



Fisheries
and Oceans

Pêches
et Océans

Fish Habitat Management
P.O. Box 358
Iqaluit, Nunavut
X0A 0H0

October 14th, 2001

Krista Taverner
Dillon Consulting
P.O. Box 978
Iqaluit, NU
X0A 0H0
Fax: (867)-979-0345

RE: Granular Resource Management Project, City of Iqaluit

Dear Krista:

The above project proposal was received by The Department of Fisheries and Oceans, Fish Habitat Management(DFO-FHM) on September 14th, 2001. The project involved excavating gravel from two drainage ditches that discharge into Koojesse Inlet. Although the project has been completed, I am writing this letter to clarify potential impacts on fish habitat and suggest appropriate mitigation measures for future projects.

Presence of Fish Habitat

Firstly, I would like to confirm that the so called “ditches” at the location of the project site are defined as fish habitat by DFO. The ditch is, in fact, a stream that has been altered by human activities (i.e., military, industrial, and municipal) in the North 40 area over the course of several decades. It is unlikely that fish are present in the stream. Despite its degraded state, the stream plays a role in transporting nutrients and other inputs into Koojesse Inlet, a feeding and migration area for arctic charr. The stream is defined as “fish habitat” because fish in Koojesse Inlet indirectly depend on the stream to carry out their life processes. (Please see “*Policy for the Management of Fish Habitat*” for further information.)

Impacts on Fish Habitat

The project proposal indicates that discharge of sediment into Koojesse Inlet is a potential impact associated with the project. Admittedly, Total Suspended Solids (TSS) levels are “naturally” elevated during precipitation and spring run-off events, and the natural disturbance regime of Koojesse Inlet is characterised by sediment loading. DFO-FHM assumes that the impacts of elevated TSS levels arising due to development activities are additive to TSS levels that occur due to natural factors. Those impacts are generally negative, resulting in direct mortality of fish, disruption of fish habitat, and decreased primary productivity of fish bearing waters. As such, activities in or around fish bearing waters that may lead to elevated TSS are discouraged.

Mitigation Measures

It has been determined that the proposed project may result in the deposition of deleterious substances into fish bearing waters, and depositing deleterious substances into fish bearing waters is prohibited as stated under Subsection 36(3) of the *Fisheries Act*. In addition to the measures set out in the project proposal (i.e., use of erosion control check dams), the following mitigation measures, if incorporated into the project, are intended to prevent any potentially harmful impacts to fish and fish habitat:

- All activities, including maintenance procedures and vehicular refuelling, should be controlled to prevent the entry of petroleum products, silt, debris, rubble, or other deleterious substances into the water.
- All spills of oil, fuel, or other deleterious material should be reported immediately to the 24-Hour Spill Line at (867) 920-8130.

Fisheries Act Regulations

If the proposed work is carried out as described in the plans provided to DFO-HM and if the additional mitigation measures specified above are implemented, the proposed work will not be considered as contravening Subsection 35(1) and/or Subsection 36(3) of the *Fisheries Act*. If a contravention occurs as a result of a change in the plans for the proposed works, or failure to implement the additional mitigation measures specified above, prosecution under Subsection 35(1) and/or Subsection 36(3) of the *Fisheries Act* may be initiated. Please note that this letter of advice does not release the proponent of the responsibility for obtaining any other permits that may be required.

If you have any questions, feel free to contact me at (867) 979-8007 or by fax at (867) 979-8039.

Sincerely,

Original Signed By:

Jordan DeGroot
Habitat Management Biologist
Fisheries and Oceans Canada
Eastern Arctic Area

c.c. Mathew Hough, City of Iqaluit
Stefan Gelinas, Kudlik Construction