EA1819-01 Depositing Processed Kimberlite in Pits and Underground

Presentation at Public Hearings

September 5 – 6, 2019

Yellowknife, NT



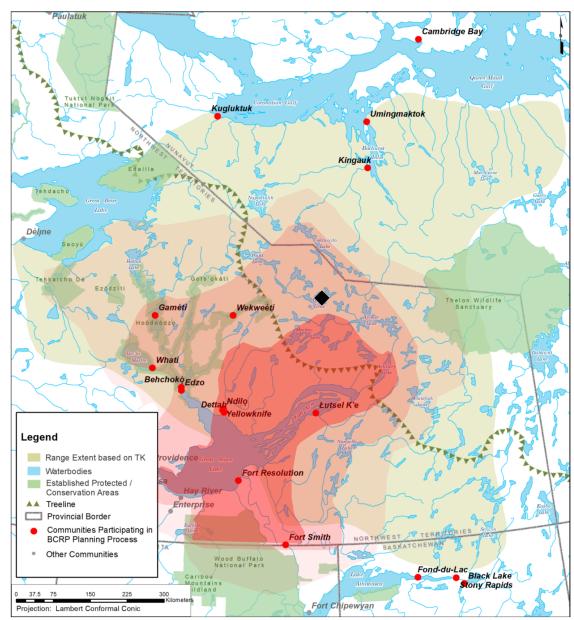
- 915 members
- Fort Resolution / Yellowknife
- Treaty 8 signed in 1900
- Akaitcho Treaty 8 Tribal Council

"...for as long as the sun shines, the rivers flow, and the grass grows..."



The DKFN asserts that their treaty rights include the right to hunt, fish, trap and gather to sustain their livelihood in their traditional territory.

DKFN
Socioeconomic
Use Area.





 DKFN <u>supports responsible development</u> in its Traditional Land Use area.

 DKFN has concerns and recommendations that need to be addressed to ensure that this development has minimal infringement or effects on its Aboriginal and Treaty Rights.

GENERAL COMMENTS

- Lack of consultation and engagement
- Too many information gaps are proposed to be filled post EA approval



CONCERNS

- Water quality
- Fish and fish habitat
- Wildlife and wildlife habitat



WATER QUALITY

DDMI Impact Predictions

- Modeling for A418 & A154 neutral effect
- Modeling for A21 adverse effect

DDMI Conclusions

 Issues of concern related to EFPK into mine workings are the same as FPK

WATER QUALITY

DKFN Recommendations:

1. Third party review of water quality model.



2. Develop a conceptual site model that includes:



- release mechanisms
- Transport
- Uptake mechanisms
- 3. Lit review evidence-based depth threshold
- 4. Validate the 500 mg/L threshold





Stratification and Water Quality

DDMI Impact Predictions

- Fish are excluded from pit lakes until AEMP benchmarks are met
- Meromixes will prevent exposure to deleterious conditions
- Fish species are restricted to <40 m

DDMI Conclusions

- Generally no impacts to fish
- AEMP benchmarks exceeded in A21



DKFN Recommendations:

1. Remove A21 from PK deposition



2. Lit review – evidence-based depth threshold



Siltation and Disturbance

DDMI Impact Predictions

Details of dike breaching not well described

DDMI Conclusions

- Potential effect on stratification due to breaching dike walls
- Impact not assessed



DKFN Recommendations:

1. Need for clear methods and mitigation during breaching of dikes.



WILDLIFE AND WILDLIFE HABITAT

DDMI Impact Predictions

Change in WQ could affect caribou health

DDMI Conclusions

- Effects on caribou health negligible
- No additional loss of habitat



WILDLIFE AND WILDLIFE HABITAT

DKFN Recommendations:

1. Take a cautionary approach to the prediction of project related effects



CLOSING

- Effective of consultation and engagement
- Unaddressed recommendations deferral to the permitting stage
- Collaboration with Indigenous groups



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