

## Reviewer Comments and Proponent Responses

**Project: Rachel Reindeer Wellness Camp**  
**Board: Gwich'in Land and Water Board**  
**Organization: Gwich'in Tribal Council**

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Gwich'in Tribal Council - Department of Cultural Heritage - Kristi Benson				
1		DCH	The Department of Culture and Heritage has no comments or concerns at this time.	

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
GNWT-ENR - EAM (Environmental Assessment and Monitoring) - Erin Goose				
1	Allowed Water Withdrawal	The Cover Letter and the Licence Application Form both state that Gwich'in Tribal Council (GTC) is proposing to withdraw up to 2000 m3 of water per day. However, ENR notes that the overview on the Online Review System states that project activities include the withdrawal of up to 2000 m3 of water per year.	ENR recommends clarification be provided as to whether the intention is to withdraw up to 2000 m3 of water per day or per year.	
2	Impacts and Mitigations Table – Changes in Surface Water Quality	In the Impacts and Mitigations Table in both the Permit and Licence Application Forms, changes in water quality for surface water is not checked off. ENR notes that the Spill Contingency Plan (SCP) addresses spills into a water body, suggesting that change to surface water quality through a spill is a possibility.	ENR recommends that GTC update the Impacts and Mitigations Table to include changes in water quality for surface water as a possible impact and to propose mitigations in the event of surface water contamination.	
3	Licence Application Form – Water Licensing Criteria	In the Licence Application Form, the only item checked off under Water Licensing Criteria is “to obtain water”. ENR notes that as per Schedule F of the Waters Regulations, a Type B Water Licence is required for the “deposit of waste by a camp or a lodge with capacity of more than 50 occupants per day...” Section 9 of the Permit Application Form indicates that the maximum capacity of the camp is anticipated to be 140 people, which is greater than the threshold of 50 required to trigger a Water Licence on the basis of deposit of waste.	ENR recommends that the deposit of waste be part of the scope of the licence and that all conditions applicable to the deposit of waste be included in the licence.	
4	Effective Dates of Plans	ENR notes that neither the Waste Management Plan (WMP) nor the SCP provide an effective date for the plan.	ENR recommends that GTC clarify whether the intention is for the WMP and SCP to be effective immediately upon approval by the Board, or if there is a specific date or other trigger upon which they are to take effect.	
5	SCP – Resource Inventory	The SCP indicates that there are two small spill kits and one large spill kit located on site. ENR notes that there is no information provided on the contents of these spill kits. Additionally, the SCP mentions the possibility of using booms, skimmers, and sorbent pads if a spill enters a water body. ENR notes that it is not clear if these resources are available on site or if they would need to be brought in from off site.	ENR recommends that GTC provide a list of the materials available in each size of spill kit.  ENR recommends that GTC clarify whether booms, skimmers, and sorbent pads are available on site. If they are not available on site, ENR recommends that GTC indicate where these resources could be obtained from if needed.	
6	SCP – Project Supervisor	One of the steps in the initial response presented in Section 6.2 of the SCP is to notify the Wellness Camp Project Supervisor	ENR recommends that GTC update the SCP to provide a phone number for the Project Supervisor to ensure t	

	Contact Information	Project Supervisor. The only contact information provided for the Project Supervisor in the SCP is a PO Box. ENR notes that this does not allow for timely notification of the Project Supervisor in the event of a spill.	that the Project Supervisor can be notified in a timely manner in the event of a spill.	
7	WMP – Map Contents	ENR notes that while Figure 2 of the WMP shows some locations relevant to waste, the locations of the outhouse and the wastewater discharge are not included.	ENR recommends that GTC provide a map in the WMP to show the locations of the outhouse and the wastewater discharge.	
8	WMP - 3.1 Types of Waste, page 5	The categories for the types of waste should be separated out further, as they may all be treated and disposed of separately. It is unclear what is meant by “other waste (e.g. used oil)” – is this hazardous waste?	<p>1. ENR is recommending that the proponent re-categorize the types of waste as follows (or in a similar fashion): “combustible solid waste” (including paper, cardboard, untreated wood), “non-combustible solid waste” (including food waste, plastics, other non-recyclable non-combustible materials), “sewage and greywater”, “hazardous waste” and/or “other waste”. These categories should also be reflected in the Waste Management Planning Summary.</p> <p>2. The proponent should clarify what is meant by “other waste”, if it is different from the other categories defined above.</p> <p>3. Should hazardous waste be managed, ENR is recommending that the proponent adhere to ENR’s Guideline for Hazardous Waste Management (2017), available at: <a href="https://www.enr.gov.nt.ca/sites/enr/files/resources/128-hazardous_waste-interactive_web.pdf">https://www.enr.gov.nt.ca/sites/enr/files/resources/128-hazardous_waste-interactive_web.pdf</a>, and the proponent should indicate in the Waste Management Plan that they will adhere to the Guideline.</p>	
9	WMP - 3.1.1 Food, Garbage and Household Waste, page 5	<p>1. It is unclear how many staff and volunteers are needed for the 2 methods of handling this type of waste. It is unclear what constitutes a “short-term visit” and a “long-term visit”.</p> <p>2. As per ENR’s Open Burning Guideline (October 1993), available at: <a href="https://www.enr.gov.nt.ca/sites/enr/files/guidelines/solid_wastes_suitable_for_open_burning.pdf">https://www.enr.gov.nt.ca/sites/enr/files/guidelines/solid_wastes_suitable_for_open_burning.pdf</a>, food waste is not suitable for open burning. If an incinerator is not used, food waste should be removed off-site for disposal at the Inuvik Solid Waste Disposal Facility. Other combustible materials (like paper, cardboard, and untreated wood) can be burned.</p> <p>3. There is no indication of whether there will be an attendant at the burn barrel when it is in use.</p> <p>4. It is unclear how large the dedicated area for storing waste in the main building is, and how much waste it can accommodate (if waste cannot be removed off-site immediately).</p>	<p>1. ENR is recommending that the proponent clarify when each of the 2 methods would be used.</p> <p>2. ENR is recommending that the proponent clarify that organic materials are to be removed off-site for disposal, and that the burn barrel would only be used for paper, cardboard, and untreated wood.</p> <p>3. ENR is recommending that the proponent indicate that an attendant will be present at all times that the burn barrel is burning.</p> <p>4. ENR is recommending that the proponent indicate how large the dedicated storage area is, how much waste can be stored there, and how frequently waste will be removed off-site (i.e. at least when the storage area is full).</p>	
10	WMP - 3.1.2 Human Waste and Greywater, page 5	1. The Waste Management Plan mentions an outhouse will be used in instances where the wastewater treatment plan is not operational – but it is unclear where the outhouse will be and how it will be managed. While there are no guidelines on how this should be managed, it is encouraged that a hole approximately 15-20 cm d	<p>1. ENR is recommending that the proponent clarify where the outhouse will be located and include further details about how it will be maintained to limit impact on the environment.</p> <p>2. ENR is recommending that the proponent clarify when honey buckets will be used.</p>	

		<p>deep and 10-15cm in diameter be dug at least 60 metres from water, trails, or other utilized sites. It is also encouraged that soil be thrown into the hole after each use, to speed decomposition, and that toilet paper is packed out.</p> <p>2. The Waste Management Plan states that there may be instances where honey buckets are used, but it is unclear in what instances. Would they be used only when the wastewater treatment plant is not being used?</p>		
11	WMP - Waste Management Planning Summary, page 6	<p>1. In section 3.1.2, it states that "in the event that the wastewater treatment plan is not operational, there is an outhouse at the Wellness Camp for visitors to use". It is unclear in the summary table that the outhouse and honey buckets will only be used when the wastewater treatment plant is not being used.</p> <p>2. As per ENR's Open Burning Guideline, a burn barrel is not suitable disposal for organic waste. ENR also recommended different category names be used in other sections of the Waste Management Plan.</p>	<p>1. ENR is recommending that the proponent clarify in the table that human waste will only be stored in the outhouse and honey buckets when the wastewater treatment plant is not in use.</p> <p>2. ENR is recommending that the proponent adjust Table 1 to reflect changes.</p>	
12	WMP – Northwind Industries	Section 3.1.3 of the WMP indicates that waste materials such as dirty fuel or waste oil will be given to Northwind Industries. ENR notes that no documentation is provided to confirm that Northwind Industries will be able to accept these materials.	ENR recommends that GTC provide confirmation from Northwind Industries that they will be able to accept dirty fuel and waste oil from the Wellness Camp.	
13	References	Waters Regulations, NWT Reg 019-2014.	N/A	
14	ENR cover letter	Please see ENR's cover letter.	N/A	

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GNWT-ENR - EAM (Environmental Assessment and Monitoring) - Erin Goose				
1	Water Use	ENR notes that the allowed annual water withdrawal volume is not consistent throughout the licence. Part A, Condition 1a) of the Draft Licence states that the scope of the licence includes withdrawal of up to 2,0000 m3 of freshwater per year, while Part D, Condition 1 allows the withdrawal of only 2,000 m3 of water per year. Additionally, there is remaining uncertainty as to whether the intention was for the maximum water withdrawal to be a daily or an annual limit. In the initial application, the Cover Letter and Licence Application Form requested the use of up to 2,000 m3 of water per day, while the Overview on the Online Review System (ORS) indicated that the request was for up to 2,000 m3 of water per year. The Draft Licence provides an annual limit, consistent with the ORS Overview, but this does not match what was requested in the Application documents. ENR commented on this discrepancy in the initial review of the application but no response was provided.	<p>ENR recommends the Gwich'in Land and Water Board (the Board) ensure that the allowed water withdrawal volume is consistent throughout the licence.</p> <p>ENR recommends that the Board confirm whether Gwich'in Tribal Council (GTC) is seeking permission to withdraw up to 2,000 m3 of water per day or per year, and if necessary update the licence to reflect GTC's intended water withdrawal limit.</p>	
2	Scope – Deposit of Waste	As per Part A, Condition 1b) of the Draft Licence, the only waste management activity covered within the scope of the licence is the deposit of waste to the Sewage Disposal Facilities. The Waste Management Plan indicates that a burn barrel may be used on-site, although it is not clear whether ash from the burn barrel would be disposed of on-site or transported off-site for disposal. ENR notes that limiting the scope of waste management in the licence to deposit to the Sewage Disposal Facilities may prevent the use of the burn barrel, especially if ash is intended to be disposed of on-site.	ENR recommends that the Board consider expanding the scope of the licence relating to waste management to ensure that use of the burn barrel and the associated disposal of ash (if ash is to be disposed of on-site) will be covered under the scope of the licence.	
3	Effluent Discharge Location	Part F, Condition 4 of the Draft Licence is as follows: "The Licensee shall discharge all Effluent from the Sewage Treatment Facility to the discharge location described in the approved Waste Management Plan." ENR notes that the Sewage Treatment Facility effluent discharge location is not adequately described in the Waste Management Plan. The Waste Management Plan indicates only that discharge occurs approximately 50 m away from the Sewage Treatment Facility, but not in which direction this 50 m is measured. Additionally, as previously noted by ENR, the discharge location	<p>ENR recommends that the Board require that GTC further describe the Sewage Treatment Facility effluent discharge location in the Waste Management Plan such that it is clear what location is being referenced in Part F, Condition 4 of the licence. This description should include, but not be limited to the following:</p> <ul style="list-style-type: none"> <li>- Clarification of the direction in which the 50 m distance from the Sewage Treatment Facility is measured</li> <li>- Clear identification of the effluent discharge location on a map</li> </ul>	

		on is not included on the map in the Waste Management Plan.	Confirmation of the effluent discharge location is located 100 m away from the ordinary high-water mark of any watercourse, as per Part F, Condition 5 of the Draft Licence.	
4	Fuel Storage Locations	Part H, Condition 7 of the Draft Licence, which was not included in the previous licence, states that "the Licensee shall not establish any fuel storage facilities or refuelling stations, or store chemicals or Wastes within 100 metres of the Ordinary High-Water Mark of any Watercourse." ENR notes that no scale is provided on the map in the Spill Contingency Plan and therefore it is difficult to determine whether any existing fuel storage facilities are within 100 m of the ordinary high-water mark of any watercourse.	ENR recommends that GTC confirm whether any of the current fuel storage facilities are located within 100 m of the ordinary high-water mark of any watercourse.	
5	Schedule 1, Condition 1e)	Schedule 1, Condition 1e) of the Draft Licence requires the following as part of the Annual Water Licence Report: "A summary of any updates or revisions to the Spill Contingency Plan, Engagement Plan, and/or Operation and Maintenance Plans, conducted under the Annual Review referred to in Part B Condition 9." ENR notes that this condition should include updates or revisions to the Waste Management Plan. Additionally ENR notes that the "and/or" in the conditions should be revised to "and", as a summary of updates and revisions should be provided for each plan.	ENR recommends that the Board include the Waste Management Plan in Schedule 1, Condition 1e) of the licence.  ENR recommends that the Board revise the "and/or" in Schedule 1, Condition 1e) of the licence to "and".	
6	Schedule 1 – Waste Management Activities	While Schedule 1 of the Draft Licence includes requirements for summaries of activities conducted in accordance with the Spill Contingency Plan and Engagement Plan (Schedule 1, Conditions 1d) and 1f) respectively), ENR notes that an equivalent condition is not included for the Waste Management Plan.	ENR recommends that the Board add a condition to Schedule 1 of the licence to require a summary of activities conducted in accordance with the approved Waste Management Plan as part of the Annual Water Licence Report.	
7	Surveillance Network Program	ENR notes that the Draft Licence does not include a Surveillance Network Program (SNP). The definition included in the Draft Licence for SNP states that the program is detailed in Annex A, but Annex A only contains a concordance table. Without an SNP, important information related to sampling is missing. Part F, Condition 6 of the Draft Licence includes effluent quality criteria (EQC) for the Sewage Treatment Facility effluent at SNP station G13L3-001-2, however, without an SNP, it is not clear where this station is located, what sampling frequency will be applied, or what parameters (if any) will be sampled beyond those included as EQC. Additionally, it is not clear whether there are any additional stations where sampling will occur beyond this one compliance point.	ENR recommends that an SNP be included in the licence. The SNP should include details on the locations, sampling frequencies, and sampling parameters of all SNP stations.	
8	Cover Letter	Comment Letter	N/A	Please find attached the GTC's amended documents for the Wellness Camp applications. To address reviewer concerns and comments brought forward during the application review process, these adjustments have been made to the following documents:  Land Use Permit Application • Updated Impacts and Mitigations Table for potential impacts to surface water quality

Water Licence Application

- Added 'To deposit waste' in Water Licensing Criteria table
- Updated Impacts and Mitigations Table for potential impacts to surface water quality
- Updated requested volume from 2,000 per day to 2,000 per year.

Waste Management Plan

- Section 1 added effective date immediate upon its approval by GLWB
- Figure 2 updated to show locations of outhouses and wastewater discharge site
- Section 3.1 updated to better define types of waste and their management plans
- Section 4 with addition of letter - company that will take waste oil

Fuel Spill Contingency Plan

- Section 1 added effective date immediate upon its approval by GLWB
- Section 5.1 updated to describe spill kits on-site and their contents
- Section 6.4 updated to describe availability of spill response equipment
- Section 6.2 updated with phone numbers for project supervisor & site supervisor