

4 November, 2020

Mackenzie Valley Land and Water Board
4922-48th Street, Yellowknife

Response to Interventions
Bluefish Hydro Facility Water Licence Application MV2020L4-0005

The Northwest Territories Power Corporation (NTPC) owns and operates the Bluefish Hydroelectric Facility. The facility, which is located 39 km north of Yellowknife at the north end of Prosperous Lake on the Yellowknife River, contributes power to the North Slave electrical system. NTPC has applied for a new water licence to operate Bluefish Hydro, application MV2020L4-0005.

Following the Technical Session on 22 September, 2020, and Interventions provided by the Government of the Northwest Territories (GNWT; GNWT 2020) and Tłı̄chǫ Government (2020) on October 20 and 19 respectively, NTPC offers this Response to Interventions.

The most recent version of the Bluefish Lake Mercury Monitoring Plan is Version 6 (the "Plan"; NTPC 2016), prepared during construction of the new dam at Bluefish under MV2009L4-0004, later transferred to MV2005L4-0008. Recent monitoring of mercury levels in Bluefish Lake fish under this Plan was completed in 2018 (NTPC 2019). NTPC (2019) found that mercury levels in Slimy Sculpin (as a sentinel species) and game fish (Northern Pike) were stable or decreasing, and that game fish were below the national guideline for human consumption (CFIA 2017). As such, NTPC's position was that the requirements of the long-term mercury monitoring program had been met.

In response to requests contained within the interventions from GNWT (2020) and Tłı̄chǫ Government (2020), NTPC makes the following commitments.

1. An additional collection of Slimy Sculpin for mercury analyses will be completed in fall 2023 prior to the end of the open water season, and will follow the methods used in previous years and described in the Mercury Monitoring Plan (Version 6).
2. The results of the Slimy Sculpin collection will be summarized in a report to be provided to MVLWB. The report will examine trends in concentrations by comparing results to previous mercury monitoring data collected at Bluefish Lake (including all data collected between 2012 and 2018).

4 November, 2020

3. The outcome of the proposed monitoring study will be communicated with stakeholders, including the Yellowknives Dene First Nation, North Slave Métis Alliance, Tłıchǫ Government, Wek'èezhìı Renewable Resources Board and Cassidy Point Association.

The Slimy Sculpin collection for the proposed mercury study will be conducted prior to the end of the open water season in 2023, as the Tlıcho Government included in their recommendation that NTPC 'refrain from sampling slimy sculpin for a few years' (Tłıchǫ Government 2020). Note that NTPC will not provide fish consumption advice within any communications that occur following the Slimy Sculpin collection, as this responsibility remains within the jurisdiction of the GNWT Department of Health and Social Services (see GNWT 2016).

NTPC believes that the three commitments above respond to, and align with, the recommendations made by the GNWT and Tlıcho Government. We suggest to the MVLWB that any outstanding questions or concerns with Parties can be resolved through written submissions and that a Public Hearing is not required. No parties have requested a Public Hearing and NTPC feels any items described above can be completed outside of a Public Hearing which would be more efficient for all parties involved.

If you have any questions or comments or require further information about the upcoming application, please contact me at MatthewMiller@ntpc.com and mmiller@ntpc.com. Please include both email addresses on any email correspondence.

Sincerely,



Matthew Miller, M.Sc., P.Eng.
Senior Environmental Licensing Specialist
Northwest Territories Power Corporation

References

CFIA (Canadian Food Inspection Agency). 2017. Canadian food inspection agency fish products standards and methods manual: Appendix 3: Canadian guidelines for chemical

4 November, 2020

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GNWT. 2020. Intervention for MV2020L4-0005. 20 October 2020. Available at http://registry.mvlwb.ca/Documents/MV2020L4-0005/MV2020L4-0005%20-%20NTPC%20-%20Bluefish%20-%20GNWT%20ENR%20-%20Intervention%20-%20Oct20_20.pdf

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NTPC 2019. 2018 Fisheries and Mercury Monitoring Results for the Bluefish Hydroelectric Facility. Available at <http://registry.mvlwb.ca/Documents/MV2005L4-0008/MV2005L4-0008%20-%20NTPC%20-%20Bluefish%20-%202018%20Fisheries%20and%20Mercury%20Monitoring%20%20Results%20for%20the%20Hydroelectric%20Facility%20-%20May28-19.pdf>

Tlicho Government. 2020. Intervention for MV2020L4-0005. 19 October 2020. Available at http://registry.mvlwb.ca/Documents/MV2020L4-0005/MV2020L4-0005%20-%20NTPC%20-%20Bluefish%20-%20Tlicho%20Government%20-%20Intervention%20-%20Oct19_20.pdf