



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

Cidms #: 409130
NWB#: 8BW-CYL0810

June 4, 2010

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

**Re: Recommendations - Qikiqtaaluk Corporation's Road Mitigation Plan -
Type "B" Water License - Clyde River Road (8BW-CYL0810)**

Please be advised that Indian and Northern Affairs Canada (INAC) has completed a review of Qikiqtaaluk Corporation's Road Mitigation Plan 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: Lou-Ann Cornacchio, Water Resources Manager, INAC
Andrew Keim, Water Resources Inspector, INAC



Technical Review Memo

To: Phyllis Beaulieu, Manager of Licensing, NWB

From: Andrea Cull, Water Management Specialist, INAC

Re: Recommendations - Qikiqtaaluk Corporation's Road Mitigation Plan - Type "B" Water License - Clyde River Road (8BW-CYL0810)

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 by the Licensee 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 then undertook such works during the months of June and July 2009 and then submitted an amendment application to the existing Water License #8BW-CLY0810 to the NWB in October 2009. It is to be noted that the new road route included 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.

August 20, 2009, INAC's Water Inspector inspected the old roadway from Clyde River to Cape Christian (See attached Inspection Report).

August 24, 2009, INAC's Water Inspector Issued an "Inspector's Direction" (See attached Inspector's Direction).



August 31, 2009, Qikiqtaaluk Logistics Inc. submitted a mitigation plan developed to restore impacts to grounds and waters on the old roadway from Clyde River to Cape Christian.

INAC has reviewed the following documents:

- INAC - Inspector's Direction – August 24, 2009
- Mitigation Plan to Restore all Impacted Grounds and Waters on the "Old Roadway" – Road between Clyde River and Cape Christian"

RECOMMENDATIONS:

The following constitute comments from both INAC's Waters Unit and Field Operations Unit. 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.

The Mitigation Plan satisfactorily addressed a number of the requirements of the Inspector's Direction. However, the following information was not provided in the Plan.

- Weekly reporting mechanism to regulators.
- Map diagram that clearly identifies the alternate road, impacted sites, constructed water crossing, etc.
- An INAC Inspector was on site and noted the following issues that are to be addressed prior to the 2010 field season;
 - Submission of as-built drawings of the constructed roadway signed by an engineer approving of the design and construction methodology used in the construction of the new roadway.
 - Submission of plans to address ponded water adjacent to the new roadway to prevent thermokarst, additional erosion, sedimentation of proximal water sources and the destruction of the tundra which occurred during the construction of the new roadway.

Prepared by: Andrea Cull, Water Management Specialist, INAC

Cc: Lou-Ann Cornacchio, Water Resources Manager, INAC
Andrew Keim, Water Resources Inspector, INAC