



Independent Environmental Monitoring Agency

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May 17, 2018

Joseph Mackenzie
Acting Chair, Wek'eezhii Land and Water Board
#1-4905 48th St, Yellowknife, NT
X1A 3S3

Re: Sable Diffuser Construction Plan

Dear Mr. Mackenzie,

The Independent Environmental Monitoring Agency (Agency) has reviewed the Sable Project Diffuser Construction Plan (Construction Plan) and submits the following comments to the Wek'eezhii Land and Water Board for your consideration.

Adaptive Management

Section 3.2.2 discusses the adaptive management actions to be implemented if the primary and secondary thresholds for Total Suspended Solids are triggered. The actions described are acceptable however, the language is very vague and non-committal. For example, it states that if triggers are exceeded the following actions may be implemented. The Agency believes that if the thresholds are triggered these actions should be implemented not just considered. During construction activities the Inspector plays a key role in ensuring that permit requirements are met, best practices are being used, and is able to provide direction to Dominion Diamond should an issue arise so that it can be addressed before an exceedance occurs. As such, the inspector should be contacted once the primary or secondary adaptive management threshold is triggered.

Recommendation 1: Ambiguous terms such as 'may be' should be removed from the adaptive management actions to provide greater certainty as to timely initial intervention on any issues that may arise.

Recommendation 2: Dominion Diamond contact the Inspector upon triggering of a primary or secondary adaptive management threshold.

Diffuser Project Footprint

Section 3.1.2 describes the diffuser and associated pipeline as having a small footprint of roughly 176 m². This number does not seem correct. Based on the Construction Plan the in-lake portion of the diffuser will be 286 m long with over a meter wide pipeline corridor and the land-based portion of the pipe including the associated road bed is roughly another 500m.

Recommendation 3: Dominion Diamond recalculate the total diffuser project footprint including the above ground portion with associated access road and the underwater pipe and diffuser including the associated anchor points.

Should you have any questions concerning these comments, the Agency is pleased to discuss these at your convenience.

Sincerely,

A handwritten signature in blue ink that reads "Jaida Ohokannoak". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Jaida Ohokannoak
Chairperson

Cc: Dominion Diamond– April Hayward
Tłıchq Government – Jessica Hum
Yellowknives Dene First Nation – Alex Power
łutsel K'e Dene First Nation – Ray Griffith
North Slave Metis Alliance – Nicole Goodman
Kitikmeot Inuit Association – Geoff Clark,
Government of the Northwest Territories – Laurie McGregor
Indigenous and Northern Affairs Canada – Michael Roesch