



Water Resources Division
Nunavut Regional Office
Iqaluit, NU X0A 0H0

March 31, 2015

Your file - Votre référence
3AM-IQA0612

Our file - Notre référence
IQALUIT-#899942

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
Gjoa Haven, NU X0E 1J0

**Re: Aboriginal Affairs and Northern Development Canada's (AANDC) Completeness
Assessment of an Application to Amend and Renew Water Licence 3AM-IQA0612 –
City of Iqaluit – Municipal Undertaking.**

Dear Ms. Beaulieu,

On March 10, 2015, AANDC received notice from the Nunavut Water Board (the NWB) regarding the above mentioned application, inviting interested parties to provide comments by March 31, 2015.

AANDC reviewed the renewal application and the results of our review are provided in the enclosed memorandum for the Board's consideration. Comments have been provided pursuant to the Department's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me at 867-975-3876 or sarah.forte@aandc-aadnc.gc.ca for any additional information.

Regards,

Sarah Forté
Water Management Coordinator

c.c.: Erik Allain, Manager of Field Operations, AANDC Nunavut
Karen Costello, Director Resource Management, AANDC Nunavut



Completeness Assessment Memorandum

To: Sarah Forté, Water Management Coordinator, AANDC

From: Amjad Tariq, Regulatory and Science Advisor, AANDC
Robert Savard, Water Resource Officer, AANDC

Date: March 24, 2015

Re: Water Licence Renewal and Amendment Application, #3AM-IQA0612

Licensee: City of Iqaluit
Project: Municipal Undertaking
Region: Qikiqtani

A. BACKGROUND

On March 10, 2015, the Nunavut Water Board (NWB or Board) distributed the City of Iqaluit's application (the Application) to renew and amend its Type 'A' Water Licence, # 3AM-IQA0612 (the Licence), to interested parties for review. During the period November 2012 to March 2015, the Board received from the City of Iqaluit (the City) several submissions in support of the Application to renew and amend the Licence, which was issued to the City on May 15, 2006 and expired, following an extension to the Licence term, on July 15, 2012. Interested parties were asked to perform the following tasks by March 31, 2015:

1. Review the scope of the information provided and identify any deficiencies that require additional information or further response from the City of Iqaluit (i.e., a completeness assessment and initial preliminarily technical assessment); and
2. Provide comments on the type of technical meeting, pre-hearing conference, and public hearing to be held.

The City is requesting that the length of term of the Licence be twenty-five (25) years.

It is pertinent to mention that in response to NWB's request dated October 21, 2013, the Water Resources Division, AANDC had already completed a preliminary technical assessment and completeness check and a correspondence was sent to NWB on November 08, 2013. However, at the time, the Board was not in a position to allow the



City to proceed to the next stage of the licensing process due to the absence of some pre-licensing requirements¹.

The total scope of the present renewal and amendment application includes the original scope, the addition to the original scope and new requests to the original scope².

B. RESULTS OF REVIEW

The following comments/recommendations are submitted for the consideration of NWB:

Application Forms: 'Application for Water Licence Renewal' and 'Application for Water Licence Amendment'

The Board's Guide 7 (Licensee requirements following the Issuance of a water licence) requires completing the above mentioned forms. In principle the proponent should be requested to provide updated forms complete in all respects. The present application contains an outdated renewal form and a letter describing the amendments. Though the present application should be considered because it contains the necessary information, it should not set a precedent for omitting required forms.

1. Information Requests

Emergency Preparedness Plan for Sewage Lagoon

The Dam Safety Inspection Report³ recommends the completion of an Emergency Preparedness Plan for the sewage lagoon. The City of Iqaluit has an intention to retain the lagoon as a back-up facility. In light of the City's consultant report, localized failures and/or seeps are expected. The proponent should be requested to provide an Emergency Preparedness Plan accordingly.

2. Type of Technical Meeting, Pre-Hearing Conference, and Public Hearing

The technical meeting, pre-hearing conference, and public hearing should be held in person given the scale of the City of Iqaluit's municipal water and waste management facilities, the need for clarity on the scope of licensed activities, documented non-compliance with licence terms and conditions, and anticipated public concern.

End of comments.

¹ Letter from the Manager of Licensing, NWB to the Acting Chief Administrative Officer, City of Iqaluit, March 10, 2014

² Letter from the Acting chief Administrative Officer, City of Iqaluit to Manager of Licensing, NWB, March 2, 2015

³ Dam Safety Inspection Report, City of Iqaluit, Concentric Associates International Incorporated, September 21, 2011