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Amendment of Type A Water licence for Doris-Madrid

Review Comment Number	KIA-NWB-01
Subject/Topic	Hope Bay Operational Update Scope Activities
References	<ul style="list-style-type: none"> 2AM-DOH1335 Water Licence Amendment – Hope Bay Operational Update Main Application Document, Section 1.1, Table 1.2-1, p. 5
Summary	Table 1.2 compares approved mine activities under the current license with the changes included in the Water License amendment application. While the current license activities are quantified for all mining activities under the Water License, the required changes under the Water License Application are not.
Detailed Review Comment	Table 1.2 provides a list of approved mine activities under the current Water License (“Approved” column), with clear quantification of each activity. For example, overburden stockpiles are Doris: 1 overburden stockpile. However, the changes that are needed are not quantitatively provided or estimated for some mining activities under the “Water License Amendment” column, which leads to confusion on the changes included in the Water License Amendment application. For example, Overburden stockpiles are overburden piles at Doris and Madrid. No specification on the amount of stockpiles at each location is provided. This same issue is visible for several other mine activities (i.e., ore stockpile, waste rock stockpile, and contact water ponds).
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> The Proponent should quantify or estimate all changes under the “Water License Amendment” application column, like the quantification provided under the current Water License “Approved” column. If the proponent is unable to quantify these in advance (as an estimate), please explain why not.
Importance	High

Review Comment Number	KIA-NWB-02
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Subject/Topic	Additional Marine Outfall Diffuser not included in the updated scope activities.
References	<ul style="list-style-type: none"> 2AM-DOH1335 Water Licence Amendment – Hope Bay Operational Update Main Application Document, Section 1.1, Table 1.2-1, p. 5
Summary	Table 1.2-1 provides a comparison of approved mine activities under the current license versus the changes included in the Water License amendment application but does not include the additional marine outfall diffuser that will be installed.
Detailed Review Comment	Table 1.2-1 provides a list of approved mine activities under the current Water License (“Approved” column) and the changes that are needed under the “Water License Amendment” column. It includes activities like diesel fuel storage, which will take place on land, but not the additional marine outfall diffuser, which will occur in sea water. More water will be withdrawn from the lakes. It is assumed that some of this water will go through the mine and out the new marine outfall (water balance). Thus, it seems relevant to add this activity to Table 1.2-1 and the relevant text. We recognize that the NWB does not have jurisdiction to approve the release of water or waste into the marine environment, but the activity can still be added to the table.
Recommendation/Request	<p>The KIA requests the following:</p> <p>Clarify the uses and end points of the additional water that will be withdrawn from the lakes within the main application document for the Water License Amendment. This helps reviewers understand what will happen to the additional water that is withdrawn from the lakes.</p> <p>The Proponent should include the new marine outfall along with the anticipated change in outflow between the current license and the application within Table 1.2-1, along with relevant text.</p>
Importance	High

Review Comment Number	KIA-NWB-03
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Subject/Topic	Avoidance measures are not specified in terms of the placement of new infrastructure.
References	<ul style="list-style-type: none"> • 2AM-DOH1335 Water Licence Amendment – Hope Bay Operational Update Main Application Document, Section 1.2, page 5
Summary	The proposed Water License Amendment indicates in Section 1.2 that new activities will include new water and waste management infrastructure, a mill, additional fuel storage at Roberts Bay, Doris and Madrid, increased water use, and widening of the Windy Road. However, other new activities are not mentioned on this list such as the explosives facility that will be installed along with a new marine outfall.
Detailed Review Comment	<p>The proposed Water License Amendment provides a bulleted list of operational updates in Section 1.2 that includes the following new activities: water and waste management infrastructure, a mill, additional fuel storage at Roberts Bay, Doris and Madrid, increased water use, and widening of the Windy road. However, there appear to be other activities that are mentioned later in the section, such as an explosives facility (emulsion plant) and a new marine outfall/diffuser. Section 1 lacks clarity about which infrastructures and activities will be added, using similar terminology in both Section 1 and the maps on pages 7 to 10; thus, it's unclear to the reviewer.</p> <p>Further, it is unclear what avoidance measures were implemented to avoid or reduce environmental impacts. For example, what efforts were made to avoid putting new service roads, stockpiles, laydown areas, and fuel areas near Doris Lake? What efforts were made to avoid putting the emulsion plant near a waterbody or stream?</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • For clarity, please provide a table of proposed activities/changes at the mine that are planned, whether they may or may not relate to the Water License Amendment. Then please indicate which activities/changes apply to the Water Licence amendment application. • Please provide a discussion of the avoidance measures used to reduce the potential for the proposed new infrastructure/activities to affect the environment, particularly waterbodies/watercourses.



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Importance	High
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Review Comment Number	KIA-NWB-04
Subject/Topic	Maps on pages 7 –10 need a caption, figure number and could use clarity on the location of the proposed infrastructure.
References	2AM-DOH1335 Water Licence Amendment – Hope Bay Operational Update Main Application Document, Section 1.2, P 7-10
Summary	The maps on page 7-10 of the document lack a figure number and caption and the location of the infrastructure proposed in the polygon should be included for clarity.
Detailed Review Comment	<p>The maps provided on pages 7 -10 lack a figure number and caption but are presumably referred to elsewhere in the document as Figure 1.1 -3.</p> <p>The maps provide polygons for the areas where additional Project infrastructure is proposed and a description of that infrastructure but lack clarity on the actual location and footprint of the proposed infrastructure to be included within the polygon. Where possible, it would be more informative to include a more detailed map with these locations and footprints for each listed infrastructure, as the exact location may determine the potential risk that the proposed infrastructure poses. For example, fuel storage closer to a waterbody poses more risk for waterbody contamination than fuel storage at a distance from the waterbody. We recognize that there may be a desire for flexibility in citing within the polygon, but showing the intended locations, and stating that they are subject to change within the polygon, would be helpful.</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • Please add a caption and figure number (assume Figure 1.1-3) to the maps on pages 7-10.



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References	<ul style="list-style-type: none"> 2AM-DOH1335 Water Licence Amendment – Hope Bay Operational Update Main Application Document, Section 3.3.8.1 p. 21
Summary	The water supply section (Section 3.3.8.1) of the document indicates that freshwater water withdrawals will minimize effects to fish habitat but lacks language about minimizing effects on fish and wildlife.
Detailed Review Comment	<p>The Water Supply section indicates that “Agnico Eagle will optimize freshwater withdrawals at Doris Lake, Windy Lake, and/or Patch Lake to minimize effects to fish habitat, consistent with the 2017 FEIS”.</p> <p>This statement should also indicate that effects on fish will be minimized.</p> <p>Effects on wildlife (e.g., fish eating birds) should also be considered.</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please include language to indicate that freshwater withdrawals at Doris Lake, Windy Lake, and/or Patch Lake will also minimize effects to fish and wildlife.
Importance	High

Review Comment Number	KIA-NWB-07
Subject/Topic	Details on updates to the management plan appendices are missing
References	<ul style="list-style-type: none"> 2AM-DOH1335 Water Licence Amendment – Hope Bay Operational Update Main Application Document (entire document where appendices are referenced)
Summary	The main body of the Water Licence Amendment document contains boilerplate text regarding adherence to management plans already in place for the Project. Text should be edited to summarize or mention where updates were made to these management plans and provide examples of how management plans were updated according to planned Project changes.
Detailed Review Comment	Generally, where appendices are referenced throughout the document to describe management practices that Agnico



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	<p>Eagle will continue to implement (e.g., Appendices 6-B, 6-F, 6-G, 6-H, 6-J, 6-M, and 6-O), it would be beneficial to identify and describe any updates to the referenced management practices or appendices that are associated with the proposed production increases. This would help clarify where management practices have been modified in response to the proposed activities within each section.</p> <p>At present, the language throughout the document suggests that no changes to the management plans are anticipated (e.g., “Agnico Eagle will continue to adhere to the management practices outlined in the Water Management Plan”). Where modifications to existing plans or procedures are proposed as a result of the increased activities, these changes should be clearly identified in the document text. In addition, the document should include a discussion regarding the adequacy of the proposed modifications to mitigate the potential effects associated with the increased level of activity.</p> <p>For example, Section 3.3.8.2 states that Agnico Eagle will continue to adhere to the management practices outlined in the Domestic Wastewater Treatment Management Plan (Appendix 6-B). However, this text should include a clearer explanation of whether and how any additional wastewater will be treated. For example, could information be provided that additional wastewater is expected at specific locations (list them), will be treated at the current locations, and that additional capacity is not required?</p>
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> • In each section where an existing management practice appendix is referred to, please provide summary text that confirms whether the plan was updated and provide a summary of how the plan was updated to address changes to the Project proposed in the Water Licence Amendment.
Importance	Moderate
Review Comment Number	KIA-NWB-08
Subject/Topic	Water withdrawal monitoring/reporting



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References	<ul style="list-style-type: none"> 2AM-DOH1335 Water Licence Amendment – Hope Bay Operational Update Main Application Document, Section 4.2.2, p. 26-27
Summary	Clarity is needed on how the water withdrawals proposed in the Water License Amendment will be monitored and how the data will be collected, stored, analyzed, and reported.
Detailed Review Comment	The document does not provide information on how water withdrawals will be monitored. The annual reports provide water withdrawal information but do not specify the exact locations of the gauges to monitor withdrawal or how the data on withdrawal are collected, stored, and analyzed. It should be specified in this document that water withdrawal will be adequately monitored, along with the details on the monitoring and where and when it will be reported.
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> Please provide information on how water withdrawals from the various waterbodies proposed for the Water License Amendment will be monitored/reported.
Importance	High

Review Comment Number	KIA-NWB-09
Subject/Topic	Water balance versus requested water withdrawal
References	<ul style="list-style-type: none"> 2AM-DOH1335 Water Licence Amendment – Hope Bay Operational Update Main Application Document, Section 4.2.1, p. 26 and Section 3.3.8.1, page 21 Appendix 4-C “Analysis of Increased Water Withdrawals at Hope Bay” Section 2.1.1.1, page 3 and Section 2.1.2, page 7
Summary	Concern over Agnico Eagle proposing to remove 100% of the available water supply, which they calculated at two of the three lakes.
Detailed Review Comment	Agnico Eagles states on page 21 that they would like to withdraw 2,916,855 m3/year of which 2,637,125 m3/year is from Doris Lake, 159,870 m3/year is from Windy Lake, and 59,860 m3/year is from Patch Lake. This represents an



	<p>increase over the current license (2,033,800 m³/year) of 883,055 m³/year, a 43% increase.</p> <p>Agnico Eagle's consultants estimated the effects of additional freshwater withdrawals from Windy, Doris and Patch lakes. The results of this assessment are in Appendix 4-C. On page 26 of the main Water License Amendment application, it is stated that "Windy Lake could supply 159,870 m³/year, Patch Lake could supply 103,000 m³/year, and Doris Lake could supply 2,637,125 m³/year while respecting the DFO's guidelines for fish habitat for the lakes (DFO 2010, 2013). Thus, Agnico Eagles is looking to take 100% of the supply that they state is available at two out of three lakes. This seems like a risk to the environment, given several uncertainties related to the modelling completed for the water balance. For example:</p> <ul style="list-style-type: none">• How was climate change factored into the water balance? Climate change is not mentioned in Appendix 4-C "Analysis of Increased Water Withdrawals at Hope Bay"• It is unclear if the water balance model for the lakes includes the most recent data for water levels, as some older years of data are mentioned in the following statements:<ul style="list-style-type: none">○ Appendix 4-C, page 3 states "Lake volumes were determined using subsurface contours for the lakes, created from bathymetric survey information collected in 2006 and 2008." As bathymetric data is unlikely to change quickly, this data may be suitable but should be discussed in the Appendix.○ Appendix 4-C, page 3 states "Bathymetric elevation data was tied to a geodetic datum from available surveyed water level benchmarks, at hydrometric monitoring station benchmarks, that were geodetic referenced from 2016 to 2020." It is unclear what proportion of the data used is from 2016 versus 2020, but that is already several years old and thus a discussion should be provided on the validity of these data to represent current and future conditions, while considering climate change.
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	<ul style="list-style-type: none"> ○ Appendix 4-C, page 7 states “The existing HEC-RAS model for the Doris Lake outflow was updated with new steady flow data calculated in the water balance model. Mean monthly stream flows for the May through October open water season were input to the HEC-RAS model for baseline and constant rate, and a steady flow analysis was run for each streamflow value.” This statement seems to indicate that newer flow data were used for HEC-RAS, but it is unclear which years were used or whether it is recent, since only May to October are mentioned. ● Appendix 4-C, page 7 states “A HEC-RAS model for the Windy Lake outflow was not developed for the FEIS, and there is insufficient data to develop one; therefore, changes to hydrologic properties and fish habitat were not performed.” However, an increase in water withdrawal of 265% (43,800 to 159,870 m³/year) is requested within this lake. This seems risky considering the above-noted uncertainties in the modelling of the water balance.
Recommendation/Request	<p>The KIA requests the following:</p> <ul style="list-style-type: none"> ● Please provide additional information on the years of data used for the modeling of the water balance, including the HEC-RAS for all three lakes. ● Please provide a discussion of the limitations and uncertainties associated with the modeling and the impacts of uncertainties, and (if applicable) how monitoring and contingencies on withdrawals will consider real time data (e.g., to take less water than permitted, if needed).
Importance	High

Review Comment Number	KIA-NWB-10
Subject/Topic	Alternative tailings management approach
References	<ul style="list-style-type: none"> ● 2AM-DOH1335 Water Licence Amendment – Hope Bay Operational Update Main Application



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References	<p>Appendix 4-E: Interim Geochemical Source Term Predictions, Hope Bay Project</p> <p>Appendix 4-F: Mine Plan Operational Update: Water and Load Balance Model</p> <p>Appendix 3-I: Doris Madrid Interim Closure and Reclamation Plan</p>
Summary	Closure cover for Doris TIA
Detailed Review Comment	<p>The interim geochemical source term predictions document noted tailings in the Doris TIA will be covered by a geosynthetic membrane followed by 1 m of construction rock (Section 2.3). Further, the document notes that, in closure, infiltration into the tailings will be limited by an overlying geosynthetic membrane , which is expected to significantly decrease loadings from the tailings (Section 4.7).</p> <p>The water and load balance model in the second reference document states that at closure surface drainage from the reclaimed TIA will passively flow via the closure spillway to Doris Lake (Section 3.5).</p> <p>The interim closure and reclamation plan (ICRP) states that the TIA water and load balance confirms that neutral metal leaching does not pose a limitation in ensuring that the water quality from the closed TIA meet the required closure water quality criteria and therefore no infiltration cover is required over the tailings surface (section 4.5.3). The ICRP also states that, at closure, a 0.3 m thick run-of-quarry (ROQ) cover will be placed on the tailings surface.</p> <p>The reference documents provide contradictory statements on the closure plan for the tailings. It is uncertain which cover system design was considered in the water and load balance model to assess water quality post closure.</p>
Recommendation/Request	Clarify what the conceptual closure plan for the tailings is (infiltration reduction cover that incorporates a geosynthetic membrane or a 0.3 m thick rockfill physical isolation cover. Clarify which cover concept was used to project post closure water quality.
Importance	Moderate



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Review Comment Number	KIA-NWB-12
Subject/Topic	Patch 7 Contact Water Pond
References	Appendix 3-C: Design Report: Patch 7 CWP 4 and Sump 6A
Summary	Impact of proposed CWP4 on stability of proposed Patch 7 Waste Rock Pile
Detailed Review Comment	The Contact Water Pond (CWP4) at Patch 7, is proposed to be excavated into native ground (permafrost) at a depth of up to 5 m. CWP4 is proposed to be located at the toe of a proposed waste rock pile. Given that it is proposed to be excavated into native ground and temporarily store water, the operation of CWP4 could result in permafrost degradation that may have a negative impact on the stability of the proposed waste rock pile.
Recommendation/Request	Has AEM considered the potential for permafrost degradation around CWP4 and its potential impacts on the stability of the adjacent waste dump?
Importance	Moderate

Review Comment Number	KIA-NWB-13
Subject/Topic	Patch 7 Contact Water Pond
References	Appendix 3-C: Design Report: Patch 7 CWP 4 and Sump 6A
Summary	Impact of CWP4 on surrounding permafrost
Detailed Review Comment	The Contact Water Pond (CWP4) at Patch 7, is proposed to be excavated into native ground at a depth of up to 5 m. CWP4 has a design drain down time of 30 days. The storage of water in CWP4 has the potential to thaw permafrost beneath and adjacent to CWP4.
Recommendation/Request	Confirm that a thermal analysis of the proposed CWP4 has been undertaken to support the 30-day design drain down time and that storage of water in CWP4 for this duration will not have negative impacts on the surrounding permafrost.



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Importance	Low
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Review Comment Number	KIA-NWB-14
Subject/Topic	Patch 7 Contact Water Pond
References	Appendix 3-C: Design Report: Patch 7 CWP 4 and Sump 6A Appendix 3-I: Doris Madrid Interim Closure and Reclamation Plan
Summary	Closure plan for CWP4
Detailed Review Comment	The Contact Water Pond (CWP4) at Patch 7, is proposed to be excavated into native ground at a depth of up to 5 m. During operations, CWP4 will be dewatered to the Doris TIA. As per the interim closure and reclamation plan, at Closure, CWPs are to be breached to re-establish the natural drainage path.
Recommendation/Request	Given CWP4 will be excavated into native ground, restoring natural drainage at closure may not be possible. Confirm the conceptual closure plan for the proposed CWP4 at Patch 7.
Importance	Low

Review Comment Number	KIA-NWB-15
Subject/Topic	Saline Pond 1
References	Appendix 3-B: Design Report: Saline Pond 1
Summary	Closure plan for Saline Pond 1
Detailed Review Comment	The Saline Pond (SP1), is proposed to be blasted and excavated into bedrock at depths of up to 21 m. During operations, SP1 will store saline water from the Doris underground mine and from Saline Pond 2. During operations, water from SP1 will be pumped to the saline effluent treatment plant for treatment prior to discharge to the receiving environment. As per the Doris-Madrid Interim Closure and Reclamation Plan, water management ponds



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	are to be closed by restoring natural drainage where possible.
Recommendation/Request	Given the CWP will be excavated up to 21 m into bedrock, restoring natural drainage at closure may not be possible. Confirm the conceptual closure plan for the proposed SP1.
Importance	Low

Review Comment Number	KIA-NWB-16
Subject/Topic	Sediment Sample Depth
References	Appendix 6A AEMP, P34 Sediment Methods; P24-25 Table 3.1-2. Monitoring Schedule and Sampling Frequency
Summary	Sediment samples are collected from the top 2-3 cm; it is unclear whether this depth accurately represents the preceding three years to effectively characterize project influences on sediment quality. Refinement of the sediment sampling method is recommended.
Detailed Review Comment	<p>The Aquatic Effects Monitoring Program provides detail on how sediment samples will be collected as follows: <i>“Surficial sediment quality samples will be collected using an Ekman grab sampler and will be collected concurrently with benthic invertebrate sampling... Each sediment sample will be carefully transferred onto a plastic tray, and the top 2 to 3 cm of sediment will be removed and homogenized in a plastic bowl using a plastic spoon and placed into two containers: one for particle size and one for sediment chemistry.”</i></p> <p>While we appreciate the sediment sampling methodology uses this approach to characterize what is assumed to be representative of the preceding three years (noting sediment samples are collected once every three years), the typical sedimentation rates in Arctic lakes are sufficiently slow that 2-3 cm are unlikely to accumulate during the sampling interval. The sampling methodology therefore incorporates additional years of sediment accumulation, potentially including the baseline period, diluting the potential signal of mine influences on the receiving environment.</p>



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Recommendation/Request	<p>We recommend Agnico Eagle provide evidence that the top 2-3 cm of sediment are representative of the 3-year sampling interval. If this evidence is unavailable, we recommend Agnico Eagle investigate for each sediment sampling location to evaluate the depth of sediment that represents a 3-year interval and adjust the sampling protocols accordingly.</p> <p>Note if sedimentation rates are substantially less than 1 cm / 3 years, a more refined sediment sampling method may need to be considered.</p> <p>Note this concern applies both to sediment sampling within the freshwater environment as well as the marine environment.</p>
Importance	Moderate

Review Comment Number	KIA-NWB-17
Subject/Topic	Water Quality Sampling Frequency
References	Appendix 6A AEMP, P24-25 Table 3.1-2. Monitoring Schedule and Sampling Frequency
Summary	<p>Water quality sampling frequency in waterbodies proximal to project infrastructure, in particular saline and contact water ponds, does not include the freshet / post freshet period when risks associated with pond overtopping are at their height and contaminants deposited on land via dust deposition are mobilized to the receiving environment. Water quality sampling during or immediately following freshet is recommended.</p>
Detailed Review Comment	<p>Water quality sampling under the AEMP program occurs twice annually in April and August. These samples effectively characterize conditions late in the winter and during summer when inflows are minimized and water levels are at their lowest. However, the growing number of saline and contact water ponds currently on site and proposed through the operational update highlight a risk to the aquatic environment during and immediately following freshet. During this period, melting snow may report to these water management structures, increasing the risk of uncontrolled discharges either via overtopping or through use of the</p>



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Review Comment Number	KIA-NWB-19
Subject/Topic	Fish and Fish Habitat (Offset)
References	<p>KitIA-IR-22</p> <p>Appendix 4C: Analysis of Water Withdrawals at Hope Bay (ERM 2025)</p> <p>Section 3.0 Fisheries Analysis</p> <p>Section 3.1 Lakes</p> <p>Section 3.2 Outlet Streams</p> <p>Section 3.2.2.1. Fish Passability</p> <p>Section 3.2.2.2. Open Water Timing and Wetted Channel Area</p>
Summary	The submission lacks sufficient information on fish passability, and habitat impacts under updated operations and higher water withdrawals.
Detailed Review Comment	<p>AEM's response to KIA's IR does not address the previous request.</p> <p>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</p> <p>is presented in Appendix 6Q section 2.1 including Appendix table B.1 and B.2.</p> <p>Environmental flow needs assessment using the flow information and increased water withdrawal is required.</p> <p>Appendix Table B.1. and B.2 If HEP addresses life histories of spawning, nursery, foraging, and overwintering.</p> <p>There is no mention of fish movement, passability, and/or migration. If these were considered during HEP.</p>
Recommendation/Request	Please illustrate how fish passability/movement considerations contributed directly to each life functions in the HEP.



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Importance	High
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Review Comment Number	KIA-NWB-20
Subject/Topic	Fish and Fish Habitat (Offsetting)
References	KitIA-IR-23 Appendix 6 Q Conceptual Fish Offsetting Plan , Table 3.8, Table 3.9
Summary	Habitat loss or alteration occurred in both watercourse and waterbody that includes 8 watercourses (outflow and inflow) and 5 ponds. Habitat gain offsetting measures are implemented for waterbodies (5 ponds) but no offsetting measures are provided for the 8 watercourses where there were reported habitat losses: Doris Outflow, Windy Outflow, Little Roberts Outflow, Ogama Inflow, Ogama Outflow, Imniagut O utflow, Patch Outflow, and PO Outflow.
Detailed Review Comment	AEMs response to KIA’s IR 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).
Recommendation/Request	Provide offsetting measures for the 8 water courses 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 water courses that are impacted from previously submitted offsetting plan (ERM 2018).
Importance	High



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Review Comment Number	KIA-NWB-21
Subject/Topic	Fish and Fish Habitat (Offsetting)
References	KitIA-IR-24 Appendix 6 Q Conceptual Fish Offsetting Plan Table 3.8, Table 3.9
Summary	Lake Trout and Slimy Sculpin are expected to have habitat losses due to operational updates. However, habitat losses are not offset for these two species (see Table 3.8).
Detailed Review Comment	AEM's response to KIA's IR does not address the previous request.
Recommendation/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. "
Importance	High