



Sahtu Land and Water Board

Staff Report

Division: Land Program	Report No.: 1
Date Prepared: November 12, 2021	File No.: S21C-005
Meeting Date: November 16, 2021	
Subject: Renewal application for Type A Land Use Permit submitted by Selwyn Chihong Mining Ltd. for mineral exploration at Howard's Pass, Mackenzie Mountains in the Tulit'a District.	

1. Purpose/Report Summary

The purpose of this Report is to present to the Sahtu Land and Water Board for consideration:

- a) The Land Use Permit Renewal Application submitted by Selwyn Chihong Mining Ltd. (SCML) - **Attachment 1**,
- b) Confirm the conformity of the Application with the Sahtu Land Use Plan,
- c) Confirm the exemption from Preliminary Screening,
- d) The Engagement Plan and Record,
- e) The Spill Contingency Plan,
- f) The Waste Management Plan,
- g) The Restoration Plan, and
- h) The terms and conditions for the renewal Permit **S21C-005**.

2. Background

- **October 1, 2021** – SLWB received the Land Use Permit Renewal Application and began the 10-day completeness check.
- **October 4, 2021** – SWLB staff sent a request for additional/revised information.
- **October 6, 2021** – additional information received.
- **October 13, 2021** - the application was deemed complete and review packages were sent out electronically to members of the Tulit'a District Distribution List using the Online Review System (ORS) with a request for reviewer comments by October 27, 2021.
- **October 27, 2021** – Reviewer comments received.
- **November 2, 2021** – Proponent response deadline.
- **November 12** – Proponent responses to comments received.
- **November 16, 2021** – Board meeting to consider Land Use Permit Renewal Application S21C-005 for a term of 5 years.

3. Discussion

3.1 Project Overview and Scope

Selwyn Chihong Mining Ltd. (SCML) (the Applicant) has submitted a complete application for the renewal of their type A land use permit S16C-002, expiring on November 23, 2021. The purpose of this Application is to allow SCML to extend their exploration activities to the mineral claims and leases in the Howard's Pass area of the Northwest Territories (15% of the Selwyn Project area) using the existing camps, infrastructure, and equipment that are currently in place on the Yukon side of the border (85% of the Selwyn Project area).

This will be the second renewal of the original Permit S07C-003 issued in 2009, following an Environmental Assessment. Only three of the planned 100 holes were drilled on Northwest Territories claims by SCML in 2014 under this permit. The permit was renewed in 2016 (S16C-002). No additional Project activities occurred during this period of active authorization.

The scope of the Project remains the same as originally applied for. When the Project activities commence, there will be up to six diamond drills in operation from approximately June to November of each field season. Drills are moved by helicopter lift or by towing on a sled with a Caterpillar Dozer (CAT) using existing 2.5 m width CAT trails from previous exploration work. Approximately 10 km (< 4 ha) of new CAT trails may be required to skid drills to previously unexplored areas.

Due to the proposed location of drill targets, the Applicant is requesting the Board to reduce the standard **100 m setback** from the Ordinary High Water Mark (OHWM) of any watercourse to **30 m** from the OHWM when performing the land use activities described in the application. This request was made during the regulatory proceeding for S16C-002; however, as the request was made after the review comment period closed, the Board did not accept it at the time (**Attachment 2 – Request for reduced watercourse setback**).

3.2 Program Components

3.2.1 Management Plans

SCML submitted the following Management Plans with the Application:

- **Engagement Plan and Record**¹;
- A revised comprehensive **Waste Management Plan**²;
- A revised **Spill Contingency Plan**³ to capture the company logo change and recommendations made in previous reviews; and
- A **Restoration Plan**⁴.

¹ SLWB Registry for S21C-005 – [SCML Renewal – Engagement Record and Plan – Oct 1 21](#)

² SLWB Registry for S21C-005- [SCML Renewal – Comprehensive Waste Management Plan – Oct 1 21](#)

³ SLWB Registry for S21C-005- [SCML Renewal – Spill Contingency Plan – Oct 1 21](#)

⁴ SLWB Registry for S21C-005- [SCML Renewal – Restoration Plan for NWT components – Oct 1 21](#)

3.2.2 Access and Personnel

Ground access to the Selwyn Project is via the Don Road in the Yukon and use of a short section of the 80-km long Howard's Pass Access Road (HPAR). The HPAR road, located entirely in the Northwest Territories, is currently undergoing an Environmental Assessment for expansion. SCML will use helicopters and CATs to move drills to the claims in the NWT.

Personnel required include one helicopter pilot, six drillers and six helpers, six geologists/geologist helpers, one Environmental Compliance Coordinator, and two equipment operators. At any given time, the maximum number of people working on the drill program on claims within the NWT will be 20.

3.2.3 Camp

SCML's current permit does not request the development of any new camps or infrastructure in the NWT. All crews and equipment will be supported from existing camps that are permitted in the Yukon.

3.2.4 Equipment

The proposed drilling program will use up to six diamond drills (Boles 25A/37), one caterpillar tractor (D7) and one excavator (345D) for moving drills and rehabilitating roads and water pumps for supplying drills with water.

3.2.5 Fuel Use and Storage

All fuel will be slung in drums from the main camp permitted in the Yukon, by helicopter to fuel caches and drill sites or moved by CAT sloop. Fuel will be pumped from drums or tidy tanks with either hand-powered or electrical pumps.

3.3 Regulatory Requirements

3.3.1 Type of Area

The mining leases and claims are located on Territorial land.

3.3.2 Eligibility

SCML is eligible for the permit under section 18, part (a)(i) of the Mackenzie Valley Land Use Regulations (MVLUR):

where the proposed land-use operation is in the exercise of a right to search for, win or exploit minerals or natural resources, holds the right.

The Project includes two claims areas known as the "Anniv" (Claims F66410, F66411, F66412, F68549 and lease 2878) and the "XY Nose" (Claim F92331 and lease 2879) (**Attachment 2 – Location Maps**).

3.3.3 Application Fee

An application fee of \$150.00 was received with the Application. No land use fees are due as the Project is on Territorial lands.

3.3.4 Term

The Applicant has applied for a five-year term.

3.3.5 Triggers

The applicable permitting criteria from the MVLUR are as follows for lands located outside the boundaries of a local government:

4. (b) (i) *the use of the use of motorized earth-drilling machinery the operating weight of which, excluding the weight of drill rods, stems, bits, pumps and other ancillary equipment, equals or exceeds 2.5 t, for a purpose other than the drilling of holes for building piles or utility poles or the setting of explosives within the boundaries of the local government,*
- (iv) *the use of a stationary motorized machine, other than a power saw, for hydraulic prospecting, moving earth or clearing land.*

3.3.6 Land Use Plan Conformity

The Sahtu Land Use Plan (SLUP) was approved in August 2013, making the requirement for conformity with the SLUP a legislative requirement. The Project lies within the Nááts'ihch'oh Proposed Conservation Initiative Zone 41. The Project is a "legacy land use" as defined by the SLUPB, and therefore is exempt from the zoning conformity requirement. During the 2016 renewal, a conformity determination was undertaken for the Project in accordance with section 47 of the MVRMA, for the remaining conformity requirements 2-14. The Board did not receive any reviewer comments regarding conformity to the SLUP for this review.

Board Decision: The SLWB has reviewed the application as per Section 46 of the MVRMA and determined the activity continues to be in accordance with the conformity requirements of the SLUP.

3.3.7 Engagement and Traditional Knowledge

Community Engagement

Pre-application meetings were held with community representatives in 2020 regarding the Howard's Pass Access Road widening Project, a transboundary Project that was subsequently referred to EA. Due to the covid pandemic and travel restriction, SCML could not conduct face-to-face meetings with Sahtu parties. The application and supporting documents were sent to the three land corporations (Tulit'a Land Corporation (TLC), Fort Norman Metis Land Corporation (FNMLC) and Norman Wells Land Corporation (NWLC) prior to submission of the Application to the SLWB. Follow-up virtual meetings were requested and held with NWLC on September 22, 2021. At the meeting, SCML explained that the

only change made in the renewal that differs from the 2016 application was the request for a reduced setback distance from water courses for some drill targets.

Board staff are satisfied that the level of engagement for this renewal application, while limited due to pandemic considerations, has been adequate. No significant changes to the Project activities are planned and no opposition to the renewal of this permit was raised.

Board Decision: The SLWB has reviewed the Engagement Plan and Record and determined the Plan is in general accordance with the MVLWB Policy and Guidelines for engagement and recommends approval.

Traditional Knowledge

No new Traditional Knowledge was collected for this application. The Applicant is relying on the TK submitted in 2006 for the original permit.

3.3.8 Preliminary Screening

Under the Preliminary Screening Requirements of section 124(1) of the *Mackenzie Valley Resource Management Act* (MVRMA), the Board must conduct a preliminary screening of any proposed development prior to the issuance of a Licence, Permit, or Authorization, unless it is exempt from Part 5 of the MVRMA.

The Applicant has also requested an exemption from preliminary screening in accordance with the Preliminary Screening Regulations and the exemption list regulations, having confirmed that the Project has not been modified and the renewal application covers all the activities currently included in the existing permit S16C-002.

To be exempt from a preliminary screening, a development must meet the requirements outlined in Part 1, Section 2 of the Schedule 1 of the Exemption List Regulations annexed to subsection 143(1) of the *Mackenzie Valley Resource Management Act* (MVRMA), which states:

A development, or part thereof, for which renewal of a permit, licence or authorization is requested that

- a) has not been modified; and*
- b) has fulfilled the requirements of the environmental assessment process established by the Mackenzie Valley Resources Management Act, the Canadian Environmental Assessment Act or the Environmental Assessment Review Process Guidelines Order.*

Board staff believes that this application is exempt from preliminary screening, in accordance with the Exemption List Regulations.

Further discussion is included in Section 4.5.

4. Public Review

Of the 22 organizations to which the application was distributed, sixteen (16) of which are represented within the Sahtu Settlement Area, review comments were received from:

- GNWT-Environment and Natural Resources (**GNWT-ENR**)
- GNWT – Prince of Wales Northern Heritage Centre (**GNWT-PWNHC**), and
- GNWT – Lands – Sahtu Region (**GNWT-Lands**).

Attachment 3 includes the Review Comment Table and submitted Letters.

4.1 Issues Raised During the Review

The main issues raised during the review were related to:

- **Wildlife Protection** – include permit conditions for mitigation of migratory bird nest disturbance – Permit Condition #74; dens, push-ups, lodges, hibernacula, roosts; setback distances for wildlife (GNWT-ENR ID 1,2).
- **Archaeological Potential** – include standard permit conditions for AOA and AIA-High Potential (GNWT-PWNHC ID 1) – Permit Conditions #46 and #47.
- **Archaeological Buffer** – use standard setbacks of 150 m from known archaeological site and 500 m from known burial site (GNWT-PWNHC ID 2) – Permit Condition #43
- **Reduced Watercourse buffer** – highlight mitigation measures to be used when drilling near watercourses (GNWT-Lands ID 1) – Permit Conditions #4, #29, #32, #33.
- **Report Drill Locations** – include condition for Inspector to receive GPS locations for bore holes prior to commencement of drilling (GNWT-Lands ID 2) – Permit Condition #3.
- **Update Inspector contact information** - (GNWT-Lands ID 3) – Permit Condition #8.

4.2 Spill Contingency Plan v. 4.0

Board staff reviewed the **Spill Contingency Plan** (Version 4.0) with consideration of the basic requirements of Aboriginal Affairs and Northern Development Canada's *Guidelines for Spill Contingency Planning* (April 2007) and have the opinion the Plan conforms with the intent of the Guidelines.

4.3 Comprehensive Waste Management Plan v. 6.0

Board staff reviewed the **Comprehensive Waste Management Plan** (Version 6.0) with consideration of the basic requirements of MVLWB *Guidelines for Developing a Waste Management Plan* (2011) and have the opinion the Plan conforms with the intent of the Guidelines.

4.4 Restoration Plan v. 1.0

Board staff reviewed the **Restoration Plan** for the NWT portion of the exploration drilling. The claim areas are in the upland portion of the region. Large slightly hilly alpine plateaus with alpine tundra vegetation dominate the area. Forbs-grass meadows (broad leaved plants) are typical on the moist sites. Irregular open mixed subalpine fir and spruce stands grow at some mid-to lower slope locations and at the base of valleys.

Mineral exploration drilling entails the vegetation and surface clearing and levelling of 10m x 10m areas for drill placement. A small amount of water is used for drilling. The Applicant proposes to dispose of all drill cuttings and drill water in land-based sumps located a minimum of 30 metres from drinking and surface water sources. Following drilling, the sump is filled in and the vegetative matter replaced on the sump to promote natural revegetation and/or seeded with a native grass seed mix. Following completion of all drilling, trails will be scarified, where necessary, and seeded with native grass mix. All reclaimed areas will be monitored and maintained until successful restoration.

4.5 Potential for Environmental Impacts and Mitigation Measures

The GNWT-Lands Inspector has no problem with the requested change from 100 m to 30 m; however, requested that more detail be provided for the site-specific mitigation measures that would be used to ensure no detrimental adverse environmental impacts from drilling within 100 m of a watercourse.

Table 1 provides a summary of the Applicant’s submission of the mitigation measures to be taken to avoid potential impacts from drilling and use of sumps within 100 m of the ordinary high water mark (OHWM) of any watercourse.

Table 1: Summary of SCML Potential Impact and Mitigation Measures for reduced Watercourse Buffer

Valued Component	Potential Impact	Mitigation
Biophysical Environment		
Surface Water Quality	Reduced water quality from erosion, spills, drill waste discharge, sump instability	<ul style="list-style-type: none"> • Spill Contingency Plan (SCP) • use of silt fences • work during dry weather periods when possible • sumps to be of sufficient size and depth (1.0 m) to prevent overflow and bermed to prevent runoff entering • only place non-toxic drill cuttings into sumps • where possible avoid drilling within 100 m of any watercourses with OHWM • clean equipment of grease, oil, surface grime prior to use
Terrain, Permafrost, Vegetation	Vegetation clearing, sumps, drilling activities may alter the terrain and permafrost,	<ul style="list-style-type: none"> • do not scrape surface down to mineral soil • save and replace organic topsoil for reclamation • use existing trails where possible • use of vegetation buffers to protect riparian habitat • minimize grading and soil compaction • clean equipment prior to mobilization to avoid non-native species introductions • avoid steep slopes and unstable areas

These types of potential impacts fell within the scope of the Environmental Assessment⁵ that was completed for this Project. The Preliminary Screening Report prepared for S07C-003, August 15, 2007⁶ was also reviewed and found that the Applicant had applied for a 30 m setback from watercourses for drill locations and sumps, and a 100 m setback for fuel, from the OHWM of a watercourse. Mitigation measures described in Table 1 are documented in the Preliminary Screening approved by the Board for this Project. The Applicant has completed similar drilling within 30 m of watercourses in the Yukon Territory and assumed similar conditions would apply in the NWT.

BOARD DECISION: The application is exempt from preliminary screening, in accordance with the Exemption List Regulations.

4.6 Security

A security deposit of \$32,722.50 was required in the previous permit S16C-002 Condition 52, to be deposited with the Minister prior to commencement of the land-use operation. Since the land-use operation has not commenced, this security has not yet been deposited.

A revised security estimate of \$31,535.00 was prepared by the Applicant and submitted with the Application, noting that there is now an all-season access road to the Project site.

Board staff note that this revised estimate was prepared using the LWB outdated Land Use Permit Security Worksheet. There were no review comments on the security estimate. Board staff used the new Permit security tool (not approved) to calculate a security estimate for this Project. The estimate ranged from a low of \$15,500.00 to \$69,000.00 depending on the need for heavy equipment to restore the site.

Board staff are satisfied that a security of \$32,000.00 will be sufficient for this Project.

4.7 Draft Permit

A draft Permit was developed by Board staff, based on the previous permit and the MVLWB's current Standard Land Use Permit Conditions Template, to allow reviewers to comment on possible conditions.

- Definitions and Conditions suggested to be included that were not in the previous Permit are shown in **yellow**. Definitions and Conditions suggested to be removed are shown in **blue**.
- Non-standard conditions, including those carried forward from previous Permit, and changes requested by the Applicant are shown in **green**.
- An explanation for these changes is included after the condition in *purple italics*.

There were specific reviewer recommendations for changes or additional conditions to be included. The draft Permit conditions as posted on the ORS with track changes are in **Attachment 4**.

⁵ SLWB public registry for S07C-003 - [MVEIRB Report of Environmental Assessment and Reasons for Decision – July 3, 2009](#)

⁶ SLWB public registry for S07C-003 – [Preliminary Screening – Aug 15 07](#)

The most important question for the Board is the use of sumps for drilling waste and the requested reduced watercourse buffer for both drilling and sump locations.

The following evidence from the regulatory proceeding is presented for the Board's consideration.

- Due to the proposed location of drill targets, the Applicant is requesting the Board to reduce the standard **100 m setback** from the Ordinary High Water Mark (OHWM) of any watercourse to **30 m** from the OHWM when performing the land use activities described in the application (**Attachment 2 – Request for reduced watercourse setback**).
- The first question to address is whether the watercourses adjacent to drill locations have an OHWM to which the permit conditions would apply.
- The relevant portion of the definition of OHWM for this site is the reference to “those parts of the Watercourse bed and banks that are frequently flooded by water so as to leave a mark on the land and where the natural vegetation changes from predominately aquatic vegetation to terrestrial vegetation”.
- SCML indicated that “these watercourses are in alpine areas at the top of the watershed, where they are very small and intermittent creeks”. No fish were reported from these creeks which freeze to the bottom in winter.
- Comments from the Traditional Knowledge Study (November 2006) support this observation, “Small creeks usually freeze; today weather changes”, “Small creeks freeze. Not sure about today, it is different.”
- We therefore have indirect evidence that these intermittent headwater watercourses likely do not have a defined OHWM.
- Schedule H in the Waters Regulations sets out the requirements for a Water Licence when activities are proposed near watercourses. Deposit of Waste is permitted without a licence if one of the following criteria are met:
 2. (1) Watercourse crossings: *of watercourse that is less than 5 metres wide at ordinary high water mark at point of construction*
 - (2) Watercourse training:
 - (a) *of intermittent watercourses,*
 - (b) *of watercourses that are less than 5 metres wide at ordinary high water mark at the point of training,*
 - (c) *removal or placement of less than 100 m³ of material*
 3. Deposit of Waste: *deposit of waste if there is no direct or indirect deposit to surface water*
- The Waters Regulations would not apply to the watercourses in the vicinity of the drill locations as headwater streams are not generally wider than five metres.

- The Waters Regulations permit the removal or placement of less than 100 m³ of material. Each drill target will remove less than this amount of material, which will be replaced at completion.
- The Waters Regulations permit the deposit of waste (deposit of drill waste to a sump or natural depression) if it can be demonstrated that no waste will be directly discharged to water, or indirectly flow to water due to instability of the sump and/or overflow.
- For small projects, like this mineral exploration Project, the activities of drilling, and deposit of drill wastewater to sumps or depressions near intermittent watercourses are not prohibited as they are not likely to cause significant adverse impacts. The Applicant’s Impact and Mitigation Table demonstrates that measures will be taken to minimize any potential for direct or indirect discharge of drilling wastewater to water.
- Based on the detailed topographic map showing proposed locations of the 100 drilling targets in relation to watercourses (**Attachment 2**), approximately 40 drill holes would fall within 100 m of a watercourse, with approximately 20 drill holes within 50 m, and four less than 30 m.
- Board staff looked at all previous authorizations and the preliminary screening for the original application and compiled this information in Table 2.

Table 2: Previous Board decisions regarding approved setbacks from the OHWM of any watercourse.

Approved Setbacks from the OHWM of any Watercourse			
Authorization / Document	Drilling Location	Sump / Natural Depression	Drilling Waste /Discharge
Preliminary Screening Report	not within 30 m	not within 30 m	direct ground water/ drilling water (waste) from the drill hole for settling of fine material.
Licence S07C-003 Conditions	not within 30 m	not within 100 m	no specific condition for drill wastes to a sump no drill waste allowed to spread to the surrounding lands
Licence S16C-002 Conditions	when drilling within 100 m, contain all drill waste for off- site disposal, or deposit into Sump or natural depression.	no Sump within 100 m, unless authorized by Inspector	non-toxic drilling waste to Sump or natural depression
Licence S21C-005 Conditions	when drilling within 100 m, contain all drill waste for off- site disposal, or deposit into Sump or natural depression.	no Sump within 30 m	non-toxic drilling waste to Sump or natural depression

Applicant	not within 30 m	no Sump within 30 m	non-toxic drilling waste to Sump or natural depression
Staff/Reviewer Recommendation (R) and rationale	<u>R – drilling within 100 m</u> This would permit a drill location closer than 30 m. There are four drill locations that fall into this area. No within 30 m would need to be followed by “unless otherwise authorized by an Inspector”.	<u>R -no Sump within 100 m, unless authorized by Inspector</u> This allows a sump to be closer, and provides some oversight on the location and potential for impacts	<u>R – allow the use of sumps for non-toxic drilling waste</u> The intention has always been to direct drilling waste to sump or natural depression.
Board Recommendation	Agreed	Agreed	Agreed

- The preliminary screening for S07C-003 confirms that the Applicant applied for and described mitigation for drill locations, and the disposal of drill wastewater into sumps or natural depressions, within 30 m of any watercourse.
- The Board’s decision and permit conditions for S07C-003 approved the drill locations within 30 m, but the location of sumps was set at not within 100 m based on concerns raised by the Sahtu Renewable Resources Board (SRRB) during the review process.
- The Board’s decision for S16C-002 permitted drilling within 100 m, and the disposal of drill wastewater to a sump located more than 100 m from a watercourse, unless authorized by an Inspector.
- The condition for drilling within 100 m would permit a drill location closer than 30 m. There are four drill locations that fall into this area.
- If the no drilling within 30 m is used, it would need to be followed by “unless otherwise authorized by an Inspector” for the Permittee to remain in compliance with the condition for the four drill locations.
- The Applicant has requested the use of a sump within 30 m of these intermittent watercourses as contemplated in the original application.

Fact 1- the use of sumps for disposal of drill wastewater was always contemplated and approved by the Board in the original and subsequent authorizations.

Fact 2- It is the Inspector and Board’s preference that sumps no longer be permitted due to ongoing problems with permafrost instability and reclamation.

Fact 3- the original permit S07C-003 issued did not permit use of sumps within 100 m of a watercourse.

Fact 4- the first permit renewal S16C-002 permitted sumps closer than 100 m, if authorized by an Inspector.

It is Board staff's opinion that:

1. the use of sumps for disposal of drill wastewater should continue to be permitted,
2. sumps only be permitted closer than 100 m of any watercourse, if authorized by an Inspector, and
3. the drill locations are not restricted, but for any drill locations within 100 m of any watercourse, the drill wastewater must be contained and disposed of to a sump located greater than 100 m of any watercourse, unless otherwise approved by an Inspector.
4. The permit conditions be revised to remove the reference to the OHWM so that all watercourses, regardless of their size, will be subject to these conditions.

A draft Permit cover page is in **Attachment 5**.

5. Conclusion

- Board staff have reviewed the documents submitted for the renewal Application and found that they have been prepared in accordance with the Board's policies and guidelines.
- The Project continues to be in conformity with the Sahtu Land Use Plan.
- The Project has been confirmed to be exempt from preliminary screening as there have been no modifications to the scope or activities. The requested change in watercourse buffer from 100 m to 30 m was proposed in the original application with potential impacts and mitigation measures described and approved.
- The Board has carefully reviewed and considered all the evidence for the requested reduced watercourse setbacks. The Board will permit drill locations adjacent to any watercourse and the use of sumps for the disposal of drilling wastewater provided they are located greater than 100 m from any watercourse, unless otherwise authorized by an Inspector.
- There were many comments and recommendations regarding the draft conditions through the public review process. Board Staff are of the opinion that the terms and conditions in the Permit for **S21C-005** will mitigate any potential impacts and there were no significant public concerns raised for this Project.

6. Recommendation

Board staff recommend that the Board proceed with the regulatory process for the renewal of Permit S16C-002 by:

- 1) Confirming the **Conformity with the Sahtu Land Use Plan**.
- 2) Making a motion to approve the **Engagement Plan**.
- 3) Making a motion to approve the **Preliminary Screening Exemption**.
- 4) Making a motion to approve **Spill Contingency Plan v. 4.0**.
- 5) Making a motion to approve the **Comprehensive Waste Management Plan v. 6.0**.
- 6) Making a motion to approve the **Restoration Plan v. 1.0**.

- 7) Making a motion to approve the renewal of **Land Use Permit S21C-005** with terms and conditions for a period of five years.
- 8) Making a motion to approve the draft **Reasons for Decision (Attachment 6)** and draft **Decision Letter (Attachment 7)** prepared for the Board.

7. Reference Material Attachments

1. Application Form
2. Request for Reduced Buffer and Location Maps
3. Review Comment Table and submitted letters
4. Draft Permit conditions with track changes
5. Draft Permit cover page
6. Draft Reasons for Decision
7. Draft Decision Letter

Respectfully submitted,



Bonnie Bergsma
Regulatory Coordinator-Specialist

Executive Director Comments:



Paul Dixon
Executive Director