



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

November 16, 2009

Richard Dwyer
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

**Re: Recommendations on Qikiqtaaluk Corporation's Amendment
application for a Type "B" Water License for the Clyde River Road**

Please be advised that Indian and Northern Affairs Canada (INAC) has completed a review of Qikiqtaaluk Corporation's amendment application for a Type "B" Water License #8BW-CYL0810, Clyde River Road located in the Qikiqtani Region of Nunavut. All associated documents related to this license posted on the NWB ftp website under 8BW-CLY were included in my review (please see attached technical memo for recommendations).

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4738 or by email at Andrea.Cull@ainc-ianc.gc.ca

Yours truly,

Original Signed By

Andrea Cull
Water Management Specialist

Cc: Ian Rumbolt, Acting Water Resources Manager, INAC



Technical Review Memo

To: Richard Dywer, Licensing Administrator, NWB

From: Andrea Cull, Water Management Specialist, INAC

BACKGROUND:

The NWB granted Water License #8BW-CLY0810 to Qikiqtaaluk Corporation on March 3, 2009 to allow repairs to the road between Clyde River and the former Long Range Navigation (LORAN) Station at Cape Christian. The repairs include water crossings over one river, four creeks that are fish bearing, and four non-fish bearing water crossings.

Repairs to the Clyde River Road started in June 2009. At this time, half of the existing road is repaired, the bridge is constructed and some of the culvert installations are complete. The remaining area of the road is considered to be beyond repair.

The Qikiqtaaluk Corporation consulted with members of the community including experienced Inuit workers, and decided to re-route part of the existing road in order to build a sustainable road that is suitable for long-term use.

Qikiqtaaluk Corporation submitted an amendment application to existing water License #8BW-CLY0810 to the NWB in October 2009, to build the re-routed portion of the road, which includes the installation of culverts at 3 new creek crossings.

The construction of the new road began on June 25, 2009 without approval from the NWB. The Qikiqtaaluk Corporation has set the completion of this project for October 1, 2010.

INAC has reviewed the following documents:

- Erosion, Sediment and Drainage Control Plan Cape Christian
- Stamped Drawings for Bridge and Culverts
- Revised Spill Plan (Part H, Item 2 of the Water License)
- Annual Report – to March 31, 2009
- Water License Application Form
- Fish Habitat compensation and monitoring plan, Municipality of Clyde River – April 2009
- Fish and fish Habitat assessment at stream crossing Report, Municipality of Clyde River – August 2008
- Supplementary questionnaire amendment



- Map of the impacted areas
- Executive summary for amendment
- Inspector's Direction – August 24, 2009

RECOMMENDATIONS:

INAC recommends that the NWB impose standard conditions suitable for this project. The following recommendations provided, are for your consideration in the amendment approval process.

1. Monitoring Program

Water License #8BW-CLY0810, along with its terms and conditions, should be extended for a minimum of five (5) years to Dec. 31/15. This License must remain in effect until the project area is fully reclaimed and demonstrated to have no harmful impact to the quality of nearby water resources through post-closure monitoring.

INAC recommends that Part J, Conditions applying to the Monitoring Program, of the current water license be expanded to include ongoing monitoring of the road after construction of October 1, 2010 up to 25 years (including: erosion, sediment control, water quality testing).

The Licensee must satisfy their Annual Monitoring Requirements specified in Part B Item #2 of the License. The 2009 Submission is anticipated to provide a detailed description of all reclamation work undertaken along the areas impacted areas identified by the Water Resource Officer at the time of his Aug. 20/09 Inspection.

2. Spill Contingency Plan

The Spill Contingency Plan should clarify that all fuel caches will be located at least 30m above the high mark of any water body.

A diagram/schematic that identifies all fuel caches, spill response kit storage areas, and fuel transfer areas must be included in a revised Plan.

The Response Action Section of the Spill Contingency Plan should make reference to the Nunavut Spill Report Line and include a copy of the Nunavut Spill Report Form. This form can be obtained from the Nunavut Water Board public registry at <http://www.nunavutwaterboard.org>. Please note that the 24-hour Spill Report Line telephone number is (867) 920-8130 and facsimile number is (867) 873-6924. Furthermore, INAC requests the proponent report all spills to Peter Kusugak, INAC Manager of Field Operations, phone: 867-975-4295, fax 867 975-6445 as well as the Nunavut Spill Report Line.