

Reviewer Comments and Proponent Responses

Project: Behdzi Ahda' First Nation
Board: Sahtu Land and Water Board
Organization: Behdzi Ahda First Nation Band

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
GNWT - Environment and Climate Change - Environmental Regulatory Analyst				
1	GNWT-ECC Cover Letter	Please see attached.	N/A	Acknowledged.
2	Minister Definition	The definition of "Minister" refers to the Minister of Environment and Natural Resources (ENR). As of April 1st, 2023, the Government of the Northwest Territories (GNWT) Departments of Lands and ENR merged to form the Department of Environment and Climate Change (ECC).	GNWT-ECC recommends that the definition of "Minister" be updated to refer to the Minister of GNWT-ECC.	This comment is intended for the SLWB.
3	Surveillance Network Program – Sewage Disposal Facility	<p>The Sahtu Land and Water Board (SLWB) is seeking input on the proposed Surveillance Network Program (SNP) Stations E, C, and W for the Sewage Disposal Facility (SDF). Firstly, the SLWB is seeking input on whether the three proposed groundwater monitoring wells should be converted to surface water monitoring stations. As the discharge is a surface discharge through a natural wetland it would be desirable to have surface water monitoring rather than groundwater monitoring. However, it is unclear whether there are suitable surface water monitoring locations. Figure 4 of Appendix 1 of the application package shows one small natural pond downgradient of the SDF. Other than that pond, it is unclear if other locations consistently have sufficient surface water to allow for reliable sampling.</p> <p>Secondly, the SLWB is seeking input on whether at least two of the three SNP stations should be moved closer to the pond adjacent to the SDF. As shown in Figure 4 of Appendix 1 of the application package, the three proposed locations are close together, and all further downgradient than the natural pond near the SDF. It would be desirable to have the locations more spaced out, including locations closer to the natural pond. However, as noted above, it is unclear if there would be suitable sampling locations closer to the pond.</p>	GNWT-ECC recommends that Behdzi Ahda' First Nation discuss the feasibility of selecting three locations downgradient of the SDF which consistently have sufficient surface water to allow for surface water sampling. This response should include a discussion of whether there would be suitable locations closer to the natural pond, or if the natural pond itself could be used as a sampling location.	BAFN is agreeable to have proposed SNP locations SNP-E and W converted from groundwater to surface water sampling and moved closer to the natural pond as shown on revised Figure 4, appendix 1 (attached to Proponent Responses Letter). It is thought that sufficient surface water will be present during open water season. Rather than sampling groundwater at SNP-C, surface water pond sampling is proposed instead at location SNP-P, obtaining grab samples from shore with extension pole/litre lab bottle collection.

4	Annual Report Requirements	There are several Annual Report requirements for SNP results which appear to be redundant. Schedule 2, Conditions 1b) and 1c) require tabular summaries and laboratory reports for all SNP results. Schedule 2, Conditions 1f)iii), 1f)iv), 1g)vii), 1g)viii), 1h)v), and 1h)vi) require tabular summaries and laboratory reports for SNP results pertaining to specific facilities. Considering that Schedule 2, Conditions 1b) and 1c) capture all SNP results, including requirements to submit SNP results for specific facilities is redundant.	GNWT-ECC recommends that Schedule 2, Conditions 1f)iii), 1f)iv), 1g)vii), 1g)viii), 1h)v), and 1h)vi) be removed as Schedule 2, Conditions 1b) and 1c) already require reporting of all SNP results.	This comment is intended for the SLWB.
No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Environment and Climate Change Canada (ECCC) - Jennifer Sabourin				
1	General Comment	ECCC has reviewed the Behdzi Ahda' First Nation DRAFT Municipal Water Licence for K'áhbamjítúé (Colville Lake), NT and has no comments to provide at this time.	N/A	Acknowledged.