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## 2AM-DOH1335 Amendment Application - AEM Response to Information Request's (IRs)

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John Roesch <JRoesch@lands.kitia.ca>  
To: Robert Hunter <robert.hunter@nwb-oen.ca>

Thu, Apr 16, 2026 at 12:07 PM

Hello Robert, the KIA has reviewed AEM's response to KIA's IRs for the Amendment for the Type A Water license for Doris – Madrid, operational update. Our comments are as follows:

### KitIA-IR-22

AEM's response does not address the previous request.

As indicated in the 1st review, very limited information regarding fish passability including migration and/or fish movement due to operational updates and increased water withdrawal is presented in Appendix 6Q section 2.1 including Appendix table B.1 and B.2. Environmental flow needs assessment using the flow information and increased water withdrawal is required.

Appendix Table B.1. and B.2 If HEP addresses life histories of spawning, nursery, foraging, and overwintering. There is no mention of fish movement, passability, and/or migration. If these were considered during HEP, please illustrate how fish passability/movement considerations contributed directly to each life functions in the HEP.

### KitIA-IR-23

AEM's response does not address the previous request.

Table 3.8 of Appendix 6-Q provides habitat offsetting for 6 ponds (Pond 1,2,3, 4a, 5b to 5f, and 5) only, even though habitat losses were reported for 8 watercourses (Doris Outflow, Windy Outflow, Little Roberts Outflow, Ogama Inflow, Ogama Outflow, Imniagut Outflow, Patch Outflow, and PO Outflow).

Provide offsetting measures for the 8 watercourses that are impacted due to operational updates. If not offsetting, provide explanation and related implications for not providing offsetting fish habitats for the 8 watercourses. Provide explanation and rationales for changes in the current offsetting plans in relation to no habitat gains/offsets for the 8 watercourses that are impacted from previously submitted offsetting plan (ERM 2018).

### KitIA-IR-24

AEM's response does not address the previous request.

Provide offsetting measures specifically for Lake Trout and Slimy Sculpin that are impacted in Table 3.5 of Appendix 6-Q. Habitat units for 242 Lake Trout and 964 Slimy Sculpin are impacted due to operational update and water withdrawals. If not offsetting for these two species, provide scientific rationales for omitting offsetting plans for Lake Trout and Slimy Sculpin.

Or provide justifications that offsetting for other fish species and/or overall productivity compensates for these species' losses.

The KIA is satisfied with all other responses to KIA's Information Requests.

Thank you.

John

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**From:** Robert Hunter <[robert.hunter@nwb-oen.ca](mailto:robert.hunter@nwb-oen.ca)>

**Sent:** April 10, 2026 11:09 AM

**To:** John Roesch <[JRoesch@lands.kitia.ca](mailto:JRoesch@lands.kitia.ca)>; Beer, Jordan (she-elle) <[jordan.beer@rcaanc-cirnac.gc.ca](mailto:jordan.beer@rcaanc-cirnac.gc.ca)>;

Wykes, Russell (ECCC) <[Russell.Wykes@ec.gc.ca](mailto:Russell.Wykes@ec.gc.ca)>; Simpson, Holly <[Holly.Simpson@dfo-mpo.gc.ca](mailto:Holly.Simpson@dfo-mpo.gc.ca)>

**Cc:** Keim, Andrew <[andrew.keim@rcaanc-cirnac.gc.ca](mailto:andrew.keim@rcaanc-cirnac.gc.ca)>; EANorthNU [Yel] <[EANorthNU@ec.gc.ca](mailto:EANorthNU@ec.gc.ca)>;

Gwizdkowska, Liliana (ECCC) <[liliana.gwizdkowska@ec.gc.ca](mailto:liliana.gwizdkowska@ec.gc.ca)>; Audet-Lecouffe, José <[jose.audet-lecouffe@dfo-mpo.gc.ca](mailto:jose.audet-lecouffe@dfo-mpo.gc.ca)>;

Ali Shaikh <[ali.shaikh@nwb-oen.ca](mailto:ali.shaikh@nwb-oen.ca)>; Licensing Department <[licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)>

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Good morning,

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