



Gwich'in Social & Cultural Institute

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Helga Harlander
Gwich'in Land and Water Board
Box 2018
Inuvik NT X0E 0T0
Via email: h_harlander@glwb.com

November 5, 2014

Dear Helga,

Re: G13H004 Preliminary remediation plan for James Creek

We have reviewed the above-noted document for cultural and heritage concerns. The GSCI has the following concerns: There are numerous traditional trails in close proximity to the camp. This indicates a high level of traditional use – and the general area has also been noted as a hunting area. Trails also often indicate an increased likelihood of undiscovered archaeological materials. Therefore, the GSCI requests that the Territorial Archaeologists' Office be made aware of any activities which will impact previously undisturbed ground to assess whether or not an archaeological assessment is appropriate. The GSCI is also concerned that the contaminated parts of the site may be accessible accidentally by the public. If this is a possibility, the GSCI requests signage or fencing to prevent access.

Sincerely,

Sharon Snowshoe
Executive Director, GSCI

c.c. Tom Andrews, PWNHC

November 7, 2014

Helga Harlander
Land and Water Tech
Gwich'in Land and Water Board
P.O. Box 2018
Inuvik, NT
X0E 0T0

Dear Ms. Harlander,

**Re: DOT GNWT
Land Use Permit Application – G13H004
Preliminary Remediation Plan Review
Request for Review and Comments**

The Department of Environment and Natural Resources has reviewed the plan at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, *Waters Act* and the *Wildlife Act* and has the following comments and recommendations for consideration by the Board.

Topic 1: Groundwater Treatment

Comment(s):

The Remediation plan noted that the treatment of groundwater would be based on recommendations through the review process, seeing as a treatment facility to treat other contaminated water will be on site, treatment of additional 50m³ should be feasible.

Recommendation(s):

- 1) Treat the contaminated ground water (~50m³) to the Canadian Council of Ministers of Environment criteria for the protection of aquatic life.
- 2) Please provide a Groundwater Monitoring Plan that includes SNP stations and piezometers on the site diagram for reference. This should also include a narrative on how they are used to mitigate impacts to the surrounding environment.

Topic 2: Bioremediation Options

Comment(s):

The bioremediation technique proposed is through traditional land farming techniques. Successful soil bioremediation technologies have included land farming, bio-piles and in-situ bioventing. Nutrient addition (bio-stimulation) have been shown to generally be effective

Recommendation(s):

- 1) Other bioremediation approaches and applications for groundwater could be explored, as moderate petroleum concentrations can be lowered at a higher biodegrading rate in arctic climates over a short time frame when an aggressive tilling program and bioventing techniques are applied.

Comments and recommendations were provided by ENR technical experts in the Environment Division and the Inuvik Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM).

If you have any questions or concerns, please do not hesitate to contact Patrick at 920-6118 or patrick.clancy@gov.nt.ca.

Sincerely,



Patrick Clancy
Environmental Regulatory Analyst
Environmental Impact Assessment Section
Conservation, Assessment and Monitoring Division
Department of Environment and Natural Resources
Government of the Northwest Territories



Tetlit Gwich'in Renewable Resource Council

P.O. Box 30 Fort McPherson, NT X0E 0J0

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November 13, 2014

Gwich'in Land & Water Board
PO Box 2018
Inuvik, NT X0E 0T0

Dear Helga:

Re: Questions and Comments for Remediation Plan for James Creek Maintenance Camp

The Tetlit Gwich'in Renewable Resource Council held a public meeting with Department Of Transportation on the Remediation Plan for James Creek Maintenance Camp.

The following are questions and concerns that were brought forth:

1. Has D.O.T. already applied for an application for permit for this project? If no – when?
2. D.O.T. should go on the local radio station (CBQM) to give out information to the community on project and what kind of work they propose to do at James Creek. (Video presentation)
3. There should be a sign put up to advise people of where not to get water due to possibility of contamination.
4. Water samples to be collected at James Creek; tested before start-up of project and ongoing until completion of project. Water samples should be collected years after project is completed.
5. Local people to be hired and trained to ensure proper collection of water samples.
6. Where is the water samples sent for testing and is there a possibility of water samples being contaminated while in transit?
7. Will a new water plant be built at James Creek and if yes by who?
8. Will the septic tank be removed?
9. Has D.O.T. considered where new temporary camp site will be located and for how long?
10. How many years will this project be in operation?
11. What guidelines will be followed?
12. D.O.T. should take the Designated Gwich'in Organization and Tetlit Gwich'in Renewable Resource Council on a tour and explain to them what they are proposing to do?

The Tetlit Gwich'in RRC strongly suggest that you involve the community in all aspects of this proposed project.

We look forward to your response and if there are any questions, please feel free to call the above phone number.

Thank you.

A handwritten signature in blue ink, appearing to read 'Abraham Wilson'.

Abraham Wilson
President