



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

Your file - Votre référence
8BW-IGD1921
Our file - Notre référence
GCdocs # 94589010

May 19, 2021

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

**Re: Crown-Indigenous Relations and Northern Affairs Canada Comment on City
of Iqaluit Application for Renewal of Type B Water Licence No. 8BW-IGD1921**

Dear Mr. Dwyer,

Thank you for your May 3, 2021 invitation to review the Type B water licence 8BW-IGD1921 renewal application, submitted by the City of Iqaluit on April 30, 2021.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at
Vincent.okonkwo@canada.ca or Sarah Forté at Sarah.forté@canada.ca.

Sincerely,

Vincent Okonkwo
Environmental Assessment Coordinator



Technical Review Memorandum

Date: May 19, 2021

To: Richard Dwyer, Manager of Licensing, Nunavut Water Board

From: Vincent Okonkwo, Environmental Assessment Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada Comment on
City of Iqaluit Application for Renewal of Type B Water Licence No. 8BW-
IGD1921

Region: ☐ Kitikmeot ☐ Kivalliq ☒ Qikiqtani

A. BACKGROUND

The City of Iqaluit (City) is submitting a renewal application for the 8BW-IGD1921 Type B water licence for the purpose construction of an access road with three water crossings to a proposed new granular aggregate deposit northwest of the City. The Type B Water License 8BW-IGD1516 was originally issued in 2015 and renewed in 2019 (8BW-IGD1921). The City had intentions of constructing the gravel road during the 2015 construction season and again in 2019, but due to unforeseen factors, the construction of the road project was never started. The City is now intending to complete this project during the 2021 construction season.

CIRNAC Provides the following comments and recommendations pertaining to the Type B Water Licence 8BW-IGD1921 application for renewal submitted April 30, 2021.

Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Purpose of Type B Water Licence Renewal Application
R-02	Application Information Gap
R-03	Annual Report Submission
R-04	Spill Response and Erosion and Sediment Control (SRESCP) Update



B. RESULTS OF REVIEW

1. Purpose of Type B Water Licence Renewal Application

Comment:

The subject line on the invitation for comments sent out by the Nunavut Water Board (NWB) on May 3, 2021, indicates that the Type B Water Licence renewal application is for the Iqaluit Granular Deposit Project.

The executive summary states that the purpose of the Type Water Licence renewal application is for the construction of an access road to a proposed new granular resource site and, on the Type B Water Licence No. 8BW-IGD1921 issued on May 8, 2019, it indicates that the purpose is for the installation of water crossings.

The proposed scope of the Type B Water Licence renewal is unclear.

Recommendations

(R-01) CIRNAC recommends that City of Iqaluit clarify the scope of the application to renew Type B Water Licence No. 8BW-IGD1921.

2. Application Information Gap

Comment:

In paragraph 1 of the executive summary, City of Iqaluit stated:

“The City is now intending to complete this project during the 2021 construction season. Construction is expected to take one year, however, the City is seeking to apply for a two-year term in the case that project activities are delayed and require two years to complete”.

In the renewal application, the city did not provide the following information:

- Time lines as the anticipated start and finish dates for the road construction project.
- The number and types of equipment to be used in the construction project.
- The number of personnel expected on site during construction.
- How to manage waste generated during the construction.



Recommendations:

(R-02) CIRNAC recommends that the City of Iqaluit clarify:

- The anticipated start and finish dates for the construction Project;
- Number and types of equipment to be used in the construction project;
- Number of personnel on site during the project; and
- How they intend to manage waste generated during the construction project.

3. Annual Report Submission

Comment:

In paragraph 1 of the executive summary, City of Iqaluit stated:

“The license (8BW-IGD1516) was originally issued in 2015 and renewed again in 2019 (8BW-IGD1921). The City had intentions of constructing the gravel road during the 2015 construction season and again in 2019. Due to unforeseen factors, the construction of this project never started.”

Although, the construction project was not started as intended, it is not clear if the City of Iqaluit submitted an Annual Report as required by the terms and Condition Part B, Item 1 of the Type B Water Licence 8BW-IGD1921.

Recommendation:

(R-03) CIRNAC recommends that City of Iqaluit clarify if Annual Report was submitted for the Type B Water Licence 8BW-IGD1921 as per the terms and Condition of the Water Licence Part B, Item 1.

4. Spill Response and Erosion and Sediment Control Plan (SRESCP) Update

Comment:

The contact information of the Spill Response Plan and Erosion and Sediment Control Plan (SRESCP) was last updated in March 2019 and it appears there are contact information missing on the Nunavut excavating contacts. Having a contact list at hand will reduce the amount of time spent in responding to an emergency spill.

Also, the total volume of the fuel expected to be used, fuel storage locations, spill kit locations and strategies to manage fuels on site have not been included in the SRESCP.



Recommendations:

(R-04) CIRNAC recommends that City of Iqaluit Update the SRESCP to include:

- Contact information for the Foreman and Safety Coordinator in the Nunavut Excavating Contact List;
- Volume of fuels expected to be used;
- Fuel storage locations, if any;
- Spill kit locations; and
- Strategies to manage fuel on site.

C. REFERENCES

Department of Crown-Indigenous Relations and Northern Affairs Act. (2020).

Nunavut Waters and Nunavut Surface Rights Tribunal Act. (2016).

Nunavut Water Board, May 8, 2019: Renewed Type B Water Licence No: 8BW-IGD1921, P 4.