

Gwich'inat Eenjit
Gàdatr'igwijiłcheii Gidilii

Gwich'in nan, nakhwek'yün ts'at gwitr'it
tthak nakhwidavee gwiheežän eenjit



Gwich'in Tribal Council

Gwich'in land, culture & economy for a better future

September 7, 2016

Gwich'in Land and Water Board
Attn: AlecSandra Macdonald
Box 2018
Inuvik, NT X0E 0T0

[via email: AMacdonald@glwb.com](mailto:AMacdonald@glwb.com)

Re: LUP Application G16X006

Ms. Macdonald,

GTC Lands and Resources has reviewed the application, and would like to provide the following comments:

1. Gwich'in Participants have the right to carry out traditional activities in the project area. Due consideration must be given to these rights. Project activities should be communicated in a timely and meaningful manner to traditional users; this might include radio announcements, installation of signage, personal communication etc.
2. The Emergency Response and Spill Contingency Plan is not clear and provides at times contradictory information, for example:
 - a. Page 6 – 4. Wildlife encounters only addresses preventive measures, but not emergency response measures as the heading '2. Immediate Response to Emergency Situation' would suggest.
 - b. Page 7 – 2. Initial Response Procedures lists two different initial spill response procedures the first person on the scene is to follow.
 - c. The document contains outdated references to government departments or regulators (RWED on page 10, Department of Indian Affairs and Northern Development page 11, AANDC & RWED page 13)

The Emergency Response and Spill Contingency Plan should be revised to provide clear and accurate information for project personnel to follow in case of an emergency or spill event.

3. As a general observation, the application documents were short on detail and left much open to interpretation and/or inference, which makes it difficult for reviewers to provide meaningful comments.

Sincerely,

Helga Harlander
Senior Lands Analyst

Tel: (867) 777-7900 • Fax: (867) 777-7919

Chief Jim Koe Zheh, 1-3 Council Crescent, PO Box 1509, Inuvik NT Canada X0E 0T0

Website: www.gwichin.nt.ca