



March 1st, 2023

Leonard DeBastien
Executive Director
Gwich'in Land and Water Board
105 Veterans Way,
P.O. Box 2018
Inuvik, NT X0E 0T0

Water License G22L3-004, Rachel Reindeer Wellness Camp – Cancellation of Licence

Dear Mr. DeBastien

The Gwich'in Tribal Council (GTC) currently holds water licence G22L3-004 for the purpose of operating a Wellness camp (GWC) approximately 14 kilometers south of Inuvik on the east arm of the Mackenzie River. The Gwich'in Land and Water Board had approved the water licence for a term of seven years beginning July 28, 2022, and expiring July 27, 2029. During its review, the GLWB determined the classification of this licence as 'Municipal Water Use.'

The GTC would like to draw the Gwich'in Land and Water Board's (GLWB's) attention to a potential error in the interpretation of the NWT Waters Regulation that we feel has been applied to water licence G22L3-004. First and foremost, the volume of use in Column III of Schedule F – *Licensing Criteria for Municipal Undertakings* uses a lower limit of 50m³ (cubic meters) per day, and an upper limit of 2,000m³ per day for a Type B water licence. The GWC G22L3-004 licence for Municipal Water Use (camp) and Deposit of Waste specifies 2,000m³ as the annual intake limit. Of course, this places a significant restriction on camp operations, one that impedes GTC's ability to run the wellness camp effectively.

After a review of the Wellness Camp operational priorities, GTC has determined that our water use at GWC will be sub-threshold for a municipal undertaking according to the limitation set in Schedule F. *The NWT Water Regulations - Licensing Criteria for Municipal Undertakings*, sets the threshold in Column II for water use and deposit of waste permitted without a Licence as less than 50m³ per day. The GTC Wellness camp will not be running all year-round, operating for only 34 weeks per year, generally for 5 days per week. The camp has a full capacity of 43 people per day. At a 'full capacity' our estimated water consumption would be 14.4m³ per day, which is well under the 50m³ of water volume requirement triggering a class B water licence for the direct use of water and deposit of waste.

With consideration to our operational water use, GTC requests the cancellation of Water Licence G22L3-004 for the aforementioned reasons, with the understanding and commitment to reapply for a water licence should operational requirements demand greater volumes of water in the future. That being established, we will continue to operate under our Type A Land Use Permit G22H003 with no changes or modifications at this time.

If you have any comments or questions, please do not hesitate to contact our Gwich'in Wellness Camp Coordinator Jimmy Ruttan, by emailing jimmy.ruttan@gwichintribal.ca or by telephone at 867-777-7950

Tel: (867) 777-7900 • Fax: (867) 777-7919

Chief Jim Koe Zheh, 1-3 Council Crescent, PO Box 1509, Inuvik NT Canada X0E 0T0

Website: www.gwichintribal.ca



Mahsi cho for your time and attention to this matter.

Sincerely,

Sharla Greenland
Chief Executive Officer
Gwich'in Tribal Council

cc.

AlecSandra Macdonald, Regulatory Specialist, Gwich'in Land and Water Board
Angela Tripathy, GTC Chief Executive Officer
Leigh-Ann Williams-Jones, GTC Lands and Resources Manager
Darren Campbell, GTC Lands and Resources Coordinator