



Fish and Fish Habitat Protection Program
Arctic Region
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Yellowknife, Northwest Territories
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Programme de protection du poisson et de son habitat
Région de l'Arctique
301 – 5204 50th Ave. (Franklin)
Yellowknife, Territoires du Nord-Ouest
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May 13, 2026

Your file *Votre référence*
3AM-IQA1626

Subject: Water Licence, Type A, City of Iqaluit; Renewal and Amendment Application

To whom it may concern,

On April 30, 2026, the Nunavut Water Board (NWB) invited parties to review the City of Iqaluit's responses to information requests on the Water Licence, Type A, City of Iqaluit; Renewal and Amendment Application: 3AM-IQA1626. The Fish and Fish Habitat Program of Fisheries and Oceans Canada (DFO) appreciates the opportunity to review the responses to our comments.

As noted in our earlier correspondence, DFO received a Request for Review from the City of Iqaluit, which is currently under assessment. As part of this review, DFO requested additional information from the proponent. The comments and recommendations below relate to that requested information and are relevant to the water licence application. Any issues that cannot be fully resolved through NWB's process can continue to be addressed through DFO's regulatory review. If harmful impacts to fish or fish habitat cannot be addressed, the City of Iqaluit may require to apply for a *Fisheries Act* Authorization.

Comment DFO-01: Use of Explosives (NWB-DFO-02)

The City of Iqaluit committed to limiting water overpressures to 50 kPa at the location of a live fish, consistent with DFO guidance. DFO requested modelling to demonstrate blasting thresholds are met as well as proposed mitigation measures (e.g., timing windows, use of blast mats, isolation) and any monitoring plans to verify that impacts are avoided or minimized. DFO recommends those requests be included in the project's Preliminary Blast Assessment, however, any issues that cannot be fully resolved through the Board's process can continue to be addressed through DFO's regulatory review.

Comment DFO-02: Culvert Replacements (NWB-DFO-03)

Insufficient detail has been provided to assess potential impacts to fish and fish habitat. DFO requested detailed information for each culvert associated with the proposed road upgrades, including stream characteristics, fish presence and use, channel dimensions, hydrology, proposed works, and mitigation measures. This information is needed to

assess potential impacts on fish and fish habitat and to determine whether fish passage requirements apply. DFO expects this issue can be fully resolved within DFO's regulatory process.

Comment DFO-03: Water Withdrawal (NWB-DFO-04, NWB-DFO-05)

Additional information is required to assess whether the proposed withdrawals will avoid adverse effects to fish and fish habitat in both the Apex River and Lake Qiqitalik, such as loss of littoral habitat, outflow and downstream changes, fish stranding, and the creation of fish barriers. As part of our review, DFO requested that the proponent:

- Conduct hydraulic modelling to assess the effects of reduced flows on depth, velocity, and wetted area in the Apex River, and evaluate whether changes may create barriers to fish migration or result in loss of spawning or littoral habitat.
- Demonstrate that proposed maximum withdrawal rates from Lake Qiqitalik will not adversely affect outlet flow conditions, or result in a significant loss of littoral habitat.
- Provide water withdrawal rates in litres per second (L/s) to ensure compliance with fish-screening requirements.
- Confirm field monitoring will be implemented during withdrawal periods to validate model predictions and ensure that changes in hydraulic conditions are accurately reflected in the natural environment.
- Establish contingency measures (e.g., reduction or cessation of withdrawal rates) that will be implemented if monitoring identifies adverse effects to fish or fish habitat that were not predicted.

DFO recommends these requests be considered in this water licence process, however, any issues that cannot be fully resolved can continue to be addressed through DFO's regulatory review. DFO looks forward to continuing the assessment of the proposal through both NWB and DFO's regulatory process.

Yours sincerely,

A handwritten signature in black ink that reads "NATALIE GRISHABER". The signature is written in a cursive style with some capital letters.

Natalie Grishaber
Biologist
Fish and Fish Habitat Protection Program
Fisheries and Oceans Canada