



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
8BC-BTN1819
Our file - Notre référence
CIDM# 1249573

July 4, 2019

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada Comments on
City of Iqaluit Application for Water Licence Renewal 8BC-BTN1819 for
Repair of Bridge Abutments**

Dear Mr. Dwyer,

Thank you for your June 17, 2019 invitation for Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to comment on the renewal application for licence 8BC-BTN1819, for repair of bridge abutments submitted by Concentric Geoscience Inc. on behalf of the City of Iqaluit. CIRNAC examined the submission. The following comment has been provided pursuant to CIRNAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

1. Environmental Protection Plan

References:

- Concentric Geoscience Inc., 8BC-BTN1819 Water Licence Renewal Application, submitted on behalf of the City of Iqaluit, June 5, 2019.
- Concentric Geoscience Inc., 8BC-BTN1819 New Water Licence Application, submitted on behalf of the City of Iqaluit, April 8, 2018.
- Concentric Geoscience, Environmental Protection Plan for the Road to Nowhere Bridge Repair, February 8, 2019.
- Letter from Eric Shilts and Darren Brown of Concentric Geoscience Inc. to the Nunavut Water Board, Re: NWB New Type "B" Water Licence No. 8BC-BTN1819 – Bridge to Nowhere – Repair to Abutments Project, dated June 21, 2018.



The renewal application document states that the program is proposed to take place from July to August, 2019, during the open water season. This timing is consistent with the original application document submitted in 2018 for licence 8BC-BTN1819. An Environmental Protection Plan (EPP) specific to this project, as required, was finalized in February 2019 and submitted to the Nunavut Water Board.

A letter to the Nunavut Water Board from Concentric Geoscience Inc., dated June 21, 2018, provides details indicating that the EPP would be submitted later than planned due to a change in schedule for construction works. Instead of conducting work during open water season, works were planned to occur during frozen conditions. The EPP was then tailored for works during frozen conditions and does not include plans to accommodate works in or near running water.

Recommendation:

CIRNAC suggests that Concentric Geoscience Inc., on behalf of the City of Iqaluit, submit an updated version of, or an addendum to, the Environmental Protection Plan to include prevention and mitigation measures to account for the environmental risks associated with working at or near flowing water. These prevention and mitigation measures should account for all three construction sites, and for all stages of bridge repair, including flow redirection and culvert replacement should these activities occur.

If there are any questions or concerns, please contact me at (867) 975-4282 or bridget.campbell@canada.ca.

Sincerely,

Bridget Campbell,
Water Resources Coordinator