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Cambridge Bay
Ikaluktutiak
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Kugluktuk
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Bay Chimo
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Kugaaruk
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Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
X0B 1J0

Sent by e-mail:

July 17th, 2024

RE: KIA's response to B2Gold Nunavut's response to the review of the Water Management Plan.

Dear Richard Dryer, the KIA has reviewed B2Gold Nunavut's response to the review of the Water Management Plan as well as the Rascal Stream West Crossing Construction Summary Report. The KIA is satisfied with B2Gold Nunavut's responses to KIA-NWB-01, KIA-NWB-03, KIA-NWB-04, and KIA-NWB-05.

However, B2Gold Nunavut's response to KIA-NWB-02 is insufficient. KIA's recommendation was *"Identify the fish bearing stream crossing. Change the type of culvert for the fish bearing streams to open bottom."* Their response states *"An embedded, oblong culvert crossing design (twin culvert installation) was installed at the Rascal Stream crossing location in 2023. Work was completed under an approval (Letter of Advice, dated July 15, 2022) from DFO."*

This is at odds with DFO-NWB-04 where the recommendation was *"DFO recommends the proponent to use open bottom box culverts or provide rationale of why open bottom culverts were not used."* B2Gold Nunavut's response to DFO was *"Rascal Stream West Construction Summary Report is pending finalization. B2Gold Nunavut will submit when available."*

Given that the Rascal Stream West Crossing Construction Summary Report was provided and reviewed, and the arched or oblong culverts were installed, B2Gold Nunavut should have provided an explanation for the design choice. If it is due to arched or oblong closed bottom culverts being structurally stronger than open bottom box culverts, B2Gold Nunavut should say so and provide rational that they are adequate for fish passage.

Given that the KIA has not reviewed the Letter of Advice, dated July 15, 2022 from the DFO to B2Gold Nunavut, the KIA recommends that B2Gold Nunavut



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provide both KIA and DFO the rational for the arched or oblong closed bottom culverts. If it is because they are structurally stronger than open bottom box culverts, B2Gold Nunavut should clearly say so and provide rational or evidence that they will adequately provide for fish passage at the Rascal Stream Crossing.

Thank you.

A handwritten signature in black ink that reads "John Roesch".

John Roesch, P.Eng.

Senior Project Officer
Kitikmeot Inuit Association, Department of Lands, Environment, and Resources

Cc Wynter Kuliktana, Director, KIA, Department of Lands, Environment, and Resources