

Subject: Permit Renewal S16F-001

Date: Wednesday, March 17, 2021 at 3:52:51 PM Mountain Daylight Time

From: Bonnie Bergsma

To: Chuk Coulter

Hi Chuk, Thanks for the reminder about this soon to expire Permit.

S16F-001 – Type A Permit expires June 12, 2021 and authorizes the maintenance and operation of an existing private road with transfer of fuel along road as well as use of an existing quarry associated with operation of the Great Bear Lake Lodge on the Dease Arm of Great Bear Lake.

The last Inspection of the permit was completed on [August 28, 2020](#). The Inspector recommended applying for an extension prior to expiry of the permit. Extensions are easy, require only an email request and confirmation that no changes to scope or activities and no application fee. However, extensions can only be granted for 2-year periods which would not allow GBL Lodge to apply for a three-year Quarry Permit from the GNWT. Therefore, the best option is to submit an application for a 5-year renewal.

A renewal is essentially a new application for a development that has been permitted previously and is therefore exempt from preliminary screening. Applications are submitted using the same form with the same fees (\$150.00 payable to Receiver General for Canada). Link to the new [Guide to the Land Use Permitting Process](#).

Renewals do not have to be submitted prior to expiry of the current permit **UNLESS** the permittee intends on continuing the operation beyond the expiry date (June 12, 2021 for S16F-001). I would expect GBL Lodge would want a continuous operation, in which case the SLWB needs to receive the renewal application by mid-April, 2021.

The Permittee should **clearly state and clarify** in the cover letter and in the application:

- that they are applying for a preliminary screening exemption and confirm that the project has not been modified (in accordance with the Preliminary Screening Regulations and the Exemption List Regulations).
- that the renewal permit will replace the existing permit once issued (this avoids having two active permits for the same activities).
- that the renewal application covers all of the activities under the existing permit S16F-001. This will allow the Board to discontinue and grant final clearance to S16F-001, after approval of the renewal Permit (this allows the permittee to transfer the \$15,000.00 security deposit from S16F-001 to the renewal permit once final clearance is granted).

In terms of security, you would need to discuss with GNWT about amending the security ILOC to make this transfer). \$15,000.00 security (GNWT Beaufort Region – Dan Carmichael receipt # 119957)

The new draft permit conditions will be based on the previous permit. The scope of the permit must remain the same; however, conditions may be updated.

Looking at the last Inspection Report, there were two unacceptable issues:

1. Fuel storage in quarry – condition 60 (must install and use drip trays under all parked vehicles). We note that this same unacceptable condition was reported in the 2016 Inspection report.
2. Restoration of the lands – quarry / access road / greywater treatment area – related to condition 63 in Permit for submission of **an Interim Closure and Reclamation Plan (ICRP)**. See notes below

Looking at the Issuance letter and Permit from S16F-001, there were a number of items that required update and resubmission or preparation and submission. I have listed each with *some direction for each item in italics*. Since the Licence and the Permit are both linked and associated with the operation of the Lodge, it is reasonable to assume that one set of management plans required by these authorizations could be and should be prepared. This is easier for the Proponent, the reviewers, the Inspectors and the Board.

- Condition 11: Submit External authorizations – NWT Tourism Operators Licence; NWT Lands Quarry Permit; NWT Lease Agreement
The NWT Tourism Operators Licence we can transfer over; the Quarry Permit will be posted when you receive it from GNWT; I don't believe the lease agreement is required to be posted
- Condition 12: Submit Annual Reports
No Annual Reports have been submitted with the current Permit – The Application must include a 5-year report on all items listed in this condition.
- Condition 38: update Waste Management Plan, and
- Condition 58: update Spill Contingency Plan
These two plans were not updated; I have not looked at the overlap with the Licence Plans which also required some updates. It would be better to have one well-done Plan that meets requirements and Guidelines and includes all activities authorized under the Licence and Permit. Updates to these Plans should be made to the versions associated with the Licence.
- Condition 63: submit Interim Closure and Reclamation Plan for the quarry / access road / greywater treatment area
Similar to above, only one Plan needs to be prepared and approved for the Great Bear Lake Lodge Operation. During the Licence renewal, SLWB carried forward any requirements for the Permit ICRP from condition 63 that were not included in the Licence condition for the ICRP. Any updates to the ICRP should be made to the version associated with the Licence.
- Condition 72: Submit Engagement Plan
The Engagement Plan approved for the Lodge and Licence should be applicable to the Permit activities as well. An engagement record will be required to indicate that GBL Lodge has consulted and notified potentially affected parties of their intention to renew the Permit. The Engagement Plan for the Licence may be reviewed and updated if required to include information about the road and quarry.
- Condition 74: Submit Quarry Management Plan
SLWB understanding is that the Quarry Management Plan is a requirement of the Quarry Permit issued by GNWT. The Board does not also need to review and approve a Quarry Management Plan if it has been approved through their quarry permitting process.

These are my initial thoughts and notes.

The links to the application documents are on the SLWB registry home page - apply for a permit or licence in a red box.

Let me know if you have any questions.

Always happy to chat.

Bonnie

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