

Reviewer Comments and Proponent Responses

Project: Tsiigehtchic - Municipal Water Licence Renewal
Board: Gwich'in Land and Water Board
Organization: Charter Community of Tsiigehtchic

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Environment and Climate Change Canada (ECCC) - Mrs. Stephinie Mallon				
1	ECCC No Comments	ECCC has reviewed the Draft Water Licence G22L3-001 and has no comments at this time.	N/A	Noted.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
GNWT-ENR - EAM (Environmental Assessment and Monitoring) - Erin Goose				
1	Part D – Maintenance of Water Treatment Facilities	Water Licence G16L3-001 includes the following as Part C, Condition 4: "The Water Supply Facilities shall be maintained and operated to the satisfaction of an Inspector." Draft Water Licence G22L3-001 includes similar conditions about facilities being maintained and operated to the satisfaction of an Inspector for the Waste Disposal Facilities (Part F, Condition 2), the Sewage Disposal Facilities (Part F, Condition 10), and the Solid Waste Disposal Facilities (Part F, Condition 20). However, ENR notes that Part D of Draft Water Licence G22L3-001 does not include an equivalent condition for the Water Treatment Facilities.	ENR recommends the following condition be added to Part D of Water Licence G22L3-001: "The Licensee shall operate and maintain the Water Treatment Facilities to prevent structural failure and to the satisfaction of an Inspector."	Specific wording to be added to the licence Part D for equivalent conditions for the Water Treatment Facilities.
2	Schedule 1 – Additional Information	ENR notes that, considering the following, there is additional information that should be required by the Annual Water Licence Report under Schedule 1 of Water Licence G22L3-001: <ul style="list-style-type: none"> Part B, Condition 20 of the Draft Water Licence requires an Engagement Plan. However, Schedule 1, Condition 1.e) of the Standard Water Licence Conditions Template relating to the Engagement Plan is not included in the Draft Licence. Part B, Conditions 3 and 4 of the Draft Water Licence relate to the incorporation of Traditional Knowledge. However, Schedule 1, Condition 1.f) of the Standard Water Licence Conditions Template relating to Traditional Knowledge is not included in the Draft Licence. Part B, Condition 1.f) of Water Licence G16L3-001 requires that modifications and repairs to the Water Supply and Waste Disposal Facilities be documented in the Annual Report. Additionally, Schedule 1, Condition 1.h) of the Standard Water Licence Conditions Template requires that major maintenance activities be recorded in the Annual Report. However, Schedule 1 of Draft Water Licence G22L3-001 does not contain a condition addressing maintenance. Schedule 1, Condition 1.i) of the Standard Water Licence Conditions Template addresses the quantities of waste removed from waste disposal facilities. This would be relevant for an 	ENR recommends the following conditions be added as requirements of the Annual Water Licence Report under Schedule 1 of Water Licence G22L3-001: <ul style="list-style-type: none"> "A summary of engagement activities conducted in accordance with the approved Engagement Plan, referred to in Part B, Condition 20 of this Licence" "A summary of how Traditional Knowledge was incorporated into decision making" "A summary of major maintenance activities conducted in accordance with this Licence" "Monthly and annual quantities in cubic metres of Waste removed from the Waste Disposal Facilities, identified by disposal location" 	This comment has been noted by the proponent and the section will be reviewed and edits will be made to include wording addressing ENR recommendations.

		y waste removed from the Solid Waste Disposal Facilities and for effluent discharged from the Sewage Disposal Facilities, however the condition is not included in Draft Water Licence G22L3-001.		
3	Schedule 4, Condition 1	Schedule 4, Condition 1 of Draft Water Licence G22L3-001 states that the Facility Specific Closure and Reclamation Plan for the Solid Waste Disposal Facilities “shall address the relevant sections of Environment and Climate Change Canada’s Solid Waste Management for Northern and Remote Communities: Planning and Technical Guidance Document.” ENR notes that the use of the term “relevant sections” could be subjective, and therefore it would be beneficial to have a more specific list of information that is to be included in the Facility Specific Closure and Reclamation Plan for the Solid Waste Disposal Facilities. This list should be developed in keeping with Environment and Climate Change Canada’s Solid Waste Management for Northern and Remote Communities: Planning and Technical Guidance Document.	ENR recommends that Schedule 4, Condition 1 of Water Licence G22L3-001 be updated to add a specific list of information that must be included in the Facility Specific Closure and Reclamation Plan for the Solid Waste Disposal Facilities.	Upon review of the appropriate section of the Environment and Climate Change Canada’s Solid Waste Management for Northern and Remote Communities: Planning and Technical Guidance Document, section 8.0 (MSW Facility Closure and Post-Closure) includes relevant information. The licence can be updated to include more specific wording to represent the specific section of the document relating to closure.
4	SNP Station Locations – 1557-5 and 1557-6	As noted in inspection reports from 2018 and 2020, there is difficulty getting to SNP station 1557-5 and SNP station 1557-6 has been dry. The draft SNP has been carried over from Water Licence G16L3-001. However, ENR notes that it is imperative that sampling can occur consistently at all SNP locations, and that it should be considered if the SNP must be amended to achieve this.	ENR recommends that for SNP station 1557-5, either accessibility be improved, or new locations be considered that would be consistently accessible. ENR recommends that for SNP station 1557-6, new locations be considered where water would be consistently present to sample. ENR recommends that the Board consult with the Inspector in determining the most appropriate locations for SNP 1557-5 and 1557-6.	This comment has been noted by the proponent and will be considered for improvements of the ongoing SNP program.
5	Cover Letter	Comment	N/A	Noted.