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Staff Report

Applicant: Government of Yukon – Department of Highways and Public Works	
Location: Hwy #8 – Yukon Border to Inuvik	**File Number(s):** MV2019L8-0013 and MV2019X0027
Date Prepared: June 17, 2022	**Date of Board Meeting:** July 7, 2022
Subject: Erosion and Sediment Control Plan Version 1.0	

1. Purpose

The purpose of this Report is to present to the Mackenzie Valley Land and Water Board (MVLWB/the Board) an Erosion and Sediment Control Plan Version 1.0 (Plan) submitted by Government of Yukon – Department of Highways and Public Works (GY – DHPW) to fulfill Part C Condition 14 of Permit MV2019X0027 and Part F Conditions 9 and 10 of Licence MV2019L8-0013.

2. Background

- August 31, 2020 – Issuance of Permit MV2019X0027 and Licence MV2019L8-0013;
- April 21, 2022 – Plan received;
- April 25, 2022 – Plan deemed complete and review commenced;
- May 20, 2022 – Comments and recommendations due and received;
- June 3, 2022 – Responses due and received;
- June 3, 2022 – Late comments submitted by Gwich'in Tribal Council Department of Lands and Resources;
- June 7 , 2022 – Responses to GTC comments received;
- June 9, 2022 – Updated Plan submitted (Version 2), in consideration of reviewer comments;
- **July 7 2022 – Updated Plan presented to the Board for decision, and**
- August 20, 2025 – Expiration of Permit MV2019X0027 and Licence MV2019L8-0013.

3. Discussion

History

On August 31, 2020, GY – DHPW received a Permit and a Licence for the construction of an approximately 800-km fibre optic line from Dawson City, Yukon to Inuvik, Northwest Territories. For the purposes of the

Permit and Licence Applications, the project was defined as the section of the Dempster Fibre Project (DFP) located in the Northwest Territories. The fibre optic cable will enter the Northwest Territories at the Yukon/Northwest Territories border and then travel approximately 271 km north, within the Dempster Highway right-of way to Inuvik. The project is located entirely within the Gwich'in Settlement Area (GSA), passing through the communities of Fort McPherson and Tsiigehtchic. The project will connect to an existing terminal facility in Inuvik and to existing buildings in communities along the route to provide service to those communities. The project was determined to be transboundary as outlined in the MVLWB Governance Policies – June 2019, because it crosses territorial borders.

The purpose of this project is to tie into the existing Mackenzie Valley Fibre Line, creating a continuous network running through Yukon, Northwest Territories and Northern British Columbia. This new line will ensure Yukon, Northwest Territories, and other northern communities will have access to a secondary fibre network in the event of a service disruption. It will also benefit the northern communities that tie into the line through satellite by providing redundancy.

The proposed development includes:

- Fibre optic cable and conduit to be installed adjacent to the Dempster Highway along the Right of Way, extending form the Yukon border to Inuvik; and
- Handholes along the route.

Construction and operation of the project will require the following supporting activities:

a) The use of water and deposit of waste;
b) Geotechnical drilling;
c) Use of pre-existing staging areas for equipment and materials (up to five staging areas may be used at one time);
d) The use and storage of fuel;
e) Construction of temporary camps to accommodate work crews;
f) Clearing of vegetation as required in the right of way;
g) Installation of conduits and fibre optic cable;
h) HDD drilling and/or installation of cable at watercourse crossings; and
i) Ongoing operation and maintenance.

<u>Management Plans</u>

In the initial Project Description submitted with the Applications, GY – DHPW referred to several differed reports and plans (Emergency Frac-Out Response Plan, Inspection and Maintenance Plan, Permafrost Protection Plan, Erosion and Sediment Control Plan, and Construction Environmental Management Plan), this was unclear to reviewers as to why these various reports and plans were not submitted with the Application. The recommendation to the Board was to include the various reports and plans in the conditions of the authorizations. GY – DHPW agreed to submit the Plans for Board approval prior to construction. To address the comments and recommendations as well as the commitments made, the Board included conditions requiring the submission of noted Plans.

Part C Condition 14 (MV2019X0027) states:
A minimum of 90 days prior to the commencement of this land use operation, the Permittee shall submit to the Board, for approval, an Erosion and Sediment Control Plan. The Permittee shall not commence Project activities prior to Board approval of the Plan.

Part F Condition 9 (MV2019L8-0013) states:
A minimum of 90 days prior to the commencement of Project activities, the Licensee shall submit to the Board, for approval, an Erosion and Sediment Control Plan. The Licensee shall not commence Project Activities prior to Board approval of the Plan.

Part F Condition 10 (MV2019L8-0013) states:
The Licensee shall comply with the Sediment and Erosion Control Plan, once approved, and shall annually review the plan and make necessary revisions to reflect changes in operations or as directed by the Board. Revisions to the plan shall be submitted to the Board for approval.

On April 21, 2022, GY-DHPW submitted the required Erosion and Sediment Control Plan Version 1.0.

Summary of Erosion and Sediment Control Plan

The purpose of the plan is to outline the erosion and sediment control activities to be implemented throughout the duration of the Dempster Fibre Project (DFP). Erosion and sediment control activities will be conducted as part of all installation activities for the duration of the Project to minimize the effect on the surrounding landscape. Sediment and erosion control will support the continuation of a healthy environment and any future human activities that will occur in the project area.

Preventative Measures Identified in the Plan

- Minimize the size of the disturbed area (i.e. project footprint).
- Use existing trails and roads as much as possible.
- Maximize retention of natural vegetation cover—it is your best and cheapest defence against erosion.
- Maintain riparian buffers as stated in Small HDD Plan.
- Minimize compaction at the site.
- Avoid working on unstable areas and steep slopes.
- Minimize water crossings.
- Sequence and schedule construction to take advantage of drier weather.
- Avoid disturbing permafrost and the overlying vegetation.
- When brushing/mulching avoid clearing to soil, cut trees and shrubs off near ground level leaving the root mass in the ground. Willows are very hardy and will regrow after being cut off and driven on if most of the roots are kept intact.
- Avoid rutting, use appropriate equipment for ground conditions.
- Time construction to occur at a time of year that minimizes erosion.
- Time the mobilization and demobilization of equipment and camps to minimize erosion.

- Avoid mobilization efforts during spring runoff. During the spring and fall when temperature falls below zero at night, ground can be much more stable during the morning than during the heat of the day. If necessary, time moving equipment for when the ground is frozen.
- Visit the site before the work and identify site-specific erosion issues and sediment release problems that may arise based on work-site factors such as:
    - Slope, aspect, and elevation;
    - Soil texture and percolation characteristics;
    - Areas with little vegetation cover that are likely to erode;
    - Local climatic factors (e.g., rain shadows); and
    - Proximity to sensitive water and potential for sedimentation.

Sediment Control Measures Identified in the Plan

- Silt Fence Installation

4. Public Review Comments

On April 25, 2022, the Plan was circulated for public review on the Online Review System (ORS). By May 20, 2022, comments and recommendations were received from the Government of the Northwest Territories – Environment and Natural Resources (GNWT ENR). Gwich'in Tribal Council (GTC) submitted late comments on June 3, 2022.[1]

GNWT-ENR commented that the preventative measures provided in the ESCP were general and nature, and recommended GY-DHPW revise the list to be specific to the DFP (ENR#1). GNWT-ENR recommended that GY-DHPW's statement that "construction to occur at a time of year that minimizes erosion" be replaced with specific times of year that will be prioritized for construction (ENR #2). GNWT-ENR requested clarification on how pre-construction site visits identified in Section SECP 5.0 will be used to ensure that appropriate sediment and erosion control measures are in place prior to the start of construction. (ENR #3). GNWT-ENR commented that silt fences were the only control measure listed, and that there were no details outlining which erosion prevention and sedimentation controls will be used, where they will be used, and how they will be monitored during and after construction. GNWT-ENR recommended GY-DHPW provide details on the all the types of controls that will be used, identify specific areas where certain controls will be installed, and an outline of how the controls will be monitored/maintained during and after construction (ENR#4). GNWT-ENR recommended that GY-DHPW include site map(s) indicating areas of concern and planned installation locations (ENR#5).

GTC-Department of Lands and Resources (GTC-DLR) commented that GY-DHPW did not provide a summary of drainage conditions to be encountered along the Dempster highway in the ESC. (GTC#1). GTC-DLR recommended that trenching not take place and that only vibratory plows should be used for this project (GTC#2). GTC-DLR requested further information regarding the impacts of the surface lay method.

By June 10, GY-DHPW responded to all comments, updated the Plan (Version 2) to reflect the recommendations received, and submitted it to the Board on June 9, 2022.

[1] Comment Table

5. Staff Comments

Staff confirm that Plan revisions have considered reviewer recommendations. Staff are of the opinion that the proposed measures will sufficiently protect against erosion and sedimentation during project activities, particularly since they are taking place within the highway right of way, where regular monitoring and responses can be carried out.

6. Security

The status of security for this Project will not be affected by the Board's decisions related to the Plan.

7. Conclusion

Board staff conclude that the revised Plan has adequately addressed the comments and recommendations received during the review, is in conformity and the requirements of Permit MV2019X0027 and Licence MV2019L8-0013 and can be approved.

Board staff conclude there are no outstanding issues or concerns with this Plan.

8. Recommendation

Board staff recommend the Board **make a motion to approve the Sediment and Erosion Control Plan version 2** as required by Land Use Permit MV2019X0027 and Water Licence MV2019L8-0013.

A draft decision letter is attached.

9. Attachments

- MV2019X0027
- MV2019L8-0013
  - Sediment and Erosion Control Plan Version 1.0
  - Revised Sediment and Erosion Control Plan Version 2.0
- Review Comment Summary Table and Attachments
- Draft Decision Letter from the Board

Respectfully submitted,

AlecSandra Macdonald
Regulatory Specialist

Reviewer Comments and Proponent Responses

Project: Dempster Fibre Project
Board: Mackenzie Valley Land and Water Board
Organization: Government of Yukon - Department of Highways and Public Works

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Staff Analysis
GNWT-ENR - EAM (Environmental Assessment and Monitoring) - Erin Goose					
1	General Preventative Measures	ENR acknowledges that Section 4.0 lists General Preventative Measures and can extrapolate that these general measures will be used throughout construction of the Dempster Fibre Line, however, this is not explicitly stated in the text. ENR notes that this section should include a connection to the planned construction activities for the specific project at hand, and specify which (if not all) measures will be implemented.	ENR recommends that Government of Yukon – Department of Highways and Public Works (GY-DHPW) revise this section to be specific to the Dempster Fibre Line Project, rather than a general list of preventative measures.	Section 4.0 of the Erosion and Sediment Control plan will be revised to be specific to the Dempster Fibre Line Project as per this recommendation.	Proponent response is satisfactory
2	Timing Construction to Minimize Erosion	Section 5.0 of the Sediment and Erosion Control Plan (SECP) includes the principle of timing "construction to occur at a time of year that minimizes erosion." ENR notes that for clarity, the GY-DHPW should specify the specific times of day/year that are being referred to.	ENR recommends that rather than stating the generality "Time construction to occur at a time of year that minimizes erosion", GY-DHPW note the specific times that will be prioritized for construction.	Installation of the cable will be timed to avoid the seasonal runoff to minimize the potential for erosion along the Project route. This period of seasonal runoff typically completed by mid-June. Construction activities will begin following the end of seasonal runoff period until the seasonal freeze-up occurs.	Proponent response is satisfactory

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Staff Analysis
3	Pre-construction site visit	Section 5.0 of the SECP states that a site visit should occur prior to the start of work to identify site-specific erosion issues and sediment release problems. ENR notes that it is not clear how the results of the site visit will be used to ensure that the appropriate mitigations are in place prior to the start of construction.	ENR recommends that GY-DHPW clarify how the results of site visits will be used to ensure that appropriate sediment and erosion control measures are in place prior to the start of construction.	Environmental monitors are typically two working days ahead of construction. If areas where erosion and sedimentation control would be required are identified, the information from the Environmental Monitor will be shared with the site supervisor. The construction crew, with assistance from the Environmental Monitor, will install silt fencing in the identified locations to prevent erosion and sedimentation from occurring. The Environmental Monitors will be instructed by a Qualified Environmental Professional on the proper installation techniques for silt fencing.	Proponent response is satisfactory
4	Erosion Prevention and Sedimentation Controls	ENR acknowledges that Section 6.0 provides a detailed description on silt fencing, its use, and proper installation. It is not clear, however, where silt fencing will be installed during the Dempster Fibre Line construction. Does GY-DHPW intend to use silt fencing around all construction zones? Will silt fencing only be installed in certain areas based on factors listed in Section 5.0? Is silt fencing the only control that is currently expected to be used? ENR notes that additional detail is required outlining which erosion prevention and	ENR recommends that GY-DHPW provide additional details on all erosion prevention and sedimentation controls that may be used during construction and installation of the Fibre Line. The information should include the types of controls, specific areas where certain controls will be installed, and an outline of how the controls will be monitored/maintained during and after construction.	In fibre optic cable installation, typically the only erosion and sediment control measures that are required is silt fencing or sandbags. Alternative measures can be implemented when required, such as straw wattles, erosion cloth blankets, mud matts, etc. Monitoring of the installed silt fences will be conducted by Environmental Monitors who will be trained by Qualified Environmental Professionals on the installation, inspection, and monitoring of silt fencing as an erosion control measure. Silt fences will be inspected at least once a week and after each rainfall. Any necessary repairs will be done when bulges occur or when sediment accumulation reaches 50 per cent of the fabric height. Any areas of collapse,	Proponent response is satisfactory

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Staff Analysis
		sedimentation controls will be used, where they will be used, and how they will be monitored during and after construction to ensure erosion and sedimentation does not occur.		decomposition or ineffectiveness will be immediately replaced. Sediment deposits will be removed as necessary to continue to allow for adequate sediment storage and to reduce pressure on the silt fence. The construction crews and Environmental Monitors will ensure that the sediment is removed to a secure area. Silt fence materials and sediment deposition will not be removed until the catchment area has been appropriately stabilized. The area of the removed silt fence will also be stabilized.	
5	Site Maps	ENR notes that there are no maps in the Plan to outline sensitive areas and areas where control materials will be installed.	ENR recommends that the GY-DHPW include at least one site map to outline sensitive or key areas of concern, as well as the planned installation locations for erosion/sedimentation control measures.	A Qualified Environmental Firm (QEP) has been engaged for the entirety of the Project. The QEP is in the process of developing maps that will outline sensitive or key areas of concern. As the mapping becomes available, examples can be shared if requested.	Proponent response is satisfactory
6	Cover Letter	Comment Letter	N/A		
Gwich'in Tribal Council - Lands and Resources - Kanda Gnama					
1		Summary of the drainage conditions The proponent did not provide a summary of drainage conditions to be encountered along the Dempster highway in the ESC. This summary is required in the Plan.		A section will be added into the Sediment and Erosion Control plan to discuss drainage conditions along the Dempster highway.	Proponent response is satisfactory

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Staff Analysis
2		Conventional Burry (page 5 of the plan) The proponent has proposed using vibratory plow or trencher for conventional bury. The GTC is of the opinion that to minimize ground disturbance and the project's environmental footprint; only vibratory plows should be used for this project. This is particularly important as the plan did not outline a detailed method for dispersion of surface water, should water begin to pond or begin to preferentially follow the trench/slice within which the FOC will be installed. Given the current challenges that our Region faces with regard to flooding and drainage, any activity that has the potential to exacerbate this challenge should be adequately scrutinized to ensure any potential negative impacts to drainage systems are sufficiently mitigated.		The proponent can confirm that only a vibratory plow will be used for the conventional bury installation method. The section of the plan will be updated to remove "trencher".	Proponent response is satisfactory

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Staff Analysis
3		Surface Lay (page 5 of the plan) The plan did not outline the potential environmental consequences of this method. GTC requests that the proponent provides more details of potential impacts.		The cable being used in the application of Surface Lay is a project specific cable designed to eliminate environmental consequences. Due to its armoured coating, it is secifcially designed to eliminate potential degredation caused by animals or by natural elements. The Surface Lay methodlogy will only occur in water, and cable weights will be placed to secure the conduit in place, so it will not be visible and will limit impact to wildlife passing through waterbodies. The Project will take every effort to limit Surface Lay installation and will review all locations where Surface Lay is designed to review alternative installation methods where suitable. Surface Lay is a final resort installation when there is no other suitable method.	Proponent response is satisfactory

Gwìch'inat Eenjit
Gàdatr'igwijìlcheii Gidilii
Gwìch'in nan, nakhwek'yùu ts'àt gwitr'it tthak nakhwidavee gwiheezàa eenjit

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

June 3, 2022

Attention: AlecSandra Macdonald, Gwich'in Land and Water Board

RE: MV2019X0027, MV2019L8-0013 -Dempster Fibre Line _Government of Yukon - Department of Highways and Public Works

Dear AlecSandra,

On behalf of the Gwich'in Tribal Council (GTC), I would like to thank you for the opportunity to provide feedback regarding the following plans inherent to the Dempster Fibre Line Project:

- **Closure and Reclamation Plan**
- **Emergency Frac-Out Response Plan**
- **Environmental Management Plan**
- **Heritage Resource Management Plan**
- **Inspection and Maintenance Plan**
- **Permafrost Protection Plan**
- **Sediment and Erosion Control Plan**
- **Wildlife Management and Monitoring Plan**

The submission below summarizes GTC's comments and recommendations regarding specific aspects of these Plans.

Mahsi (thanks) for your time and attention to this matter. Please do not hesitate to contact me should you have any questions.

Sincerely,

Kanda Kola Gnama
Transboundary Specialist

cc. Leigh-Ann Williams Jones, GTC Manager of Lands and Resources

Tel: (867) 777-7900 • Fax: (867) 777-7919
1-3 Council Crescent, PO Box 1509, Inuvik NT Canada X0E 0T0
Website: www.gwichintribal.ca

GTC's comments and recommendations

- **Closure and Reclamation Plan**

Clearing
Progressive reclamation should be contemplated in areas where natural revegetation may be inhibited.

- **Emergency Frac-Out Plan**

No concerns regarding this plan.

- **Environmental Management Plan**

Section 4.2 clearing and brushing.
Progressive reclamation should be implemented in areas where natural revegetation may be inhibited to reduce the impacts of edge effects, prevent habitat fragmentation and to decrease the potential for preferential use by predators. Special attention should also be paid to key nesting and burrowing wildlife species that may be impacted through ground compaction and/or habitat loss. Restricting activity periods during peak migration times or implementing stop work orders should be contemplated when key wildlife species are present within close range to work sites, including but not limited to Moose, Porcupine Caribou, Boreal Woodland Caribou, etc.

4.5 Horizontal Directional Drilling
For Horizontal Directional Drilling Mitigation Measures, it is quite concerning that the proponent contemplates disposing of drill waste in natural depressions, irrespective of how inert the by-products may be. It is concerning to the GTC that project proponents would even contemplate such a disposal method in Arctic Regions, given the ecological sensitivity of many areas, which are continually experiencing permafrost degradation, changes in drainage patterns due to increased flooding events and runoff, and vegetation loss due to changing thermal regimes and disturbance. GTC is strongly against any deposition of any wastes within the Gwich'in Settlement Region (GSR) and would expect that all wastes be trucked outside of the GSR.

Noise disturbance: noise disturbance is lacking in this plan.
The GTC believes that noise disturbance will occur during the project construction phase and requests that mitigation measures related to this disturbance be developed to avoid potential effects on wildlife and nearby communities as required. Special consideration should be given to areas where subsistence harvesting is being conducted by Participants, including hunting, trapping, berry picking and fishing.

- **Inspection and Maintenance Management Plan**

No concerns regarding this plan.

- **Sediment and Erosion Control Plan**

Summary of the drainage conditions

The proponent did not provide a summary of drainage conditions to be encountered along the Dempster highway in the ESC. This summary is required in the Plan.

Conventional Burry (page 5 of the plan)

The proponent has proposed using vibratory plow or trencher for conventional bury. The GTC is of the opinion that to minimize ground disturbance and the project's environmental footprint; only vibratory plows should be used for this project. This is particularly important as the plan did not outline a detailed method for **dispersion of surface water**, should water begin to pond or begin to preferentially follow the trench/slice within which the FOC will be installed. Given the current challenges that our Region faces with regard to flooding and drainage, any activity that has the potential to exacerbate this challenge should be adequately scrutinized to ensure any potential negative impacts to drainage systems are sufficiently mitigated.

Surface Lay (page 5 of the plan)

The plan did not outline the potential environmental consequences of this method. GTC requests that the proponent provides more details of potential impacts.

- **Wildlife Management and Monitoring Plan**

Section 1.2 - Engagement

This section indicates that GTC and Tetlit Gwich'in Council in Fort McPherson will review this Plan. The GTC requests that the proponent reaches out to the Gwichya Gwich'in Council in Tsiigehtchic and the Nihtat Gwich'in Council in Inuvik for review and feedback.

Overall, GTC reiterates the concerns raised by the GRRB regarding this plan, especially caribou hunting along the Dempster Highway by Gwich'in participants. Caribou is a significant part of local diets and is equally important for food security. The proponent must consult with the local Renewable Resources Councils to ensure that activity periods do not coincide with subsistence harvesting and will minimize any disruption to harvesting practices, including trapping, hunting and berry picking. As per section 12.4.13 of the Gwich'in Comprehensive Land Claim Agreement (GCLCA), if a land-use conflicts with harvesting activities, the Proponent is required to consult with the GTC, as well as provide notification to any Renewable Resource Council for the area in which the land is situated.

Failure to do so, would be considered an infringement on Gwich'in hunting rights and cultural practices along the dempster highway.

- **Heritage and Resources Management plan**

The Chance find protocols/procedures
The Chance find protocols/procedures are not written in plain language (the Yukon Government ones are, however). If these will be reviewed and used by non-technical workers, it would be beneficial if these guidelines were written in plain language.

Flagging any "chance find" sites might attract looting or even simple damage from curious members of the public who may stop and explore, especially considering this is along the highway. Can another way to identify sites be used instead? If there will be a lot of other flagging, and the flagging tape doesn't specify that it's heritage materials, then this is less of a concern.

Human remains
Covering human remains with a tarp or blanket may not be the best practice, and the RCMP and Teetl'it Gwich'in should be consulted to confirm this practice before this guide is finalized.

- **Permafrost protection plan.**

Permafrost protection awareness Training:
The plan did not provide sufficient information on what training will consist of.
More details about this training are required.

Thaw Sensitivity
Permafrost along much of the Dempster Highway corridor is generally warmer than about -5°C. (Page 5 of PPP).
This appears to be a gross generalization, and the characteristics of permafrost in the Gwich'in Settlement Region should be explored.
A detailed description of soil characteristics is important to determine areas where specific mitigation activities are required. A transect outlaying these characteristics is advisable.

Permafrost and Snow
Deep snow insulates the permafrost in the winter. Unnaturally deep accumulations can prevent the active layer from fully refreezing (page 6).
Considering the elevated snowpack accumulation observed this year, extra caution should be undertaken throughout the construction phase as impacts to the active layer and permafrost/water table from increased insulating factors is likely to occur. These potential impacts to the active layer and permafrost are concerning and additional mitigation measures should be explored to reduce any further impacts.

Methods for Identifying Permafrost

The plan stated that: *The following **methods and tools** will be implemented to ensure construction crew and personnel have the knowledge and resources available to identify areas with a high potential for permafrost prior to conducting installation activities* but seems to limit these methods and tools to site identification and ground probing by the construction crews.

This is confusing as the project design (engineering and Geotechnical design) should have identified thaw sensitive and thaw-stable permafrost areas. Especially with regards to the extensive research that has already been conducted and published within the GSA, that specifically addresses permafrost. Ground probing by construction crews and environmental monitors should constitute an additional contribution to protecting permafrost, not the primary detection tool.

Best Practices for Permafrost Reclamation

This section is satisfactory. The same approach should have been implemented as a proactive step to identify the different types of permafrost along the Highway corridor prior to executing project activities.

Government of Northwest Territories | Gouvernement des Territoires du Nord-Ouest

May 20, 2022

Tyree Mullaney
Regulatory Specialist
Mackenzie Valley Land and Water Board
P.O. Box 2130
4922-48th Street 7th Floor YK CENTRE MALL
YELLOWKNIFE, NT X1A 2P6

Dear Tyree Mullaney,

Re: Dempster Fibre Project, Sediment and Erosion Control Plan Version 1.0, (MV2019X0027, MV2019L8-0013)

The Department of Environment and Natural Resources, Government of the Northwest Territories has reviewed the application at reference based on its mandated responsibilities under the *Waters Act* and has included comments and recommendations for the consideration of the Board at this time.

If you have any technical questions, please contact Laura Malone, Regulatory and Science Advisor, Water Management and Monitoring Division at email Laura_Malone@gov.nt.ca.

Should you have any general questions, please contact Erin Goose in the Environmental Assessment and Monitoring unit at email gnwt_ea@gov.nt.ca

Sincerely,

Erin Goose

Erin Goose
Environmental Regulatory Analyst
Environmental Assessment and Monitoring Section
Environmental Stewardship and Climate Change Division
Department of Environment and Natural Resources
Government of the Northwest Territories