

From: [Tyree Mullaney](#)
To: permits@mvlwb.com
Subject: FW: 12 01 13 FW: MV2012X0002 & MV2012L4-0002 - CFB/ASU Edmonton - Request for Comment
Date: Monday, January 23, 2012 11:10:27 AM
Attachments: [120123 MVLWB MV2012X0002 MV2012L4-0002 CFB-ASU Edmonton request for comment-EC.pdf](#)
[MV2012X0002 MV2012L4-0002 Comment Summary Table-EC.xlsx](#)

Please post to the registry

Thanks,

Tyree Mullaney
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor, 4922 48th St, PO Box 2130 | Yellowknife, NT | X1A 2P6
ph 867.766.7464 | fax 867.873.6610
[✉ tyree@mvlwb.com](mailto:tyree@mvlwb.com) | www.mvlwb.com



From: Smith,Paula [Iqa] [<mailto:Paula.C.Smith@ec.gc.ca>]
Sent: January-23-12 11:04 AM
To: tyree@mvlwb.com
Cc: EANorthNWT [Yel]; Ogilvie,Carey [Yel]; Bujold,Ron [Yel]; Dunn,Allison [Iqa]
Subject: RE: 12 01 13 FW: MV2012X0002 & MV2012L4-0002 - CFB/ASU Edmonton - Request for Comment

Hi Tyree,
Please find attached Environment Canada's comments regarding the CFB/ASU Edmonton proposal. Feel free to contact me should you have any questions.
Thank you,
Paula

Paula C. Smith

Environmental Assessment Coordinator
Environmental Assessment North
Environmental Protection Operations
Environment Canada
P.O. Box 1870
Iqaluit, NU X0A 0H0
paula.c.smith@ec.gc.ca
Telephone 867-975-4631
Facsimile 867-975-4645
Government of Canada
Website www.ec.gc.ca

Paula C. Smith

Coordonnatrice en évaluation environnementale
Évaluation environnementale au Nord
Activités de protection de l'environnement
Environnement Canada

C.P. 1870
Iqaluit, NU X0A 0H0
paula.c.smith@ec.gc.ca
Téléphone 867-975-4631
Télécopieur 867-975-4645
Gouvernement du Canada.gc.ca
Site Web www.ec.gc.ca

From: Rebecca Chouinard [<mailto:rchouinard@mvlwb.com>]

Sent: Friday, January 13, 2012 4:52 PM

To: screeningofficer@eastarm.com; scellis@eastarm.com; jbrennan@yellowknife.ca; rlong@yellowknife.ca; lmandeville@denation.com; Carolc.lands@gmail.com; Rick.Walbourne@dfo-mpo.gc.ca; Bruce.Hanna@dfo-mpo.gc.ca; Sao_enterprise@northwestel.net; EANorthNWT [Yel]; Gnwt_ea@gov.nt.ca; Rhonda.Batchelor@gov.nt.ca; Patrick.Clancy@gov.nt.ca; Duane.Fleming@gov.nt.ca; Amy.Lizotte@gov.nt.ca; Mark.Davy@gov.nt.ca; Glen.Mackay@gov.nt.ca; intergov@aandc.gc.ca; norrisa@aandc.gc.ca; consultationsupportunit@aandc.gc.ca; james.lawrance@aandc.gc.ca; Julian.Kanigan@aandc.gc.ca; Krystal.Thompson@aandc.gc.ca; Scott.Stewart@aandc.gc.ca; Charlene.Coe@aandc.gc.ca; Robert.Jenkins@aandc.gc.ca; Nathen.Richea@aandc.gc.ca; CAU-UCA@aandc.gc.ca; vchristensen@reviewboard.ca; permits@mvlwb.com; enviromgr@nsma.net; Matthew.Spence@cannor.gc.ca; Kate.Witherly@cannor.gc.ca; c_heron@smithlanding.com; kerrigarner@tlicho.com; SusanA@wcb.nt.ca; environment@ykdene.com; tslack@ykdene.com; esangris@ykdene.com; ttsetta@ykdene.com; pvmetis@ssimicro.com; susanc@ssimicro.com; saowekweti@netkaster.ca; edwardchocolate@tlicho.com; clifforddaniels@tlicho.com; lauraduncan@tlicho.com; grandchiefedjiwa@tlicho.com; kerrigarner@tlicho.com; vgibson@interchange.ubc.ca; alfonznitsiza@tlicho.com; mark_cp@wlwb.ca; brett@wlwb.ca; kclark@wrrb.ca; jsnortland@wrrb.ca

Cc: 'Amanda Gauthier'; tyree@mvlwb.com; 'Zabey Nevitt - MVLWB'

Subject: MV2012X0002 & MV2012L4-0002 - CFB/ASU Edmonton - Request for Comment

(Sent on behalf of Tyree Mullaney)

Request for Comments

Land Use Permit and Water Licence – Exercise Arctic Ram

The Water Licence and Land Use Permit Applications listed above are now available for viewing online. To access these documents on our website, please go to to www.mvlwb.com under "Items for Review", CFB/ASU Edmonton. The Mackenzie Valley Land and Water Board (MVLWB) will use your comments in its joint review, evaluation, and preliminary screening of these applications.

Please submit your comments using the attached Excel table by **January 23, 2012** quoting the Land Use Permit and Water Licence Application numbers. Please contact us if additional time is required to complete further studies or investigations.

Please note that in accordance with MVLWB policy, any late comments will not be accepted.

If you have any questions or concerns regarding either application, please contact me at (867) 766-7464 or email tyree@mvlwb.com.

Yours sincerely,

Tyree Mullaney

Regulatory Officer

Environmental Assessment North
Environmental Protection Operations (EPO)
Qimugjuk Building 969
P.O. Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 975-4631
Fax: (867) 975-4645

23 January 2012

EC File: 4708 002 011
MVLWB File: MV2012X0002 & MV2012L4-0002

Tyree Mullaney
Regulatory Officer
Mackenzie Valley Land and Water Board
PO Box 2130
Yellowknife, NT X1A 2P6

Via email: permits@mvlwb.ca

RE: MV2012X0002 & MV2012L4-0002 – CFB/ASU Edmonton – Request for Comment

Environment Canada (EC) has reviewed the information regarding the above-mentioned water license and land use applications, as submitted to the Mackenzie Valley Land and Water Board (MVLWB). The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act 1999*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

1 Canadian Mechanized Brigade Group, based out of Edmonton, Alberta, proposes to complete Exercises ARCTIC RAM 2012 in the Yellowknife to Behchoko to Gameti ice road corridor from 23 January through 15 March 2012 with the main exercise occurring from 14 to 26 February 2012. Approximately 1 500 Canadian Forces members will take part in this joint exercise which aims to build and improve Canadian Army Arctic capabilities and will provide interoperability training with the Canadian Rangers. Proposed activities include the establishment of multiple temporary camps which will be located at various, predetermined operational areas called Operations Boxes, as required. The main camp will support up to 390 personnel while the primarily day use camp will support up to 700 personnel, other camps will range from 50 to 175 personnel.

Based on a review of the project proposal, EC provides the following comments for the MVLWB's consideration:

General

- The proponent shall not deposit, nor permit the deposit of chemicals, sediment, wastes, or fuels associated with the project into any water body. According to the *Fisheries Act*, Section 36 (3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.

- All sumps, spill basins, and fuel caches should be located in such a manner as to ensure that their contents do not enter any water body, are to be backfilled, and re-contoured to match the surrounding landscape when they are no longer required.

Waste Disposal

- The proponent states that all sewage waste (i.e. honey bags) will be disposed of at Fidler's Lake Lagoon. This site is no longer in operation and this waste must be disposed of at either the Behchoko or Yellowknife Landfill sites. EC recommends that the proponent ensure that prior authorization for disposal of this type of waste be obtained from the intended landfills and disposal should occur in the appropriate area within the landfills.

Transportation

- The proponent states that ground transportation will occur over snow-covered and groomed winter trails. EC recommends that travel should only be conducted on frozen, snow packed ground. Ground transport should cease if early warming occurs, and/or if the program has not been completed by spring. Travel via tracked vehicles on soft ground may disturb the vegetative mat, compact and rut the soils and damage the permafrost areas. Off-road traffic activity should not occur outside of winter months. The duration of operation activity should be kept as short as possible to minimize overall impact.
- In order to lessen the overall footprint of project activities, EC strongly urges the proponent to minimize the width of transportation corridors in association with operation activity. The creation of trails and access roads and camps impact the arctic and subarctic environment: the vegetative mat may be damaged, soils may be compacted and permafrost may melt, resulting in subsidence and erosion.
- No disturbance of stream bed or banks of any definable watercourse is permitted and suitable erosion control measures shall be implemented at all stream/lake crossings. Clearing adjacent to streams/lakes should be done without disturbing the organic layer. Slash and debris shall not be deposited in any definable watercourse and shall be deposited above the high water mark such that they do not enter any water system.

Wildlife and Species at Risk

- EC recommends that food, domestic wastes, and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) be made inaccessible to wildlife at all times. Such items can attract predators of migratory birds such as foxes, ravens, gulls, and bears. Although these animals may initially be attracted to the novel food sources, they often will also eat eggs and young birds in the area. These predators can have significant negative effects on the local bird populations.
- 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.
- 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. The Table below lists species that may be encountered in the project area that have been assessed by COSEWIC as well as their current listing on Schedules 1-3 of SARA (and designation if different from that of COSEWIC). Project impacts could include species disturbance, attraction to operations, and destruction of habitat.

| Terrestrial Species at Risk potentially within project area ¹ | COSEWIC Designation | Schedule of SARA | Government Organization with Primary Management Responsibility ² |
|--|---------------------|------------------|---|
| Wood Bison | Threatened | Schedule 1 | GNWT |
| Grizzly Bear | Special Concern | Pending | GNWT |
| Wolverine (Western population) | Special Concern | Pending | GNWT |

¹The Department of Fisheries and Oceans has responsibility for aquatic species.

²Environment Canada (EC) 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. Populations that exist in National Parks are also managed under the authority of the Parks Canada Agency.

EC recommends:

- For any Species at Risk that could be encountered or affected by the project, the proponent should note any potential adverse effects of the project to the species, its habitat, and/or its residence. 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.
- 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.
- Implementation of these measures may help to reduce or eliminate some effects of the project on migratory birds and Species at Risk, but will not necessarily ensure that the proponent remains in compliance with the *Migratory Birds Convention Act*, *Migratory Birds Regulations*, and the *Species at Risk Act*. The proponent must ensure they remain in compliance during all phases and in all undertakings related to the project.

If there are any changes to the project or more information is made available, EC should be notified as further review may be necessary. Please do not hesitate to contact the undersigned

with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca

Yours truly,

A handwritten signature in blue ink, appearing to read 'PS', with a long horizontal flourish extending to the right.

Paula C. Smith
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)
Ron Bujold (Environmental Assessment Officer, EPO, Yellowknife, NT)
Allison Dunn (Sr. Environmental Assessment Coordinator, EPO, Iqaluit, NU)