

October 27, 2015

To; Joseph Heron
Resource Management Officer
North Slave Region

Re, Your letter of September 15, 2015, Re Land Use Permit MV2013J0006, Campsite/Lodge, Mackay Lake, NT

Following our telephone conversation and the extension of the deadline, I want to confirm that we have and will continue to remove empty fuel drums, recyclable items and waste material as we have room on empty aircraft and or opportunity and access from the ice road in the winter, Unfortunately, the lodge has not operated full time since the caribou foreclosure by GNWT in 2009 and our ability to continue transporting return items, as we did in the past, since 1989 when we acquired the lodge, has been impacted by circumstances beyond our control.

We are working on some options to re-establish the lodge as a going concern and this could allow us to plan and schedule the removal and or recycling of things like fuel drums, batteries, plastic containers etc,

We do appreciate that the intent of the land use permitting and enforcement process, is to protect the environment. We make the point that our tourism lodge has been environmentally friendly for over 3 decades, using scientific and traditional knowledge, and we would like to work together to find affordable ways to continue and permit past practices and to find affordable ways to improve things.

I suggest that land use permits for exploration and mining camps may be different from those required for tourism and lodge operations.

Your letter raises some other issues and I ask that you respond to each of them and or forward them to the appropriate authority to do so,

1. I have made the point several times that you/the inspector should inform us of your inspection trips to the lodge so that we could go with you if we are not already there operating. You have been to Mackay Lake Lodge now in both 2014 and 2015 without our presence. Please respond to this request.
2. In your Sept 15 letter you now refer to condition #3 & #4 of our permit which requires that we contact the Inspectors at least 48 hours prior to the commencement of any activities in the land use area. We acquired Mackay Lake Lodge in 1989 and have operated it in all seasons at different times as we had market demand for the lodge facilities. As a lodge we do not undertake any land use activities and we do not believe that giving you 48 hour notice prior to accepting lodge guests is the intent of the conditions of the permit. Please seek clarification of this point.
3. We have pointed out in the past that the photo graphs that you post of our incinerator and land fill site are almost impeccably clean and compared to the dumps around Yellowknife we should

be commended yet you continue to impose the requirement that we discontinue the use of this site and instead of using old fuel as accelerants we should burn new fossil fuels transporting things back to approved facilities.

4. We have repeatedly asked for a list of approved facilities for the various disposals as referred in your letter #2,3,5, 9 &10. Please provide a list of the approved facilities, who owns them, and who approved them and what items are they approved for.
5. What do we need to do to get our incinerator and land fill site approved? We point out that they were considered acceptable in the past and that they are very clean and environmentally friendly and include traditional knowledge.
6. We have requested information, approval regarding the use of hydrocarbon impacted soils for fill and dust control on our runway. Hydrocarbons are used extensively on streets and roads and airports, please advise.
7. We have removed the hydro carbon impacted soil from our generator shed and point out again that we hope to eventually replace the use of the diesel generators with wind and solar power.
8. We will continue to store used parts, tires, building materials, etc on site for future use and recycling and we will remove those items that do not serve a useful purpose as we have room on aircraft or winter road hauls.
9. We did remove our 250 gallon fuel storage tank a few years ago pointing out that it had been installed by the original lodge owners and did have secondary containment but it is impossible to get a 100 meter distance from the OHWM as our boat and float plane dock is on a point and by the lake. So now we must use 45 gallon drums and haul them back and forth with catch trays, It is not reasonable for us to operate without the use of drums near the docks. However we did reposition the drums noted in your 2014 reports so they are lined up and have the bungs horizontal. We continue to use catch trays and will continue to clean up any minor spills. Thank goodness, we have not had any serious spill since 1989 but if we did we have a spill contingency plan,,
10. AS we have reported, there has been some unauthorized use of our runway by charter companies and or their clients which did result in a spill by our grader and also some un-named fuel drums on our site. We will clean and remove these as we have time and money depending on re-establishing the lodge since the foreclosure.
11. We have in the past picked up abandoned fuel drums scattered around the lake but now the approach by the inspectors requiring us to have them named and labelled is a disincentive for us to do so in the future.

I am willing to meet and would like any help or advise to finding ways to include and make our traditional practices that work, acceptable in the permitting and enforcement processes.

Gary Jaeb
President; True North Safaris Ltd.

c/c Miki Ehrlick
MVLWB

