip Extension and Diversion Construction Monitoring.
Summary	The background documents that could clarify some of the information in the RSE fishway technical memo (listed in the reference section above) could not be easily located online.
Detailed Review Comment	Several background documents referenced in the RSE Fishway Design Technical Memo (listed in the reference section above) could provide clarity on the development of plans for the fishway construction. It would be helpful to access these reports, as they could not be found online or in the NWB database.
Recommendation/ Request	• Please provide the documents listed above as attachments to the RSE Fishway Design Technical Memo or provide them on the NWB database.

Sincerely,

Janet Kadlun

Senior Project Officer

Kitikmeot Inuit Association