



Your file - Votre référence
8AC-ALT----

June 11, 2018

Our file - Notre référence
IQALUIT-# 1221288

Licensing Department
Nunavut Water Board
P.O. Box 119
GJOA HAVEN, NU, X0B 1J0

Sent via email: licensing@nwb-oen.ca

Re: INAC's Response to DND's response letter dated January 24, 2018 for Type 'A' Water Licence Application – Canadian Forces Station Alert (Water Licence 8AC-ALT----)

To Whom It May Concern,

Thank you for the Nunavut Water Board's June 1, 2018 notice for comment on the above mentioned Water Licence application. A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Indigenous and Northern Affairs Canada'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 by telephone at 819-953-8988 or email at ian.parsons@canada.ca for further information.

Sincerely,

Ian Parsons
A/Manager, Water Resources
Water Resources Division
Resource Management Directorate
Indigenous and Northern Affairs Canada
P.O. Box 100
IQALUIT, NU X0A 0H0

Encl.

Cc. Spencer Dewar, Director, Resource Management Directorate – INAC, NRO
Erik Allain, Director of Lands – INAC, NRO

Memorandum

To: Licensing Department, Nunavut Water Board

From: Ian Parsons, A/Manager, Water Resources, Indigenous and Northern Affairs
Canada, Nunavut Regional Office (NRO)

Cc: Spencer Dewar (INAC; NRO), Erik Allain (INAC; NRO)

Date: June 6, 2018

Re: INAC's Response to DND's response letter dated January 24, 2018 for Type 'A' Water Licence Application – Canadian Forces Station Alert (Water Licence 8AC-ALT----)

Applicant: Department of National Defence
Representative: Colonel Kevin G. Horgan, Commander Real Property Operations Group
Project: Canadian Forces Station Alert
Region: Qikiqtani

A. Background

On July 21, 2016, the Nunavut Water Board (NWB or Board) distributed the Department of National Defence's (DND; the Licensee) Application for a new Type 'A' Water Licence, 8AC-ALT----, to interested parties for a completeness assessment. This Type 'A' Water Licence Application is meant to regulate water use, waste disposal and land farm activities at Canadian Forces Station (CFS) Alert, located on northern Ellesmere Island. The Application was originally submitted by the DND as an amendment and renewal for 3BC-ALT1015 and has been re-classified as a Type 'A' Application as daily water use at CFS Alert is in excess of 300 m³/day. Daily water use exceeds the threshold for a Type 'B' Water Licence, largely due to the re-circulation of source water through distribution pipes to prevent freezing.

CFS Alert is a remote military installation operated by the DND, in continuous operation since 1958. The site includes facilities that support a year-round population ranging from 50-100 people, with the summer population increasing to ~200 people. Military exercises held at CFS Alert can see total population increase to as much as 400 people at one time.

INAC submitted Completeness comments and Information requests to the NWB on August 26, 2016, DND provided response to this submission on January 24, 2018.

INAC has been asked to review and submit comments on DND's response letter dated January 24, 2018.

B. Results of review

On behalf of INAC's Water Resources Division, the following comments and recommendations are provided for consideration:

INAC's response is broken into two parts to align with DND's letter dated January 24, 2018.

1. General Comments

INAC is satisfied with all of DND's comments under this section and looks forward to the technical review stage of the application.

2. Information Requests

INAC will be using DND's numbering from their submission in this section.

i) DND Comment number 9)) DND is seeking clarification if a Fuel Management section under the Spill Contingency Plan would be acceptable to INAC.

Yes a section on Fuel Management contained within the Spill Contingency Plan would be acceptable to INAC.

ii) DND Comment number 10)) INAC would like to clarify this comment. What INAC is looking for here is how the water is controlled around the various infrastructures at Alert. For Example how is water diverted or stopped from entering the sewage treatment area(too much water entering this system may load it and allow water to flow outside of the intended wetland area) or how it is diverted around the landfills and landfarms. If water is not controlled and allowed to enter and leave (escape) these facilities then you have possible contaminated water entering the environment. INAC would like to ensure this is not occurring.

Although INAC would like to see standalone documents for all plans submitted, INAC will not pursue this further as long as all information is contained within documents submitted to the NWB.

Therefore, INAC is satisfied with all other DND comments under this section and again looks forward to the technical review stage of the application.