



NIHTAT GWICH'IN COUNCIL

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**July 10, 2026**

Elizabeth Wright, Chair  
Gwich'in Land and Water Board  
105 Veterans Way  
P.O. Box 2018  
Inuvik, NT X0E 0T0

and

Mark Cliffe-Phillips  
Executive Director  
Mackenzie Valley Environmental Impact Review Board  
200 Scotia Centre  
P.O. Box 938  
Yellowknife, NT X1A 2N7

**Delivered via Email and Online Registry**

**Re: Delta Bible Camp, Type A Land Use Permit Application G26J001**

Dear Chair Wright and Mr. Cliffe-Phillips,

I am writing on behalf of the Nihtat Gwich'in Council ("Nihtat") regarding the Gwich'in Land and Water Board's Preliminary Screening Determination dated June 29, 2026.

At the outset, Nihtat wishes to clarify that its submissions throughout this regulatory proceeding have never been directed to the environmental merits of the proposed Delta Bible Camp project. Nor has Nihtat asserted that the proposed activities are likely to result in significant adverse environmental impacts or constitute a cause of public concern requiring referral to environmental assessment under the Mackenzie Valley Resource Management Act.

Rather, Nihtat's submissions have consistently raised a separate procedural issue concerning the evidentiary record before the Gwich'in Land and Water Board.

Specifically, Nihtat has submitted that, before exercising its statutory authority to issue a Type A Land Use Permit, the Board should be satisfied that the applicant has demonstrated lawful authority to occupy the Gwich'in private lands upon which the application is founded.

Nihtat acknowledges the statutory authority of the Gwich'in Land and Water Board under the Mackenzie Valley Resource Management Act to consider applications for land use permits and water licences.

Nihtat also recognizes that the Board is not responsible for determining matters of governance established under the Gwich'in Comprehensive Land Claim Agreement ("GCLCA"). Those matters are governed by the rights, authorities, and governance framework established under the GCLCA.

However, where an application is founded upon an asserted right to occupy Gwich'in private lands, Nihtat respectfully submits that the applicant bears the evidentiary burden of demonstrating lawful authority to occupy those lands. It is not the responsibility of Nihtat to investigate or establish the legal authority upon which the applicant relies.

Gwich'in private lands are held pursuant to the GCLCA for the collective benefit of Gwich'in Participants and are administered in accordance with the governance framework established under that Agreement. Consequently, authorizations affecting those lands, including leases, licences, rights of occupation, and their associated terms and conditions, should be supported by lawful authority established under the governance framework of the GCLCA.

Accordingly, Nihtat submits that the threshold issue before the Board is whether the applicant has demonstrated lawful authority to occupy the Gwich'in private lands upon which its application for a Type A Land Use Permit is founded.

The Board's Preliminary Screening Determination concludes that the proposed project is unlikely to have a significant adverse environmental impact and is not a cause of public concern. Nihtat does not challenge those environmental findings.

However, the Reasons for Decision do not address the procedural issue raised by Nihtat. The Reasons simply state that the camp is located on Gwich'in private lands and that access is authorized under Gwich'in Tribal Council Lease No. GTC25L003. They do not explain the evidentiary basis upon which the Board concluded that the lease constitutes lawful authority to occupy Gwich'in private lands, nor do they address Nihtat's submissions respecting the governance framework established under the GCLCA.

For these reasons, Nihtat respectfully maintains that the application remains procedurally incomplete and that the outstanding issue concerning the applicant's authority to occupy the lands has not been addressed.

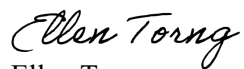
This correspondence is not intended as a request for referral to environmental assessment. Rather, it is intended to ensure that the public record accurately reflects that Nihtat's concerns relate to the evidentiary foundation of the application and not to the environmental assessment conducted under Part 5 of the Mackenzie Valley Resource Management Act.

Nihtat respectfully requests that this correspondence be placed on the public registry for Application G26J001.

Thank you for your consideration.

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Respectfully submitted,



Ellen Torng  
Senior Technical Lead  
Nihtat Gwich'in Council

Attachments

Letter from Ellen Torng to GTC Lands and Resources Department, February 20, 2026 Re: Land Authorization



Kanda Gnama  
Senior Lands Manager  
Gwich'in Tribal Council

February 20, 2026

Dear Kanda,

I am writing from a technical review perspective on behalf of the Nihtat Gwich'in Council regarding the Gwich'in Tribal Council Modified Commercial Lease – Class II Authorization (GTC Authorization No. GTC25L003) associated with the Delta Bible Camp site.

Nihtat Gwich'in Council first became aware of this authorization only after the related land use permit application was submitted to the Gwich'in Land and Water Board. In order for Nihtat to complete its technical review of this matter, we require clarification and supporting documentation on several procedural aspects of the authorization.

Nihtat respectfully requests the following information:

1. **Consultation and Engagement**

Confirmation of what consultation or engagement was undertaken with Nihtat Gwich'in Council prior to issuance of the authorization, including any correspondence, meeting records, or notices provided.

3. **Renewable Resources Council Input**

Copies of any comments or recommendations referenced in Schedule 3, including the full documentation underlying that summary.

4. **Fee Reduction or Waiver**

A copy of the GTC Lands policy or procedures that allow for reduction or waiver of lease fees, clarification on who holds the authority to approve such reductions, and the documented rationale supporting the fee decision in this case.

5. **Authorization Process**

Confirmation of the internal review and approval process followed for this authorization, including sequencing of engagement, review, and decision-making steps.

6. **Lease Duration**

Confirmation of the GTC Lands policy or Board Resolution authorizing an the approval of a 25 year occupancy.

Nihtat requires this information to complete its internal review and to determine its position regarding the associated land use permit application.

We would appreciate receiving the requested documentation and clarification at your earliest convenience so that Nihtat may proceed with its review in a timely manner.

Please do not hesitate to contact me if further clarification is required regarding this request.

Sincerely,  
  
Ellen Torng  
Nihtat Senior Technical Lead



**Distribution List**

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Nihtat Gwich'in Council

Vice President Chris Smith  
Nihtat Gwich'in Council