



## **Gwich'in Renewable Resources Board**

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Nov 18, 2015

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

Attention: AlecSandra Macdonald  
Regulatory Officer

**RE: Water Licence renewals G99L8\_001 and G99L8-002 Peel, Mackenzie and Arctic Red Rivers ferry landing operations**

In our review of this file, staff of the Gwich'in Renewable Resources Board noted that annual reports were filed consistently late (Part B: General Terms and Conditions\_ Item 1); and, there was a history of non-compliance with employing sediment control measures (Part C: Conditions Applying to Water Use\_Item 2), or lack of communication about alternative measures.

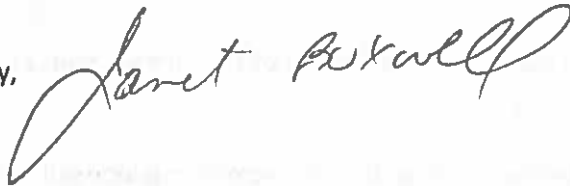
In light of this record of inconsistency in adhering to the terms of the current water license staff offer the following comments:

1. We do not support the issuance of a license for a 25 year term as is proposed in the current application. This is a dynamic environment that presents complex engineering challenges. However, it can be expected that advances in technology in coming years will permit alternatives to current ferry landing construction and sediment control measures to ensure the safe operation of the ferries in an environmentally sustainable and timely manner.
2. We recommend the continuation of the current 5 year term for license issuance in order for DOT to regularly provide updated spill contingency plans; respond to community concerns; adapt to changes in technology and apply best management practices in ferry landing operations.
3. We recommend the continuation of all the Terms and Conditions as outlined in the 2010 water license. We further recommend that the Terms and Conditions be subject to a full formal review every 5 years to determine whether they are effective, and if not, to determine why not and adjust accordingly.
  - a. In particular, we recommend that DOT continue to engage affected communities directly in face to face meetings in order to address community and stakeholder concerns, and;
  - b. continue to provide annual reports to the Board as directed in Part B – General Conditions

4. We recommend that alternative sediment control measures be explored and their use implemented.
5. Staff support comments and recommendations by the Gwich'in Social and Cultural Institute (GSCI) that there be continuing monitoring of water quality, water flow, fish health and sustainability of the fishery as part of the Terms and Conditions of future water licenses.
6. The LAMP harvest monitoring program of 2010-2015 did not address potential Cumulative Effects of ferry landing operations in addition to potential upstream effects on the health of fish and fish habitat within the context of a changing climate.
7. We recommend that the Dept of Transport implement the recommendations of the Aquatic Effects Study of 2001-2002 by GeoNorth (Chap 7-conclusions and recommendations), including; using the approach of the Aquatic Effects Study as a model for future studies that incorporate scientific knowledge and Traditional knowledge.
8. We suggest the Aquatic Effects Study be updated with current scientific and traditional knowledge and compared to the results of the previous study and these results and methods form the basis of an ongoing monitoring program.

If you have questions concerning these comments you may contact me by phone at (867) 777-6615 or by email: [jboxwell@grrb.nt.ca](mailto:jboxwell@grrb.nt.ca)

Sincerely,



Janet Boxwell  
Renewable Resources Manager  
Gwich'in Renewable Resources Board