

6	General File	Comment (doc) ENR Letter with Comments and Recommendations Recommendation	
1	Topic 1: Study Objectives	<p>Comment It is noted in Section 2 that direct observation will occur at a "range of flow conditions". Given that the study appears to be designed for one field season, it isn't clear how monitoring over a range of flow conditions will be completed as outlined.</p> <p>Recommendation 1) ENR recommends that Dominion clarify the "range of flow conditions" that are being proposed and any limitations that may be present should monitoring be limited to one field season.</p>	<p>Apr 1: As indicated in the Wek'èezhii Land and Water Board's Reasons for Decision on the amended Ekati mine Water Licence (W2012L2-0001; Part J, Condition 15), the purpose of the Cujo Outflow Special Study Design is to propose the details of the field surveys to be completed within streams B2, B3, and B4 to confirm outflows will be sufficient to ensure that access to spawning habitats is maintained for spring-spawning species. Spring (i.e., freshet) conditions representative of the Ekati Mine site are a rapid melting of ice and snow, with a subsequent short-duration of high water flows. The Cujo Outflow Study Design will provide direct measurements of physical streamflow characteristics (i.e., depth, velocity, connectivity) as they are expected to occur during the Misery Underground Project, when there is no Discharge from the King Pond Settling Facility. These measurements will then be used to extrapolate to the range of hydrologic scenarios that could be experienced (i.e., hydrologic scenarios for dry or wet years). Therefore, the proposed field season of measurements in addition to the substantial quantity of historical hydrological data, is adequate to obtain the streamflow characteristics as would be expected under a no Discharge scenario. Furthermore, the study data will identify what flow conditions allow access to suitable spawning habitats, which meets the Board Directive to confirm outflows will be sufficient to ensure that access to spawning habitats is maintained for spring-spawning species.</p>
2	Topic 2: Hydrological Trends	<p>Comment It is noted in Section 5.0 of the study design that the exact flow conditions in 2019 will be weather dependent. It further notes the upper and lower quartile of flows that is predicted in June.</p> <p>Recommendation 1) The final study report submitted in 2020 should outline in detail how the stream flows observed in the study relate to baseline and operational monitoring data for the area including any recent trends in flow. This will assist the Board and reviewers in understanding the applicability of this information to future years during the Misery Underground operations.</p>	<p>Apr 1: The purpose of the Cujo Outflow Special Study Design is not to define changes in stream flow, relate them to baseline and/or operational conditions. Annual stream flow measurements have been collected through the comprehensive hydrology component of the Ekati mine Aquatic Effects Monitoring Program (AEMP), which monitors the aquatic environment downstream of the mine. As part of the hydrology AEMP, annual flow measurements have been taken to record a range of Discharges under varying flow conditions and recent trends have been documented. As indicated in the Wek'èezhii Land and Water Board's Reasons for Decision on the amended Ekati mine Water Licence (W2012L2-0001; Part J, Condition 15), the purpose of the Cujo Outflow Special Study Design is to propose the details of the field surveys to be completed within streams B2, B3, and B4 to confirm outflows will be sufficient to ensure that access to spawning habitats is maintained for spring-spawning species. The Cujo Outflow Special Study Design will identify what flow conditions allow access to suitable spawning habitats and compare the observed conditions with the timing and frequency of flow conditions under</p>

			future operations as well as recorded historical flows monitored under the AEMP. The required historical streamflow data will be obtained from the hydrology monitoring stations established for the Ekati mine AEMP.
3	Topic 3: Spawning vs Migratory/Fish Passage	<p>Comment The study objectives (Section 2.0) are limited to understanding fish passage and potential barriers. However, there are several references in the study plan to a more comprehensive evaluation of other fish habitat (e.g. spawning areas) as there is reference to direct "observations and measurement of fish habitat conditions" and the identification of "areas of potential spawning habitat for Arctic grayling" to "help understand connectivity and access to the available spawning habitat in relation to the location of potential barriers."</p> <p>Recommendation 1) Given the various references and clear relevance to habitat assessment to support the migratory passage evaluation, ENR recommends that this be better reflected and outlined in the study objectives.</p>	<p>Apr 1: The Study objectives were developed specifically to meet the Wek'èezhii Land and Water Board (the Board) Directive, which was to confirm outflows will be sufficient to ensure that access to spawning habitats is maintained for spring-spawning species rather than a fish migratory passage evaluation. These objectives are the primary focus of the Study and will be used to meet the Board Directive in response to concerns raised during the Water Licence amendment review process. Supplementary information will also be collected to support interpretation of the study results specific to spring-spawning habitat access. This supplementary information is additional, useful information but not the primary focus of the Study or pivotal to the success of the Study. In other words, this information will have no impact on the ability of the Study Design to meet the Directive and therefore, do not need to be included in the objectives. It is not anticipated that hydrological changes will result in the elimination of fish migratory pathways. However, it is possible that access to suitable spawning habitat could be reduced. As directed by the Board, this Study has been designed to assess changes in access to habitat suitable for spring-spawning species. Hydrological conditions that provide access to suitable spring-spawning habitat will also provide suitable migratory pathways; however, the reverse is not necessarily true (i.e., a fish able to migrate along a stream may still not have access to suitable spawning habitat). No changes to the Study Design or objectives are required.</p>
4	Topic 4: Study Schedule	<p>Comment The study schedule transect selection will occur on June 1-2 with barrier and fish passage occurring immediately following, as well as a round of monitoring 7-10 days following Trip 1 and 7-10 days following Trip 2. This would provide for a maximum window of 20 days from the time of transect evaluation on June 1-2 to completion of the third monitoring assessment. Arctic grayling are known to spawn immediately following break-up and then return to larger water bodies. However, egg hatching may occur 13-18 days following spawning (Scott and Crossman, 1998). Fry will remain in the area until sufficient growth occurs to depart. ENR appreciates that Section 4.0 notes that all information observed during the program will be related to historic and predicted range of flows as well as life history and habitat requirements for Arctic grayling. However, Dominion should outline whether the proposed monitoring timelines in Section 5.0 are appropriate to ensure</p>	<p>Apr 1: Concerns were raised during the Water Licence amendment review process about whether there would be sufficient water levels for fish spawning and egg hatching when no water is expected to be Discharged from the King Pond Settling Facility (KPSF). As such, the Wek'èezhii Land and Water Board (the Board) included a Directive in the Water Licence for Dominion to confirm outflows will be sufficient to ensure that access to spawning habitats is maintained for spring-spawning species. The Cujo Outflow Study has been designed to meet this Board Directive, focusing on the identification of the potential for barriers to spring-spawning fish movement and access to suitable spawning habitat. The Study will provide direct measurements of physical streamflow characteristics (i.e., depth, velocity, connectivity) as they are expected to occur under flow conditions for Misery Underground Project operation, with no Discharge from the KPSF. These measurements will then be used to extrapolate to the range of</p>

		<p>sufficient fish passage for various stages of the life cycle including departing grayling fry.</p> <p>Recommendation 1) ENR recommends that Dominion outline how the proposed timelines for the study outlined in Section 5.0 relate to the life cycle of Arctic grayling in the area including break-up timing, previous observed timing of spawning, and anticipated time of departure of grayling fry.</p>	<p>hydrologic scenarios that could be experienced, which would include scenarios that cover the departure of Arctic Grayling fry. The Study has been designed to focus on the flow conditions suitable for adult fish to access spring-spawning habitat, which is very different to the flow conditions necessary for departure of Arctic Grayling fry. Therefore, the proposed timeline for the Study is appropriate to meet the Study objectives and direction from the Board.</p>
5	Topic 5: References:	<p>Comment Scott, W.B & E.J. Crossman. 1998. Freshwater Fishes of Canada. Galt House Publications Ltd., Oakville, Ontario.</p> <p>Recommendation 1) ENR recommends that the Board note the reference in the above comment which is supplied in support of ENR comments and recommendations.</p>	Apr 1: Acknowledged.

Independent Environmental Monitoring Agency: Marc Casas

ID	Topic	Reviewer Comment/Recommendation	Proponent Response
1	General File	<p>Comment (doc) Agency comment letter on Cujo outflow study design</p> <p>Recommendation</p>	
2	Additional Species Monitoring	<p>Comment The Wek'eezhii Land and Water Board (WLWB) Reason for Decision states: "The Board notes that although Arctic Grayling is the predominant species, monitoring should not be restricted to Arctic Grayling and has therefore included Part J, Condition 15 to apply to all spawning species." (p.32) This study plan states that incidental observations of fish species in the monitored 'B' streams will be recorded, but assessment of access to habitat will focus solely on Arctic grayling. Slimy sculpin, a sentinel species monitored in the AEMP, are also present, and like grayling, spawn in spring in both lakes and streams. It is not clear why slimy sculpin are not included in the assessment of habitat.</p> <p>Recommendation Recommendation: Dominion should include slimy sculpin in the access to habitat monitoring or provide rationale for why they should not be included.</p>	<p>Apr 1: Concerns were raised during the Water Licence amendment review process about whether there would be sufficient water levels for fish spawning and egg hatching when no water is expected to be Discharged from the King Pond Settling Facility (KPSF). As such, the Wek'eezhii Land and Water Board (the Board) included a Directive in the Water Licence for Dominion to confirm outflows will be sufficient to ensure that access to spawning habitats is maintained for spring-spawning species. The Cujo Outflow Study has been designed to meet this Board Directive, focusing on the identification of the potential for barriers to spring-spawning fish movement. Arctic Grayling were included in the Jay Environmental Assessment as a Valued Component (VC). VCs represent physical, biological, cultural, social, and economic properties of the environment that are considered to be important by society. Thus, it is appropriate for the Study Design to focus on fish VCs (i.e., Arctic Grayling) in the streams of interest. Slimy Sculpin are included in the Ekati Aquatic Effects Monitoring Program (AEMP) as a sentinel species; a fish species that could be used to detect potential Mine-related effects prior to being observed in large-bodied fish species. Although Slimy Sculpin provide useful information as a sentinel species within the AEMP, this fish species is not considered a VC, as it is a small-bodied fish species that is not Traditionally harvested. However, the Study has been designed to determine whether barriers to fish passage may occur with no Discharge from the KPSF and should no barriers be identified for Arctic Grayling, then the conclusion is expected to also apply to Slimy Sculpin.</p>

Distribution List

Ekati - Cujo Lake Outflow Special Study Design - Version 1.0 (W2012L2-0001)

File(s):

Proponent: Dominion Diamond Ekati Corporation

Reviewer Comments Due By: Mar 26, 2019

Proponent Comments Due By: Apr 2, 2019

Document(s)

Cujo Outflow Special Study Design

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March 26, 2019

Joseph Mackenzie
Chair
Wekeezhii Land and Water Board
#1-4905 48th Street
Yellowknife, NT
X1A 3S3

Dear Ms. Elsasser,

**Re: Dominion Diamond Ekati ULC (Dominion)
Water Licence – W2012L2-0001
Cujo Lake Outflow Special Study Design - Version 1.0
Request for Comment**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the study at reference based on its mandated responsibilities under the Environmental Protection Act, the Forest Management Act, the Forest Protection Act, the Species at Risk (NWT) Act, the Waters Act and the Wildlife Act and provides the following comments and recommendations for the consideration of the Board.

Topic 1: Study Objectives

Comment(s):

It is noted in Section 2 that direct observation will occur at a “range of flow conditions”. Given that the study appears to be designed for one field season, it isn’t clear how monitoring over a range of flow conditions will be completed as outlined.

Recommendation(s):

- 1) ENR recommends that Dominion clarify the “range of flow conditions” that are being proposed and any limitations that may be present should monitoring be limited to one field season.

Topic 2: Hydrological Trends

Comment(s):

It is noted in Section 5.0 of the study design that the exact flow conditions in 2019 will be weather dependent. It further notes the upper and lower quartile of flows that is predicted in June.

Recommendation(s):

- 1) The final study report submitted in 2020 should outline in detail how the stream flows observed in the study relate to baseline and operational monitoring data for the area including any recent trends in flow. This will assist the Board and reviewers in understanding the applicability of this information to future years during the Misery Underground operations.

Topic 3: Spawning vs Migratory/Fish Passage

Comment(s):

The study objectives (Section 2.0) are limited to understanding fish passage and potential barriers. However, there are several references in the study plan to a more comprehensive evaluation of other fish habitat (e.g. spawning areas) as there is reference to direct “observations and measurement of fish habitat conditions” and the identification of “areas of potential spawning habitat for Arctic grayling” to “help understand connectivity and access to the available spawning habitat in relation to the location of potential barriers.”

Recommendation(s):

- 1) Given the various references and clear relevance to habitat assessment to support the migratory passage evaluation, ENR recommends that this be better reflected and outlined in the study objectives.

Topic 4: Study Schedule

Comment(s):

The study schedule transect selection will occur on June 1-2 with barrier and fish passage occurring immediately following, as well as a round of monitoring 7-10 days following Trip 1 and 7-10 days following Trip 2. This would provide for a maximum window of 20 days from the time of transect evaluation on June 1-2 to completion of the third monitoring assessment.

Arctic grayling are known to spawn immediately following break-up and then return to larger water bodies. However, egg hatching may occur 13-18 days following spawning (Scott and Crossman, 1998). Fry will remain in the area until sufficient growth occurs to depart.

ENR appreciates that Section 4.0 notes that all information observed during the program will be related to historic and predicted range of flows as well as life history and habitat requirements for Arctic grayling. However, Dominion should outline whether the proposed monitoring timelines in Section 5.0 are appropriate to ensure sufficient fish passage for various stages of the life cycle including departing grayling fry.

Recommendation(s):

- 1) ENR recommends that Dominion outline how the proposed timelines for the study outlined in Section 5.0 relate to the life cycle of Arctic grayling in the area including break-up timing, previous observed timing of spawning, and anticipated time of departure of grayling fry.

Topic 5: References:

Comment(s):

Scott, W.B & E.J. Crossman. 1998. *Freshwater Fishes of Canada*. Galt House Publications Ltd., Oakville, Ontario.

Recommendation(s):

- 1) ENR recommends that the Board note the reference in the above comment which is supplied in support of ENR comments and recommendations.

Comments and recommendations were provided by ENR technical experts in the Water Management and Monitoring Division and the North Slave Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM), Environmental Stewardship and Climate Change Division.

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email patrick.clancy@gov.nt.ca.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Clancy', written in a cursive style.

Patrick Clancy
Environmental Regulatory Analyst
Environmental Assessment and Monitoring Section
Environmental Stewardship and Climate Change Division
Department of Environment and Natural Resources
Government of the Northwest Territories



Independent Environmental Monitoring Agency

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March 26, 2019

Joseph Mackenzie
Chair, Wek'eezhii Land and Water Board
#1-4905 48th St, Yellowknife, NT
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Re: Cujo Lake Outflow Special Study Design

Dear Mr. Mackenzie,

The Independent Environmental Monitoring Agency (Agency) has reviewed the Cujo Lake Outflow Special Study Design Plan submitted by Dominion Diamond Mines ULC (Dominion). The Agency submits the following comments for your consideration.

Additional Species Monitoring

The Wek'eezhii Land and Water Board (WLWB) Reason for Decision states: "*The Board notes that although Arctic Grayling is the predominant species, monitoring should not be restricted to Arctic Grayling and has therefore included Part J, Condition 15 to apply to all spawning species.*" (p.32) This study plan states that incidental observations of fish species in the monitored 'B' steams will be recorded, but assessment of access to habitat will focus solely on Arctic grayling. Slimy sculpin, a sentinel species monitored in the AEMP, are also present, and like grayling, spawn in spring in both lakes and streams. It is not clear why slimy sculpin are not included in the assessment of habitat.

Recommendation: Dominion should include slimy sculpin in the access to habitat monitoring or provide rational for why they should not be included.

Should you have any questions concerning these comments, the Agency is pleased to discuss these at your convenience.

Sincerely,

Jaida Ohokannoak
Chairperson

Cc: Dominion Diamond– Harry O'Keefe
Tł̨chq̨ Government – Violet Camsell-Blondin
Yellowknives Dene First Nation – Johanne Black

łutsel K'e Dene First Nation – Lauren King
North Slave Metis Alliance – Jessica Hurtubise
Kitikmeot Inuit Association – Geoff Clark
Government of the Northwest Territories – LeeAnn Malley
Indigenous and Northern Affairs Canada – Dinah Elliott