

From: [Liu, William](#)
To: [Jacqueline Ho](#)
Cc: [Angela Love](#); [McLean, Sarah](#)
Subject: RE: Fish Habitat and Community Response Action Summary
Date: Thursday, November 22, 2018 5:19:42 PM

Hi Jacqueline,

Please find our responses below, and let me know if you need any additional clarification.

Also, to clarify do we need a board approval for this report?

Thanks,
William

William Liu
Regulatory Specialist
Phone: (867) 445-1485

From: Jacqueline Ho <jho@mvlwb.com>
Sent: November 19, 2018 1:52 PM
To: Liu, William <William.Liu@debeersgroup.com>
Cc: Angela Love <angela.love@mvlwb.com>
Subject: Fish Habitat and Community Response Action Summary

Hello William,

I have reviewed De Beers' [Fish Habitat and Community Response Action Summary](#). I have some follow up questions below:

1. The approved AEMP Response Plan version 2 states that the assessment of whether arctic grayling return to Kennady lake during post-closure would be incorporated in the 2018 AEMP Report (Due May 1, 2019) and the AEMP Re-evaluation Report (Due July 31, 2019). However, Section 2.7 of the Response action Summary indicates the assessment will only be incorporated in the AEMP Re-evaluation Report. Please clarify and justify this discrepancy.

De Beers Response: The approved AEMP Response Plan version 2 states in Section 5.1.6 that the assessment of Arctic Grayling return to Kennady Lake during Post-closure will be conducted after the response actions described in Sections 5.1.1 to 5.1.5 are complete, and the presence and distribution of Arctic Grayling, downstream of Area 8 are better understood. This assessment will be incorporated, to the extent possible, in the 2018 AEMP Report, as further information from the flow mitigation efficacy assessment is required to inform the assessment, which will only be available after the 2018 AEMP Report is drafted. A more complete assessment will be incorporated in the AEMP Re-evaluation report.

2. As indicated in Section 2.1.3 of the Summary, the Moderate Action Level in the Approved AEMP Response Plan V.2 has been triggered as there was an absence of Arctic Grayling in Area 8 and in the downstream area during the 2018 season. Part I, condition 7 states:

If any Action Level as defined in the approved AEMP Design Plan is exceeded, the Licensee shall:

- a) Notify the Board within thirty (30) days of when the exceedance is detected; and
- b) Within ninety (90) days of when the exceedance is detected, submit an AEMP Response Plan that satisfies the requirements of Schedule 6, item 4 to the Board for approval.

Board staff have not officially received any standalone notification from De Beers regarding the exceedance of the moderate action level, other than what is reported in the Summary. In the future, De Beers should notify the Board of any exceedance formally and separate from other submissions in order to properly track compliance. Board staff reminds De Beers that within 90 days of exceedance detected, an AEMP Response Plan is required.

De Beers Response: Review of the data commenced shortly before submission of the Response Action Summary. De Beers is currently drafting the Notice of Exceedance and will submit to the Board prior to Nov 30, 2018. An AEMP Response Plan will follow thereafter.

3. Please clarify the following abbreviations:
 - a. RPM Adjustment (figure 2-1); and

De Beers Response: RPM (Revolutions per Minute)

- b. DSMR programs (section [2.1.2.1](#)).

De Beers Response: It is a typo. It should be **DSFM** (Downstream Flow Mitigation)

Feel free to contact us if you have any questions.

Sincerely,

Jacqueline



Jacqueline Ann Ho, MSc

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