

MVLWB Registry

From: Miki <mehrlich@mvlwb.com>
Sent: Wednesday, December 17, 2014 3:24 PM
To: permits@mvlwb.com
Subject: FW: MV2013J0006 - Revised SPC and WMP - May22-13

Please post email to MV2013J0006 – Reports and studies - Other
Title: True North Safaris – Correspondence from TNS – Dec15-14

From: Gary Jaeb [mailto:gary@truenorthsafaris.com]
Sent: December 15, 2014 6:12 PM
To: Miki; Don Morin; info@spectacularnwt.com; Robert Collinson; Ryan Strain; Daniel Jaeb; MALCOLM JAEB; Julie Jaeb
Subject: Re: MV2013J0006 - Revised SPC and WMP - May22-13

Thank you Miki

I need to make the point clearly now that **in hind sight**

- Mackay Lake Lodge should not have agreed to nor been subjected to AANDC land lease change of “USE” nor the MVLWB land use permitting process.

- and

- we have not operated the lodge since the issuance of the MVLWB land use permit in 2013 and in spite of this, we are now threatened with court action for failing to comply with conditions of the permit.

Mackay Lake Lodge has been licensed as a lodge since 1983 and has offered lodge services, accommodations and meals, to a variety of clients including hunters, fishers, film crews, truckers, geologists, diamond drillers, students, Industry and Government workshops etc.

Our (TOL), Tourism Operators License, allowed us to guide a variety of tourists including fishing, cultural, naturalist, educational and we have an outfitters license that regulates and allows sport hunting and caribou hunting, which had been our primary activity until ENR closed it in 2009.

Clients who have stayed at the lodge have been guided by us under our TOL or outfitters licenses or if using the lodge as a base for exploration, trucking or other activities have always had to have their own land use permits.

However, with the closure of caribou hunting, we were trying to diversify and had entered into discussions with some of the diamond mining companies operating in the area. In 2013 we were told by AANDC that we needed to apply for a change of the “use” section of our land lease and this would require a land use permit from the MVLWB.

In hind sight we could have/should have requested clarification regarding the dictate that we apply for a change of the “use” for our lease. We thought that it would be easy, somewhat of a formality, as we had been meeting regulatory requirements as we knew them. It didn’t turn out that way.

We are NOW , following devolution, asking for an appeal /review process of the conditions that are in the permits and a review of the regulation of the tourism and lodge sector and the possible relationship the mining, oil and gas sectors.

We need a review of the (*inappropriate*) conditions attached to the MVLWB permit for Mackay Lake Lodge.

1. Regarding the Engagement Plan, when did this become a requirement for a land use permit?

The tourism industry needs its own set of guidelines for engagement, and as an example, Mackay Lake Lodge has been licensed since 1983 and has long standing relationships in the communities, its Board of Directors, including the aboriginal communities with land claims in the area.

What is the role of your MVLW Board? We have expressed concerns regarding the conditions that were recommended by the consultants and inspectors and in our application process, why our concerns seem to have not been considered by the MVLW Board..

2. Waste Management Plan

Conditions that we have objected to and appealed throughout the application process include;

- the type of forced air fired, electric, expensive incinerator that your permit requires ..Our home made incinerators work.
- demand to truck or fly our waste fuel back to Yellowknife/approved facility...combined with disallowing us to use it to accelerate garbage burns/why?
- lack of information on approved facilities around Yellowknife, who has approved them?
- new requirements to truck or fly ashes back to Yellowknife/approved facilities when we have historically buried them “deep” and have a spot less land fill sight compared to existing approved dumps around Yellowknife. Could the Board or someone come and have a look....the inspectors have created a conflict of interest situation for them selves.
- what is the basis for giving the “inspectors” the powers to create conditions and inspect them with no avenue for appeal accept the Federal Courts.. according to the Chairman of the MVLW Board.?

Why have three lodges been required to apply for MVLWB land use permits?

Mahsi

Gary Jaeb

From: [Miki](#)

Sent: Monday, December 15, 2014 3:29 PM

To: 'Gary Jaeb'

Cc: [Angela Plautz](#)

Subject: RE: MV2013J0006 - Revised SPC and WMP - May22-13

Hi Gary,

I am writing to follow up with you on the questions you have below as well as from our phone conversation last Thursday.

Regarding the Engagement Plan, please find attached a template for you use. Section 3.4 of the MVLWB's [Engagement Guidelines](#) describe what an Engagement Plan must do; the attached template provides a means for smaller operators to address these requirements. Please let me know if you require any assistance with this template.

In response to your question on the number of lodges and outfitters with current authorizations issued by a Land and Water Board, here is a list of what I could find so far – I will confirm whether this is the complete list in a few days:

- Great Slave Lake Lodge ([MV2012L8-0003](#))
- Great Bear Lake Lodge ([S12L3-002](#))
- Bathurst Inlet ([W2008J0014](#))

I am waiting to hear back from EC and ENR regarding your questions about incinerators – they have both had staff changes since the meeting we held last August. For background please refer to some [information on incineration](#) that EC sent you last fall.

I also owe you some information on suspensions and cancellations of Land Use Permits – I hope to get that to you later this week.

Miki

Miki Ehrlich
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor, 4922-48th St. | PO Box 2130 | Yellowknife, NT | Canada | X1A 2P6
ph 867.766.7469 | fax 867.873.6610
mehrlich@mvlwb.com | www.mvlwb.com

Please note: All correspondence to the Board, including emails, letters, faxes and attachments are public documents and may be posted to the Public Registry.



Guidelines for Developing a Waste Management Plan state that folks who use an incinerator must follow the Canada-wide Standards for Dioxins and Furans and the Canada-wide Standards for Mercury Emissions.)

From: Gary Jaeb [<mailto:gary@truenorthsafaris.com>]
Sent: December 11, 2014 9:24 AM
To: Miki
Subject: Re: MV2013J0006 - Revised SPC and WMP - May22-13

Thank s Miki

I am talking to NWT Tourism and need to know how many Tourism Lodges have been required to get a MVLWB land use permits and the names if possible

Also would like to know why using fuel/gas /deisel/JetB to accelerate burning of garbage is not allowed. Where does this come from and why is it a policy in NWT? Who approves incinerators? The permit conditions refer to “removed to a licensed facility”...what are the names of the licensed facilities in or around Yellowknife?
Thank you for your patience.

Gary

From: [Miki](#)
Sent: Thursday, December 11, 2014 8:45 AM
To: gary@truenorthsafaris.com
Subject: RE: MV2013J0006 - Revised SPC and WMP - May22-13

From: Miki [<mailto:mehrlich@mvlwb.com>]
Sent: December 10, 2014 2:11 PM
To: 'gary@truenorthsafaris.com'
Subject: RE: MV2013J0006 - Revised SPC and WMP - May22-13

Hi Gary,
Clint forwarded to me the plans you sent him on December 5th. I will review your submission in the next few days and get back to you. Direction was provided on the revisions to the Plans required by the Board in the letter that accompanied the issuance of your Permit. The link to that letter and the Permit is provided below.
<http://www.mvlwb.ca/Boards/mv/Registry/2013/MV2013J0006/MV2013J0006%20-%20True%20North%20Safaris%20-%20Issuance%20letter%20with%20permit%20and%20conditions%20-%20Sept24-13.pdf>

Miki

Miki Ehrlich
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor, 4922-48th St. | PO Box 2130 | Yellowknife, NT | Canada | X1A 2P6
ph 867.766.7469 | fax 867.873.6610
mehrlich@mvlwb.com | www.mvlwb.com

Please note: All correspondence to the Board, including emails, letters, faxes and attachments are public documents and may be posted to the Public Registry.



From: Clint Ambrose [mailto:Clint_Ambrose@gov.nt.ca]
Sent: December 5, 2014 12:51 PM
To: Miki Ehrlich; Joe Heron
Subject: Fw: MV2013J0006 - Revised SPC and WMP - May22-13

Fyi

Clint Ambrose
Manager, Resource Management (Inspector)
North Slave Regional Office
Department of Lands
Government of the Northwest Territories
#16 Yellowknife Airport, Yellowknife, NT X1A 3T2
Tel: 867.765.6648 / Cell: 867.446.0769 / Fax: 867.873.9754
Email: Clint_Ambrose@gov.nt.ca

From: Gary Jaeb <gary@truenorthsafaris.com>
Sent: Friday, December 5, 2014 12:07 PM
To: Clint Ambrose; Scott_stewar@gov.nt.ca
Reply To: Gary Jaeb
Subject: MV2013J0006 - Revised SPC and WMP - May22-13

At this time I ask that you accept the attached spill contingency plan and respond with any requests for information

Gary Jaeb