



May 8, 2008

Johnny Edwards
Land and Water Technician
Gwich'in Land and Water Board
P.O. BOX 2018
INUVIK, NT X0E 0T0

Dear Mr. Edwards:

GWICH'IN TRIBAL COUNCIL, G08H004
Land Use Permit Application – Gwich'in Camp and Fuel Storage.

The Department of Environment and Natural Resources (ENR) has reviewed the above application based on its mandated responsibilities under the *Wildlife Act*, the *Forest Management Act (FMA)* and the *Environmental Protection Act (EPA)* and provides the attached comments from ENR staff for consideration.

If you have any questions or concerns, please do not hesitate to call Claire Singer, Environmental Regulatory Analyst at 920-6591.

Sincerely,

Claire Singer
Environmental Regulatory Analyst
Environmental Assessment and Monitoring
Environment and Natural Resources

c.c.

Chandra Venables
Environmental Assessment Specialist
Wildlife Division

Donald Andre
Regional Environmental Assessment Coordinator
Environment and Natural Resources – Inuvik Region

Gwich'in Tribal Council: G08H004
Gwich'in Camp

Concern – Potential Wildlife disturbance

The Proponent has proposed a camp that will house between two and thirty-five persons, that there will be access by fuel and water trucks when the ice road permits and that waste will be treated and stored onsite. ENR is concerned of the potential for increased interaction between persons and wildlife and resulting increases in associated impacts.

Desired End Result: To minimize the disturbance to wildlife and wildlife habitat and increase the protection of wildlife and camp personnel including clientele participating in camp activities.

Recommendation: The Proponent should:

- Report all problem bear incidents to a Renewable Resource Officer as soon as possible;
- Report any defense of life and property bear kills to ENR as soon as possible; and
- Not feed or harass wildlife.

Concern – Waste Management

The Proponent stated that: “All garbage will be sorted, recycled and taken to Inuvik” and that “The sewage and waste water is treated in this facility and discharged to the east of the camp”. However, it has not provided its waste management mitigative measures to prevent wildlife attraction. ENR recognizes that timely storage and disposal of camp waste, specifically food waste, is of critical importance to minimize safety risks associated with wildlife attraction. Inadequate storing, onsite treatment, and/or burning of wastes are the most common activities that result in wildlife conflicts. Wildlife attraction can lead to unwanted wildlife-human contact, and/or habituation of wildlife, both of which may lead to an increase in mortality of ‘nuisance wildlife’ due to kills by camp or regulatory personnel for safety reasons.

The Proponent has also assumed the use of community solid waste sites without providing evidence of consultation and acceptance of this from the community in question.

Desired End Result: To minimize the waste produced, improve waste storage methods and minimize wildlife attraction.

Recommendation: The Proponent should prepare and submit a stand-alone Waste Management Plan. The Plan should be approved by the regulatory authority and be incorporated as a condition of the project license, permit or

other regulatory authorization. This Plan should include/address (but not be limited to):

- The identification of waste storage, transport and treatment measures to prevent wildlife attraction. Whether odorous waste is stored for the purpose of onsite or off-site disposal, it must be done in a timely manner stored in a sealed (airtight) container to prevent wildlife attraction and be bear proof.
- With respect to the use of NWT-based community waste management infrastructure, the Plan should demonstrate that the receiving community and/or facility has been consulted and has consented to the use of its infrastructure for disposal of the waste types and quantities in question.

Concern – Fuel Storage and Spills

In Section 5 of its application, the Proponent states that “The power generator plant (approximately 60m²) contains the power generator and a 35,000L double-hulled Enviro-Tank on the outside for diesel fuel”. Page 9/17 of the application includes a picture of the Envirotank that shows fuel stains on the side and end of the tank where the refueling station is; this is concerning, particularly considering this a new tank and facility.

Desired End Result: To minimize the potential for fuel spills and plan contingency.

Recommendation: The Proponent should:

- Prepare and submit a stand-alone Spill Contingency Plan for the facility that meets the 'spirit and intent' of the NWT Spill Contingency Planning and Reporting Regulations,
- Ensure that a qualified person attends fuel transfer for the duration of the fuel transfer operations, and
- Ensure drip trays, spill pads and/or mats are used while refueling.

Concern – Species at Risk

The *Species at Risk Act* (SARA) states that adverse effects on listed species must be identified, and regardless of significance, mitigated and monitored (s.79). It is ENR's view that the treatment of those species listed under the Act be consistent with the treatment of species assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC).

In the application, the Proponent has not indicated an awareness of the Species at Risk occurring in the proposed project area. Therefore ENR notes the following species, and their SARA/COSEWIC designation, that have habitat in the project area. ENR also requests that the Proponent report (to the local natural resources Officer) sightings of any of these species:

- Woodland Caribou (Threatened)
- Peregrine Falcon (Threatened)
- Grizzly Bear (Special Concern)
- Wolverine (Special Concern)
- Olive-Sided Flycatcher (Special Concern)
- Rusty Blackbird (Special Concern)
- Short-eared Owl (Special Concern)