



ᐃᓄᐱᓄᐱ ᐃᓄᐱᓄᐱ ᐃᓄᐱᓄᐱ
NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

via email

August 14, 2013

Sharon Ehaloak

Executive Director

Nunavut Planning Commission

Cambridge Bay, NU

Re: Feedback for NPC's Workshop "Filling Gaps in the DNLUP" in Cambridge Bay

Dear Sharon:

Thank you for the Nunavut Planning Commission's (the Commission) June 20, 2013 invitation to attend the workshop entitled "Filling Gaps in the Draft Nunavut Land Use Plan" (Workshop), in Cambridge Bay in September 2013. The Nunavut Water Board (NWB or 'Board') is grateful for this opportunity to further contribute to the Draft Nunavut Land Use Plan (DNLUP) and to comment on the workshop agenda well ahead of the scheduled event.

As per your request, this letter confirms that the following two NWB staff members will be attending and participating in the Workshop:

- Damien Côté – Executive Director
- Cory Zyla – Technical Advisor

The NWB looks forward to participating and contributing to the Commission's consultative process to the extent that it is within the NWB's mandate and resource capacity, and is accepted and deemed useful to the Commission. As per your request, I include in this letter feedback on the following items: (1.) the Workshop's Agenda and (2.) a list of issues that will require the Commission's attention in developing the DNLUP.

Workshop Agenda

The NWB was pleased to receive the provided Workshop Agenda (Agenda) in advance of the workshop. Given that the Workshop proceeds as described in the Agenda, the NWB foresees several opportunities to raise pertinent issues, such as during the Q&A and open forum discussions on data, information, and the rationale behind the Commission's decision-making processes.

The NWB's understanding of the purpose of the Workshop is based on the Commission's 2013 'A Guide for Engagement' (Guide). The Guide states that the purpose of the Workshop is "to



provide clarity and to inform submissions on the DNLUP” and to “present the DNLUP and provide reason for its content through a review of the Options and Recommendations document”. As such, the NWB interprets the Guide as meaning that the Workshop’s primary purpose is to act as an information session for planning partners (i.e. not a final consultation of planning partners for the DNLUP). In this regard, the NWB understands that planning partners will have an opportunity to present their concerns and issues with the DNLUP as written feedback following the Workshop and to subsequently participate in a separate opportunity to discuss those issues at a future workshop scheduled in 2014. The NWB looks forward to its engagement in this process and is hereby responding to this first invitation while being mindful of the multi-step consultative process which lies ahead.

That said, in the spirit of proactive engagement, the NWB provides below several of its key concerns and issues pertaining to the DNLUP. In sharing these issues early, the NWB hopes that the Commission will have ample time to consider them carefully in anticipation for the next steps in this consultative process.

List of Issues

From the NWB’s perspective, there are several key water management and policy issues that need to be addressed for the DNLUP to be effective. Several of these issues have been brought to the Commission’s attention in past meetings and are provided again in light of their importance but also to help facilitate future discussion. Noting that this is not an exhaustive list, the following issues may be brought forward for discussion by the NWB and/or other interested parties as planning partners move forward through the Commission’s consultative process:

Source protection options for community drinking supplies

Land use planning can take several approaches to protecting Nunavut’s various communities’ drinking water supplies. For instance, a few options include: (i.) leaving the issue to be addressed by the NWB, (ii.) establishing prohibitions on land uses within community watersheds, (iii.) establishing results-based direction or guidelines (e.g. this approach was used in the Great Bear Lake Watershed Management Plan, NWT), or (iv.) establish interim protection measures for proposed secondary watersheds, pending NWB decision on applications by municipalities to use these watersheds as drinking water sources. At this time, as the NWB was not involved in the delineation of secondary Community Watersheds, it remains unclear to the NWB as to how they were established and their intended use. The



issue of source protection options would require a substantial amount of discussion of the impacts of the various options.

Buffers and Set-backs

During the IPG Joint Workshop held on February 20th, 2013 in Yellowknife, the Commission indicated that NWB may be able to provide assistance in determining whether set-backs or buffers separating development from the edge of community watersheds are needed to ensure protection of drinking water. This issue has important implications for the NWB as the embedding and inclusion of inflexible buffer zones or set-back distances in the DNLUP have the potential to directly affect the NWB's licensing process.

Cumulative Impacts

The current DNLUP states that in order to achieve the Commission's objective of addressing cumulative impacts, the Commission's Policy is to: "consider implementing thresholds for cumulative impacts, or levels of acceptable change, of land use activities on the Ecosystemic and socio-economic environment, that are supported by Government, Inuit, the NWMB, the NIRB, and/or the NWB". The potential use of 'thresholds' or 'levels of acceptable change' requires a substantial amount of discussion (e.g. What constitutes a threshold? How will a threshold be enforced? etc.). Furthermore, the explicit reference to garnering support from fellow IPGs in Nunavut indicates that this issue requires discussion among the Commission's planning partners.

Water Management Areas

Seeing as the new *Nunavut Water Regulations* (registered on April 18, 2013) define 65 Water Management Areas for Nunavut, the NWB believes that the Commission should incorporate the boundaries of these areas into the DNLUP. This issue may require minimal discussion, such as clarification that WMAs will be included in the plan or alternatively the reasons for why the Commission believes it is not appropriate to include them.

Amendments and Periodic Reviews

The Commission has noted that it is important that the Nunavut Land Use Plan (NLUP) remains a 'living document' that can respond to new information, evolving circumstances, and changes in objectives for land use planning across Nunavut. The NWB agrees that it is

