



NIRB File No.: 19UN013

Related to NIRB File Nos.: 19WA006, 13UN034

NPC File No.: 149007

NWB Water Licence: 3AM-IQA1626 Amendment No.1

DFO Authorization 18-HCAA-01025

March 8, 2019

City of Iqaluit CAO
City of Iqaluit
Building 901, Box 460
Iqaluit, NU X0A 0H0

c/o Erica Bonhomme, Nunami Stantec

Sent via email: cao@city.iqaluit.nu.ca, erica.bonhomme@stantec.com.

Re: Opportunity to address comments received regarding the City of Iqaluit's "Apex River Drinking Water Supply" project proposal

Dear Erica Bonhomme:

On January 11, 2019 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen the City of Iqaluit's "Apex River Drinking Water Supply" project proposal from the Nunavut Planning Commission (NPC or Commission). On February 14, 2019, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by March 7, 2019.

On or before March 7, 2019 the NIRB received comments from the following interested parties:

- Government of Nunavut (GN)
 - Department of Culture and Heritage
 - Department of Environment
 - Department of Health
 - Nunavut Research Institute (NRI)
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
- Environment and Climate Change Canada (ECCC)
- Fisheries and Oceans Canada (DFO)
- Alex Medeiros
- Robert Carveth

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/125429.

A *summary* of the public concerns reflected in the comment submissions relate to the following:

- Lack of justification for using the Niaquanguk (Apex) River for the source of recharge water in quantities which in published studies appears to exceed the amount allowable under Fisheries and Oceans Canada guidelines, based on historical data, forecasts, and studies of the river's of discharge, with subsequent effects on the ecological health of the river;
- Lack of proper assessment of residual effects on the river resulting from the withdrawal;
- Lack of information regarding any consideration of possible alternatives to supplement Lake Geraldine;
- Lack of information regarding consultation with the Amaruq Hunters and Trappers Association (HTA) and residents of Iqaluit and Apex;
- Limited information provided as to whether the river's resident char population is part of a Commercial Recreational Aboriginal (CRA) fishery, or whether the lakes from which the char may be resident are within a CRA fishery area;
- Concern with respect to the proposed project not addressing long-term water shortages for Iqaluit; and
- Lack of information regarding any archeological survey of the pipe route.

The NIRB would like to provide the City of Iqaluit with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister. The NIRB respectfully requests that a response be provided directly to the NIRB by **March 22, 2019**.

If the City of Iqaluit determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require clarification, please contact the undersigned directly at 867-983-4617 or at kmorrison@nirb.ca.

Sincerely,



Keith Morrison
Technical Advisor II
Nunavut Impact Review Board

cc:

Distribution List

Amy Elgersma, City of Iqaluit

Richard Dwyer, Nunavut Water Board

Robert Chapple, Community and Government Services

Mark D'Aguiar, Fisheries and Oceans Canada

Fisheries Protection Program, Fisheries and Oceans Canada