



Indigenous and
Northern Affairs Canada

Affaires autochtones
et du Nord Canada

Your file - Votre référence
7BL-TRP----

June 30, 2017

Our file - Notre référence
IQALUIT-#1157252

Licensing Department
Nunavut Water Board
P.O. Box 119
GJOA HAVEN, NU, X0B 1J0

Sent via email: licensing@nwb-oen.ca

**Re: Technical Review of Water Licence Application (No. 7BL-TRP----) – Tree River
Outpost (Plummer's Great Bear Lake Lodge)**

To Whom It May Concern,

Thank you for the Nunavut Water Board's June 2, 2017 notice of the above mentioned water licence application.

A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Indigenous and Northern Affairs Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-975-3877 or email at Amanda.Winegardner@aandc-aadnc.gc.ca for further information.

Sincerely,

Amanda Winegardner
Water Management Specialist
Water Resources Division
Indigenous and Northern Affairs Canada
P.O. Box 100
Iqaluit, NU X0A 0H0

Encl.

Cc. Ian Parsons, A/Manager, Water Resources, INAC, Nunavut Regional Office (NRO)
Erik Allain, Manager, Field Operations, INAC, NRO

Canada 

Memorandum

To: Licensing Department, Nunavut Water Board

From: Amanda Winegardner, Water Management Specialist, Indigenous and Northern Affairs Canada (INAC)

Cc: Ian Parsons, A/Manager, Water Resources, INAC
Erik Allain, Manager, Field Operations, INAC

Date: June 30, 2017

Re: Technical Review of Application No. 7BL-TRP---- for Tree River Outpost

Applicant: Chuk Coulter (Plummer's Great Bear Lake Lodge)
Project: Tree River Outpost
Region: Kitikmeot

Comments:

A. Background

The Tree River Outpost (the camp) is a remote hunting and fishing camp that has been in existence since the 1960s. The camp is situated on the banks of the Tree River, approximately 8 km upstream of the Coronation Gulf and is operated by Plummer's Great Bear Lake Lodge (the Applicant). The Applicant does not currently hold a Water Licence or Authorization Without a Licence for water use or deposit of waste and the camp has been operating unlicensed since the creation of Nunavut. Correspondence available on the public registry suggests that the Applicant was informed of the need for a Water Licence by the Nunavut Water Board in 2009. In 2016, an inspector from Indigenous and Northern Affairs Canada (INAC) was made aware of the camp and conducted an inspection on July 7, 2016. The Applicant was advised that a Type B Water Licence or Authorization Without a Licence would be required for continued operation of the facility.

The Tree River Outpost operates annually during July and August. The site consists of five guest cabins, a main kitchen building, an outfitting building, three staff cabins, outhouses and additional sheds/out buildings. There is also a floatplane dock, airstrip and old (non-operational) incinerator. The Applicant has applied for a Type B Water Licence for water use of 1 m³ per day for camp uses as well as the deposit of sewage, and greywater. Solid waste is removed from the site.

The Applicant has requested a Water Licence term of 25 years (to June 2043).

B. Results of review

On behalf of INAC's Water Resources Division, the following comments and recommendations are provided for the NWB's consideration:

1. **Quantity of water use**

Source:

- 1) 7BL-TRP---- New Water Licence Application, Section 13: Quantity and Quality of Water Involved

Comment: The Applicant has estimated their water use to be 1 m³ per day. Given the number of accommodations available to house guests, it may be appropriate for the allowable water use in the Water Licence to be up to 5 m³ per day in order to give the Applicant a bit of leeway with water use.

Recommendation 1: INAC recommends that any issued Water Licence permit up to 5 m³ per day.

2. **Deposit of greywater and July 2016 inspection report.**

Source:

- 1) 7BL-TRP---- Tree River Outpost English Summary
- 2) 7BL-TRP---- Unlicensed Inspection of July 7 2016

Comment: The Applicant has indicated in their project summary that greywater from camp activities is "pumped up the gravel hill more than 50 m and is deposited on land where it is naturally filtered". However, in a July 2016 inspection report by an INAC inspector, the inspector noted that greywater from the kitchen facility was being put into a sump beside the river. The inspector also noted that the sump had overflowed. The inspector advised the Applicant that the greywater sump would need to be re-located and that confirmation that this had occurred was required for the inspector by July 31, 2017.

The inspector also noted a few other items for correction in the July 6, 2016 including the removal of a piece of equipment at risk for burial beside the river.

Recommendation 2: INAC recommends that the Applicant confirm whether the gravel hill system is the replacement system for the kitchen sump.

Recommendation 3: INAC also reminds the Applicant to address any outstanding requirements outlined in the July 7, 2016 inspection report.

3. Deposit of food waste

Source:

- 1) 7BL-TRP---- New Water Licence Application, Section 15: Quantity and Quality of Waste Involved
- 2) 7BL-TRP---- Unlicensed Inspection of July 7 2016

Comment: The Applicant has indicated that bags of solid waste from camp operations are removed from site and flown to an external disposal facility. However, in a July 2016 inspection, the inspector noted that food waste is composted at a site across from the river from the camp.

Recommendation 4: INAC recommends that the Applicant confirm the location of a compost pile across the river from the camp. INAC also recommends that the Applicant describe the measures taken to prevent food waste from entering any water bodies.

4. Closure and Reclamation Plan

Source:

- 1) 7BL-TRP---- Preliminary Technical Review – Tree River Outpost
- 2) 7BL-TRP---- Closure and Reclamation

Comment: After their preliminary technical review of this application, the NWB requested that the Applicant provide a Closure and Reclamation Plan. The Applicant has submitted a document entitled ‘Closure and Reclamation’ that outlines a brief history of the Tree River Outpost and that there are no plans to close the operation. The Applicant states that if the camp became financially non-viable that the lease and associated infrastructure would be sold.

Recommendation 5: INAC notes that the Applicant has not described a plan for temporary or permanent closure. INAC recommends that the Applicant update their Closure and Reclamation plan to include the basic measures that would be needed to secure infrastructure and protect water bodies in the event of temporary or permanent closure. Additionally, the camp operates annually for only two months of the year. As such, it would be prudent to describe the annual closure procedures that are undertaken at the end of each operating season as they relate to water use and deposit of waste.

5. Water Licence Term

Source:

- 1) 7BL-TRP---- New Water Licence Application, Section 25: Proposed Term of Licence

Comment: The Applicant has requested a Water Licence term of 25 years, through to June 2043.

Recommendation 6: INAC has no issues with a Water Licence term of 25 years. INAC reminds the Applicant that significant changes in operation may occur at a camp over a 25-year period and that they will be responsible for applying for an amendment should their needs change in terms of water use or deposit of waste.