

Reviewer Comments and Proponent Responses

Project: DEMCo - Camsell River Project
 Board: Sahtu Land and Water Board
 Proponent: DEMCo Ltd. - Denendeh Investments Incorporated

File Number: S25C-001
 Review Comments Due: February 5, 2025
 Proponent Responses Due: February 17, 2025

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Fisheries and Oceans Canada (DFO) - Ms. Anna-Maija LaFlamme				
1		<p>The DEMCo- Camsell River Project, New Type A LUP, file number: S25C-001, documents briefly discuss water withdrawal activities, the use of winter roads, the construction of temporary docks, and barge access which have the potential to impact fish and fish habitat.</p> <p>Impacts to fish and fish habitat can occur during exploration activities through loss of riparian habitat during site clearing, erosion and sedimentation, release of drilling fluids and cuttings into aquatic environments, disturbance to fish and fish habitat during sensitive life stages, and water withdrawals, particularly during low water periods, associated with drilling, surface stripping and camp operations.</p> <p>Direct fish mortality can occur during water withdrawal activities through entrainment/impingement. Entrainment occurs when a fish is drawn into a water intake and cannot escape and impingement when a fish</p>	<p>In order to comply with the Fisheries Act, it is recommended that the Proponent follow DFO's protective measures for fish and fish habitat and standard codes of practice which can be found on DFO's website (https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html and https://www.dfo-mpo.gc.ca/pnw-ppe/practice-pratique-eng.html).</p> <p>DFO recommends that the proponent review the Code of Practice for Repair, maintenance and construction of docks, moorings and boathouses), Ice Bridges and snow fills, and to respect the NWT in-water works restricted activity timing windows (Projects Near Water - Northwest Territories Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat (dfo-mpo.gc.ca)). By doing so, works, undertakings or activities where impacts to fish and fish habitat can be avoided.</p>	<p>DEMCo will review the recommended documentation, water intakes will be equipped with appropriate screens to prevent fish entrainment/impingement. This is normal best practices for all water intake systems, whether it is a domestic water draw using a small pump for domestic water or a drill, which we are not using within this permit application.</p> <p>Total water use for this project is likely less than 5 cubic meters per day. The water pump will only be on for short periods of time to fill camp water supplies. Water will be sourced from large waterbodies to prevent draw down.</p> <p>In the unlikely event that a fish is killed by activities or damage to fish habitat will occur, DEMCo or its representatives will immediately contact DFO.</p>

		<p>is held in contact with the intake screen and is unable to free itself. In addition, excessive amounts of water withdrawn from ice-covered waterbodies can impact fish through oxygen depletion, loss of over-wintering habitat and/or reductions in littoral habitat.</p>	<p>The proponent should refer to DFO's Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater available at https://www.dfo-mpo.gc.ca/pnw-ppe/codes/screen-ecran-eng.html when using fish screens and if the water intake flow is up to 0.150 m³/s, or 150 liters per second (L/s).</p> <p>For water withdrawal from watercourses, DFO recommends the proponent follow the Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada (https://waves-vagues.dfo-mpo.gc.ca/Library/348881.pdf) and demonstrates that water withdrawal rate remains <10% of actual (instantaneous) flow and does not result in flows <30% of mean annual discharge (MAD).</p> <p>If the proposal meets the criteria for a site specific review (e.g., withdrawing water during the Restricted Activity Period), as described on DFO's website (https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-003-eng.html), they should complete and submit the request for review form available on the website(https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-004-eng.html).</p>	
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			<p>If the proposal meets the criteria for a site specific review (e.g., withdrawing water during the Restricted Activity Period), as described on DFO's website (https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-003-eng.html), they should complete and submit the request for review form available on the website (https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-004-eng.html).</p> <p>It is also the proponent's Duty to Notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption, or the destruction of fish habitat. Such notification should be directed to DFO.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca</p>	
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GNWT-ECC (Environment and Climate Change) - Environmental Regulatory Analyst				
1	GNWT-ECC - no comment	The Department of Environment and Climate Change (ECC), Government of the Northwest Territories has no comments or recommendations for the consideration of the Sahtú Land and Water Board at this time regarding Denendeh Exploration and Mining Company Limited's application for a land use permit.	Please contact GNWT_EA@gov.nt.ca with any questions or concerns.	DEMCo will contact GNWT-ECC if they have any concerns.

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CIRNAC (Yellowknife) - Megan Larose				
1	Closure and Reclamation Plan - Section 2 - Roles and Responsibilities	The roles and responsibilities section of the closure and reclamation plan does not include contact information for the applicant (DEMCo Ltd).	An updated version of the closure and reclamation plan should include the correct contact information for the applicant.	Closure and Reclamation plan will be updated with correct contact information
2	Closure and Reclamation Plan - Section 6 - Security	Section 6 of the closure and reclamation plan indicates that security will be held by the Government of Northwest Territories; however, the Project Description suggests that all DEMCo's mineral claims and leases except for one lease are on land administered by the federal government. The project description also suggests that the camp and fuel storage will be located on federal land; however this should be confirmed. The security deposit would be held by the Government of Canada for land use activities that take place on federal land.	It is recommended that DEMCo confirm the land use activities that will occur on federal land and those that will occur on territorial land so that the appropriate split can be applied to the security deposit.	All the proposed land use activities will occur on federal land. Activities on the small area of territorial land will be limited to exploration field activities, and brushing of existing trails (all low impact surface exploration).
3	Waste Management Plan - Section 4.2.2 - Sewage	Section 4.2.2 of the waste management plan does not include mitigation applicable to the proposed Camsell River Project (e.g., includes reference to Ingraham trail). Details regarding how sewage will be managed and disposed of for the project are necessary.	Provide details on how sewage will be managed and disposed of for the Camsell River Project in a revised version of the waste management plan.	Revised waste management plan will correct this error. We will be using toilets that allow the collection of waste that will be shipped off-site.
4	Waste Management Plan - Section 4.2.3 - Greywater	The waste management plan indicates that camp greywater will be disposed of in a natural sump above the high water mark. However, the land use permit security worksheet indicates an area of 10m ² will be occupied by	Clarify the proposed management plan for camp greywater. If sumps are proposed, please provide details regarding size and use.	Revised waste management plan will clarify this. Natural sumps will be identified.

		sumps. Clarification is required regarding the construction of sumps for greywater disposal, including the number of sumps and size.		
5	Waste Management Plan - Off-site Disposal	The waste management plan provides a description of the anticipated waste streams generated by the project as well as an estimated amount. Most waste is identified as being removed off-site; however, it is not clear how often waste material will be removed from site.	Identify the frequency that waste will be removed from site in a revised version of the waste management plan.	Revised waste management plan will clarify this. Waste will be removed via aircraft on a weekly basis.
6	Spill Contingency Plan - Formatting and Appendices	Table 2 (Section 8.2) listing contact information for local agencies for emergency spill response extends off the page and phone numbers are cut off. Formatting is required so that the full table is visible. The appendices have not been included in the draft version of the spill contingency plan submitted for review.	Include all appendices referenced in the main document and make adjustments to Table 2 so that it fits on the page in a revised version of the Spill Contingency Plan.	Formatting to be corrected in revised spill contingency plan. It was actually believed that so many MSDS sheets have been provided over the years that we assumed this would not be a necessity. We can submit the MSDS sheets.
7	Spill Contingency Plan - location of spill response materials	Once locations have been determined, a map showing the locations of spill kits and fuel storage areas should be included in a revised version of the Spill Contingency Plan.	Include a map showing the locations of spill kits and fuel storage areas in a revised version of the Spill Contingency Plan.	Map will be included in revised spill contingency plan.
8	Draft Land Use Permit Conditions - Condition 10 and Condition 57	Land use activities on federal land require notification of the federal Resource Management Officer (Inspector). The CIRNAC federal inspector can be reached at 867 669-2442.	It is recommended that contact information for the federal inspector be included in condition #10 and condition #57 for activities that will be carried out on federal land.	DEMCo accepts this addition.
9	Draft Land Use Permit Conditions - Condition 60 - Security Deposit	CIRNAC - Resource and Land Management (RLM) used information provided in the project description, closure and reclamation plan, and	CIRNAC-RLM recommend that the Board consider a land use permit security deposit of \$33,431.25.	DEMCo accepts this change with revised higher limits on equipment that may possibly be on-site at one time.

		<p>waste management plan to prepare a land use permit security worksheet. Based on the information provided, CIRNAC-RLM suggest that the land use permit security deposit posted by DEMCo should be \$33,431.25. This varies from the estimate provided by DEMCo by \$3,403.12. The variances are identified in the attached CIRNAC-RLM LUP Security Worksheet. It most cases, variances are a result of minor clarifications required regarding number of structures and equipment requirements. Additionally, CIRNAC-RLM has based the security estimate on the assumption that the camp, fuel storage and equipment storage will be located on federal land. If this assumption is incorrect, clarity on the proposed land use activities (e.g., fuel storage) that will be located on federal and territorial land is required so that the security deposit can be split between federal and territorial lands. CIRNAC-RLM would be happy to work with DEMCo, and the Government of Northwest Territories to come to a final agreement on the security deposit required for the project.</p>		
10	Draft Land Use Permit Conditions - Condition 70 - Maximum Fuel On Site	<p>The land use permit application and project description provided by DEMCo indicate that the maximum volume of fuel on-site will include: 8,200 litres of diesel, 2,050 litres of gasoline, and 10,250 litres of aviation fuel for a total of 20,500 litres. If</p>	<p>It is recommended that the Board consider revising Condition 70 to reflect the maximum amount of fuel identified by DEMCo for the project.</p>	<p>DEMCo agrees with this change.</p>

		DEMCo is of the opinion that this is a sufficient volume of fuel for the proposed land use activities then, this should be reflected in Condition 70 of the land use permit. The land use permit security worksheet takes the total fuel volumes into consideration in the calculation of the security deposit required. Changes in the amount of fuel stored on-site would result in the need to revisit the security deposit.		
11	Federal Contaminated Site - Contaminants and Reclamation Directorate (CARD)	As identified in the Project Description, DEMCo's proposed project is located, in part, within a federal contaminated site maintained by CIRNACs Contaminants and Remediation Division (CARD). It is recommended that DEMCo continue to communicate with CIRNAC-CARD regarding project plans, access considerations related to the Terra Airstrip and any potential hazards or risks that may exist associated with establishing a camp within the Terra site.	It is recommended that DEMCo continue to work collaboratively with the CIRNAC-CARD project team regarding project plans that may overlap with contaminated sites that are monitored and managed by the CARD team CIRNAC (Megan Larose) took Comment #11 down from the ORS	DEMCo will continue to work collaboratively with the CIRNAC-CARD team.
No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
GNWT-ECE - PWNHC (Prince of Wales Northern Heritage Centre) - Danielle Desmarais				
1	Corrections/clarifications	The Engagement Log document states: "Request PWNHC to complete a desktop study of the project area for known archaeological sites." A desktop study, known as an Archaeological Overview Assessment (AOA), is not conducted by the	Change engagement log to indicate that engagement with PWNHC has only included a request and receipt of archaeological sites data and add the communications about application errors.	Engagement log will be revised to fix this.

		<p>PWNHC. Additionally, an AOA is to assess areas within a project footprint (+30m) that have high archaeological potential, which would then be subject to mitigation, either with an Archaeological Impact Assessment (AIA-High Potential OR AIA) or avoidance. The AOA should ALSO include recommendations for known/recorded archaeological sites and the person completing the AOA would submit a request for sites data to the PWNHC as part of the process of completing the AOA.</p> <p>Aurora Geosciences did submit a request and subsequently received, archaeological sites data information, but no AOA has been received. Aurora Geosciences was contacted about this error and has agreed to revise this document.</p>		
2	Corrections/clarifications	<p>Project Description states: "4.2.2 Archaeological sites of record - An information request for archaeological records within NTS 085004 and NTS 085N08 was submitted to the Prince of Wales Northern Heritage Centre. This information was submitted in support of Permit W2018C002."</p> <p>This statement is not relevant to this LUP application. Aurora Geosciences was contacted about this error and has agreed to revise this document.</p>	remove or revise statement	Project description has been updated with the correct NTS sheet numbers.

3	Protection of Historical, Archaeological, and Burial Sites	<p>The Wildlife, Archaeology, and Environment Management Plan document includes considerations for Heritage Resources. Some of these considerations are already part of regulations and/or draft conditions, but there is also the inclusion of “6. Training.... Archaeological site identification procedures”.</p> <p>Additionally, the Project Description states: “As part of this application, DEMCo has committed to completing a desktop study and any field investigation as required before constructing a camp. “ and “DEMCo sees this project as having a very low environmental impact but agrees to have an archaeological impact assessment done as a precautionary step to identify areas of interest. This could be done next summer while a field program is operational. Should any areas of interest be identified, DEMCo would adhere to any of the setbacks suggested under the Impact Assessment.”</p> <p>Although the terminology is not quite accurate* inclusion of these considerations demonstrates a proactive approach to the protection of our heritage resources and is greatly appreciated.</p>	The proponent, and all developers in the NWT, are welcome to contact us at the Prince of Wales Northern Heritage Centre, with any questions they may have about the territory’s approach and protocols for our heritage resources, before an LUP application is submitted	We will update wording to accurately reflect the correct terms, to avoid confusion.
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4	Protection of Historical, Archaeological, and Burial Sites	<p>The Draft Conditions currently include: 55. Archaeological Buffer; 56. Site Disturbance; 57. Site Discovery and Notification; 58. AIA-High Potential; and 59. AIA.</p> <p>While we are grateful for the enthusiasm to protect known and potential archaeological sites, typically conditions would include: Archaeological Overview - At least 30 days prior to any new land disturbance, including new drill sites, the Permittee shall conduct an Archaeological Overview to identify areas of high and low potential for archaeological and burial sites and shall submit a summary report to the Board and the Prince of Wales Northern Heritage Centre. with AIA – High Potential Prior to disturbance in areas of high potential for archaeological or burial sites identified in the Archaeological Overview, the Permittee shall conduct an Archaeological Impact Assessment of the sites where disturbance is planned and shall submit a summary</p>	<p>Add to draft conditions: At least 5 days prior to any new land disturbance, including new drill sites, the Permittee shall conduct an Archaeological Overview to identify areas of high and low potential for archaeological and burial sites and shall submit a summary report to the Board and the Prince of Wales Northern Heritage Centre. ARCHAEOLOGICAL OVERVIEW</p> <p>Remove from draft conditions: 59 - Prior to any new land disturbance, the Permittee shall conduct an Archaeological Impact Assessment of the sites where disturbance is planned and shall submit a summary report to the Board and the Prince of Wales Northern Heritage Centre. AIA</p> <p>Additionally, the non-invasive and non-drilling sampling and survey which is planned for 2025 fieldwork, can be conducted while the AOA and AIA-High Potential are being completed.</p>	DEMCo has no issues with these recommendations.

		<p>report to the Board and the Prince of Wales Northern Heritage Centre.</p> <p>OR</p> <p>AIA - Prior to any new land disturbance, the Permittee shall conduct an Archaeological Impact Assessment of the sites where disturbance is planned and shall submit a summary report to the Board and the Prince of Wales Northern Heritage Centre.</p> <p>For this current LUP application, the omitted Archaeological Overview condition is necessary but the last condition AIA, is not necessary.</p> <p>Fortunately, DEMco has agreed to complete an AOA (they use the term desktop study) and AIA, which in this situation would be an AIA-High Potential.</p>		
No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Environment and Climate Change Canada (ECCC) - Jessica Kassar				
1	Aircraft use and disturbance to migratory birds. Reference: Project Description Section 4.3.4 Aircraft Access	<p>The Proponent indicates there may be a potential for low-level flights during the spring, summer or fall in areas of high bird concentrations.</p> <p>The Project Description (pg. 15) states that the "... property would be most prominently accessed by fixed-wing aircraft from Déline, Norman Wells or Yellowknife, NT."</p>	<p>In order to reduce aircraft disturbance to migratory birds and subject to pilot discretion regarding safety, ECCC recommends the Proponent:</p> <p>a. Avoids known concentrations of birds (e.g. Middle Mackenzie River and Brackett Lake Important Bird Areas) by a lateral distance of at least 1.5 kilometres.</p>	<p>DEMCo will inform pilots of these recommendations. No work is planned in the vicinity of these areas outside of normal aircraft operations from the Norman Wells airport to the site. These flights will represent logistical support and will not have a high frequency. For example, when the project is in operation, 1-2 flights from Norman Wells to the site per week, depending on operational requirements. With a greater number of flights during mobilization and demobilization.</p>

		<p>Norman Wells borders Middle Mackenzie River (NT081) and Brackett Lake (NT082) Important Bird Areas (IBAs) and Terrestrial Key Habitat Sites. In the Brackett Lake area during fall, 1,500 Tundra Swans and 12,000 ducks have been recorded. Further, numerous species of shorebirds, such as Long-billed Dowitcher, Pectoral Sandpiper, and Lesser Yellowlegs, stage in the Brackett Lake area in the fall (IBA Canada).</p>	<p>b. Avoids excessive hovering or circling over areas of high bird concentrations.</p> <p>c. If avoidance is not possible, maintain a minimum flight altitude of 1,100 metres (3,500 feet) over these areas.</p> <p>d. Inform pilots of these recommendations and of areas of high bird concentrations.</p> <p>ECCC recommends the Proponent incorporates these measures into the wildlife management plan, should the Board determine that a Wildlife Management and Monitoring Plan will be required for this Project as per section 95 of the Wildlife Act.</p>	<p>Recommended measures to be incorporated into the Wildlife, Archaeology and Environment Management Plan</p>
2	<p>Project Activities Within Migratory Bird Habitat & Nesting Season. Reference: Project Description Section 4 Activities Proposed Under This Application; Engagement Plan – Prelude Project for a Wildlife, Archaeology, and Environment Management Plan</p>	<p>The Migratory Birds Regulations (MBR) prohibit the disturbance or destruction of migratory birds and their nests or eggs. The nests of all migratory birds are protected when they contain a live bird or viable egg. The project occurs during the nesting season for migratory birds which extends from early May until late August for this region (the border of Nesting Zones B8 and C8). The project includes ground-based geological, geophysical and geochemical exploration (with no drilling plan for 2 years), watercraft and small vehicle operation, and potentially drone-supported airborne geophysical surveys, which will be conducted primarily between June and October.</p>	<p>ECCC recommends the Proponent carry out all phases of the project in a manner that reduces risk to migratory birds and to avoid harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests and eggs.</p> <p>ECCC recommends that proponents should not conduct potentially destructive or disruptive activities at key locations or during key periods to avoid negative impacts to migratory birds.</p> <p>In this regard, the Proponent should take into account ECCC’s Guidelines to Avoid Harm to Migratory Birds and visit Fact Sheet Nest Protection Under</p>	<p>DEMCo will review suggested material and conduct operations in a manner to reduce the risk to migratory birds, their eggs and nests. DEMCo will contact CWS North for additional information and technical details on how best to minimize risk to migratory birds.</p>

		<p>Migratory birds, their nests and their eggs can be inadvertently harmed, killed, disturbed or destroyed because of many activities including, but not limited to, sensory disturbances from high noise activities. Harming of individual birds, nests or eggs, can have long-term consequences for migratory bird populations in Canada, especially through the cumulative effects of many different incidences.</p>	<p>the Migratory Birds Regulations, 2022 and Frequently Asked Question, Migratory Birds Regulations, 2022 for more information on the amended Migratory Bird Regulations and updates to nest protections.</p>	
3	<p>Project Activities Disturbing Migratory Bird Nesting Habitat During Nesting Season. Reference: Project Description Section 4.3.3 Summer Access; Engagement Plan – Prelude Project for a Wildlife, Archaeology, and Environment Management Plan</p>	<p>The Proponent indicates that, while existing trails and roads would be renewed and utilized whenever possible, new trails might be constructed; therefore vegetation clearing, brushing, habitat alteration and/or disturbance may be required during the general nesting period as part of project activities. The Migratory Birds Regulations prohibit the disturbance or destruction of migratory birds and their nests or eggs.</p> <p>The Engagement Plan (4.1.6 Migratory Birds) states that “Measures are in place to protect migratory birds from Project effects, specifically during nesting.” The Proponent mentions that they will avoid active nest searches and will avoid flagging active nest locations if located. If active nests are located, the Proponent will maintain a minimum 20m buffer. No</p>	<p>ECCC recommends the Proponent adequately avoid vegetation clearing, brushing, excavation, material contouring, sensory/infrastructure disturbance and/or other forms of habitat disturbance during the general nesting period, which extends from early May until late August for this region.</p> <p>The Proponent must consider options such as avoiding, adapting, rescheduling or relocating activities. If a nest containing a migratory bird or egg is discovered/disturbed, the Proponent must:</p> <ol style="list-style-type: none"> a. Halt all disruptive activities in the nesting area until nesting is complete and the young have fledged; and b. Establish a protective buffer zone around the nests. The buffer zone must be determined by a setback distance appropriate for the species, 	<p>DEMCo will make efforts to limit disturbance activities during nesting season to only those necessary for current operations. Crews working on brushing work will be made aware of the potential for disturbance, and to pay attention for signs of nesting birds, and to stop work in an area and establish a buffer zone appropriate for the species if encountered. DEMCo will need to conduct some brushing of existing trails during the summer season for both safety and access around the site.</p>

		<p>other measures to reduce disturbance to migratory birds are indicated.</p> <p>The Project is located on the border of Nesting Zones B8 and C8. In this area, migratory birds may be found nesting from early May until late August.</p> <p>During this nesting period, vegetation clearing, brushing, excavation, progressive reclamation, and material contouring activities may disturb or alter nesting habitat along with other sensory disturbances that may increase the risk of destruction or abandonment of the nests and eggs of migratory birds. It is important to note that nesting periods may vary from year to year due to climatic conditions and some species may nest outside the dates provided if conditions are favourable.</p> <p>If there are occupied migratory bird nests where work is planned, activities that could disturb or destroy nests should be avoided, adapted, rescheduled or relocated. The best way to avoid disturbing or destroying active nests is to avoid conducting harmful activities during the nesting season.</p>	<p>the intensity of the disturbance, and the surrounding habitat until the young have naturally and permanently left the vicinity of the nest.</p> <p>Proponents are encouraged to follow the guidance on ECCC's Guidelines to Avoid Harm to Migratory Birds.</p> <p>For further questions or technical information, please contact ECCC (cwsnorth-scfjord@ec.gc.ca).</p>	
4	ECCC Contact Information. Reference: Engagement Plan	The Proponent has provided an Engagement Plan for a Wildlife, Archaeology, and Environment Management Plan but has not	ECCC recommends the Proponent notify ECCC's Canadian Wildlife Service (cwsnorth-scfjord@ec.gc.ca; 867-444-9291) for instances involving:	Will add ECCC as a contact for instances involving migratory birds.

		<p>identified ECCC as a contact for instances involving migratory birds.</p> <p>ECCC has management responsibilities for migratory birds under the Migratory Birds Convention Act (MBCA).</p>	<p>a. Interactions and incidents involving the potential disturbance of individuals or nests and any mortality events of these species;</p> <p>b. Wildlife monitoring reports and annual reports that pertain to these species; and</p> <p>c. Updates to wildlife management and monitoring plans, or their equivalents, in relation to these species.</p>	
5	<p>Report Inconsistencies Reference: Land Use Permit Application - Waste Management Plan Section 4.2.2 Sewage</p>	<p>ECCC has noted the following inconsistency in the Land Use Permit Application: The Waste Management Plan (4.2.2 Sewage) states that "The porta potty will be stored in a safe location on the side of the Ingraham Trail." It is unclear why the porta potty would be located on the side of the Ingraham Trail, as the Project location is proposed for the Camsell River Property in the southeast area of Great Bear Lake. A clarification of either why this location for the porta potty was chosen or if this location was mistakenly written is necessary.</p>	<p>ECCC recommends the Proponent clarify the location of the porta potty for this Project.</p>	<p>Updated waste management plan will address this.</p>
6	<p>Species at Risk – SAR Missing and/or Effects and Measures Missing. Reference: Engagement Plan – Prelude Project for a Wildlife, Archaeology, and Environment Management Plan</p>	<p>Section 79 of Species at Risk Act (SARA) requires the assessor and decision body ensure that where a project is likely to affect a listed species or its Critical Habitat, all adverse effects of the project are identified and considered in the assessment of the project. Appropriate measures must be taken</p>	<p>ECCC recommends the Sahtu Land and Water Board ensure the Proponent:</p> <p>a. Identifies adverse effects of the Project on the listed species likely to be affected and their Critical Habitat;</p> <p>b. Takes measures to avoid or lessen those adverse effects and</p>	<p>DEMCo to update species at risk list for the project with information supplied by ECCC. DEMCo appreciates the additional information supplied by ECCC.</p>

		<p>to avoid or lessen those effects and include monitoring. Measures should be consistent with applicable recovery documents. Section 79 applies to all listed species on Schedule 1 of SARA including those listed as Special Concern, Threatened, Endangered and Extirpated. As a matter of best practice, COSEWIC-assessed species should be assessed similarly to those listed under SARA.</p> <p>The Proponent has not identified all Species at Risk that are likely to be present in the Project area; the attached table contains a list of additional species that are likely to be encountered in the Project area that have been assessed as at risk by COSEWIC or listed on Schedule 1 of SARA.</p> <p>The Proponent has not identified all adverse effects of the Project on Species at Risk and Boreal Caribou Critical Habitat (NT1 range). The Project may have additional adverse effects on listed species including: impacts due to noise or other sensory disturbances, wildlife injury or mortality, and exposure to toxic or hazardous substances.</p>	<p>monitor them to inform adaptive management; and</p> <p>c. Implements mitigation and monitoring measures that are consistent with applicable listed species Recovery Strategies and Action Plans or Management Plans. Where the Proponent may encounter a listed species, the primary mitigation measure should be avoidance. ECCC recommends the Proponent:</p> <p>d. Submit monitoring reports to the appropriate regulators and organizations with management responsibility for that species. Monitoring should include recording the timing and location of observed listed species, their behavior when encountered, and actions taken by the Proponent to avoid disturbance to the species, its habitat, and/or its residence.</p>	
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