

Rhonda Miller - MVLWB

From: Kathleen Graham [kgraham@mvlwb.com]
Sent: August-03-11 12:42 PM
To: 'Geraldine Byrne'
Cc: screeningofficer@eastarm.com; scellis@eastarm.com; dlcarter@shaw.ca; mlcarter@telus.net; jbrennan@yellowknife.ca; rlong@yellowknife.ca; lmandeville@denenation.com; Carolc.lands@gmail.com; imadenegurl@hotmail.com; Rick.Walbourne@dfo-mpo.gc.ca; Sao_enterprise@northwestel.net; ec.ea.nwt@ec.gc.ca; Frmc53@yahoo.ca; forsmithmetiscouncil@northwestel.net; Gnwt_ea@gov.nt.ca; Rhonda_Batchelor@gov.nt.ca; Patrick_Clancy@gov.nt.ca; Duane_Fleming@gov.nt.ca; K_Johnson@gov.nt.ca; Mark_Davy@gov.nt.ca; Glen_Mackay@gov.nt.ca; hrnc@northwestel.net; intergov@inac-ainc.gc.ca; norrisa@inac.gc.ca; consultationsupportunit@inac.gc.ca; james.lawrance@inac.gc.ca; Lorraine.Seale@inac-ainc.gc.ca; Darnell.McCurdy@inac.gc.ca; Charlene.Coe@inac-ainc.gc.ca; Robert.Jenkins@inac.gc.ca; landsnresources@katlodeeche.com; doraenzoe@yahoo.ca; Lkdfn_lands@yahoo.com; vchristensen@reviewboard.ca; permits@mvlwb.com; jccarter@northwestel.net; lands@nsma.net; Matthew.Spence@cannor.gc.ca; Kate.Witherly@cannor.gc.ca; ima.nwtmn@northwestel.net; Katherine.Cumming@pc.gc.ca; Gordon.Hamre@pc.gc.ca; ceo@srfn195.com; bblack@fortsmith.ca; mrichardson@hayriver.com; SusanA@wcb.nt.ca; wfn@northwestel.net; environment@ykdene.com; tslack@ykdene.com; esangris@ykdene.com; ttsetta@ykdene.com; 'Amanda Gauthier - MVLWB'
Subject: RE: MV2011L4-0002 - NTPC - Taltson Renewal - Draft Comment Table (Pre-Proponent Response)
Attachments: MV2011L4-0002 - Draft Comment Table Aug3_11.xlsx

Geraldine,

The timeline is somewhat tight between now and the scheduled Technical session. The reviewers will need time to review NTPC's responses prior to the August 15th Technical Session. I can give you an extra day to provide your responses (until 5pm on August 9th). Also, I have included Lutselk'e Dene First Nation's comments in the attached draft comment table. Please use this version of the comment table for your response.

Thanks,

Kathleen

Kathleen Graham

Regulatory Officer

Mackenzie Valley Land and Water Board

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From: Geraldine Byrne [mailto:GByrne@ntpc.com]
Sent: Wednesday, August 03, 2011 11:53 AM
To: 'Kathleen Graham'
Subject: RE: MV2011L4-0002 - NTPC - Taltson Renewal - Draft Comment Table (Pre-Proponent Response)

Hi Kathleen,

Thanks for the draft table summarizing the comments. I am wondering if you would consider allowing me to have five business days to complete the table. This would mean I would submit it to you on August 10.

Thank you for your consideration.

Sincerely,
Geraldine

Geraldine Byrne
Business and Energy Development
NTPC / NTHydro
Yellowknife, NWT / (867) 766-5079

From: Kathleen Graham [mailto:kgraham@mvlwb.com]

Sent: Wednesday, August 03, 2011 9:16 AM

To: Geraldine Byrne

Cc: screeningofficer@eastarm.com; scellis@eastarm.com; dlcarter@shaw.ca; mlcarter@telus.net; jpbrennan@yellowknife.ca; rlong@yellowknife.ca; lmandeville@denotation.com; Carolc.lands@gmail.com; imadenegurl@hotmail.com; Rick.Walbourne@dfo-mpo.gc.ca; Sao_enterprise@northwestel.net; ec.ea.nwt@ec.gc.ca; Frmc53@yahoo.ca; fortsmithmetiscouncil@northwestel.net; Gnwt_ea@gov.nt.ca; Rhonda_Batchelor@gov.nt.ca; Patrick_Clancy@gov.nt.ca; Duane_Fleming@gov.nt.ca; K_Johnson@gov.nt.ca; Mark_Davy@gov.nt.ca; Glen_Mackay@gov.nt.ca; hrnc@northwestel.net; intergov@inac-ainc.gc.ca; norrisa@inac.gc.ca; consultationsupportunit@inac.gc.ca; james.lawrance@inac.gc.ca; Lorraine.Seale@inac-ainc.gc.ca; Darnell.McCurdy@inac.gc.ca; Charlene.Coe@inac-ainc.gc.ca; Robert.Jenkins@inac.gc.ca; landsnresources@katlodeeche.com; doraenzoe@yahoo.ca; Lkdfn_lands@yahoo.com; vchristensen@reviewboard.ca; permits@mvlwb.com; jccarter@northwetel.net; lands@nsma.net; Matthew.Spence@cannor.gc.ca; Kate.Witherly@cannor.gc.ca; ima.nwtmn@northwestel.net; Katherine.Cumming@pc.gc.ca; Gordon.Hamre@pc.gc.ca; ceo@srfn195.com; bblack@fortsmith.ca; mrichardson@hayriver.com; SusanA@wcb.nt.ca; wpfn@northwestel.net; environment@ykdene.com; tslack@ykdene.com; esangris@ykdene.com; ttsetta@ykdene.com; 'Amanda Gauthier - MVLWB'

Subject: MV2011L4-0002 - NTPC - Taltson Renewal - Draft Comment Table (Pre-Proponent Response)

Good Morning Geraldine,

Attached is the draft comment table summarizing the comments received on the Taltson Hydroelectric Facility Type A Renewal. Please insert NTPC's detailed responses to the reviewer's comments in the spaces provided and then return the completed excel spreadsheet to me by 5pm on August 8, 2011. If you have any questions, please don't hesitate to call me.

Regards,
Kathleen

Kathleen Graham

Regulatory Officer

Mackenzie Valley Land and Water Board

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Comment Summary Table - (insert file number)
(insert type of permit or licence) - (enter Proponent)

#	REVIEWER	TOPIC	COMMENT	Reviewer Recommendation	Company Response
1	AANDC	Application for Renewal of Water Licence: Hydroelectric Facility Questionnaire pg.8	NTPC states that the inclusion of an overview of the conceptual abandonment and restoration plan for the site is not applicable. AANDC position is that closure and reclamation planning is necessary. A cursory review of the public registry was initiated however we were not able to find a reference to an abandonment and restoration plan. The current water licence states that the Licensee is to annually review the approved abandonment and restoration plan and modify it to reflect changes in operation and technical advances.	It is recommended that the submission of a conceptual closure and reclamation plan. This should be added as a term and condition of the water licence. If an Abandonment and Restoration plan exists for the facility then it should be reviewed by NTPC and resubmitted following renewal.	
2	AANDC	Current NTPC Water Licence- minimum water levels for the Twin Gorges and Nonacho Lake reservoirs	Currently the WL states that the Twin Gorges Reservoir water levels must not fall below 238.9 metres, and the Nonacho Lake Reservoir water levels must not fall below 319.3 metres. It appears that this was arrived at using a drought sequence that was based on the lowest three year flood sequence on record (1969-1971), scaled to be the equivalent to the 1 in 50 year, 3 year drought. Concerns were raised by a member of the Technical Advisory Committee in 1996 that this was based on limited data. In the transcript for the NWT Water Board September 5, 1996 Public Hearing. Mr Phil Helwig, NTPC acknowledged that "it is probably time to re-evaluate the requirement given that the hydrological database is much longer." Given that this was 15 years ago, it would be prudent to use the dataset currently available to determine if these minimum water levels are still appropriate.	Use the current database to determine if any changes are warranted to the minimum water levels for the Twin Gorges and Nonacho Lake reservoirs.	
3	AANDC	Water Effects Monitoring Program Review Analysis: Table 5, 1.3	The 1999 WEMP Terms of Reference stated that interviews with residents to identify historical and potential future crossing sites and frequency of use were to take place between 1999 and 2002, yet as of January 2006 this preparatory work, along with reconnaissance level survey and short term field monitoring did not take place. NTPC's 2006 proposed Terms of Reference modifications seem to focus on the short term field monitoring task, suggesting it can be completed with a 4 or 5 day survey, however there is no mention of interviewing residents.	Interviewing of residents to identify historical and potential future crossing sites and frequency of use is important, and should take place. Consultation with local Aboriginal groups and traditional use is a requirement of AANDC's AEMP Guidelines. Please provide rationale for the proposed Terms of Reference modifications.	
4	AANDC	Water Effects Monitoring Program Review Analysis: Table 6	Shoreline erosion on Nonacho Lake has been identified by the Nonacho Lake Fishing Camp as an issue when water levels are maintained at a high level for extended periods of time however sediment and erosion monitoring is only proposed for Trudel Creek.	It is recommended that monitoring of shoreline erosion on Nonacho Lake be added to the WEMP.	

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#	REVIEWER	TOPIC	COMMENT	Reviewer Recommendation	Company Response
5	AANDC	Water Effects Monitoring Program Review Analysis, Pg.22, Section 2.4.1.2	The WEMP review analysis states that as part of the proposed Deze expansion project 20 lake trout from Nonacho Lake were tested in August 2010, and that results of the analysis were pending at the time of writing the report. It is noted that on June 28, 2011 the GNWT office of the Chief Public Health Officer released a fish consumption advisor for Nonacho Lake found at: http://www.hlthss.gov.nt.ca/pdf/public_health_advisories/2011/english/elevated_mercury_levels_in_nonacho_and_stark_lakes.pdf . This advisory included the results from the 2010 fish samples, along with samples from previous years.	AANDC feels the sampling could be conducted more frequently than the 7 year monitoring cycle proposed to begin in 2018, given the release of the health advisory and the Nonacho Lake Fishing Camp.	
6	AANDC	Water Effects Monitoring Program Review Analysis, Pg.28, Section 2.5	NTPC states that the determination of current and future erosion rates along Trudel Creek and on reaches further downstream, and the collection of water temperatures at various locations throughout the Talston River watershed , has only been initiated and has not been adequately collected to meet regulatory concerns.	AANDC feels it is important to take measures to ensure these studies are fully supported and occur as soon as possible within the next year. If concerns are noted following these studies, these will have to be adaptively managed (see comment above).	
7	AANDC	Water Effects Monitoring Program Review Analysis, Pg 30, Section 3.2	While it is understood that the Aquatic Effects Monitoring Program to be developed if the expansion project moves forward would be much more comprehensive than the current Water Effects Monitoring Program, it would be beneficial to collect as much information as possible when on site due to the remote location.	Incorporate additional data collection that has been identified for the expansion project into the existing Water Effects Monitoring Program where feasible.	
8	AANDC	Water Effects Monitoring Program	The Water Effects Monitoring Program, would benefit from an adaptive management component, where for example, operations could be changed/altered, or monitoring increased, to address concerns on a as-needed basis. This is particularly important if the term of the Water Licence is extended to 25 years.	An adaptive management component for the Water Effects Monitoring Program should be developed.	
9	DFO	Documentation in Support of the Taltson WL Renewal - 5. Major Hydro Maintenance	NTPC schedules annual maintenance plant shutdowns for after June 15 in consideration of furbearer life cycles. Ramping effects associated with plant shutdowns can also affect spring spawners such as Northern Pike.	NTPC should consider potential effects to fish species that spawn in the spring when scheduling plant shutdowns. In the Taltson expansion project, sites with high potential for stranding were to be identified followed by monitoring and an assessment of fish stranding after a shutdown event. This would be useful to incorporate into the Water Effects Monitoring Program for the existing facility.	

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10	DFO	Documentation in Support of the Taltson WL Renewal - 3.3. Main Dam and Powerhouse	The intake structure located on the upstream face of the dam is equipped with trash racks but there is no mention of screens on the penstocks to prevent fish from being swept into the turbines.	NTPC should incorporate mitigation measures to prevent fish entrainment such as fine bar racks on the existing trashracks or screens of an appropriate mesh size on the penstocks. During the Taltson Expansion Project Environmental Assessment, a commitment by Deze Energy was to investigate if screen sizes <100mm are effective in preventing applicable fish species and life stages from being entrained and if they are operationally feasible. NTPC should conduct this assessment for the existing facility to assess and mitigate potential effects to fish.	
11	DFO	Documentation in Support of the Taltson WL Renewal -3.3. Main Dam and Powerhouse	The powerhouse currently contains a single vertical shaft Francis-type turbine generator unit. A fish mortality assessment that compares this type of turbine to alternatives now available such as low head Kaplan turbines that are seen as fish friendly would be beneficial. Information gathered on this subject as part of the Deze Energy Taltson Hydro Expansion Project Environmental Assesment could be incorporated.	Add a condition to the Water Licence requiring a fish mortality assessment for the existing turbine. If the assessment indicates there is an issue, NTPC should consider potential modifications to the existing turbine or replacing it in the future with a turbine that is more fish friendly. As this may not be an option in the near future, it is even more important that mitigation measures be incorporated that prevent fish from coming into contact with the turbines (e.g. fine bar racks on the trash racks, screens on the penstocks).	
12	DFO	Water Effects Monitoring Program Review Analysis: Table 6	Riparian Habitat and Fish Usage Assessment is to include vegetation transect surveys and fish sampling via seine, net, electroshocker, minnow trapping and snorkel surveys. Based on this description, the littoral habitat is also being assessed.	NTPC should clarify that the fish usage assessment includes littoral habitat.	
13	DFO	Water Effects Monitoring Program Review Analysis: Table 6	Sedimentation and Erosion Assessment is proposed only for Trudel Creek. Shoreline erosion on Nonacho Lake has been identified by the Nonacho Lake Fishing Camp as an issue when water levels are maintained at a high level for extended periods of time. This could have negative effects on fish and fish habitat.	Monitoring of shoreline erosion on Nonacho Lake should be added to the WEMP.	

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#	REVIEWER	TOPIC	COMMENT	Reviewer Recommendation	Company Response
14	DFO	Current NTPC Water Licence- minimum water levels for the Twin Gorges and Nonacho Lake reservoirs	Currently the WL states that the Twin Gorges Reservoir water levels must not fall below 238.9 metres, and the Nonacho Lake Reservoir water levels must not fall below 319.3 metres. It appears that this was arrived at using a drought sequence that was based on the lowest three year flood sequence on record (1969-1971), scaled to be the equivalent to the 1 in 50 year, 3 year drought. Concerns were raised by a member of the Technical Advisory Committee in 1996 that this was based on limited data. In the transcript for the NWT Water Board September 5, 1996 Public Hearing. Mr Phil Helwig, NTPC acknowledged that "it is probably time to re-evaluate the requirement given that the hydrological database is much longer." Given that this was 15 years ago, it would be prudent to use the dataset currently available to determine if these minimum water levels are still appropriate.	Use the current database to determine if any changes are warranted to the minimum water levels for the Twin Gorges and Nonacho Lake reservoirs.	
15	DFO	Current NTPC Water Licence-fluctuating water levels due to operations	In the current Water Licence there is a lower limit specified for water levels in the Twin Gorges and Nonacho Lake reservoirs and minimum flow requirements for stretches of the Taltson River. However, water level fluctuations can have a significant impact on fish and fish habitat and should be monitored. For instance, a sudden drop in water levels could result in the stranding of fish eggs, potentially impacting an entire year class.	As recommended by DFO in 2006, important timing windows throughout a year that are a critical time for spawning and egg hatch should be determined so that water level fluctuations during these time periods can be avoided or at least minimized.	
16	DFO	Current NTPC Water Licence- minimum flow requirements	In the current Water Licence, a minimum flow of 14 cubic metres per second shall be maintained in the river channel between the outflow of the control structure at Nonacho Lake Reservoir and the forebay of the Twin Gorges Power Facility. A minimum flow of 28 cubic metres per second shall be maintained below the Twin Gorges Facility Power Generation Facility in the river channel at a point 100 metres below the confluence of Trudel Creek and the Taltson River. While these flows might be appropriate, it is unclear what information was used to determine this.	Rationale for the existing flow requirements should be provided for review.	
17	DFO	Water Effects Monitoring Program	For any monitoring program, it is essential to have an adaptive management framework where results trigger appropriate actions (e.g. new mitigation measures, operational changes). This is not the case with the current Water Effects Monitoring Program.	Develop an adaptive management framework for the Water Effects Monitoring Program. Annual updates should be available for review and a re-evaluation of the WEMP should be conducted at set intervals as per many other aquatic effects monitoring programs in the NWT.	

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#	REVIEWER	TOPIC	COMMENT	Reviewer Recommendation	Company Response
18	DFO	Water Effects Monitoring Program Review Analysis, Pg 30	While it is understood that the Aquatic Effects Monitoring Program to be developed if the expansion project moves forward would be much more comprehensive than the current Water Effects Monitoring Program, it would be beneficial to collect as much information as possible when on site due to the remote location.	Incorporate additional data collection that has been identified for the expansion project into the existing Water Effects Monitoring Program where feasible. Components of the AEMP identified for pre-construction monitoring include the ice regime for Nonacho Lake and Trudel Creek, dissolved oxygen monitoring in late winter, and the Tronka Chua Lake assessment.	
19	DFO	Hydroelectric Development Questionnaire	NTPC states that "the operating parameters of the Taltson Twin Gorges Hydroelectric Generating Station remain unchanged since the latest 1996 licence renewal and no changes are proposed as part of this application package." However, in Chapter 6 of the Developer's Assessment Report for Deze Energy's Taltson Hydro Expansion, it states "as the removal or rehabilitation of the Nonacho Lake control structure is likely to be required in a life extension and eventual relicensing of the existing generation facility at Twin Gorges, the construction of the new structure within the Expansion Project is of significant benefit to the existing customers of NTPC."	Please clarify whether NTPC anticipates having to replace or rehabilitate the existing Nonacho Control Structure within the requested term for the Water Licence renewal.	
20	Carter	Erosion	Erosion of the shoreline and sand esker that we see every day while at Nonacho. Further fluctuation in the shoreline will only result in more damage. Re: Erosion, My lease states on page 4 under Environmental, Clause 18 – The Lessee shall not do anything which will cause erosion of the banks of any body of water on or adjacent to the land, and shall provide necessary controls to prevent such erosion. It also states on page 4 under Environmental clause 17 – The Lessee shall at all times keep the land in a condition satisfactory to the Minister. As conscientious environmental keepers, we strongly object to any other party being able to do otherwise.		
21	Carter		High water levels have destroyed one of our buildings. Another building had to be moved back twice in the 1970's. High water levels also prevent us getting to one cabin except by boat		

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22	Carter	Mercury Levels in Fish	High mercury levels in the fish have been observed on Nonacho and Hjalmar Lakes from flesh analysis samples of Lake Trout and Northern Pike taken by DFO scientists in the 1970's and 1980'S. For example: A review of fish stocks on Nonacho Lake prepared by D.B. Stewart for Department of Fisheries and Oceans in 1999 concluded that when fish in Nonacho Lake were tested in 1986 for mercury, Lake Trout were found to be of levels not suitable for commercial sale.		
23	Carter	Mercury Levels in Fish	Subsequent testing confirm mercury levels remain high. On June 28, 2011 the chief public health officer of the Northwest Territories released a public health advisory Re: Limiting the consumption of Lake Trout eaten from Nonacho Lake. Although northern pike remains the choice sport fish of some of our tourist fishermen, to our knowledge recent mercury testing was not completed on this fish species.		
24	Carter	Cysts in Fish tissue	Cysts abundant in the flesh. These cysts were not present before Nonacho Lake became a reservoir for the Taltson River Hydroelectric Facility at Twin Gorges. This can be confirmed by sustenance aboriginal hunters and fishermen from the nearby community of Lutselk'e.		
25	Carter	Loss of Arctic Grayling habitat	The rising of waters on Nonacho Lake from the "Nonacho Lake Dam" has destroyed the portion of the Taltson River between Nonacho and Gray Lakes, essentially creating one lake with a series of narrows between the two lakes. The destruction of a substantial river current iin this part of the Taltson River has destroyed the habitat of the Arctic Grayling. We have not observed any Arctic Grayling on Nonacho Lake in nearly 40 years.		

#	REVIEWER	TOPIC	COMMENT	Reviewer Recommendation	Company Response
26	Carter		The Nonacho Lake Dam has raised water levels on Nonacho Lake to heights whereby Nonacho Lake is no flowing into Tronko Chua Lake. This has resulted in two outlets flowing from Nonacho Lake. There was no connectivity between these two lakes prior to the early 1970's and maps published prior to 1970 will confirm this. To our knowledge, no documented scientific studies have ever been conducted to assess the environmental ramifications this has caused to either the Tronka Chua or Nonacho Lake Systems.		
27	Carter	Debris	Approximately 1000 miles of Nonacho and Hjalmar Lake Shorelines are strewn with an unsightly mess of dead trees. Some of these dead trees located on northern Nonacho Lake, only miles from the barren lands, were nearly three feet in diameter.		
28	Carter		As a result, we believe granting the applicant a water licence for a further 25 years to be excessive. Furthermore, should a water licence be granted, some form of routine checks ought to be in place ensuring accountability on the part of the applicant.		
29	LKDFN	<i>"The operating parameters of Taltson Twin Gorges Hydroelectric Generating Station remain unchanged since the latest 1996 license renewal. There has been no new information unchanged since the latest 1996 license renewal."</i> (p.7)	Because of the high amount of Mercury within Nanacho Lake, there is proof of adverse changes to the water supply around the hydro dam and further studies should be carried-out to see if there are connections between this high amount of mercury within the lake and the hydro dam development.	Until studies have been carried-out, the LKDFN will not support the granting of the water license to the Taltson Hydro Dam.	
30	LKDFN	<i>"all known cases of persons or properties affected by this hydroelectric facility have been compensated"</i> (p.7)	This part of the document is completely false and without merit, whereas the issue was discussed during the 1997 water license permit renewal but it was not resolved. There are documents within the Taltson Twin Gorges Generating Station: Application for Renewal of Water License Number N1L4-0154" that showcase the motivations of the First Nations regarding the Taltson Hydro Dam and how they wanted to seek compensation for the loss of their traditional areas.	So to say that all cases of persons and property affected by the hydro dam have been compensated, is completely false and the LKDFN will continue to pursue this issue and use other sources of support if necessary.	

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31	LKDFN	“No changes to the existing permitted range of flow regime are proposed as part of this Water License Renewal Application package. Therefore, no additional impacts to the environment are anticipated.” (p.7)	Again dealing with the issue surrounding the high levels of mercury within Nanacho Lake, there are environmental issues that illustrate the negative impacts towards the watershed near the Taltson Hydro Dam.	An Environmental review should be completed that studies the current trends around the Taltson Hydro Dam	
32	LKDFN	Regarding the “NTPC Hazardous Waste Management Plan – Figure 6.1 – Waste Segregation Map” (P.49), there is no clear indication of where the used materials will be transferred to (i.e. what registered facility for recycling) or how long they must wait at the site until transfer.	The LKDFN is quite concerned with the limited knowledge pertaining to the management of waste within the area of development and detailed description of storage process.	The LKDFN requests a review that deals specifically with the amount of waste generated within the development area and management protocols of waste transfers to the registered facility for recycling.	
33	LKDFN	Within 6.1 License Modifications, there is a request to extend the Taltson Water License from 15 years to 25 years. It also states that the “NTPC was granted a water license – N1L4-0150 – for Snare Rapids, Snare Falls and Snare Forks in the 1999 for a duration of 25 years” (P.140) and also highlight other examples within Canada and United States of similar examples.		Without an in-depth environmental review on the Taltson Hydro Dam, it does not seem feasible support a big request regarding the Taltson Hydro Dam, the LKDFN believes that the current management of this development is no on par with the current handling of such a project, whereas things were quite different in 1997.	

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34	LKDFN	<p>The Lutsel K'e Dene First Nation does have issue with various claims for compensation with the Northwest Territories Power Cooperation and would like this settled. Within the document entitled "<i>Northwest Territories Water Board Reasons for Decisions – Issued Pursuant to Section 26 of the Northwest Territories Waters Act. Chap. 39. R.S.C – License Number: N1L5-0154 (Type "A")</i>" it's written that the Lutsel K'e Dene First Nation, Deninu Kue First Nation and the Salt River First Nation have addressed the issue of compensation dated August 23, 1996 and that was during the previous water license application.</p>		<p>Because this compensation issue was not settled during this time, the LKDFN believes that this topic should be addressed again to finally bring closure to the concerns of local community members that have suffered negative effects when this development brought environmental changes to the land, wildlife and watershed. Unless this issue is not discussed and negotiated with the Lutsel K'e Dene First Nation, we have no choice but to insist that the water license not be granted until we come to an agreement upon this longstanding issue.</p>	