

Reviewer Comments and Proponent Responses

Project: South Nahanni Outfitters Ltd. – Land Use Permit Renewal MV2022J0023

Board: Mackenzie Valley Land and Water Board

Organization: South Nahanni Outfitters Ltd.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response	Board Decision
GNWT-Lands - Dehcho Region - Dani Rogers					
1	Draft Conditions Part B: Definitions- Shut Down Period	The Permittee goes to the base camp outside of seasonal operation for maintenance/upkeep of the camp.	The Inspector recommends not implementing a Shut Down Period.	Noted and appreciated.	Noted. The definition for Shut Down Period and related condition SEASONAL NOTIFICATION - CONTACT INSPECTOR have not been included in the Permit.
2	Draft Conditions 26(1)(b): Conditions #4 & #5	As this is a permit renewal, commencement of the land use operation has already begun. With the Permittee going to the camp outside of their busy seasonal operation for maintenance/upkeep, the Inspector does not see the need for the notifications.	The Inspector recommends removal of conditions #4 and #5.	Noted and appreciated.	Noted. These conditions have been removed from the Permit.
3	Draft Conditions 26(1)(c): Condition #7	The type and size/number of equipment is listed in the application that will be used throughout the Land Use Permit. If Permittee needs to use equipment not listed, adding unless otherwise authorized in writing by an Inspector to the condition will benefit the Permittee with not needing an amendment to the LUP.	The Inspector recommends keeping the inclusion of this condition but add "unless otherwise authorized in writing by an Inspector" at the end.	Noted and appreciated.	This is a standard condition of the Board, and authority over type, size, and number of equipment is not an express power given to Inspectors under the MVLUR. However, using the word "similar" in the condition may be a practical solution for giving some amount of flexibility to Permittees, within reason, and relying on an Inspector's discretion.
4	Draft Conditions 26(1)(g): Condition #16	As waste is being disposed of outside of the NWT and the Permittee provided information on the waste facility in the Waste Management Plan, the Inspector does not see the need for the notification.	The Inspector recommends not including this condition.	Noted and appreciated.	Noted. This condition has been removed from the Permit.

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MVLWB - Erica Janes					
1	Closure Cost Estimate, Section C1: Solid Waste	Board staff note that SNOL has included numbers for Solid Waste in the template as follows: 1250 person days per season for burnable material, and 1250 for non-burnable. With information provided elsewhere in the Application, Board staff calculate 20 people on site for 4 months (120 days) of operating per season = 2400 person days per season.	Please clarify the number of person days per season, including showing how the number is derived.	The reason why I came up with 1250 versus 2400 is that on average 75% percent of the time that the clients and guides are with us is spent in the field and not in camp at all. Additionally most clients who finish their hunt before their scheduled end day leave early, again contributing to less man days in camp. But to be safe instead of some 625 man days in camp I doubled it and chose 1250 man days in camp.	Acceptable response.
2	Closure Cost Estimate, Section L1: Land Disturbance	Board staff note that SNOL has included a disturbed area of 1.2ha in this section. In SNOL's Application for Permit MV2015J0001, this number was entered as 0. In addition, there is was illustration provided as part of that Application (included in "Additional information for new LUP Application - Mar4-15" on the public registry page for MV2015J0001) that shows the airstrip occupying 10ha, the access road occupying 2.4ha, and no area labeled for the camp lease.	Please confirm the area of land disturbed as part of SNOL's operations at the Root River Base Camp.	A shut down of adjacent airstrip (10 ha) and its access road (2.4 ha) with its marks made by wheeled aircraft and the motorized equipment on site only will naturally revegetate. Base camp (1.2 ha) has minimal impact on disturbed surface area except dug out holes for outhouses and the greywater drain field. In order to give a number for surface size (and to be safe) I included the base camp lease size of 1.2 ha. For better visual understanding	Acceptable response.

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				I attached a base camp sketch with layout and sizes here.	
GNWT-ENR (Environment and Natural Resources) - Environmental Regulatory Analyst					
1	ENR Comment Cover Letter	Please see attached.		None.	Noted.
2	Wildlife Management and Monitoring Plan (WMMP)	ENR considers it a best practice for all Proponents to submit a basic (Tier 1) Wildlife Management and Monitoring Plan (WMMP) with their application for authorizations. A Tier 1 WMMP should outline how impacts to wildlife and wildlife habitat will be mitigated even if the Minister of ENR does not require a WMMP under section 95 of the Wildlife Act. To facilitate this, a template for such a plan is provided on the ENR website at https://www.enr.gov.nt.ca/en/services/wildlife-management-and-monitoring-plans .	ENR recommends the proponent develop a Tier 1 WMMP.	South Nahanni Outfitters operates under the current ownership and out of this current location (Root River base camp) since July 2004. This application is by no means a new project; it is a renewal of an existing land use permit. The owners and its crew maintain a clean, tidy and organized camp ever since. South Nahanni Outfitters is inspected annually by the territorial land authorities who write up reports which so far did not contain shortcomings about the set up and operation. Every year South Nahanni Outfitters submits a mandatory annual operations plan to ENR before the active hunting season starts. Besides providing all operational information, it also includes a wildlife conflict handling	SNOL's current practices and regulatory requirements outside the MVLWB process are noted. The Board notes that a WMMP is not for Board approval; therefore, SNOL could be encouraged to follow up with GNWT-ENR to discuss this requirement.

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				<p>policy. It points out our bear deterrent strategy and the handling and storage of meat, horns and capes in the field and in base camp in order to avoid human wildlife conflicts.</p> <p>Through our mandatory yearly tourism operation licensing program via ITI we are also required to submit our Waste management and Safety plans. Our waste management procedures and safety plans do work very well as it shows in our 2 decades of operation.</p> <p>South Nahanni Outfitters would like to point out that in the past 20 years of operation at the Root river base camp only 2 problem bears had to be destroyed, the last one in 2012. After submitting the bears to ENR, both were found to be at the end of their life with no body fat present in late fall and most of their teeth lost or worn down. Other than the 2 bear killing events no other human wildlife conflict has ever occurred.</p>	



December 20, 2022

Erica Janes
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 Erica Janes,

Re: South Nahanni Outfitters Ltd. Permit Renewal Application MV2022J0023

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

If you have any technical questions please contact Lara Mountain, Wildlife and Fish Division at lara_mountain@gov.nt.ca.

Should you have any general questions or concerns, please do not hesitate to contact gnwt_ea@gov.nt.ca.

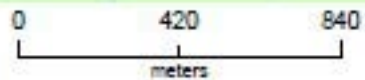
Sincerely,

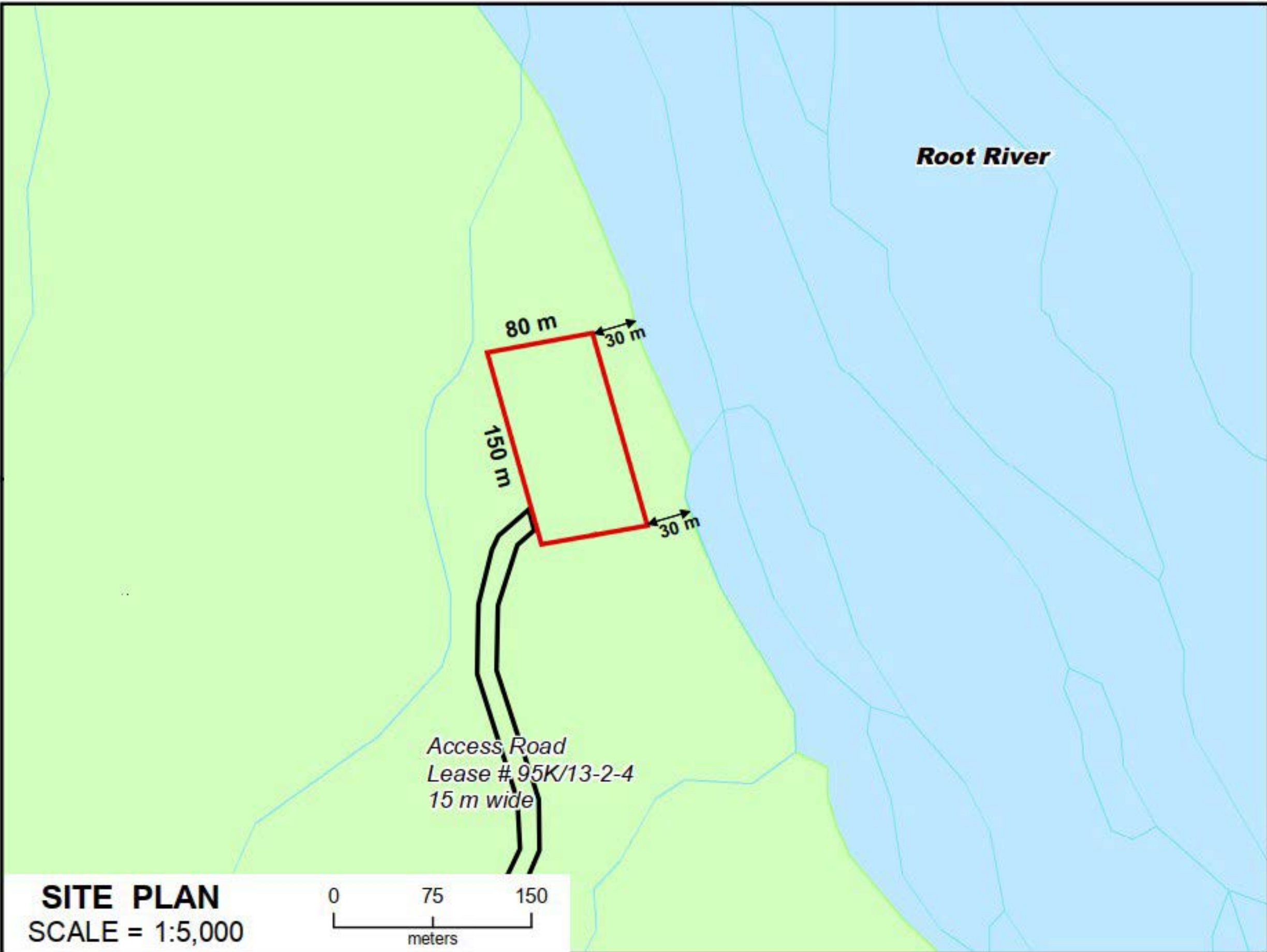
Shakita Jensen
On behalf of the Environmental Regulatory Analyst
Environmental Assessment and Monitoring Unit
Department of Environment and Natural Resources
Government of the Northwest Territories



SITE PLAN

SCALE = 1:20,000





ANNEXED HERETO AND FORMING PART OF N.W.T. LEASE No. 95 K/13-1-4

LATITUDE: 62° 48' 56"N
 LONGITUDE: 125° 37' 28" W
 PROJECTION : UTM, zone 10
 DATUM: NAD 83
 SKETCH AREA = 1.2 ha±
Area obtained by ArcInfo calculation using XTools

DRAWN BY: E.M., IMAG
 DATE: January 4, 2008
 REVISED:
 DATE:

MANAGER LAND ADMINISTRATION

DATE



Indian and Northern
Affairs Canada

Affaires indiennes
et du Nord Canada

LAND ADMINISTRATION

Canada