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Date: Fri, Jan 30, 2015 at 10:38 AM

Subject: re: Agency Files Additional Comment on the AEMP Design Plan Update for Lynx Project--Monitoring of Fugitive Dust Effects from Lynx Project

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The Agency submitted one comment on the AEMP Design Plan update in relation to Lynx Project as follows:

Comment: With a new pit and associated access road to be operated within 2 km of Lac de Gras, it seems likely that there will be some dust deposited in the area of Lac de Gras closest to the pit and downwind of the pit operations. It would be helpful to know what these effects may be and to establish a baseline before development begins at Lynx. This could then be compared to conditions after construction and operations begin.

Recommendation: DDEC should be directed to establish a new AEMP station sited within the northeast arm of Lac de Gras near the Lynx pit. The siting of the station should be guided by prevailing downwind conditions and proximity to the footprint of the Lynx development area. Sampling should begin as soon as possible with open water conditions in 2015 to help establish baseline conditions, and continue until closure. The sampling should include water, biota and sediments. Sampled water quality and sediment variables should include TSS, nutrients and metals. The Agency understands this may be somewhat precautionary, but we believe this would be helpful because: (1) DDEC is committed to a precautionary approach by the Environmental Agreement and (2) the results of the monitoring we propose would serve well in the event that Jay is approved.

DDEC responded on January 26, 2015 as follows:

DDEC disagrees that an additional AEMP sampling location in Lac de Gras is required at this time. Dustfall monitoring falls under the purview of the Air Quality Monitoring Program

(AQMP), which is currently being updated in order to accommodate the work planned at the Lynx development. Dustfall monitors near the shore of Lac de Gras downwind from the Lynx development will enable the estimation of any potential effects to the aquatic environment and the institution of aquatic monitoring on an adaptive management basis should there be any indication of likely effects. Baseline and future monitoring requirements for the proposed Jay Project are currently the subject of review by the MVEIRB and, as such, should not be a factor in WLWB decision-making for the Lynx Project.

In light of DDEC's response, the Agency today filed an additional comment and recommendation through the on-line registry system as follows:

Comment: The Agency noted DDEC's January 26 response to our recommendation for an AEMP station in Lac de Gras. The Agency supports improvements and updates to the 2009 Air Quality Monitoring and Management Plan. However, that Plan does not reflect the sampling locations used in the 2011 Air Quality Monitoring Program Report and further improvements that the company committed to in response to the Agency's review of the 2011 Report by SENES Consultants. It is unclear whether DDEC intends to only place dustfall collectors near Lynx and whether any snow or vegetation sampling is anticipated. It would also be important to have an updated Air Quality Monitoring and Management Plan well before any work is carried out at the Lynx site. Even with such monitoring in place, the Agency remains concerned with possible changes to water quality in nearby Lac de Gras.

Recommendation: DDEC should provide a firm date as to when it will distribute an updated version of its Air Quality Monitoring and Management Plan that takes into account the Lynx Project and other improvements in air quality monitoring and management. Time should also be allowed for engagement with other interested parties, especially GNWT. The changes to the Plan with regard to the addition of the Lynx Project should include details on dustfall sampling and locations, and whether snow and vegetation sampling will also be conducted. This date for comments and a formal review should be concluded well in advance of work at the Lynx site to ensure proper air quality monitoring before the project begins.

The Agency looks forward to a response from DDEC.

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