COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: Apex River Drinking Water Supply
Proponent: City of Iqaluit
Location: Qikiqtani (South Baffin) Region
Comments Due By: March 7, 2019 **NIRB #:** 19UN013

Indicate your concerns about the project proposal below:

no concerns	traditional uses of land
x water quality	x Inuit harvesting activities
terrain	x community involvement and consultation
air quality	local development in the area
wildlife and their habitat	tourism in the area
marine mammals and their habitat	human health issues
birds and their habitat	other:
x fish and their habitat	
heritage resources in area	

Please describe the concerns indicated above:

The amount of water proposed exceeds the threshold of established risk to fish-bearing waters as set forth by the Department of Fisheries and Oceans. Likewise, we calculate the instantaneous withdrawal necessary to supplement Lake Geraldine by an annual amount of 500,000m^3 would have an 80% probability of exceedance of the maximum available flow of the Apex River during low-flow periods based on measured data available. I have outlined these concerns in the enclosed letter, and included the peer-reviewed publication that outlines the ethicacy of such a supplemental program as proposed.

Do you have any suggestions or recommendations for this application?

I strongly recommend that his proposal be rejected outright. The Apex River is not a sufficient long-term supply source for the City of Iqaluit. There is no justifiable means of supplementing the supply of Lake Geraldine sufficiently based on the current or historic average instantaneous flow availability of the Apex River. The financial and ecological risk outweigh any reasonable withdrawal scenario.

Do you support the project proposal? Yes No x Any additional comments?

The Apex River is of extreme community importance, and this proposal would directly risk the ecological integrity of the Apex River.

Name of person commenting: Andrew Medeiros **of** Halifax, NS
Position: Assistant Professor **Organization:** Dalhousie University
Signature: **Date:** March 6, 2019