From: <u>EISC</u>

To: "Joel Gowman";

cc: EISC; "Wall, Erica"; "Watson, Ernest"; "Claire Singer"; "Stone, Ivy [Yel]"; "Mike Fournier"; "Myra Robertson";

Sheila Nasogaluak; "shhtc@nt.sympatico.ca";

Subject: EISC Decision: INAC (GOWMAN) INAC Contaminated Sites Program- Johnson Point Site Remediation [02/08-

01]

**Date:** Monday, March 10, 2008 6:30:28 PM

Attachments: ENR Comments - CARD-INAC - Johnson Point Site Remediation.pdf

DFO Comments (WATSON) Johnson Point Site Remediation.pdf

EC (STONE) Johnson Point Site Remediation.pdf

Decision Form March 2008.pdf

INAC (GOWAN) EISC Decision Letter March 10, 2008.pdf

Please find the attached information regarding the above noted project submission screened at the February 27-March 1, 2008 Environmental Impact Screening Committee meeting.

#### **Barb Chalmers**

Environmental Assessment Coordinator
Environmental Impact Screening Committee
Joint Secretariat-Inuvialuit Renewable Resource Committees
107 Mackenzie Road, Suit 204
PO Box 2120
Inuvik, NT X0E 0T0
TEL 867-777-2828 FAX 867-7772610
eisc@jointsec.nt.ca

# **ENVIRONMENTAL IMPACT SCREENING COMMITTEE**



Submission Number: [02/08-01]

March 10, 2008

#### **INAC**

Indian and Northern Affairs Canada PO Box 1500 5103 - 48th Street Yellowknife NT X1A 2R3

ATTENTION: MR. JOEL GOWMAN, PROJECT MANAGER

Dear Sir/Madam:

RE: INAC (GOWMAN) INAC Contaminated Sites Program- Johnson Point Site Remediation

During a meeting held February 29- March 1, 2008 the Environmental Impact Screening Committee (EISC) screened the above noted project description. Based on the information provided, the EISC concluded that the development, development will have no significant impact and may proceed without environmental impact assessment and review under the Inuvialuit Final Agreement. [IFA Section 11.(17)a]. A copy of the decision is attached.

The EISC has approved this project for the period 2008 to 2011field seasons as requested. In providing this approval the EISC reminds the developer that any significant change in the project description or a significant incident will require the re-submission of the project for environmental screening. The developer should submit an annual report to the EISC on the project.

Attached is the advice received from the Fisheries and Oceans Canada, Environment and Natural Resources (GNWT) and Environment Canada for your information.

Not sure if there were others!?

Sincerely,



Barb Chalmers
Environmental Assessment Coordinator

cc. Fisheries and Oceans Canada
Fisheries Joint Management Committee
Environment and Natural Resources (GNWT)
Environment Canada
Sachs Harbour HTC

Attachments: Fisheries and Oceans Canada
Environment and Natural Resources (GNWT)
Environment Canada

JOINT SEC

NO. 031 P. 3



# ENVIRONMENTAL IMPACT SCREENING COMMITTEE

NAME OF PROPONENT: INAC (GOWMAN)

PROJECT DESCRIPTION: INAC Contaminated Sites Program- Johnson Point Site

Remediation [02/09-01]

# **DECISION OF THE SCREENING PANEL (circled):**

The development will have no such significant negative impact and may proceed without environmental impact assessment and review under the Inuvialuit Final Agreement. [IFA s. 11. (17) (a)]

- 2. The development if authorized subject to environmental terms and conditions recommended by the screening committee, will have no such significant negative impact and may proceed without environmental assessment and review under the Inuvialuit Final Agreement. [IFA s. 11(17)(b)]
- 3. The development could have significant negative environmental impact and is subject to assessment and review under the <u>Inuvialuit Final Agreement</u>. [IFA s. 11. (17) (c)]
- The development proposal has deficiencies of a nature that warrant a termination of its consideration and the submission of another project description. [IFA s. 11. (17) (d)]

Signed on the \_\_\_\_ day of March 2008.

Fred McFarland, Chair

Albert Ruben, GNWT Member

Ron Gruben, Inuvialuit Member

Morris George, YTG Member

Eric Cockney, Indvialuit Member

Johnny Lennie, Canada Member

Darren Nasogaluak, Inuvialuit Member



Pêches et Océans Canada

Your file Votre réference

Fish Habitat Management Suite 101, 5204-50<sup>th</sup> Avenue Yellowknife, Northwest Territories X1A 1E2 Gestion de l'Habitat du Poisson Suite 101 5204, 50e Avenue Yellowknife (Territoires du Nord-Ouest) X1A 1E2

Our file Notre réference

February 25, 2008

Barb Chalmers, Environmental Assessment Coordinator Environmental Impact Screening Committee Joint Secretariat – Inuvialuit Renewable Resource Committees P.O. Box 2120 Inuvik, NT X0E 0T0

Dear Ms. Chalmers:

#### Re: Johnson Point Site Remediation, Banks Island, NT

Department of Fisheries and Oceans – Western Arctic Area (DFO) has reviewed the Application for Environmental Impact Screening for the Johnson Point Site Remediation, submitted to the Environmental Impact Screening Committee (EISC) by Indian and Northern Affairs Canada - Contaminates and Remediation Directorate (INAC). Our review was limited to potential risk to fish and fish habitat. Based on the information provided and a site visit conducted on July 31, 2007, we have concluded that the project is not likely to cause significant adverse effects on fish and fish habitat. DFO provides the following comments for consideration to assist the EISC in screening the proposed works:

INAC has engaged DFO during the development of the plan and we will continue to work cooperatively to ensure the protection of aquatic environments during site remediation activities.

Remedial activities have the potential to impact fish. Of most concern are activities that have the potential to contribute sediment to water courses. Some of these include development of borrow sources, construction of barge landings, road upgrades, airstrip repairs, and drainage repairs. Also of concern is the long term stability of any infrastructure such as the airstrip. As such, DFO recommends the following measures be incorporated into the project to ensure that any potentially adverse effects on fish and fish habitat will be mitigated:

- 1. The long term stability of the airstrip, including cross drainages and culverts, should be ensured.
- All road culverts should be removed and drainages stabilized upon completion of remedial activities.
- 3. To avoid the Arctic char migration period in the unnamed river, in water works should not occur between September 15 and October 30 of any year.
- 4. Machinery should be operated in a manner that minimizes disturbance to the bed and banks of any watercourse.
  - a. To prevent additional disturbance, all vehicular traffic should be restricted to the road unless necessary for remedial works.
  - b. Machinery should be clean and free of fluid leaks.
  - c. Wash, refuel and service machinery and store fuel and other materials for the machinery away from the water to prevent deleterious substances from entering the water.



- An emergency spill kit should be on site in case of fluid leaks or spills from machinery.
- 5. Waste materials removed from the work site should be located above the ordinary high water mark and stabilized to prevent them from entering any watercourse. Spoil piles could be contained with silt fence, flattened, covered with biodegradable mats or tarps, and/or planted with preferably native grass or shrubs.
- 6. Effective sediment and erosion control measures should be installed before starting work to prevent the entry of sediment into the watercourse. Particular attention should be paid to the road ditches and drainages. These measures should be maintained until complete re-vegetation of disturbed areas is achieved or until such areas have been permanently stabilized by other effective sediment and erosion control measures, in the event that re-vegetation is not possible.
- 7. Disturbed areas should be vegetated by planting and seeding preferably native grasses and cover such areas with mulch to prevent soil erosion and to help seeds germinate. If there is insufficient time in the growing season remaining for the seeds to germinate, the site should be stabilized (e.g., cover exposed areas with erosion control blankets to keep the soil in place and prevent erosion) and then vegetated the following spring. If re-vegetation is not possible due to climatic extremes and/or lack of appropriate seed or stock, the site should be stabilized using effective sediment and erosion control measures. Care should be exercised to ensure these measures do not cause thawing or frost heave.
- 8. Effective sediment and erosion control measures should be maintained until complete re-vegetation of disturbed areas is achieved or until such areas have been permanently stabilized by other effective sediment and erosion control measures, in the event that re-vegetation is not possible.

Please note that this letter does not constitute authorization of the proposed work pursuant the *Fisheries Act*. It is the proponent's responsibility to obtain any approvals that may be required under any other piece of legislation.

DFO appreciates the opportunity to provide comments on the above material. I can be contacted at (867) 669-4927 if you wish to discuss any of the foregoing in more detail.

Sincerely,

Ernest Watson

Senior Habitat Biologist Fish Habitat Management

Department of Fisheries and Oceans

Emo Walsan

cc: D. Moggy, DFO

E. Wall, DFO

A. Joynt, DFO

T. Stein, DFO

J. Gowman, INAC-CARD

E. Pike, INAC-CARD

D. Arey, INAC

C. Baetz, INAC

L. Lowman, EC

**NWT Water Board** 





Environmental Protection Operations Directorate Suite 301, 5204 - 50<sup>th</sup> Avenue Yellowknife, NT, X1A 1E2

February 21, 2008

Secretary
Environmental Impact Screening Committee
P.O. Box 2120
Inuvik, NT
X0E 0T0

Our file:

Via email

## Re: Johnson Point Site Remediation, Application for Environmental Screening

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned document. The following comments are provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the Canadian Environmental Protection Act, Section 36(3) of the Fisheries Act, the Migratory Birds Convention Act, and the Species at Risk Act.

Environment Canada has the following general comments relative to this file:

1. Meeting the requirements of the *Fisheries Act* is mandatory, irrespective of any other regulatory or permitting system. Section 36(3) of the *Fisheries Act* specifies that unless authorized by federal regulation, no person shall deposit or permit the deposit of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water. The legal definition of deleterious substance provided in subsection 34(1) of the *Fisheries Act*, in conjunction with court rulings, provides a very broad interpretation of deleterious and includes any substance with a potentially harmful chemical, physical or biological effect on fish or fish habitat.

With respect to the transport, handling and storage of fuels and hazardous materials, Environment Canada has the following recommendations.

- 2. All sumps, pits, spill basins and fuel caches shall be located above the high water mark of any waterbody and in such a manner as to prevent the contents from entering any waterbody frequented by fish. Therefore, please note that maintaining a buffer of 30 m may not always be an adequate preventative measure.
- 3. Environment Canada recommends the use of secondary containment with an impervious liner, such as self-supporting insta-berms, for storage of all barreled fuel rather than relying on natural depressions to contain spills.
- 4. The proponent shall ensure that all hazardous wastes, including waste oil, receive proper treatment and disposal at an approved facility.
- 5. Please note that fuels or hazardous materials cached for this study must be removed at the end of the project.
- 6. The proponent shall have a Spill Contingency Plan in place prior to establishing any fuel caches.
- 7. Please note the following regarding a Spill Response Plan that should already be in place for the this project:
  - Please note that there should be a site specific Spill Response Plan that provides a clear path of
    response in the event of a spill and that indicates how the proponent will meet the requirements of
    prevention, preparedness, response and recovery.
  - The plan should provide a map of the campsite, indicating the location fuel storage areas and spill kits.
  - The Plan should provide contact information for individuals on site who should be notified if a spill occurs, as well as contact information for relevant government agencies that should be notified.
  - The appropriate contact information for Environment Canada is included below:

- The 24 hour Emergency Pager, monitored by Environment Canada Emergencies personnel: Tel: 867-766-3737.
- 8. **All spills** shall be documented and reported to the 24 hour Spill Line at (867) 920-8130. The Plan should provide a copy of the NWT/NU Spill Reporting Form and contact number for the Spill Line (867-920-8130).
- 9. Drip pans, or other similar preventative measures, shall be used when refueling equipment on site.

  Drip pans should also be used when equipment is left idling for any length of time in a stationary position.
- 10. The Spill Contingency Plan should provide direction regarding response actions for spills on various types of terrain (ex. spills on land, water, snow/ice, muskeg, etc...).
- 11. The Spill Contingency Plan should provide an inventory of spill response resources, and clearly indicate where these resources are located.
- 12. Except for immediate use, the permittee shall not erect camps or store materials on the surface ice of any water body.

With respect to waste management, Environment Canada recommends that the following conditions be applied through all stages of the project:

- 13. All sumps shall be backfilled upon completion of the project and recontoured to match the surrounding landscape.
- 14. Environment Canada recommends that equipment and material brought to site for this project should be packed out on project completion.
- 15. For disposal of combustible material that cannot be shipped out, Environment Canada recommends the use of an approved incinerator.
- 16. All non-combustible solid wastes (e.g., potable water bottles) shall be disposed of at an appropriate facility, e.g., Yellowknife, NT. The proponent is encouraged to make use of recycling facilities for all recyclable materials.
- 17. Environment Canada recommends that camp waste be made inaccessible to wildlife at all times. Camp waste can attract predators of migratory birds (e.g., foxes and ravens) to an area if not disposed of properly.
- 18. With respect to greywater discharge, EC has the following comments:
  - Given that this discharge is overland and is not directed towards fish bearing waters, and also given that the greywater will be treated with UV, EC doesn't have significant concerns for this discharge to the environment.
  - We don't recommend chlorination treatment for a couple of reasons. Specifically, chlorination will inhibit natural breakdown processes and it also forms chloramines. For these reasons, we discourage chlorine treatment of the greywater.

The Canadian Wildlife Service (CWS) of Environment Canada has reviewed the above-mentioned submission and makes the following comments and recommendations pursuant to the *Migratory Birds Convention Act* (the *Act*) and *Migratory Birds Regulations*), and the *Species at Risk Act* (SARA).

- 19. Section 6 (a) of the Migratory Birds Regulations states that no one shall disturb or destroy the nests or eggs of migratory birds. In order to minimize the risk of accidentally disturbing or destroying nests or eggs of migratory birds during demolition or remediation activities, Environment Canada recommends the following mitigation measures for migratory birds:
  - a. Structures with known nesting areas should be taken down either before or after the nesting season.
  - b. If other demolition or remediation work occurs during the nesting season, these areas should be inspected for active nests before any demolition or remediation work starts.
  - c. If active nests (i.e., nests containing eggs or young) are discovered, the proponent should delay any work in the area until nesting is complete (i.e., the young have left the nest).
- 20. Section 5.1 of the *Migratory Birds Convention Act* prohibits persons from depositing substances harmful to migratory birds in waters or areas frequented by migratory birds or in a place from which the substance may enter such waters or such an area.

- 21. Environment Canada recommends that the proponent follow the Inuvialuit Wildlife Management Advisory Council / Inuvialuit Game Council flight altitude guidelines, which includes recommended minimum altitudes of 650 m when flying over areas likely to have birds and 1100 m over areas where birds are known to concentrate. Environment Canada also recommends that aircraft maintain a minimum horizontal distance of 1500 m from any observed concentrations (flocks / groups) of birds.
- 22. Environment Canada recommends that camp waste be made inaccessible to wildlife at all times. Camp waste can attract predators of migratory birds (e.g., foxes and ravens) to an area if not disposed of properly.
- 23. All mitigation measures identified by the proponent, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of the proponents' representatives (including contractors) conducting operations in the field. Environment Canada recommends that all field operations staff be made aware of the proponents' commitments to these mitigation measures and provided with appropriate advice / training on how to implement these measures.
- 24. Implementation of these measures may help to reduce or eliminate some effects of the project on migratory birds, but will not necessarily ensure that the proponent remains in compliance with the *Migratory Birds Convention Act* (the *Act*) and *Migratory Birds Regulations* (the *Regulations*). The proponent must ensure they remain in compliance with the *Act* and *Regulations* during all phases and in all undertakings related to the project.
- 25. The following comments are pursuant to the Species at Risk Act (SARA), which came into full effect on June 1, 2004. Section 79 (2) of SARA, states that during an assessment of effects of a project, the adverse effects of the project on listed wildlife species and its critical habitat must be identified, that measures are taken to avoid or lessen those effects, and that the effects need to be monitored. This section applies to all species listed on Schedule 1 of SARA. However, as a matter of best practice, Environment Canada suggests that species on other Schedules of SARA and under consideration for listing on SARA, including those designated as at risk by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), be considered during an environmental assessment in a similar manner.

Terrestrial Species at			Government Organization
Risk potentially within	COSEWIC		with Primary Management
project area 1	Designation	Schedule of SARA	Responsibility <sup>2</sup>
Peary Caribou	Endangered	Pending	GNWT
Red Knot	Endangered	Pending	EC
Polar Bear	Special Concern	Pending	GNWT

<sup>&</sup>lt;sup>1</sup> The Department of Fisheries and Oceans has responsibility for aquatic species.

Impacts could be disturbance and attraction to operations.

## **Environment Canada recommends:**

- Species at Risk that could be encountered or affected by the project should be identified and any potential adverse effects of the project to the species, its habitat, and/or its residence noted. All direct, indirect, and cumulative effects should be considered. Refer to species status reports and other information on the Species at Risk registry at www.sararegistry.gc.ca for information on specific species.
- If Species at Risk are encountered or affected, the primary mitigation measure should be avoidance. The proponent should avoid contact with or disturbance to each species, its habitat and/or its residence.
- Monitoring should be undertaken by the proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, this monitoring should include recording the locations and dates of any observations of Species at Risk, behaviour or actions taken by the animals when project activities were encountered, and any actions taken by the proponent to avoid contact or disturbance to the species, its habitat, and/or its residence. This information should be submitted to the appropriate regulators and organizations with management responsibility for that species, as requested.
- For species primarily managed by the Territorial Government, the Territorial Government should be consulted to identify other appropriate mitigation and/or monitoring measures to minimize effects to these species from the project.
- Mitigation and monitoring measures must be taken in a way that is consistent with applicable recovery strategies and action/management plans.

<sup>&</sup>lt;sup>2</sup> Environment Canada has a national role to play in the conservation and recovery of Species at Risk in Canada, as well as responsibility for management of birds described in the *Migratory Birds Convention Act* (MBCA). Day-to-day management of terrestrial species not covered in the MBCA is the responsibility of the Territorial Government. Thus, for species within their responsibility, the Territorial Government is best suited to provide detailed advice and information on potential adverse effects, mitigation measures, and monitoring.

26. Environment Canada notes that the Red Knot (a shorebird) was designated as at risk by COSEWIC in April 2007. Red Knots breed on Banks Island. Although the major threats to Red Knot relate to habitat degradation in the wintering areas and decreases in food resources during spring migration, the proponent should ensure that extra precautions are taken to avoid any disturbance to the Red Knot or its habitat during the breeding season.

Red Knots nest on barren habitats (often less than 5% vegetation) such as windswept ridges, slopes or plateaus. Nest sites are usually in dry, south-facing locations, and may be located near wetlands or lake edges, where the young are led after hatching. Nests are simple scrapes on the ground in small patches of vegetation. Nesting will occur in June with hatching in early July. If an active Red Knot nest is encountered during project activities, or observations of Red Knot in the area suggest that a nest could be nearby, the proponent should avoid all activities in the area until nesting is complete (i.e., likely only resume activities in the area until after mid-July).

Observations of Red Knots should be reported to the Canadian Wildlife Service of Environment Canada through the NWT/NU Bird Checklist program.

NWT/NU Bird Checklist Survey Canadian Wildlife Service, Environment Canada 301-5204 50<sup>th</sup> Ave Yellowknife NT, X1A 1E2 Phone: 867.669.4773

Email: NWTChecklist@ec.gc.ca

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 669-4708 or by email at ivy.stone@ec.gc.ca.

Sincerely,

Ivy Stone Environmental Assessment / Contaminated Sites

CC: Mike Fournier (Northern Environmental Assessment Coordinator, EPOD, Environment Canada, Yellowknife, NT) Myra Robertson (EA Coordinator, CWS, Environment Canada, Yellowknife, NT) Barry Munson (Manager, Contaminated Sites, EPOD, Environment Canada, Edmonton)



February 27, 2008

Barb Chalmers
Environmental Assessment Coordinator
Environmental Impact Screening Committee
The Joint Secretariat – Inuvialuit Renewable Resource Committees
P.O. Box 2120
Inuvik, NT X0E 0T0

Dear Ms. Chalmers:

## CONTAMINANTS AND REMEDIATION DIRECTORATE (INAC), 02/08-01 Contaminated Sites Program – Johnson Point Site Remediation.

The Department of Environment and Natural Resources (ENR) has reviewed the above project description based on its mandated responsibilities under the *Wildlife Act*, the *Forest Management Act (FMA)* and the *Environmental Protection Act (EPA)* and submits the following comments for consideration.

## **Specific Concerns / Recommendations**

## Species at Risk

The Species at Risk Act (SARA) states that adverse effects on listed species must be identified and assessed, and regardless of significance, mitigated and monitored (Section 79). It is ENR's view that the treatment of those species listed under the Act be consistent with the treatment of species assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC).

The following COSEWIC listed species have the potential to occur in the project area:

- Polar bear (Special Concern)
- Peary caribou (Endangered)
- Peregrine falcon (Special Concern)
- Grizzly bear (Special Concern)

To sufficiently minimize potential impacts to Peary caribou, the Proponent should adhere to the following:

 Minimum flight altitudes of no less than 300m should be maintained at all times other than take-off and landing. Aircraft over-flights can disturb wildlife, thereby increasing stress to the animals and potentially extending to effects on overall health and condition. Lactating cows face extreme demands on their nutritional reserves and are therefore particularly vulnerable to disturbance during post-calving. Further, calves and cows may get separated if an intense disturbance such as low-level helicopter over-flight causes the animals to run.

- If caribou approach or are encountered within 500m of project activities, the Proponent should cease operations until caribou are no longer within that range.
- Caribou should not be approached or harassed by people on foot or in vehicles.

#### **General Concerns / Recommendations**

ENR acknowledges and supports the mitigative measures set out by the Proponent, but includes the following additional comments to ensure the protection of both wildlife and researchers in the project area:

- Improper food and waste storage, handling and disposal can lead to the attraction and subsequent habituation of bears and other carnivores. It is important that attractants be minimized and that proper food and waste handling techniques be used.
  - Burning garbage in pits or barrels and storing garbage for fly-out are the most common causes of wildlife conflicts. Wastes must be completely burned or stored in sealed, odour-proof containers. Storing refuse in a manner likely to attract wildlife is a violation of the Wildlife Act.
- Harassing wildlife can lead to greater expenditures of energy on the part of the animal and a loss of fitness. This is especially important for mammals in the winter and when female animals are still feeding their young through lactation. This is also critically important for raptors during the nesting season. ENR considers the chasing or stalking of wildlife for photography or during Eco-Tourism to be harassment. No wildlife should be disturbed, chased or harassed by human beings on foot, in a motorized vehicle or by aircraft.
- Although the concept of feeding small mammals and birds seems trivial, it is in fact a large problem. The increase in local food supply will increase the likelihood of wildlife immigrating to the area, which may include predators and scavengers. This may lead to nuisance wildlife that may have to be destroyed. The grouping together of large concentrations of animals also increases the potential for the spread of diseases. No wildlife should be purposefully encouraged to habituate to human presence (i.e. do not feed wildlife).
- All field personnel who spend more than three weeks in the field a year should complete a bear-safety training course. This is both a worker safety and wildlife issue. ENR feels that if all field workers have bear safety training and learn how to react to bears, the cases of bear attacks and the number of bears

destroyed as nuisance wildlife will correspondingly decrease. This training is also important because it will inform employees and owners on proper bear proofing methods for camps.

## **Requests of the Proponent**

- ENR requests that the Proponent record and forward all bear sightings to the local Wildlife Officer at the earliest opportunity. This will give ENR a better understanding of the location and frequency at which bears investigate camps and other developments. It will also increase ENR's ability to relocate bears that frequent developments before they become habituated and must be destroyed as nuisance wildlife.
- ENR requests that the Proponent contact the local Renewable Resource Officer as soon as possible is there are any problems with bears.

lan Ellsworth: Inuvik 777-7230 / 777-1185 (cell) / 777-7236 (fax)

Lizz Gordon: Inuvik 777-7201 Owen Allen: Inuvik 777-7247

Paul Voudrach: Tuktoyaktuk 977-2350 / 977-2335 (fax) lan McLeod: Aklavik 978-2248 / 978-2756 (fax)

• To aid in ENR's tracking of impacts to wildlife and to monitor the responses of species at risk to development activities, we request that the Proponent provide ENR's Inuvik Regional Biologist with records of any wildlife sightings made during the program. This information should include, if possible, information on location (GPS, if possible) and the number and reaction of the wildlife to overflights or other project activity (if applicable). This information would provide distribution information and could be used to help plan future mitigation.

Should you have any questions or concerns with regards to the above, please do not hesitate to contact Claire Singer, Environmental Regulatory Analyst, at (867) 920-6591 or Claire\_Singer@gov.nt.ca.

Sincerely,

Claire Singer

**Environmental Regulatory Analyst** 

**Environmental Assessment and Monitoring** 

**Environment and Natural Resources** 

C. Karin Clark Environmental Assessment Coordinator Wildlife Division

> Marsha Branigan Manager Wildlife Division – Inuvik Region