

Review Comment Table

Board:	SLWB
Review Item:	CCG Wharf Repair Management Plans
File(s):	S16L8-002
Proponent:	Department of Fisheries and Oceans
Document(s):	Cover Letter - Revised Management Plans (100 kB) CCG Wharf Repair - Environmental Management Plan (869 kB) CCG Wharf Repair - Sediment and Erosion Control Plan (4.8 MB)
Item For Review Distributed On:	Dec 6 at 17:07 Distribution List
Reviewer Comments Due By:	Jan 10, 2018
Proponent Responses Due By:	Jan 17, 2018
Item Description:	<p>Department of Fisheries and Oceans Canada (DFO) has submitted a revised Environmental Management Plan in accordance with Part B, item 6 of Water Licence S16L8-002, and a Sediment and Erosion Control Plan in accordance with Part G, item 1, for activities related to the repair of the Canadian Coast Guard Wharf in Norman Wells, NT. These Plans are for Board approval.</p> <p>Reviewers are invited to submit questions, comments and recommendations on the following submissions by January 10, 2018:</p> <ul style="list-style-type: none"> • Environmental Management Plan, and • Sediment and Erosion Control Plan.
General Reviewer Information:	<p>If you have any questions or comments regarding this review or the Online Review System, please contact Bonnie Bergsma at (867) 496-2778 or bonnie.bergsma@slwb.com.</p>
Contact Information:	Bonnie Bergsma

Comment Summary

Environment and Climate Change Canada: Gabriel Bernard-Lacaille				
ID	Topic	Reviewer	Proponent Response	Board Staff

		Comment/Recommendation		Response
1	General	Comment ECCC has reviewed in accordance with its mandate and doesn't have any comments at this time. Recommendation Not applicable.	Jan 11: No response required.	

Fisheries and Oceans Canada: Triage Group Fisheries Protection Program

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General Comment - No DFO Concerns	Comment The dredging and wharf repair proposal has been reviewed to determine whether it is likely to result in serious harm to fish which is prohibited under subsection 35(1) of the Fisheries Act unless authorized. This proposal has also been reviewed to determine whether it is likely to affect listed aquatic species at risk, any part of their critical habitat or the residences of their individuals in a manner which is prohibited under sections 32, 33 and subsection 58(1) of the Species at Risk Act, unless authorized. Provided that the plans are implemented in the manner, and during the timeframe, described, DFO has determined that this proposal will not result in serious harm to fish or prohibited effects on listed aquatic species at risk. As such, an authorization under the Fisheries Act or a permit under the Species at Risk Act is not required. Recommendation In order to comply with the Fisheries Act, it is recommended that	Jan 11: The Proponent will follow DFO's Guidance tools.	

		<p>the proponent follow DFO's guidance tools which can be found at the following website (http://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures/mesures-mesures-eng.html). Should these plans change or if information has been from the proposal, further review by DFO may be required. Consult our website or consult with a qualified environmental consultant to determine if further review may be necessary. It remains your responsibility such that the proposal meets the criteria for a site specific review, as described on our website (www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html), the proponent should submit a request for review form to DFO, which is also available on the website.</p>		
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GNWT - ENR: Central Email GNWT

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
11	General File	<p>Comment (doc) ENR Letter with Comments and Recommendations Recommendation</p>		
1	Topic 1: Dredging	<p>Comment During ENR's initial review comments submitted on March 20th, 2017, additional information was requesting regarding management and disposal of sediments excavated from the wharf area. The plans note that dredged material will be disposed of at the Town of Norman Wells (the Town)</p>	<p>Jan 11: It is proposed to sample dredged material every 10m along the face of the wharf and send the samples for laboratory testing to confirm that the material is suitable for reuse at the landfill.</p>	

		<p>landfill. It is unclear if this material will be sampled prior to its acceptance at the landfill. ENR is concerned that if any contamination exists in the sediment, such as petroleum hydrocarbons, there may be future issues at the landfill and environmental liability that may be transferred to the Town. Additionally, it is unclear if any written agreements have been reached with the Town to deposit this material in the landfill, or if a suitable area has been identified that would prevent migration of high TSS water to surrounding surface waters during placement or following rain events.</p> <p>Recommendation 1) ENR recommends that DFO outline any sampling protocols that will be undertaken of the sediment material to confirm its acceptability for disposal at the Town of Norman Wells landfill.</p>		
2	None	<p>Comment None</p> <p>Recommendation 2) ENR recommends that DFO provide any information on written agreements that exist with the Town of Norman Wells regarding the acceptance of dredged material or other deposits of waste. A letter of permission from the Town of Norman Wells is required prior to depositing the discussed wastes.</p>	<p>Jan 11: Town has confirmed by email that they will accept this waste with conditions. The Town will prepare and provide the project with a letter stating this.</p>	

3	None	<p>Comment None Recommendation 3) Additionally, if there is additional waste generated from the project, where will it be stored?</p>	<p>Jan 11: Waste metal will be disposed of at the Town landfill</p>	
4	Topic 2: Wharf Rehabilitation	<p>Comment Regarding the wharf rehabilitation, it is noted that the top 2.5m of gravel will be excavated from the wharf to allow for replacement of the sheet-piling which will occur prior to the placement of 20 mm minus gravel on the upper deck of the wharf. It is unclear in the project description if the material that is removed during the initial stage of the project is the same material that will be used for the completion of the project or if this excavated material will also require disposal. Recommendation 1) ENR recommends that DFO clarify if the excavated gravel from the dock will be re-used on the upper deck of the wharf.</p>	<p>Jan 11: The intent is to re-use excavated material, provided it is suitable. If not suitable it will be stored at the Town landfill for use as cover.</p>	
5	None	<p>Comment None Recommendation 2) If the gravel is being removed, ENR requests clarification on disposal methods and locations. Please refer to comments related to material disposal in previous comment.</p>	<p>Jan 11: Every 100 m3 of material to be taken to the Town landfill will be sampled and sent for laboratory testing.</p>	
6	Topic 3: Sediment and Erosion Control Plan	<p>Comment In reference to the following part of the Plan: 1. Introduction & Background a. Dredging Thickening of ice will be done by flooding the ice 2 to 3 weeks prior to dredging. There is no</p>	<p>Jan 11: Approximately 1.2 m of ice thickness will be required to support the dredging equipment. It is anticipated that up to approximately 0.5 m of ice will be built-up by</p>	

		<p>mention of water withdrawal in Water Licence S16L8-002.</p> <p>Recommendation 1) It is recommended the details of water usage, for instance volumes and sources, should be added to the issued Water Licence S16L8-002.</p>	<p>flooding, requiring approximately 1500 m³ of water (to be added to the Water Licence Terms and Conditions), which will be pumped from the Mackenzie River in the immediate vicinity of the wharf. Up to approximately 100 mm of water will be placed on top of the ice cover and allowed to freeze before repeating the process with next layer.</p>	
7	None	<p>Comment None</p> <p>Recommendation 2) It is recommended that details of water usage, including what water source(s) will be utilized, and what volumes of water will be required by DOT?</p>	<p>Jan 11: Approximately 1.2 m of ice thickness will be required to support the dredging equipment. It is anticipated that up to approximately 0.5 m of ice will be built-up by flooding, requiring approximately 1500 m³ of water (to be added to the Water Licence Terms and Conditions), which will be pumped from the Mackenzie River in the immediate vicinity of the wharf. Up to approximately 100 mm of water will be placed on top of the ice cover and allowed to freeze before repeating the process with next layer.</p>	
8	Topic 4: Sediment and Erosion Control Plan and Environmental Management Plan – 1) Monitoring	<p>Comment In reference to the statement: "Indigenous and Northern Affairs Canada (INAC) will have an inspector on site during the construction to monitor work activities."</p> <p>Recommendation 1) Please update your records as INAC only inspects federally retained lands in the NWT.</p>	<p>Jan 11: Documentation to be corrected to be the GNWT Land Inspector.</p>	<p>Documentation to be corrected to the GNWT Water Resource Officer.</p>

		The regulator is the GWNT for this project; therefore, the project will be monitored and inspected by the GNWT Water Resource Officer.		
9	Topic 5: Environmental Management Plan	<p>Comment In reference to vehicle use on ice.</p> <p>Recommendation 1) ENR recommends that drip trays are utilized under vehicles that are idling and being parked on the laydown area and on the ice.</p>	<p>Jan 11: The contractor will be directed to do so and this requirement will be part of his Spill Contingency Plan</p>	
10	Topic 6: Environmental Management Plan	<p>Comment In reference to potential impacts on fishing nets along the river.</p> <p>Recommendation 1) It is recommended DFO provide notification to residents in surrounding communities that have fish nets along the river that they could be impacted by project activities.</p>	<p>Jan 11: The project will implement the best suited approach to notification as recommended by the Board or other community stakeholders.</p>	