

Fisheries and Oceans Canada

Pêches et Océans Canada

Eastern Arctic Area

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DFO File: NU-03-0191

January 8, 2010

Richard Dwyer Licensing Administrator Nunavut Water Board P. O. Box 119 Gjoa Haven, NU X0B 1J0

Dear Mr. Dwyer:

RE: "Water Quality Monitoring and Management Plan for Dike Construction and Dewatering", version 3, dated November 2009.

On behalf of Fisheries and Oceans Canada (DFO) I have reviewed the above-mentioned Plan and attended a workshop in Toronto November 4, 2009 to discuss the proposed Bay-Goose dike construction.

In general, DFO supports the initiatives that are presented in the Plan to reduce sediment and TSS concentrations as a result of dike construction activities. The implementation of a causeway to be constructed during the winter, effective use of silt curtains and the pumping of water from within the dike construction area should reduce sediment and TSS.

In Section 4, the Plan identifies methodologies or Operational Procedures for Winter and Open Water Construction. DFO is in general agreement with the approaches, but would reiterate that Licence Limits as established in the Water Licence should not be exceeded, as is suggested in the text on Page 13, SOP #3.

Since much of the planned winter construction activities will take place near high value habitat or during the time period when fish eggs may be present, a conservative approach should definitely be adhered to with the licence limits corresponding to the period after Sept 1st.

Monitoring stations to be located on ice should be located as close as safety permits on either side of the causeway and in front of the work location and move in conjunction with development rather than utilizing fixed locations as depicted for winter work in Figure 7. Background levels should also be determined before construction begins.

Silt Curtain Placement and Monitoring during Open Water



DFO recommends that two additional curtains be placed between the small island south of Goose Island and the causeway. This will create a couple of additional cells, provide an additional contingency and may be more effective than utilizing the curtain that is proposed to separate the high value habitat in the east bay. Suggested locations are drawn on an attached figure.

The locations and use of monitoring results from the various station locations as depicted on Figure 8 will not provide information that will accurately identify potential impacts. Some of them are too far from the construction zone and would likely be close to background. The monitoring locations would be more appropriately located outside of the "inner" curtain along the area of construction.

Finally, all data to support derivation of the turbidity/TSS correlation should be provided to the Nunavut Water Board.

Should you have questions, or require clarification please do not hesitate to contact me at (519) 668-2132.

Sincerely,

Dave Balint

Senior Habitat Biologist

Fisheries and Oceans Canada

Eastern Arctic Area

copy Eric Kan, Fisheries and Oceans Canada

