Reviewer Comments and Proponent Responses

Project: Inuvik Wind Projec
Board: Gwich'in Land and Water Boar
Organization: NWT Energy Corporation (03) Ltd.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Fisheries and Oceans Canada (DFO) - Triage Group Fisheries Protection Program				
1	Inuvik Wind Project - Erosion and Sediment Control Plan V 1.0 (G18X005)	Your proposal has been reviewed to determine whether it is likely to result in the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat which are prohibited under subsections 34.4(1) and 35(1) of the Fisheries Act; and, effects to 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.	Fisheries and Oceans Canada does not have sufficient information to determine whether the proposed work will result in the death of fish and/or the harmful alteration, disruption or destruction of fish habitat. We recommend the proponent visit our website at http://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-001-eng.html to determine if DFO needs to review the project. If the project involves in-water work (including water withdrawal or activities to isolate the site from open water), is not in one of the listed exempted waterbody types or does not fall within the standards and codes of practice, and cannot follow all of the applicable Measures to Protect Fish and Fish Habitat (http://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html), we recommend that the proponent submit a Request for Review to fisheriesprotection@dfo-mpo.gc.ca before proceeding further.	Section 3, Project Desctiption has been updated to provide more detail on construction activities. The only in water works involves water withdrawl (up to 110m3/day). Based on the *Interm code of practice: End-of-pipe fish protection screens for small water intakes in freshwate*r, a Project Review is not required for this project as the conditions and measures set out in this code of practice and all applicable measures to protect fish and fish habitat are applied to this project. There are no aquatic species at risk present in the work zone, the water withdrawl for the projcect will be less than 110 m3/day and

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Environment and Climate Change Canada (ECCC) - Mrs. Stephinie Mallon				
1	ECCC Cover Letter	ECCC Cover Letter	N/A	-

2	Topic: Water crossings Reference:1. Erosion and Sediment Control Plan (December 2021)	As indicated in Section 3 (Project Description) of the plan, the project includes construction of an all-season access road. Table 1 indicates that access road construction will involve water crossings, and Section 4.2 (Construction Sequencing) indicates the project will include bridges and culvert crossings. However, the site layout map provided on page 6 of the plan does not indicate any water crossings along the access road.	ECCC requests that the Proponent clarify whether the project will include any in-water works, and recommends that any stream crossings be included in the site layout map.	Section 3, Project Desctiption has been updated to provide more detail on construction activities. Table 1 has been updated and 'Water Crossings' has been removed. The only in water works involves water withdrawl (up to 110m3/day). There are waterbodies near the project that appear to be surface water fed through snow and ice melt but no known waterbodies or fish-bearing streams are directly connected to these water bodies. There is no planned infrasturcture that would require crossing the watercourses. Natural drainage patterns will be
3	Topic: Response Framework for Erosion and Sediment Control Measures Reference:1. Erosion and Sediment Control Plan (December	Per Table 2, the Response Framework incorporates descriptive thresholds to indicate what conditions will trigger erosion and sediment control measures. ECCC notes that if in-water works will be conducted, then the response framework should also include quantitative water quality triggers for protection of the aquatic receiving environment.ECCC also notes that incorporating the phrase “as soon as possible” into the second task of the medium action level may expedite the response.	ECCC provides the following recommendations regarding Table 2 (Response Framework for Erosion and Sediment Control Measures):1. If in-water works will be conducted, then Table 2 should be updated to incorporate TSS/turbidity concentration thresholds, action levels and response tasks2. Revise the second task bullet for the medium action level to read “Mobilize resources as soon as possible within 24-48 hours…”	There will be no in-water construction conducted for this project. Table 2 has been updated to include "Mobilize resources as soon as possible within 24-48 hours"
4	Topic: TSS/turbidity monitoring Reference:1. Erosion and Sediment Control Plan (December 2021)	TSS/turbidity monitoring should be conducted during any in-water works.Field measurements of turbidity can be used as a real-time surrogate for measuring total suspended solids (TSS), a parameter which is otherwise determined in a laboratory. This relationship is site-specific, and should be developed using a TSS/turbidity regression curve. TSS samples should be collected periodically and analyzed in a laboratory to validate or update the relationship.Use of TSS/turbidity regression curve methodology would support real-time measurement of project-related increases in TSS, thereby enabling	ECCC recommends conducting TSS/turbidity monitoring during any in-water works.ECCC recommends employing TSS/turbidity regression curve methodology to establish the site-specific relationship between turbidity field measurements and TSS lab measurements at appropriate sampling locations, and conducting real-time surrogate monitoring of TSS. Periodically, TSS samples should be collected and analyzed in a laboratory to validate or update each site-specific relationship.	There will be no in-water construction conducted for this project
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Gwich'in Tribal Council - Department of Cultural Heritage - Kristi Benson				
1		We are unsure if erosion will impact areas outside of the archaeological assessment.	If erosion will impact areas outside of the archaeological assessment, the Territorial Archaeologist should be contacted to see if post-impact assessment is needed.	Erosion will not impact areas outside the archaeological assessment. If this changes the Territorial Archaeologist will be contacted. Contractor will be responsible for retaining any potential water runoff on site

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GNWT-ENR - EAM (Environmental Assessment and Monitoring) - GNWT ENR				
1	Mitigation Measures and Construction Sequencing	In Section 4.2 of the Erosion and Sediment Control Plan (the Plan), a construction sequence is given for sediment and erosion control measures. ENR notes that many of the measures indicated in the construction sequence are not included in the mitigation measures presented in Table 1.	ENR recommends that NWT Energy Corporation (3) Ltd. (NTEC) expand Table 1 of the Plan to include further possible mitigation measures as outlined in Section 4.2.	Table 1 has been updated to include possible mitigation measures as outlined in section 4.2
2	Water Management Quality Requirements	Section 4.4 of the Plan indicates that, prior to discharge, water will be tested to ensure quality requirements are met. ENR notes that the parameters to be tested are not specified.	ENR recommends that NTEC specify which parameters will be tested prior to the discharge of water. ENR recommends, at minimum, that the parameters to be tested include total suspended solids (TSS) and turbidity.	Section 4.4 updated to to include 'At minimum, total suspended solids (TSS) and turbidity will be tested'
3	Establishment of Vegetation	Section 4.5 of the Plan states that seeding can be used to stabilize disturbed sediments and that the silt fencing can be removed once the area is “established with vegetation”. ENR notes that it is not clear how the determination will be made that the area has been established with vegetation.	ENR recommends that NTEC clarify how it will be determined that vegetation is sufficiently established in an area to permit the removal of silt fences.	Section 4.6 has been updated to include: "Prior to removing silt fencing, an inspection of the area will be performed to confirm vegetation has been sufficiently established. "
4	Location of Risk Classification	Section 4.6 of the Plan refers to “areas that are considered moderate to high-risk as noted in Table 2”. ENR notes that the risk classification is found in Table 1.	ENR recommends that NTEC update Section 4.6 of the Plan to refer to Table 1 for the risk classification instead of Table 2.	Section 4.6 has been updated to refer to Table 1 for the risk classification instead of Table 2
5	Frequency of Monitoring	Section 4.6 of the Plan indicates that monitoring and inspection of erosion and sediment control (ESC) measures will take place on a daily and weekly basis. For areas with a moderate to high risk level, the frequency of monitoring is specified to be daily during periods of active work. ENR notes that the frequency of monitoring for low risk areas is not clearly specified. Additionally, Table 2 indicates that ESC monitoring will only occur weekly unless medium or high action levels are reached. ENR notes that this is inconsistent with the proposed daily monitoring for moderate or high risk areas.	ENR recommends that NTEC clarify the frequency of monitoring of ESC measures in low risk areas. ENR recommends that NTEC clarify the relationship between the frequency of monitoring, the risk level for the area, and the action level.	Section 4.6 has been updated with: "ESC measures shall be monitored and inspected on a weekly basis and after significant rainfall events for areas that are considered low risk" Table 2 has been updated to include: "Continue with required ESC weekly and post-rainfall monitoring and inspections for low
6	Table 2 – Reference to Section 7	In Table 2 of the Plan, the tasks for the high action level include a reference to Section 7. ENR notes that the Plan does not contain a Section 7.	ENR recommends that NTEC revise the tasks of the high action level in Table 2 of the Plan to refer to the correct section.	Table 2 has been updated to include reference to Section 5 instead of Section 7

7	Figures	ENR notes that the text in the Figures of the Plan is often difficult to read, both due to small size and blurriness.	ENR recommends that NTEC update the Figures in the Plan to improve the clarity of the text within the Figures.	Figures have been updated to improve clarity of text
8	Acronym Definitions	ENR notes that the acronyms ROW and ESC are not defined in the Plan.	ENR recommends that NTEC define all acronyms at their first use within the Plan.	Updated to include definitions for ROW and ESC
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Gwich'in Tribal Council - Lands and Resources - Kanda Gnama				
1		The Plan effective date is said to begin as soon as December 2021 (section 1.2). This date must be reviewed as the ESCP can not be in effect while the consultation is still underway.In table one, for the proposed Access road:a. another mitigation measure must be added if the proposed Road is likely to cross any water bodies. In-stream control practices, for example, will be required in this case. b.There is oversight regarding the potential impact of soil tracked out from the project area onto roadways (the Dempster Highway). This must be listed as potential impact and mitigation measures developed as well. c.The silt fencing measure is usually adequate for low-flow situations only. It can not be relied upon for impact 1 without sufficient information about the drainage system (governed by the typography and gradient of the land) in the proposed road area. The proponent should provide more information and consider other mitigation measures if required.		Plan effective date has been updated to February 2022 (a) Road is not likely to cross any water bodies, section 3 has been updated to note this. (b) Table 2 has been updated to include tracking sediment onto paved roads as potential impact and mitigations measures are have been added for prevention (wheel wash/designated areas). Section 5.9 has been added to provide further information for Access Road Entrances/Exits (c) There are no planned waterbody crossing or stream crossings. Any draingage system is expected to be low flow throughout the project area