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Mr. Chuck Hubert
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Re: Jay Project - Response to IR#77 – Assessment Endpoints and Significance Characterization

The Mackenzie Valley Environmental Impact Review Board requested that all Parties state their views on Dominion's choice of assessment endpoints for characterizing significant impacts for each of the Key Lines of Inquiry (KLOI) (except Alternatives).

Diavik Diamond Mines (2012) Inc. (DDMI) have reviewed the Developer's Assessment Report and would like to provide comment on the KLOI – "impacts to water quality and quantity from Project components". Dominion's choice of assessment endpoints for this KLOI is understood to be those listed in Table 8.1-1 with significant impacts as defined on pg. 8-448 based on the definitions in Table 8.7-1.

Regarding the assessment endpoints, DDMI notes that the endpoints only appear to include ecological uses and that anthropogenic uses (e.g. domestic and industrial) are excluded. DDMI recommends that domestic and industrial water uses be included as assessment endpoints. Specifically, that for the VCs of Surface Hydrology and Surface Water Quality, assessment endpoints include:

- Domestic use is not impaired
- Industrial use is not impaired

Regarding the characterization of significant impacts, it is unclear if the definition is consistent with how the term appears to be being applied by regulators as part of Aquatic Response Frameworks required by Water Licenses. For example in the Wek'èezhìi Land and Water Board (WLWB) Decision regarding the DDEC Aquatic Response Framework (January 30, 2015) the significance threshold is characterized as a level of change that is to be ensured is "never" reached. DDMI recommends confirming that the environmental assessment and regulatory definitions are aligned.

Please let me know if you require any additional clarification.

Regards,



Gord Macdonald

cc: Richard Bargery - DDC