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Building Nunavut Together
Nunavuliuqatigiingniq
Bâtir le Nunavut ensemble

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Government of Nunavut
Nunavut Kavamat
Gouvernement du Nunavut

October 07, 2026

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O Box 119
Gjoa haven, NU X0B 1J0

Sent VIA Email: richard.dwyer@nwb-oen.ca

RE: Comment Request for The City of Iqaluit's "Application for Water Licence Renewal" Project Proposal (NWB File No. 3AM-IQA1626)

Dear Richard Dwyer,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Water Board (NWB) for the opportunity to provide comments on The City of Iqaluit's "Application for Water Licence Renewal" project proposal.

The GN provided its initial comments on June 30, 2026. After reviewing the Proponent's responses along with discussion at the technical meeting and pre-hearing conference, the GN has a following supplemental comment to provide regarding Comment GN-TR-03. This supplemental comment is provided in the following Appendix.

Should you have any concerns with our comments, please contact me by phone at 867-975-7757 or by email at bpirie@gov.nu.ca.

Qujannamiik,

Bradley Pirie
Manager, Environmental Science
Government of Nunavut

APPENDIX

GN-S-01: Supplemental Follow-up Regarding GN-TR-03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Watercourse Crossings, Culverts, Drainage Crossings, and Watercourse Training
References	• City of Iqaluit Type A Water Licence Renewal/Amendment Application materials related to the Long-Term Water Project (LTWP), municipal roads and access roads, drainage infrastructure, gravel source or reserve areas, access to new waste management facilities, the Waste Transfer Station, and the New North 40 Landfill. • City of Iqaluit Type A Water Licence Renewal/Amendment Application materials identifying or referring to infrastructure and drainage features associated with Carney Creek, the Apex River, intermittent streams, and drainage features associated with municipal infrastructure. • 3AM-IQA1626 Application & Technical Review GN-DOE Comments-IMLE • 3AM-IQA1626 City-1Tables1to3-Tech-Review-Comments-Responses-ILAE

CONCERNS

The Government of Nunavut Department of Environment (ENV) has reviewed the City of Iqaluit's (Proponent) July 22, 2026 responses to GN's technical review comments and the referenced supporting documents. The GN would like to present this supplemental comment regarding GN-TR-03.

It is still unclear regarding the Proponent's plans for the water crossings across the Apex River and if the city plans to replace the Road to Nowhere bridge. The complete list of water crossings along with their associated parameters is also still unclear.

Watercourse crossings, culverts, watercourse training works and alterations of flow are regulated water uses under the Nunavut Waters and Nunavut Surface Rights Tribunal Act and Nunavut Waters Regulations. Depending on the nature and scale of the activity, construction, replacement, alteration or maintenance of these works may require authorization under a water licence or may be authorized without a licence under the Regulations. The application record does not clearly identify the applicable authorization basis for the City's existing

crossings and related works, or how future maintenance or modification of those works will be addressed.

RECOMMENDATIONS

With regards to GN-TR-03 Watercourse Crossings and Culverts, ENV recommends the Proponent:

- Confirm that the Long-Term Water Project will replace the Road to Nowhere bridge crossing of the Apex River with multiple culverts and that issued-for-construction drawings will be filed before construction.
- Clarify the relationship between the Master Drainage Plan and the renewed/amended water licence, including how information respecting watercourse crossings, culverts and drainage features associated with the licensed undertaking will be reflected in the licence record. Within a timeframe specified by the Nunavut Water Board, submit a consolidated, licence-specific inventory and map of watercourse crossings, watercourse training works and culverts associated with the licensed undertaking. For each feature, identify its location, affected watercourse or drainage feature, existing or proposed status, applicable authorization basis, including whether it is authorized under the licence, authorized without a licence under the Regulations, or subject to another NWB authorization, and any applicable monitoring, maintenance and mitigation requirements.

ADDITIONAL COMMENTS

N/A