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# **Sustainable Development Comments** **NIRB 99TN042** **Fishing and Hunting Lodge on Ennadai Lake**

## **General Comments**

It might be necessary for the Water Board to determine some guidelines for the submission of proposals in order to standardize submissions. The Director for Environmental Protection has been receiving proposals of various types and many are extremely poor submissions. This particular submission doesn't even have page numbers, making it very difficult to comment/review by page numbers.

It is important that see Land Use Guidelines being referred to in the application.

✓ This Document has no spill contingency plans. *Spell*

## **Water supply**

- What does sufficient height to service the lodge mean? It is necessary to outline an approximation of the volume of water needed for the operation. *802/p day*
- Is there a necessary permit to take water? A permit should be issued for the operation to take water for commercial/domestic uses.

## **Grey water and sewage disposal**

- This section is very deficient. *what additional info is req'd*
- Where will the septic pits be located in relation to the existing water body?
- Is the lake down slope from the septic systems? If yes what precautions are being taken to prevent effluent from entering this existing water body?
- What precautions will be taken to ensure protection of the Lake and the River (at the camps)?
- Will these pits be re-used year after year? If so what precautions will be taken to ensure that they are not a safety/animal hazard during the months when not in use?
- Grey water should be adequately treated before the operation is given clearance or released from responsibilities in the area.
- All latrine must be treated from time to time for aesthetic purposes.
- All latrine pits must be limed, properly covered, and reclaimed upon shutdown.
- It is necessary to submit an outline a drawing of the pits with method of protection for use during the months when not in use.

## **Garbage Disposal**

- The proposal indicated methods of incinerating and recycling will be used according to local regulations. It is very necessary to outline in detail all of the methods to be utilized.
- The word incineration was utilized; what does this mean? Are there plans for moving an incinerator on site? If so what are the specifications? **REMEMBER OPEN BURNING IS NOT INCINERATION !!**
- It is necessary to develop a Waste Management Plan for all wastes generated as a result of the operation. This should be resubmitted.

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**Hazardous Materials, Fuels, etc.**

- It is necessary to develop a Spill Contingency Plan for the development.
- A list of all hazardous materials should be sent to Environmental Protection. The list should include why the material is required and how it will be removed after the site is closed.
- All necessary permits must be obtained before any hazardous materials are transported to the site.
- All empty containers must be removed from the site and dealt with in accordance of existing Nunavut Guidelines (Former GNWT). Any hazardous materials that are left over after the operation is completed must be removed and addressed according to existing guidelines.
- All fuel drums should be stored in an area that is appropriately designed for that purpose. The storage area should be lined and bermed. Any spillage must be reported to the regulatory authority and must be cleaned-up immediately to the satisfaction of the regulatory authority.
- Any spill of any contaminant must be reported to the Spill Line.
- Contaminated soil as a result of fuel spillage must be properly treated before leaving the site.
- All Barrels (empty, partially full, or full) must be removed from the site before the site is abandoned.
- No Barrels are to be buried in the landfill area.
- All fuel caches must be removed and the site totally reclaimed after use.
- Adequate protection from freezing should be installed in all fuel systems in order to minimize or eliminate accidents as a result of cold effects.

**Equipment, vehicles, skidoos, etc.**

- Any equipment on site must be properly utilized.
- All parts (old or otherwise) must be stored at one location and must be removed and taken away when work is completed.
- No malfunctioning parts, old skidoos, old vehicles, etc. are to be buried in the landfill site. All old machinery (non-functional) must be removed from the site and taken away.

**Wildlife and their Habitat**

- There is no Plan attached to this screening request by the proponent detailing how they will deal with Human/wildlife conflicts. A Plan needs to be developed and submitted and approved prior to approval being given to the project.
- **This project was not reviewed as a hunting venture.** No hunting should be associated with this project unless the proponent applies for and receives the proper hunting permits. In fact, if this project does seek approval to become a hunting facility it will be necessary to review the impacts of this operation.

**Heritage Resources**

- All temporary and permanent Camp facilities should not be visually or otherwise obtrusive, be properly maintained, and compatible with conservation of natural and cultural heritage resources, any artifacts found along the river must not be removed.

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#### **Tourism in Area**

- This proposed project is located within the management zone of the Kazan River – recognized as a Canadian Heritage River. The Kazan Heritage River Management Plan encourages recreational use of the River and its compatibility with conservation of heritage resources. Its status as a Canadian heritage River necessarily requires any recreational development to meet higher standards of development, maintenance, and monitoring to ensure it continues to meet the integrity values for which it was nominated.
- The Management Plan proposed Territorial Parks along the Kazan, and for the development of park facilities in the Ennadai Lake area through a community consultation exercise, and as identified in 1990 the Kazan Heritage River Management Plan. This proposed development should not impact on park development.

#### **Community Involvement and Consultation**

- Locations for both permanent sites and temporary camps must have approvals and support of the community.

#### **Local Development in the Area**

- This application if approved must not negatively impact other land uses in the region. The applicant must understand that this region is open for mineral exploration and potential mine development. Impacts by other land uses on this business will be mitigated to the extent practical, but this business must not preclude or restrict other land uses in this region.

#### **Other**

- The site chosen for the temporary tent camp should be confirmed. Future consideration of establishing a permanent camp on tent camp sites should be reviewed at such time as plans become confirmed.
- There is no Abandonment and Restoration (A/R) Plan attached to this project description. An A/R Plan should be developed and submitted prior to approval of this project.

Environment  
CanadaEnvironnement  
Canada

ENVIRONMENTAL PROTECTION BRANCH  
5204-50<sup>th</sup> AVENUE, SUITE 301  
YELLOWKNIFE, NT. X1A 1E2  
(867) 669-4737 (Telephone)  
(867) 873-8185 (Fax)

File: NIRB 99TN042

Nigel Qaumariaq  
Environmental Officer  
Nunavut Impact Review Board  
P.O. Box 2379  
Cambridge Bay, NT X0E 0C0

Post-it® Fax Note	7671	Date :	# of pages 1
To	NIGEL QUAMARIAQ	From	CAREY OGILVIE
Co./Dept.		Co.	ENVIRONMENT CANADA
Phone #		Phone #	(867) 669-4737
Fax #	(867) 983-2574	Fax #	

July 23<sup>rd</sup> 1999**Ennadai Lake Lodge - NIRB 99TN042**

I am responding to your letter, dated June 29<sup>th</sup> 1999 regarding a water licence and land use permit for the proposed Ennadai Lake Lodge, NIRB 99TN042.

I noted the applicant intends to:

- Back-haul non-combustible waste; and
- Construct a concrete containment facility for fuel storage.

These actions are fully supported. As fuel likely represents one of the more hazardous materials on site, the applicant should be encouraged to have other fuel containment and response materials on site such as drip pans at fuel transfer points and absorbent matting for cleaning spills. Such measures represent best environmental practice and are consistent with the objectives of the project, i.e. tourism adventure.

Since this project is intended to be long term, and in excess of 20 people could be on site at a time, the applicant should be encouraged to utilize bio-toilet technology. Utilizing such technology would not only help maintain the quality of the local environment but would also represent a positive measure from a human health perspective

I also noted the applicant intends to construct septic pits for grey water and sewage. An attempt should be made to design the pits to some engineering standard so they are more than just holes in the ground and can enhance the degradation of organic material and dispersion of liquids.

Please call (669-4737) should you wish to discuss the comments.

Carey Ogilvie  
Northern Environmental Assessment Coordinator

c. David Porter, Nunavut Water Board

**Canada**



Fisheries and Oceans  
Canada

Pêches et Océans  
Canada

Box 358  
Iqaluit, NT.  
XOA OHO  
Ph: (867) 979-8007  
Fax: (867) 979-8039

July 19, 1999

Nigel Qaumariaq  
Environmental Officer  
Nunavut Impact Review Board  
P.O. Box 2379  
Cambridge Bay, NT  
X0E 0C0

**RE: Fishing & Hunting Lodge at Ennadai Lake**  
**NIRB: 99TN042**  
**Letter of Advice**

The Department of Fisheries and Oceans, Habitat Management, (DFO-HM) has reviewed the information submitted with the above application. DFO-HM's assessment takes into consideration fish and fish habitat related concerns only.

On the basis of the information provided, DFO has concluded that there will be no significant adverse effects on fish or fish habitat resulting from this project, if the project is conducted as described and with the following conditions:

1. The deposition of deleterious substances into water bodies frequented by fish is prohibited under Section 36 of the Fisheries Act unless authorized by regulation. The proponent shall, therefore, ensure that any chemicals, fuel or wastes associated with the proposed project do not enter any such waters.
- DFO recommends that all sumps, wastes, sewage containment's and fuel caches be located a minimum of 30 metres from the normal high water mark of any water body, and be sufficiently bermed or otherwise contained to ensure that these substances do not enter a waterway.

- All spills of oil, fuel or other deleterious materials shall be reported immediately to the 24-hour Spill Line at (867) 920-8130.

### General Comments

DFO-HM recommends the Northern Remote Site Protocols be consulted when dealing with the grey water and sewage disposal. The business proposal indicates sumps for grey water and sewage will be used in every scenario. This totals 8 septic pits. In the spirit of the Remote Site Protocols the proponents may want to consider more environmentally sound practices for their waste management.

The business proposal identifies incineration for the method of garbage disposal and "...recycling will be used according to local regulations." Could the proponent be more specific and include a copy of the "local regulations".

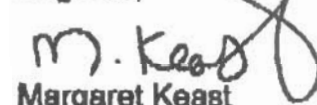
DFO-HM recommends that non-biodegradable material be flown out at every opportunity rather than storing it on site until the close of the season as outlined in the business proposal. This will decrease the risk of non-biodegradable garbage being left on site due to time constraints after the lodge closes.

Any changes to the proposed operation that may result in any impact on fish or fish habitat must be reported to the Department of Fisheries & Oceans, Iqaluit office before such changes are implemented.

Please note that none of the foregoing should be taken as authorization of the undertaking in accordance with the Fisheries Act or any other legislation.

If you have any questions or comments with respect to the above, please contact me.

Regards,



Margaret Keast  
Habitat Management Biologist, Nunavut Area

cc. Gary Weber (Area Manager, Nunavut Area)

dd. Winston Fillatre (Conservation & Protection Field Supervisor, Nunavut Area)