

## Kimberley Murray

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**From:** Elliot Holland <elliott.holland@imcprojects.ca>  
**Sent:** Friday, June 30, 2023 12:59 PM  
**To:** Kimberley Murray; Allison Stoddart  
**Cc:** manager@nahadehe.ca; ChiefSteve.nbdb@gmail.com; Raymond BOUDREAU; Sara Gordon  
**Subject:** Prairie Creek ASR Type A water licence application  
**Attachments:** CZN - ASR - Type A Licence Applications - Work Plan - June 16\_23.pdf

Kim, Allison-

On behalf of the Nahąą Dehé Dene Band, I am providing comments as requested on the work plan for the Type A water licence application for the Prairie Creek all-season road (ASR).

Based on an initial review of the application materials, the proponent's intent is to increase daily water use limits to provide operational flexibility during ASR construction and operations. The proponent is seeking to maintain the other conditions of the existing Type B water licence as much as possible.

This appears to be a primarily administrative change with limited potential environmental consequences, as long as reasonable limits on daily withdrawals in comparison to the volumes of water available in the environment are maintained.

Given this context, NDDDB considers the value of a public hearing on this matter to be limited. However, if substantive issues arise during the process that indicate the need for a hearing, NDDDB continues to recommend to the Water Board and Parks Canada that public hearings be held as close to the project location as possible, in this case, in Nahanni Butte.

We further recommend to Parks Canada that the Naha Dehe Consensus Team (NDCT) be regularly informed of the progress of this regulatory process, and we encourage Parks staff to work with Sara Gordon (NGG Agreement Implementation Coordinator) and Ray Boudreau (NDCT Secretariat Executive Director) to place these matters on upcoming NDCT meeting agendas.

Please contact me if you would like to discuss further.

Elliot

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