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October 9, 2020

File: MV2020E0011
MV2020L8-0009

Sonya Saunders, Director
Strategic Infrastructure
Department of Infrastructure
Government of the Northwest Territories
P.O. Box 1320, Yellowknife, NT X1A 2L9
Yellowknife NT X1A 2L9

Sent by e-mail

Dear Sonya Saunders:

Re: GNWT - INF – Land Use Permit & Water Licence Applications Incomplete – Mount Gaudet Access Road (MGAR) Project

On October 1, 2020, the Mackenzie Valley Land and Water Board (Board) staff received, under a combined submission, Applications for Land Use Permit (Permit) MV2020E00011¹ and Water Licence (Licence) MV2020L8-0009² for the Mount Gaudet Access Road (MGAR) Project, located north of Wrigley, in the Northwest Territories (Project), from the Government of the Northwest Territories, Strategic Infrastructure, Department of Infrastructure.

The Permit Application has been reviewed and found to be lacking information required under section 19 and incomplete in accordance with paragraph 22(1)(a) of the Mackenzie Valley Land Use Regulations (MVLUR). For the Permit Application to be considered complete, refer to the MVLWB *Guide to the Land Use Permitting Process*³ (Guide) and submit the information noted in the appropriate section(s) of this correspondence.

The Licence Application has been reviewed and found to be lacking information required under section 5 of the Waters Regulations. For the Application to be considered complete, refer to the MVLWB *Guide to the Water Licensing Process*⁴ (Guide) and submit the information noted in the appropriate section(s) of this correspondence.

¹ Land Use Permit Application: <https://mvlwb.com/registry/MV2020E0011>

² Water Licence Application: <https://mvlwb.com/registry/MV2020L8-0009>

³ MVLWB [Guide to the Land Use Permitting Process](#)

⁴ MVLWB [Guide to the Water Licensing Process](#)

General

1. Confirm whether this Project, or a component(s) thereof, constitute(s) part of the Mackenzie Valley Highway Project, which is currently proceeding through the Environmental Assessment Process; (Please clarify why or why not this is not part of the ongoing Environment Assessment);
2. Provide rationale for why many of the studies undertaken and completed in support of the Project have not been submitted as part of the Application package. Some of these studies include the following: Thermal Analysis, Archaeological Impact Assessment, Hydrological/Hyrotechnical Studies, and Fish Habitat Assessment;
3. Provide timelines for the initiation and completion of the additional studies identified in Section 5.14, Pg. 32, of the Project Description Report (PDR);
4. Explain how Project-specific features and considerations associated to the Climate Resilience Assessment can be addressed by entirely relying on similar assessment(s) done for similar projects in similar geographic locations as stated on Section 12.3.3, Pg. 43, of the PDR;
5. Clarify the extent to which activities associated with the authorizations applied for would potentially be covered under Land Use Permit MV2016E0006 as suggested under Section 5.1, Pg. 18 of the PDR, and whether the Applicant intends to amend Land Use Permit MV2016E0006 to potentially address additional activities;
6. Explain why Segment #4 of the Project was not excluded from the Application scope given that no funding has been currently secured and minimal/no geotechnical work has been completed for this segment of the Project to date;
7. Confirm the current stage in the engineering design process for the Project and when detailed engineering design for the Project may be forthcoming;
8. Confirm how the MVLWB should treat the documents marked "Draft" relative to the ones not marked "Draft". "Draft" documents included in the Application package are the Quarry Operations Plan, Geotechnical Reconnaissance Report, Waste Management Plan, Project Map, and Spill Contingency Plan. Documents not marked "Draft" and forming part of the Application Package include the Project Description Report (PDR), Land Use Permit Application, Water Licence Application, Traditional Knowledge and Land Use Information, Environmental Overview, and the Engagement Plan;
9. Clarify if and/or when a Wildlife Management Plan will be submitted as part of the Application;
10. Confirm when complete details will be provided on the number, types and design of the culverts required for the project given that Section 5.6.2, Pg. 26, states that approximately 3-5 culverts will be required/kilometer of road;
11. Explain why an Explosives and/or a Blasting Management Plan was not included as part of the Application documents given that a significant amount of blasting may be undertaken by the Project. Section 5, Pg. 11, of the Quarry Management Plan includes some measures related to drilling and blasting relative to the quarry site; however, it does not address blasting that may be undertaken outside of the quarry area/extents.

Land Use Permit Application

12. Provide details of the footprint, layout, and location of the proposed 100 - person camp facility including description of proposed water use as required under Item 9, Pg. 3, of the Application;
13. Screening-related information is provided; however, a completed screening table was not included as part of the application. Provide a copy of the completed table;
14. Provide copies of the shape files associated with the Project;
15. Confirm how the Applicant intends to incorporate reclamation and closure activities associated with the Permit MV2020E00011 into existing permit MV2016E0006 as stated under Item 18 of the Permit Application;
16. Confirm when details would be forthcoming for the one (1) or two (2) road(s) mention in Section 3.1, Pg. 4 of the PDR, which may be constructed to access the quarry site;

Water Licence Application

17. Confirm the quantity of water required for the Project. Information contained in Item 6 of the Licence application states that water use will be 15-299 cubic metres/day whereas Section 5.9, Pg. 31, of the PDR states that water use will be 150-299 cubic metres/day;
18. Confirm the purpose(s) for which the requested quantity of water is required. Item 7, Pg. 3 of the Application and Pg. 31, Section 5.9 of the PDR state that water is required for dust suppression and compaction of surface gravel while Section 5.1, Pg. 18 and states that water will be used to provide temporary surfaces and winter access during frozen ground conditions. Page 2 of the Quarry Permit Application suggests that water will be used for potable purposes or camp use; and
19. Explain why Item 8, Pg. 8, of the Licence Application states that no effluent will be generated or waste deposited into water bodies while Page 2 of the Quarry Permit Application and Page 6 of Waste Management Plan state that Greywater will be deposited to sump at the camp site.

Upon receipt of this information, the Permit and Licence Applications will be reviewed as per the *Mackenzie Valley Resource Management Act*. If this information is not provided within 90 days of the date of this letter, October 9, 2020, staff will return the Application as per section 25 of the MVLUR.

Please contact Sean Joseph at (867)766-7469 by email to sjoseph@mvlwb.com or Tyree Mullaney at 867-766-7464 or by email to tmullaney@mvlwb.com with any questions or concerns regarding this letter.

Yours sincerely,



Sean Joseph
Regulatory Specialist

Cc: GNWT - Joe Acorn, Eric Vandenberg, and Kelly Bourassa
MVLWB – Tyree Mullaney, Chris Hotson, Shelagh Montgomery, and Amanda Gauthier