

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (*i.e.* the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (*i.e.* bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

<u>TOPIC</u>	<u>COMMENT</u>	<u>RECOMMENDATION</u>
<i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i>	<i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i>

Item Number	Topic	Comment	Recommendation
IEMA 1	Use of baseline conditions	The ERM report defines a "natural" condition at closure as a free-flowing LLCF and watershed runoff. It is not clear whether ERM considered the original baseline conditions of the watershed downstream of Long Lake, prior to any mining activities, in its study on connectivity and fish habitat. For example, were there any habitat assessment conducted as part of the original fisheries assessment work or any stream level monitoring?	DDEC should ensure that its assessment of the impacts on connectivity from Fox pit filling reflects the original baseline conditions.

Item Number	Topic	Comment	Recommendation
IEMA 2	Further monitoring and modelling of fish, habitat and water flows	In the unnumbered summary pages following the covering letter, at the end of the section titled "LLCF Flooding, Source impact to Aquatic Species", DDEC states "The best timing for submission of the detailed pumping plans (including adaptive management aspects) is shortly before pumping as this ensures that the plan is based on the most current information." The ERM report (pages 32 and 33) provide details on critical areas of uncertainty that should also be addressed by the company. It is not clear what type of work or monitoring DDEC intends to carry out between the presumed acceptance of this approach to Fox pit flooding and submission of the detailed pumping plan.	DDEC should provide details of what monitoring and modelling work it will undertake between acceptance of this new approach to Fox pit flooding and the submission of the detailed pumping plan to ensure it is based on the most current information.

Item Number	Topic	Comment	Recommendation
IEMA 3	Timing, content of a detailed pumping plan and public reporting	<p>In the unnumbered summary pages following the covering letter, at the end of the section titled “LLCF Flooding, Source impact to Aquatic Species”, DDEC states that “Adaptive management for the Fox pit filling will provide the means of adjusting pumped flows rates to prevent adverse effects in the receiving environment.” It is not clear when DDEC intends to submit the detailed pumping plan or whether it will contain pumping rate ranges or just what adaptive management strategies will be implemented. It is also not clear whether DDEC intends to monitor affected streams for water depth to assure connection between lakes is maintained during periods of fish use and migration. This hydrographic monitoring is currently done a minimum of 7 times/year in the AEMP (see Table 2.2-1 of 2013 report) but this would need to continue into closure to cover the entire open-water season. For example, how will water levels in particular streams feed into pumping rates? It is not clear whether or how the company intends to report on the implementation of the plan.</p>	<p>The WLWB should direct DDEC to submit the pumping plan at least one year in advance of implementation, for approval. The WLWB should direct that DDEC provide specific details on the adaptive management aspects of the plan, including details on stream flow monitoring and how pumping rates will be adjusted. The WLWB should also direct that DDEC reported annually in the AEMP on the implementation of the Plan, including stream water levels during the open-water period, and how those results of monitoring and revised modelling are used to adaptively manage Fox pit filling.</p>

Item Number	Topic	Comment	Recommendation
IEMA 4	Delay in breach of ice core dam and spillway construction at Cell E	Fox pit filling will require 15-18.5 years and that the Cell E ice core dam be retained (ERM memo, page 26). This is a significant change in the ICRP and will require that the company keep the equipment necessary for this work on site and in working order, or that new equipment will have to be brought in. It is not clear what effect this delay will have in the costing of the ICRP and financial security.	DDEC should explain how the delay in the breach of the ice core dam and spillway construction at Cell E may affect the RECLAIM cost estimate and financial security.
IEMA 5	Timing of any adjustment of financial security	It appears that DDEC is requesting an immediate adjustment of its financial security held under the water licence in relation to reduced costs associated with Fox pit filling from Cell D. The detailed plan is not to be submitted until “shortly before pumping” yet there is considerable uncertainty and no commitment to any monitoring or modelling as part of the preparation of that plan, and few details on adaptive management. There will also be a significant delay in breaching the ice core dam at the end of Cell E and in constructing the spillway. It is the Agency’s understanding that DDEC has yet to post full financial security under the current water licence. Given all of the above, the Agency cannot support any reduction in financial security until full security is posted under the current water licence and a detailed pumping plan using Cell D is approved.	The WLWB should not provide for a reduction in financial security until full security is posted under the current water licence and a detailed pumping plan using Cell D is approved.