Appendix 2-A

Proponent Response to Screening Comments

APPENDIX 2-A. PROPONENT RESPONSE TO SCREENING COMMENTS

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
1	Executive Summary	Summary of the consultations undertaken		Y/N	CEAA	Qualifying language ("as appropriate/relevancy") is unnecessary, inflammatory, and inadvertently places arbitrary boundaries on consultation - remove	The EIS has been adjusted to limit the use of qualifying language.	--
2	Executive Summary	Summary of the consultations undertaken		Y	BC FLNRO	Page 2. Benefits of the environmental assessment process to Canadians include: Fish habitat compensation is proposed to mitigate Project effects, create and increase the productive capacity of bull trout, coho salmon, and rainbow trout in Project watersheds. To mitigate impacts on environmental values (vegetation and wildlife) the Province is implementing the following mitigation measures (avoid, minimize, restore on-site, and/or offset): • Avoid impacts on environmental values and associated components. • Minimize impacts on environmental values and associated components. • Restore on-site the environmental values and associated components that have been impacted. • Offset residual impacts on environmental values and associated components. When the proponent is unable to avoid impacts, minimize impacts, or restore on-site the Province requires offset for the residual impacts on environmental values. The provincial mitigation/compensation policy. http://www.env.gov.bc.ca/emop/ Field studies, monitoring and other scientific programs carried out for the environmental assessment process related to fisheries, wildlife, climate and water quality add to an understanding of the current natural conditions of the area Were the results from the fish/ fish habitat, wildlife/ wildlife habitat field studies and monitoring programs entered into provincial data bases (ie. SPI, CDC). Page 8 (Part B- 3- Alternatives Assessment) - During the construction phase of the Project, temporary generators will be installed prior to the availability of BC Hydro power. When can it be expected that the upgrades will be made to the BC Hydro transmission line to meet the power demands of the Harper Creek Mine. Page 23 (Part C – Vegetation and Wildlife) - The proposed mitigation includes measures include: 1) impact avoidance, 2) impact reduction and technical mitigation, and 3) reclamation. Proponent has missed a fourth critical category to address potential effects 4) Offset residual impacts on environmental values and associated components Page 24 (Part C – Vegetation and Wildlife) - The Project will also affect over 50% of all wetlands in the LSA, mainly due to the placement of the TMF in a high-elevation wetland-meadow complex area, representing about 13% of the high-elevation wetlands within the RSA. MFLNRO requests that the proponent provide a detailed map illustrating the location and size of all high-elevation wetland-meadow complexes within the RSA. KP Hydrology report, • Page 3, Exec. Summary – report states that mine not expected to impact low flows except maybe P creek. MFLNRO disagree, impacts to P and T creeks will reduce Harper Creek low flows. We would expect changes to Jones and Baker Creeks. • Page 8, How were winter flows calculated since stream gauges were removed in winter? • Page 9, Two meters were used, Swoffer and Marsh McBirney. This may be a source of error and inconsistency, Swoffer meters have errors at low velocity (i.e. propellers may not turn properly) giving incorrect cell discharge. (FLNRO)	No wildlife and vegetation offsetting plans are anticipated for the Project. Field and monitoring data can be provided to provincial databases if requested by FLNRO. It is expected that the upgrades to the BC Hydro transmission line will be in progress at the beginning of Project construction to meet the needs of the Project. A detailed map illustrating the location and size of all wetlands within the Project area is provided in Figure 15.5-3. Project impacts to hydrology, including P, T, and Harper creeks low flows and changes to Jones and Baker creeks, are assessed in Chapter 12.	--

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3	Executive Summary	Summary of the Project benefits		Y	BC MOTI	In the construction phase two routes are assessed – Alternative 1: West then South. KP Road, Birch Island Bridge, Birch Island Lost Creek Road, Jones Creek FSR. There is a large gap between KP Road and Birch Island Bridge. Please elaborate on what roads are used in between. (Executive Summary Page 8 of 37) (MOT)	The revised plan for the mine access road route, which will be widened and its alignment improved during construction, is from Highway #5 via the Vavenby Mountain FSR, Saskum Plateau FSR and the Vavenby-Saskum FSR. During construction, oversized loads will require an alternative access across the North Thompson River as the Vavenby Bridge has not been designed to cater for such loads safely. The proposed temporary construction route access for oversize loads will be from Highway #5 via the Birch Island-Lost Creek road (BILCR) to join the Vavenby Mountain FSR. This proposed route crosses the North Thompson River at the BILCR Bridge which has been designed for heavier loads.	*Project Design and Alternatives* section in Executive Summary. 5.8.3 Appendix 5-E
4	Executive Summary	Summary of the Project benefits		Y	Neskonlith Indian Band	Insufficient or lacking consultation with Neskonlith Indian Band on Cultural Heritage issues (Neskonlith)	HCMC's consultation with Aboriginal groups is discussed in Section 3.5 and a NIB specific section is included in Section 3.5.1.4 with respect to EA related funding. HCMC provided NIB with the Archaeological Impact Assessment Report in November 2012 for review and comment and the Archaeological Overview Assessment for Powerline Route Options in May 2014. HCMC also provided NIB with a set of Working Tables in July 2013. Each Working Table set out a particular concern raised regarding a Project activity, identified proposed mitigation measures, summarized the effects assessment (residual effects and cumulative effects), and provided a space to identify and provide HCMC with additional information on concerns regarding impacts on Aboriginal interests, and suggestions for mitigation and accommodation. Cultural and archaeological sites and access to traditional use sites were included in the Working Tables. HCMC's offers of capacity funding in July 2013 was to cover the costs associated with First Nations' review of the Working Tables. NIB provided comments on the Working Tables in November 2013, including comments on cultural and archaeological sites and landforms and impacts to traditional use sites. These issues have been incorporated and responded to in the NIB issues tracking table (Table 3-F3 of Appendix 3-F).	3.5 3.5.1.9 Appendix 3-F

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5	Executive Summary	Summary of the recommended mitigation measures		N	CEA Agency	Pointing to a table in the main body of the document as a stand-alone statement is not acceptable for an executive summary. The expectation is an encapsulation or high-level summary of key impacts, mitigation measures, residual effects, and cumulative effects. For non-cumulative impacts, recommend a high level summary for each of the disciplines in first column of Table 13.0-1.	A summary of key recommended mitigation measures is included in the Executive Summary.	*Summary and Conclusions* section in Executive Summary.
6	Executive Summary	Summary of the potential cumulative impacts and residual effects		N	CEA Agency	Not clear why water quality summary in Table 13.0-1 does not state the significance of the residual effects or the cumulative effect, but instead indicates "assessed in applicable VCs". If these are assessed in the applicable VCs, then why not include the result in the summary table?	A summary of all potential cumulative impacts and residual effects is included in the Executive Summary.	*Summary and Conclusions* section in Executive Summary.
7	Executive Summary	Summary of the potential cumulative impacts and residual effects		Y	BC EAO	. 33 – should not quote EAO SOC letters (EAO)	HCMC does not understand the reviewer's comment.	--
8	Executive Summary	Summary of the potential cumulative impacts and residual effects		N	Neskonlith Indian Band	Proponent has made assumptions regarding Neskonlith's interests in the Project area which are incorrect and run counter to information received by the Proponent from Neskonlith. Despite being covered by the amended section 11 order, the Proponent continues to rely on the initial section 11 order in stating that "YMI focused consultation efforts on the Simpcw First Nation and Adams Lake Indian Band as directed by the section 11 Order. Simpcw First Nation provided HCMC with evidence of use and occupation Strength of Claim and a Traditional Land Use Study). Guided by information received from Simpcw First Nation and strength of claim assessments completed by the provincial government, HCMC considers Simpcw First Nation to be the primary First Nation, with respect to the potential for adverse effects on its interests, in relation to development of the Harper Creek Project." – this is not the Proponent's decision to make (Neskonlith).	The Information Distribution and Consultation Chapter has been revised, along with the Aboriginal Rights and Interests chapter (Chapter 23) to reflect the comments made by all Aboriginal groups identified in the Section 13 Order, including NIB. This information is included in the Executive Summary as well as in Section 3.5 of Chapter 3.	*Aboriginal Information Distribution and Consultation* section in Executive Summary 3.5 Chapter 23
9	Executive Summary	Summary of First Nations' considerations		N	CEA Agency	Summary of Potential Effects on Aboriginal Activities and Accommodation Measures subsection is too general and does not contain any examples or encapsulations of any key issues identified to date. While it is understood that discussions are ongoing wrt the IBA, by this point in the EA, it is expected that specific key impacts to Aboriginal rights would be identified.	The Executive Summary includes key issues raised by Aboriginal groups.	*Aboriginal Information Distribution and Consultation* section in Executive Summary
10	Executive Summary	Summary of First Nations' considerations		N	Neskonlith Indian Band	Proponent has made assumptions regarding Neskonlith's interests in the Project area which are incorrect and run counter to information received by the Proponent from Neskonlith. Despite being covered by the amended section 11 order, the Proponent continues to rely on the initial section 11 order in stating that "HCMC focused consultation efforts on the Simpcw First Nation and Adams Lake Indian Band as directed by the section 11 Order. Simpcw First Nation provided HCMC with evidence of use and occupation Strength of Claim and a Traditional Land Use Study). Guided by information received from Simpcw First Nation and strength of claim assessments completed by the provincial government, HCMC considers Simpcw First Nation to be the primary First Nation, with respect to the potential for adverse effects on its interests, in relation to development of the Harper Creek Project." – this is not the Proponent's decision to make (Neskonlith).	The proponent has revised its Consultation (Chapter 3) and Aboriginal Rights and Interests (Chapter 23) chapters to reflect the comments made by all Aboriginal groups identified in the Section 13 Order. This information is included in the Executive Summary.	*Aboriginal Information Distribution and Consultation* section in Executive Summary Chapters 3 and 23

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11	Executive Summary	Summary of the follow up programs proposed (if applicable)		Y	BC MOTI	Traffic Management Plan (TMP) listed under "Management Plans, Compliance Reporting and Follow-up Programs" but TMP is not included in application. (Executive Summary Page 31 of 37). (MOT)	A Traffic and Access Management Plan has been provided.	*Project Description* section in Executive Summary. 24.16
12	Executive Summary	Summary of the follow up programs proposed (if applicable)		Y	Neskonlith Indian Band	Follow up measures focus on Simpcw and to a lesser extent Adams Lake, which does not address the asserted interests and concerns of Neskonlith (Neskonlith).	The proponent has revised its Consultation (Chapter 3) and Aboriginal Rights and Interests (Chapter 23) chapters to reflect the comments made by all Aboriginal groups identified in the Section 13 Order in response to the previous EA submission.	Chapter 3, Chapter 23
13	Executive Summary	Proponent conclusions from the EA with a statement regarding the key conclusions of the impact assessment		N	CEA Agency	Need to highlight where the most key/critical impacts and mitigations are for the project (top 3-5)	Key/critical impacts of the Project and mitigation measures are provided in the Executive Summary.	*Summary and Conclusions* section in Executive Summary.
14	List of Abbreviations	A final list of acronyms and abbreviations used in the Application	Abbreviations	Y	CEA Agency	Add NRCan	The Acronyms and Abbreviations section of the EIS has been amended to include NRCan.	Acronyms and Abbreviations
15	List of Abbreviations	A final list of acronyms and abbreviations used in the Application	Abbreviations	Y	BC MOTI	There seems to be quite a few abbreviations missing on this list. (MOT)	The Application has been revised to include a complete list of abbreviations.	Acronyms and Abbreviations
16	Table of Concordance	A table that clearly indicates how the requirements contained in the approved AIR have been met by the information provided in the Application.	Table of Concordance	Y	BC MOTI	This table is extremely difficult to use and the application itself has information about access routes all over the place. It feels like multiple parties wrote sections on the access routes proposed but did not communicate to one another - some of the information conflicts. (MOT)	The Table of Concordance has been revised and includes a new layout to support regulatory review.	Table of Concordance
17	1.0 – Purpose of the Application	Explain the purpose of the Application and detail specific structural components of the document	Preface to the Application, 1.1	Y	BC MOTI	EA Working Group, not "Technical Working Group" (EAO); Sections of the 24km "access road" are actually multiple roads under different jurisdictions (MoTI, District of Clearwater, MFLNRO). (Section 1.0 Introduction Page 1-3 of 33) (MOT)	These errors have been addressed throughout the Application/EIS.	--
18	1.1 – Introduction	Provide context and background to the purpose and organization of the Application.	Preface to the Application, 1.1	Y	CEA Agency	Do not see any of this information in 1.2. It is all in the Preface	The context and background to the purpose and organization of the EIS are included in the Preface.	Preface

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19	1.2 – Purpose and Understanding of the Environmental Assessment Process and Regulatory Framework	A discussion of federal legislations, provincial legislations, and other guidance documents relevant to the Project	1.6	Y	BC MOTI	This section makes several references to the Special Waste Regulation which was superseded by the Hazardous Waste Regulation in 2004 (MOE) Anticipated Provincial Permits, Licenses and Approvals Correction: MoTI will require a Provincial Public Highway industrial access permit for the intersection of Jones Creek FSR and Birch Island Lost Creek Road and the intersection of Vavenby Mountain FSR and Birch Island Lost Creek Road – INDUSTRIAL ROADS ACT, Section 5. The overhead power and communications line will be permitted to BC Hydro only in accordance with the utility policy manual – HIGHWAY ACT, Section 17 (j) and (l). MoTI will also require a Provincial Public Highway industrial access permit for the access to KP Road from Lot 748A. (Section 1.0 Introduction Page 1-25 of 33). Birch Island Lost Creek Road is a public road under MoTI jurisdiction. Any road improvements to the switchback will require a Works on Right-of-way permit - TRANSPORTATION ACT, Section 62. (Section 2.0 Project Description Page 2-22 of 104). (MOT)	The list of permits and authorizations provided in Table 2.4-1 is intended to only list potential permits that will be required for the Project. The final list of permits that will be required for Construction, Operation, Closure and Post-Closure of the Project will be determined during the Project's permitting phase.	--
20	1.3 – Purpose and Understanding of the Application Information Requirements	State that the AIR document for the proposed Project was approved by the EAO and will include the date the AIR was approved	1.6	Y	CEA Agency	Month mentioned in Table 1.6-1, but exact date needs to be inserted	The date of final AIR approval, October 21, 2011, is listed in Section 2.3.2.1 of the Assessment Process Chapter.	2.3.2.1
21	1.3 – Purpose and Understanding of the Application Information Requirements	Note that the approved AIR document was prepared as directed by the EAO under Section 11 of the BCEAA on September 18, 2008	1.6	N	CEA Agency	Date in Table 1.6-1 does not match date in brief description column to the left in this document	The Project's Section 11 Order is dated September 11, 2009. The Project's section 10(1)(c) Order is dated September 18, 2008. These dates are reflected throughout the Application/EIS.	--
22	1.3 – Purpose and Understanding of the Application Information Requirements	Discuss the intent of the approved AIR, in that the document identifies information that must be included in the Application	1.6	N	CEA Agency	AIR is mentioned in Table 1.6-1 but does not explain intent of approved AIR.	The purpose of the AIR is stated in Section 1.3.1 as "The AIR requires that HCMC provide a thorough assessment of potential environmental, social, economic, heritage, and health effects of operation/maintenance, and decommissioning of the Project, including a description of recommended mitigation measure to reduce or eliminate potential effects."	1.3.1
23	1.3 – Purpose and Understanding of the Application Information Requirements	Discuss the intent of the approved AIR, in that the document identifies information that must be included in the Application		N	BC EAO	Table 1.6-1 – Purpose of the AIR should be described here, not general characteristics of the EA process (EAO)	The purpose of the AIR is stated in Section 1.3.1 as "The AIR requires that HCMC provide a thorough assessment of potential environmental, social, economic, heritage, and health effects of operation/maintenance, and decommissioning of the Project, including a description of recommended mitigation measure to reduce or eliminate potential effects."	1.3.1

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24	2.0 – Proposed Project Description	Details and background to the proposed Project		Y	BC MFLNRO	2-13 (2.3.1 Mine Site Area) - A mine access road about 23 km in total length resulting from improvements to existing road infrastructure, and which also includes construction of a new 2.5 km road section near the mine site area. Proponent needs to provide additional details on what the 'improvements to existing road infrastructure' will entail; 2-13 (2.3.1 Mine Site Area) - A new 138 kV power line (the 'HCMC power line') about 12 km in length, connecting the plant site substation to the BC Hydro transmission line corridor. A detailed map illustrating exact location of the powerline is requested by MFLNRO detailing power pole placement (ie. location of any stream/ wetland crossings). Clarification is also requested from proponent – was the transmission line included within the LSA?; 2-28A (2.4.14 Security) - A security service contractor will be retained and an entry gate will be built to ensure the physical integrity of the facilities as well as control and record the access of people to construction and restricted areas. Proponent needs to provide addition details on the entry gate location and who will be given keys to the gate (access control) (FLNRO)	Access road: upgrades will include, as necessary, widening, improvements to alignment, improvements to the BILCR/Vavenby Mountain FSR junction, and signage improvement.Power line: Exact pole placement would be premature, although bend points of the two alignments are shown nominally. Single or H-frame wood poles spaced approximately every 100 m are envisaged.A gatehouse will be constructed at the entrance to the mine site. Since it will be staffed, keys will not be issued.	5.8.3 Appendix 5-E 5.7.1.6 5.8.4 Figure 5.8-4 5.7.2.7
25	2.0 – Proposed Project Description	Project objectives, Project planning, and history to date	1.2, 2.1	Y	CEA Agency	Add Section 1.7	Project objectives, planning, and history to-date are presented in Sections 1.2 through 1.4, Section 1.5.2, and Section 5.3.	1.2, 1.3, 1.4, 1.5.2, and 5.3.
26	2.0 – Proposed Project Description	Project management and monitoring programs	10	N	CEA Agency	10.1.5.1 – not acceptable to state that SOPs will be developed to identify methodologies as this is considered a key part of the overall mitigation strategy. More detail required (list of SOPs and general procedures and application of each with opportunity to refine these as necessary—adaptive management is to be applied on details, not general and broad mitigations). It is also expected that monitoring work during construction phase will be overseen by a third party independent environmental monitor.	The Proponent thanks the Agency for raising this issue, but believes the question is relevant to Project permitting rather than this Application/EIS. This question will be addressed in full during the Project's permitting stage.	--
27	2.0 – Proposed Project Description	Figures, photographs, and site plans to depict the regional setting, Project layout, site features, and the location of various activities	2, Appendix Q	Y	CEA Agency	No reference to Appendix Q in Section 2	The information requested has been provided in the various figures presented in Chapter 5 of the Application/EIS.	Figures 5.1-1 to 5.9-3.
28	2.0 – Proposed Project Description	Current land status	1.5	Y	BC MFLNRO	Pg 134 of 1332 3rd paragraph notes Simpcw First Nation at Boulder Creek 5 located approximately 15 km west of the Project as illustrated in Figure 1.5.2. This is not actually shown in the figure.	This figure no longer appears in the Project Description.	--
29	2.0 – Proposed Project Description	Current land status	2.5	Y	BC MFLNRO	Old Growth Management Areas have recently been legally established. These would be in the same or similar configuration as over the last 6 years. (see pg 586)(FLNRO) There is no replacement for OGMA loss identified in the document, only ha of OGMA loss. Some mitigation by placing facilities to avoid direct impacts, where feasible.(pg 722) (FLNRO)	Identifying replacement OGMA was a potential mitigation measure for old-growth forests; however, OGMA objectives do not place any legal limits on mineral exploration and development activities. A stockpile that was originally located northwest of the open pit has been moved to avoid sensitive habitat including an Old-Growth Management Area.	Chapter 15, Figure 15.5-4
30	2.0 – Proposed Project Description	Labour force required once the mine is fully operational (direct jobs only)	2.14, 7.1, Appendix A	Y	Little Shuswap Indian Band	Not as many as I had assumed. Valley's potential is limited (LSIB)to retain or recruit employees. (LSIB)	The Operations phase labour force is described in Chapter 5, Section 5.13.2.	5.13.2.

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31	2.2.1 – Location of Project and Mapping	Maps, aerial photographs, and figures that clearly depict the Project location and the longitude and latitude (containing appropriate scaling and regional contexts)	1.2, 2, Appendix Q	Y	CEA Agency	No reference to Appendix Q in Sections 1.2 or 2.	The information requested has been provided in the various figures presented in Chapter 5 of the Application/EIS.	Figures 5.1-1 to 5.9-3.
32	2.2.3 – Project Geology	Lithology, faults, and fractures and seismic events that occurred in the region	2.2, 6.9, Appendix A	Y/N	NRCan	Reference to the number of seismic events in SW British Columbia is given in Section 6.9. However, the mine site is not geographically located within SW BC. Please refer to the Natural Resources Canada online database of earthquakes to determine a more appropriate level of seismicity (i.e. within 100 km) for the study region (http://www.earthquakescanada.nrcan.gc.ca/stndon/NEDB-BNDS/bull-eng.php).	Revised sections on seismicity are included in Chapters 5 and 27, as well as Appendix 5-F of the Application/EIS.	5.5.4 27.5.3 Appendix 5-F
33	2.2.3 – Project Geology	Lithology, faults, and fractures and seismic events that occurred in the region		Y/N	NRCan	NRCan also suggests the proponent consider potential effects on the mine infrastructure from a large earthquake (e.g., M 9.0) on the Cascadia Subduction Zone.	Revised sections on seismicity are included in Chapters 5 and 27, as well as Appendix 5-F of the Application/EIS.	5.5.4 27.5.3 Appendix 5-F
34	2.2.3 – Project Geology	Lithology, faults, and fractures and seismic events that occurred in the region		Y/N	NRCan	NRCan did not find any discussion in the EIS on the potential for active faults in the area that may affect the mine site and the structural integrity of the tailings dam. Please provide this information	The TMF area is predominantly underlain by orthogneiss, intruded by subordinate granodiorite and quartz monzonite. Three drillholes exhibited zones of fractured rock indicating a potential fault zone and two additional holes were drilled in order to confirm the presence of the fault and delineate its structure if present. However, a fault was not intersected by either drillhole. The geotechnical drillhole logs are presented in Appendices B1 and B2 of Appendix 7-B, 2012 Geotechnical Site Investigation Factual Report. The bedrock in the TMF area is described as 'good' quality rock, with an average RMR value of 68 and an average RQD of 78%. Typically, the RMR values show little to no variation with depth, as shown in Appendix B3 of Appendix 7-B, 2012 Geotechnical Site Investigation Factual Report. The presently available information does not indicate a fault acting as a flow conduit. Future Site Investigation programs for subsequent design stages will further aim to improve this characterization.	Appendix 5-F Appendix 7-B
35	2.2.3 – Project Geology	Geohazard assessment for the regional and local study areas	2.2	N	NRCan	NRCan noted that the Geohazard assessment is missing from EIS section 2.2. However, it may be more appropriate for Section 6.9 (see 6.9 also).	Appendix 5-C, Terrain Mapping and Geohazards, provides this assessment.	Appendix 5-C

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36	2.2.3 – Project Geology	Geotechnical properties of pit mine materials, waste rock foundation materials, and tailings pond (dyke) foundation materials characterized based on results from drilling, test pits, and sampling programs	2.5, 2.8, Appendix A	Y	CEAA	Information is in 2.8 and Appendix A; do not see any relevant information in 2.5	The TMF area is predominantly underlain by orthogneiss, intruded by subordinate granodiorite and quartz monzonite. Three drillholes exhibited zones of fractured rock indicating a potential fault zone and two additional holes were drilled in order to confirm the presence of the fault and delineate its structure if present. However, a fault was not intersected by either drillhole. The geotechnical drillhole logs are presented in Appendices B1 and B2 of Appendix 7-B, 2012 Geotechnical Site Investigation Factual Report. The bedrock in the TMF area is described as 'GOOD' quality rock, with an average RMR value of 68 and an average RQD of 78%. Typically, the RMR values show little to no variation with depth, as shown in Appendix B3 of Appendix 7-B, 2012 Geotechnical Site Investigation Factual Report. The presently available information does not indicate a fault acting as a flow conduit. Future Site Investigation programs for subsequent design stages will further aim to improve this characterization.	Appendix 5-F Appendix 7-B
37	2.2.4 – Project Geochemistry	Short term elemental loading rates to the downstream environment	6.1, Appendix D	N	NRCan	NRCan did not find this information in the EIS.	The information requested has been provided in full in Chapter 6, Geochemistry. Sections 5.5.6 of the Project Description provide a synopsis of this information.	Chapter 6 5.5.6
38	2.2.5 – Project Facilities	A summary of all on-site components and associated on-site and off-site infrastructure and other facilities associated with the proposed Project, including figures of layouts	1.2, 2.3, 2.4	N	CEA Agency	Detailed layout of area for camp, plant, and other buildings needs to be provided (i.e.: mine dry, lab, sewage treatment plant, etc.)	A plan of the plant is now included in Chapter 5, Project Description.	Figure 5.9-4
39	2.2.5 – Project Facilities	A summary of all on-site components and associated on-site and off-site infrastructure and other facilities associated with the proposed Project, including figures of layouts		N	BC MOTI	"The area's established infrastructure preclude the need for any major off-site infrastructure developments to service the Harper Creek Project other than construction of a 12 km power line (the 'HCMC power line') connecting the plant site substation to the BC Hydro transmission line and building a new 2.5 km road section near the mine site area." MoTI will require access permits for all industrial access junctions with MoTI public roads. Permits may require additional road improvements and traffic management plans as per ministry standard. How did HCMC come to this conclusion? What about the condition of existing public road infrastructure and the additional truck traffic the mine will generate?	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind power line and road options. The need for specific permits will emerge during the post-EA permitting stage.	4.4.4 4.4.7 Appendix 5-E (Minutes of meeting: HCMC & MOTI, June 12, 2013)

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40	2.2.5 – Project Facilities	A summary of all on-site components and associated on-site and off-site infrastructure and other facilities associated with the proposed Project, including figures of layouts		N	BC MOTI	"To support development of the mine, the following services and ancillary facilities will be required for the Harper Creek Project: • A mine access road about 23 km in total length resulting from improvements to existing road infrastructure, and which also includes construction of a new 2.5 km road section near the mine site Area". The "mine access road" above includes some public road under MoTI jurisdiction. What improvements specifically are proposed?" (Section 2.0 Project Description Page 2-13 of 104).	Detailed engineering design of possible road upgrades has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage.	5.8.3 Appendix 5-E
41	2.2.5 – Project Facilities	A summary of all on-site components and associated on-site and off-site infrastructure and other facilities associated with the proposed Project, including figures of layouts		N	BC MOTI	Correction: Birch Island Lost Creek Road is not an FSR. It is a public road under MoTI jurisdiction.	This error has been corrected throughout the Application/EIS.	--
42	2.2.5 – Project Facilities	A summary of all on-site components and associated on-site and off-site infrastructure and other facilities associated with the proposed Project, including figures of layouts		N	BC MOTI	The preferred option as shown in Figure 1.2-3 will need to be addressed in the traffic impact study (TIS). See TIS comments below.	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind road options. A Traffic Impact Assessment has been undertaken.	4.4.7 Appendix 5-E (Minutes of meeting: HCMC & MOTI, June 12, 2013)
43	2.2.5 – Project Facilities	A summary of all on-site components and associated on-site and off-site infrastructure and other facilities associated with the proposed Project, including figures of layouts		N	BC MOTI	The approx. 23km road upgrades needs to be elaborated on – where, when, how etc. (Section 2.0 Project Description Page 2-16 of 104).	Detailed engineering design of possible road upgrades has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage.	5.8.3 Appendix 5-E
44	2.2.5 – Project Facilities	A summary of all on-site components and associated on-site and off-site infrastructure and other facilities associated with the proposed Project, including figures of layouts		N	BC MOTI	"Additionally, for the movement of heavy construction traffic, modification to one switchback will likely be required along the Lost Creek FSR." Birch Island Lost Creek Road is a public road under MoTI jurisdiction. Any road improvements to the switchback will require a Works on Right-of-way permit - TRANSPORTATION ACT, Section 62 . (MOT)	Detailed engineering design of possible road upgrades has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage.	5.8.3 Appendix 5-E (Minutes of meeting: HCMC & MOTI, June 12, 2013)
45	2.2.5 – Project Facilities	A description of the activities associated with construction, operation and decommissioning of the proposed Project, including schematic representations of activities, where applicable	2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 2.10, 2.11, 2.12	N	CEA Agency	Information is distributed across too many sections—need to consolidate to no more than 3 sections (construction, operation, decommissioning). While Section 2 of the document provides some of this information, it is overly focused on engineering considerations and process-related matters rather than phase-related considerations. An expanded view of the layout of building structures needs to be provided. A list of buildings and ancillary structures is required.	The Project Description (Chapter 5) has been restructured and each Project phase is detailed in its own section.	5.7

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
46	2.2.5 – Project Facilities	A description of the activities associated with construction, operation and decommissioning of the proposed Project, including schematic representations of activities, where applicable		N	CEA Agency	Section 2.4, pg. 2-23 of 104, "standard constructions and environmental protection practices will be employed by the contractor". What are these? Details needed.	In lieu of the Project-specific environmental protection practices that will follow during the detailed permitting process, best management and standardized practices provide an initial point of departure. Figures depicting the various phases of the project are provided.	Construction: Figure 5.7-1 Operations 1: Figure 5.1-2 Operations 2: Figure 5.9-1 Closure: Figure 5.7-3 Post-closure: Figure 5.7-4
47	2.2.5 – Project Facilities	A description of the activities associated with construction, operation and decommissioning of the proposed Project, including schematic representations of activities, where applicable		N	CEA Agency	Section 2.10, pg. 2-65 of 104, "the water balance indicates that the TMF is in surplus conditions during all years of operations"? More explanation needed (reference to where water balance information/calculations are).	Results of operational water balance and watershed modelling indicate that the TMF operates in a surplus condition without the need for additional make-up water to support the process water needs of the mill. Discussion is provided in Appendix 5-D and Appendix 12-B.	5.10.4.5 Appendix 5-D Appendix 12-B
48	2.2.5 – Project Facilities	A description of the activities associated with construction, operation and decommissioning of the proposed Project, including schematic representations of activities, where applicable		N	BC FLNRO	More detail required, regarding height of 138KV power lines, in order to assess future access to timber given legal loaded logging truck height. (FLNRO)	Two possible power line routes have been investigated, although right of way negotiations have yet to be concluded. Final pole positions and span dimensions will follow detailed design. However, clearances are a statutory stipulation and will be specified to allow safe logging truck movement.	5.7.1.6 5.7.1.13 5.8.4 Figure 5.8-4
49	2.2.5 – Project Facilities	A summary of the environmental management system and adaptive management approach for the proposed Project.	10	Y/N	CEA Agency	The integrity of the EMS comes into question if it is based on the principle of adaptive management. The EMS is supposed to be based on best management practices, guidelines, appropriate mitigations, and concrete commitments derived from the rigours of the EA process. Adaptive management should be relied upon sparingly and applied only as a supporting measure—the EMS should not be premised on it. Therefore, efforts need to be made throughout all sections of the EIS to employ measures that will minimize reliance on adaptive management. As a starting point, the adaptive management statement on p. 36 needs to be revised accordingly, and it is strongly recommended that HCMC re-evaluate how they have considered the employment of adaptive management throughout the EIS.	Adaptive management is inherent in an EMS, to allow for corrective action to be taken to improve performance of the system. By the same token, adaptive management provides the practical means whereby a discipline-specific management plan is modified to meet changed needs. Chapter 24, Environmental Management and Monitoring Plans, contains the array of discipline-specific plans as well as the overarching EMS for the project.	24.1 to 24.19
50	2.2.5 – Project Facilities	A summary of the environmental management system and adaptive management approach for the proposed Project.		Y/N	CEA Agency	Observation that adaptive management is mentioned only once throughout Section 10, yet Section 10 is the only section referred to for the requirement.	The entire Application/EIS submission has been revised.	24.1 to 24.19
51	2.2.5 – Project Facilities	Summary of Mine Site Area Infrastructure (Plant Site, Haul Roads, Explosives Storage and Manufacturing, Mill, and Fuel Tank Farm)	2.4, 2.11	Y	CEA Agency	Basic details are required for volumes and transport of hazardous/flammable materials.	The Fuel and Hazardous Materials Management Plan in Section 24.7 provides these details.	Table 24.7-1

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
52	2.2.5 – Project Facilities	Summary of Mine Site Area Infrastructure (Plant Site, Haul Roads, Explosives Storage and Manufacturing, Mill, and Fuel Tank Farm)		Y	NRCan	NRCan requests that the map of components indicate the location of the explosives factory and associated facilities be provided (i.e.: manufacturing plant or production area, blending area, maintenance area, decontamination/wash bay, offices, storage magazines and silos).	Detailed engineering design of the explosives facility has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage. The Federal interest in on-site explosives manufacture using hazardous substances is recognized.	Figure 5.1-2 5.7.1.11 5.9.7
53	2.2.5 – Project Facilities	Summary of Mine Site Area Infrastructure (Plant Site, Haul Roads, Explosives Storage and Manufacturing, Mill, and Fuel Tank Farm)		N	BC MOT	See comments above (MOT)	Unsure which MOT comment referred to. Reference to relevant figure provided in adjacent column.	Figure 5.1-2
54	2.2.5 – Project Facilities	Summary of upgrades and maintenance of Jones Creek and/or Vavenby Mountain Forest Service Roads	2.11, Appendix A	N	CEAA	Section 2.11 only mentions haulage roads, so it should be removed from the 3rd column. Sections 3.3.4 and Section 2.4.3 contain important information to help satisfy this AIR requirement and should be added to the 3rd column. Appendix A only discusses alignment options and upgrade and realignment of FSR road network is only described with the terms "where necessary" and "as required". Where detailed information may not currently be available, an attempt should be made to refer to available guidelines/regulations and inform the reader why the information is currently unavailable and what YMMC will do to obtain it. Such statements will form the table of commitments, which is what enables the regulators to "move past" certain issues with the clear understanding that they will be addressed at a later date. This pertains to all sections of the entire EIS as such vague qualifying statements are common throughout. Also, the reader should not have to hunt for unlisted sections of the EIS. It should be clear (with a complete list of subsections, and page numbers/subsection references for appendices) exactly where this information is located. Efforts should be made to consolidate "like" information as much as possible.	The Project Description (Chapter 5) has been restructured. Detailed engineering design of possible road upgrades has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage.	5.8.3 Appendix 5-E (Minutes of meeting: HCMC & MOTI, June 12, 2013)
55	2.2.5 – Project Facilities	Summary of upgrades and maintenance of Jones Creek and/or Vavenby Mountain Forest Service Roads		N	BC MFLRNO	Very Vague – only refers to upgrades and alignment changes where required and feasible. – No comment on materials source-upgrades to existing culverts etc. (FLNRO)	The Project Description (Chapter 5) has been restructured. Detailed engineering design of possible road upgrades has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage.	5.8.3 Appendix 5-E (Minutes of meeting: HCMC & MOTI, June 12, 2013)
56	2.2.5 – Project Facilities	Summary of upgrades and maintenance of Jones Creek and/or Vavenby Mountain Forest Service Roads		N	BC MOT	See comments under Provincial permits. (MOT)	The Project Description (Chapter 5) has been restructured. Detailed engineering design of possible road upgrades has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage.	5.8.3 Appendix 5-E (Minutes of meeting: HCMC & MOTI, June 12, 2013)

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
57	2.2.5 – Project Facilities	Summary of Off-Site Infrastructure in Vavenby	2.3, 2.4, 2.7, 2.11, Appendix A	Y	BC MOTI	See comments above. (MOT)	The Project Description (Chapter 5) includes information on the rail load-out facility.	5.7.1.7 Figure 5.7-2
58	2.2.5 – Project Facilities	Summary of 138 kV Transmission Line from Plant Site to an existing substation in Vavenby and distribution power lines within the Mine Site Area	2.3, 2.4, 2.11, Appendix A	Y	CEA Agency	Information is scattered across several sections. Should be limited to construction phase, operations phase, decommissioning phase overviews. Environmental and operational management plans would be appendized info. referred to in these sections.	The Project Description (Chapter 5) has been restructured and each project phase is detailed in its own section.	5.7.1.6 5.8.4 Figure 5.8-4
59	2.2.5 – Project Facilities	Summary of 138 kV Transmission Line from Plant Site to an existing substation in Vavenby and distribution power lines within the Mine Site Area		Y	Little Shuswap Indian Band	No discussion on the transmission line from Mica 5 and 6 at Seymour Arm, potential. (LSIB)	Three possible options to strengthen regional electricity supply are being investigated by BC Hydro and regardless of the outcome, a new 230 (kV transmission line will be constructed to Vavenby. Regional supply options are thus outside the brief of this Application/EIS.	4.4.4.2 5.7.1.13
60	2.2.5 – Project Facilities	Summary of 138 kV Transmission Line from Plant Site to an existing substation in Vavenby and distribution power lines within the Mine Site Area		Y	BC MFLNRO	More detail required, regarding height of 138KV power lines, in order to assess future access to timber given legal loaded logging truck height. (FLNRO)	Two possible power line routes have been investigated, although right of way negotiations have yet to be concluded. Final pole positions and span dimensions will follow detailed design. However, clearances are a statutory stipulation and will be specified to allow safe logging truck movement.	5.7.1.6 5.7.1.13 5.8.4 Figure 5.8-4
61	2.2.6 – Construction – Phase Activities	Discuss construction related activities such as site-clearing, foundations, utilities, and building structures in addition to the intended approaches for the delivery of services and the associated logistics	2.4, 2.8, 2.10, 5.5, Appendix A	Y/N	CEA Agency	Information is scattered, and listed sections do not discuss site-clearing/pre, foundations activities, or all building structures in detail.	Construction activities are described in a dedicated section in the revised Project Description (Chapter 5).	5.7.1 Figure 5.7-1
62	2.2.6 – Construction – Phase Activities	Details of potable water supply	2.4, 2.6, 2.11, Appendix A	Y/N	EC	The current use of and quality of water in the on-site drinking water well is not discussed. Potential impacts to this well and potential for using other onsite water as proposed in Section 2.4.12 merits additional assessment.	Potable water supply is described in a dedicated section in the revised Project Description (Chapter 5). Additional detail will be provided during the Project's permitting stage.	5.11.2
63	2.2.6 – Construction – Phase Activities	Details of waste disposal	2.4, 10.10, Appendix A	Y/N	CEA Agency	Non-hazardous waste disposal needs to be clarified, i.e.: on-site recycling initiatives, need for both an incinerator and landfill and what kinds of waste would be expected for each, along with any permitting requirements and environmental/engineering controls/measures	The revised Project Description makes reference to a management plan that deals with non-hazardous waste, as part of Chapter 24, Environmental Management and Monitoring Plans.	5.7.2.8 24.18

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
64	2.2.6 – Construction – Phase Activities	Details of waste disposal		Y/N	BC MOE	Information in App A Table 4-2 is incomplete and contains errors. Permits also required for air emissions and solid waste (landfill). "Waste Management Act" and "Special Waste Regulation" were replaced 9 years ago with Environmental Management Act and Hazardous Waste Regulation. Section 10.10 is missing some pertinent Regs, e.g. Hazardous Waste Reg, Municipal Wastewater Reg, Waste Discharge Reg, Public Notification Regulation (MOE)	A detailed description of the provincial and federal authorization requirements that apply to the Project, including waste and hazardous materials management, appears in Chapter 2, Assessment Process.	2.4-1 2.4-2
65	2.2.6 – Construction – Phase Activities	Details of energy supply	2.3, 2.4, 2.11, Appendix A	Y/N	CEAA	There needs to be a clear explanation of how YMI can or cannot make use of existing power grid capacity, what the intended plan is for powering the project into the operations phase, and what the contingency would be if the existing grid capacity does not meet HCMC's needs into the operations phase.	The revised Project Description makes reference to the energy supply alternatives that were examined in Chapter 4, Project Design and Alternatives Assessment.	5.1 4.4.4
66	2.2.6 – Construction – Phase Activities	Details of traffic management	2.4, 2.7 10.12, Appendix A, Appendix R	Y/N	CEAA	The traffic management plan needs to highlight how interactions between construction vehicles/equipment, logging vehicles, and recreation vehicles/public will be minimized and otherwise managed between Vavenby and the mine site.	A revised Traffic Impact Assessment and Traffic and Access Management Plan are now in place.	Appendix 5-E 24.16
67	2.2.6 – Construction – Phase Activities	Details of traffic management		Y/N	BC	Security Access Gate – location? Forestry access requirements?	The revised Project Description (Chapter 5) makes reference to a secure access gate and a Traffic and Access Management Plan is now in place.	5.7.1.14 5.9.9 24.16
68	2.2.6 – Construction – Phase Activities	Details of traffic management		Y/N	BC MFLNRO	Appendix R – Draft Form? (FLNRO)	A revised Traffic Impact Assessment and Traffic and Access Management Plan are now in place.	Appendix 5-E 24.16
69	2.2.6 – Construction – Phase Activities	Details of traffic management		Y/N	BC MFLNRO	Road Radio Controlled? Local frequencies assigned by Industry Canada? (FLNRO)	The Proponent believes the question is relevant to Project permitting rather than this Application/EIS. This question will be addressed in full during the Project's permitting stage.	5.11.6
70	2.2.6 – Construction – Phase Activities	Details of traffic management		Y/N	BC MOTI	Traffic management plan not included in application. Traffic Management Plan for MoTI should be specific/related to the traffic impact assessment.	A revised Traffic Impact Assessment and Traffic and Access Management Plan are now in place.	Appendix 5-E 24.16
71	2.2.6 – Construction – Phase Activities	Details of traffic management		Y/N	BC MOTI	"Speed limits would be established and enforced to prevent accidents" Speed limits on what roads? (Page 2-96 of 104). (MOT)	The Proponent believes the question is relevant to Project permitting rather than this Application/EIS. This question will be addressed in full during the Project's permitting stage.	Appendix 5-E 24.16
72	2.2.6 – Construction – Phase Activities	Details of emergency procedures	10.11	Y/N	CEA Agency	The 3-tiered environmental management strategy that is proposed is a good high-level approach; however, the EISg requirement is for "*details* of emergency procedures". Section requires more detail with emphasis on listing and describing the key EMPs that are intended. An extensive list of SOPs is not required at this time; however, an example of key SOPs to consider for each EMP should be included. As well, it is noted that section 10.11 is not specific to any particular phase of the overall project. This should be qualified, and any-phase specific emergency procedures indicated as such.	The revised Project Description (Chapter 5) makes reference to emergency procedures and an Emergency Response Plan is now in place.	5.11.8 24.4

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
73	2.2.6 – Construction – Phase Activities	Details of maintenance procedures	2.4, Appendix A	Y/N	CEA Agency	Need more information on planned quarterly/annual shutdown/maintenance procedures and what would be covered within maintenance program, i.e.: key plant tests/equipment upgrades/renewal, etc. In-situ maintenance procedures need to be explained in further detail as responsibility for incidents on mine property should rightfully be shared between the mine and maintenance contractors.	Planned shutdowns for maintenance would be undertaken according to industry standards and statutory obligations. The Proponent believes the question is relevant to Project permitting rather than this Application/EIS. This question will be addressed in full during the Project's permitting stage.	--
74	2.2.6 – Construction – Phase Activities	Construction schedule based on the most available and current information with figures of the activities, where applicable	2.4, 2.8, 2.13, Appendix A	Y	BC EAO	The schedule is based on BC Hydro power being available in 2016. This should be updated (EAO).	The revised Project Description (Chapter 5) makes reference to the timing of the BC Hydro project.	5.7.1.6 5.12
75	2.2.6 – Construction – Phase Activities	Information about the availability and appropriateness of materials required for construction	2.2, 2.4, 2.8, Appendix A, Appendix D	Y/N	CEA Agency	Section 2.2 if focused on geology wrt tailings and waste rock management. Section 2.4 only makes mention of a vague commitment to use non-PAG waste rock from stripping of the open pit for construction: "Stripping of the open pit will provide most of the Project's aggregate requirements during construction." Where will the remainder of the aggregate come from? Subsection 2.4.10 most appropriately answers the question. Note: subsections to 2nd and 3rd level should be provided where applicable and numbers provided where available. Where will cement be obtained from? Wood?	The revised Project Description (Chapter 5) makes reference to the source of materials for construction.	5.7.1.10 5.9.1.5 5.9.8
76	2.2.6 – Construction – Phase Activities	Information about the availability and appropriateness of materials required for construction		N	BC MFLRNO	No location given for the sand and gravel source required for FSR upgrades. (FLNRO)	The revised Project Description (Chapter 5) makes reference to the source of materials for construction.	5.7.1.10 5.9.1.5 5.9.8
77	2.2.7 – Operations – Phase Activities	Detail the proposed resource extraction methods and associated activities including maintenance	2.5, 2.6, Appendix A	Y/N	CEA Agency	Extraction methods: Section 2.5.2 and 2.5.5. Section 2.6 has to do with processing rather than extraction. EIS requirement pertains to mining method (open pit), associated machinery, and bench/slope design and maintenance strategy for the pit walls.	The revised Project Description (Chapter 5) makes reference to extraction methods.	5.8
78	2.2.7 – Operations – Phase Activities	Discuss the intended approach for delivery of services required for the operating phase of the Project	2.3, 2.4, 2.6, 2.7, Appendix A	Y/N	CEA Agency	2.3 – electrical power (ok); 2.4 – is specific to construction phase, but requirement here is for operational phase considerations; 2.6 – water supply (ok); Section 2.7 – use of rail line for concentrate to market (ok). Still need reference to shipment of general and hazardous goods to mine site, i.e.: frequency of diesel fuel shipments would be expected to decrease once the power transmission line has been commissioned; need for shipments of cement would likely no longer be necessary or significantly diminished once project has entered operational phase; however, shipments of other goods/materials may increase between construction and operations phases. Hence the need to describe this separately for each phase. Emphasis of missing information is on supply chain via vehicle.	The revised Project Description (Chapter 5) makes reference to shipment of hazardous goods to the mine site in the construction and operations phases of the project. Related management plans relevant to hazardous materials are also in place.	5.7.1.9 5.7.1.11 5.7.2.5 5.7.2.6 24.5 24.6 24.8 24.16 24.17 24.19
79	2.2.7 – Operations – Phase Activities	Process plant development, design and site location plan	2.4, 2.6, 2.11, Appendix A	Y/N	CEA Agency	Site location plan not included. Need an expanded map of camp/plant building infrastructure area.	These plans and maps appear in the revised Project Description (Chapter 5).	Figure 5.1-1 Figure 5.1-2 Figure 5.9-4
80	2.2.7 – Operations – Phase Activities	ML/ARD management plan	10.9, Appendix D	Y	BC MOE	Information is presented; don't know about its accuracy or completeness at this point (MOE)	The ML/ARD Management Plan is included in the Application/EIS.	24.9

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81	2.2.7 – Operations – Phase Activities	Topsoil and organic materials storage for site reclamation activities	2.9, 2.12, 10.8	Y	DFO	Overburden (2.9.1) - Does not adequately describe the various mitigations to address sediment deposition risk from overburden stockpiles. Grass seeding not a singularly acceptable mitigation.	Environmental Management Plans that describe mitigation measures are referenced in the revised Project Description in Section 5.7.2.8, including a Sediment and Erosion Control Plan and Soil Salvage and Storage Plan.	24.11 24.14
82	2.2.7 – Operations – Phase Activities	Topsoil and organic materials storage for site reclamation activities	2.9, 2.12, 10.9	N	BC MFLNRO	Application appears to address quantity of soils stored (Soils Balance), but not enough information to assess quality. Soil classification, plans for separation of surface horizons (developed soils) would be useful in assessing potential success in reclamation. (FLNRO)	Soil quality is described in the Terrain and Soil baseline (Section 4.3: Table 4.3-5 and 4.3.2.3 SMU details, and Section 4.4: 4.4.1 Soil Physical and Chemical Characteristics). Suitability of soils for reclamation purposes has been integrated into Chapter 7 Closure and Reclamation, Section 7.4.1.	Appendix 5-B 7.4.1
83	2.2.7 – Operations – Phase Activities	Explosives storage and manufacturing	2.4., 10.14, Appendix A	Y/N	NRCan	NRCan notes that most of the information is present. However, the map indicates only explosives storage facilities and should also cite the explosives factory components. This should be marked as "explosives manufacturing and storage facilities" given that the proposal includes a factory located on site.	Amendments have been made to the relevant figure.	Figure 5.1-2
84	2.2.7 – Operations – Phase Activities	Explosives storage and manufacturing	2.4., 10.14, Appendix A	Y/N	NRCan	NRCan suggests that this section could be improved by addition of the following: · the manufacturing and storage facility could be better described with respect to the potential onsite infrastructure (i.e. manufacturing plant or production area, blending area, maintenance area, decontamination/wash bay, offices, storage magazines and silos (with estimated size);	The Proponent believes that this level of detail is relevant to Project permitting rather than this Application/EIS. This question will be addressed in full during the Project's permitting stage.	--
85	2.2.7 – Operations – Phase Activities	Explosives storage and manufacturing	2.4., 10.14, Appendix A	Y/N	NRCan	NRCan suggests that this section could be improved by addition of the following: · a description of the distances to vulnerable features such as roads, bodies of water etc. should include information about maximum quantity of explosives at each facility. While some information has been provided (distance of fuel tank from explosives), some indication should be provided that QD principles have been considered and met in the mine plan and that there is assurance of compliance with distances as set out under the QD Principles Manual.	The Proponent believes that this level of detail is relevant to Project permitting rather than this Application/EIS. This question will be addressed in full during the Project's permitting stage.	--
86	2.2.7 – Operations – Phase Activities	On-site storage/stockpiling of ore	2.9, Appendix A	Y	DFO	Low Grade Ore Stockpiles (2.9.2) - Does not detail mitigation such as perimeter ditches (Figure 2.3-1) or seepage collection ponds for PAG Low Grade stockpile or how diversion ditch around PAG Low Grade stockpile will be constructed against slope gradient.	Information at the appropriate level of detail appears in the revised Project Description (Chapter 5).	5.7.1.16 5.10.2 5.10.4.4 Appendix 5-D
87	2.2.7 – Operations – Phase Activities	Water management plan including a description of water management activities such as collection, storage, treatment and method for obtaining additional water	2.10, Appendix A	Y/N	CEA Agency	Information concerning water use and processing for camp facilities (wastewater, sewage, grey water, water from lab processes, etc.) is not clear. Also, there are no details regarding whether there is sufficient water supply from groundwater/well sources over the course of the mine.	Potable water supply is described in a dedicated section in the revised Project Description (Chapter 5). Additional detail will be provided during the permitting stage.	5.11.2
88	2.2.7 – Operations – Phase Activities	Water management plan including a description of water management activities such as collection, storage, treatment and method for obtaining additional water	2.10, Appendix A	Y/N	DFO	Construction of Water Management Plan (2.10.3.1) - Information contained in this section does not clearly link or reflect information provided in earlier sections regarding water management mitigations. Water from collection ponds are to be deposited to the environment with no discussion or rationalization associated with this management activity.	The revised Project Description (Chapter 5) makes reference to water management and a related management plan for site water management is also in place. Additional detail will be provided during the permitting stage.	5.7.1.16 5.10 24.13 Appendix 5-D

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89	2.2.7 – Operations – Phase Activities	Water management plan including a description of water management activities such as collection, storage, treatment and method for obtaining additional water	2.10, Appendix A	Y/N	DFO	Diversion Ditches (2.10.4.4) - Water diversion ditch designs does not demonstrate or discuss mitigations that would be employed to reduce risk of sedimentation to downstream water courses.	The revised Project Description (Chapter 5) makes reference to diversion ditch design and a related management plan for sedimentation management is also in place. Additional detail may be provided during the permitting stage.	5.7.1.16 5.10.2 5.10.4.4 24.11 Appendix 5-D
90	2.2.7 – Operations – Phase Activities	Fuel storage and heavy equipment maintenance facility	2.4, 2.11, Appendix A	Y/N	CEA Agency	List appropriate regulations for construction of fuel storage facility, along with reference to other parts of the EIS where more details are provided.	The Fuel and Hazardous Materials Management Plan referred to in the revised Project Description (Chapter 5) contains the appropriate regulations in the reference list.	24.7
91	2.2.7 – Operations – Phase Activities	Dangerous goods and hazardous material handling, storage and/or distribution plan	10.1	Y/N	CEA Agency	Section 10.10.10 – need explanation of who will be conducting routine inspections, with what frequency, use of logs for inspections, and how the logs will be used post-inspection. Section 10.10.11 – need to expand upon the word "collected" – presumably a two-step process: capture and containment by specific mine personnel (who would be presumably trained in spill response), and then collected by a licensed 3rd party for disposal at a licensed hazardous waste treatment/disposal facility.	The Fuel and Hazardous Materials Management Plan referred to in the revised project Description (Chapter 5) makes reference to monitoring and additional details will be provided during the permitting stage.	24.7.4 24.7.5
92	2.2.7 – Operations – Phase Activities	Dangerous goods and hazardous material handling, storage and/or distribution plan	10.1	Y	BC MOE	Section 10.10.13 refers to federal legislation but not the applicable provincial requirements under the Hazardous Waste Regulation (MOE)	A detailed description of the provincial and federal authorization requirements that apply to the Project, including waste and hazardous materials management, appears in Chapter 2, Assessment Process.	2.4-1 2.4-2
93	2.2.7 – Operations – Phase Activities	Results from condemnation drilling and discussions regarding the relocation of proposed permanent mine structures, if applicable	2.2	Y	CEA Agency	Figure 2.2-3 should be expanded to its own page	Condemnation drilling is addressed in the revised Project Description (Chapter 5), as derived from feasibility studies. Additional details may be provided during the permitting stage.	5.5.7 Appendix 5-A
94	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	CEA Agency	Need more clarity and details around any stream crossings/bridge upgrades, culverts, and drainage enhancements associated with MoF road upgrade from Vavenby to mine site. Recommend a dedicated and zoomed map of proposed road upgrades/development that show the different kinds of roads, stream crossings, etc.	Detailed engineering design of possible road upgrades has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage and the importance to fish and fish habitat is recognized.	5.8.3 Appendix 5-E
95	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	DFO	Section 2.11 Various - Application does not adequately discuss and detail project components such as power supply riparian component; potable water well locations and volumes extracted; and access road riparian and stream crossing details (mine road width standard).	Detailed engineering design of possible power line river crossings, potable water supply, and road upgrades has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage and the importance to fish and fish habitat is recognized.	5.7.1.6 5.7.1.13 5.8.3 5.8.4 5.11.2

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96	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	"The area's established infrastructure preclude the need for any major off-site infrastructure developments to service the Harper Creek Project other than construction of a 12 km power line (the 'HCMC power line') connecting the plant site substation to the BC Hydro transmission line and building a new 2.5 km road section near the mine site area." Please elaborate. How did HCMC come to this conclusion? Where is the study or report indicating the infrastructure has been assessed for additional traffic generated by the mine site? Have the bridges proposed to be used been assessed? This is much too general.	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind power line and road options.The need for specific permits will emerge during the post-EA permitting stage.	4.4.4 4.4.7 Appendix 5-E (Minutes of meeting: HCMC & MOTI, June 12, 2013)
97	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	Section 2.3.3 Site Access Road More detail required. Each route/road should be listed. This section is far too general. Birch Island-Lost Creek Road is not an FSR.	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind road options. The need for specific permits will emerge during the post-EA permitting stage.	4.4.7 Appendix 5-E (Minutes of meeting: HCMC & MOTI, June 12, 2013)
98	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	Site access Road Upgrade What upgrades are proposed? How did HCMC come to this conclusion? What roads were assessed? See comment above regarding switchback improvements. (Section 2.0 Project Description 2-22 of104).	Access road upgrades will include, as necessary, widening, improvements to alignment, improvements to the BILCR/Vavenby Mountain FSR junction, and signage improvement. Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind road options. Technical details will be addressed in full during the Project's permitting stage	4.4.7 5.8.3 Appendix 5-E
99	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	"The current access to the site does not meet the Project's requirements, so the feasibility study reviewed potential site access options (Section 3.3.5)." Cannot locate what Section 3.3.5 is in relation to this comment. Again, how did HCMC come to this conclusion? More detail required. (Section 2.0 Project Description 2-16 of 104).	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind road options. Technical details will be addressed in full during the Project's permitting stage.	4.4.7 5.8.3 Appendix 5-E
100	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	2.17.8.2 and Table 2.17-4 – Traffic Management Plan mentioned, but not included in application. What, if any, additional signage is proposed on public roads for spills, wildlife, incidents etc.? (Section 2.0 Project Description 2-81 of 104).	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind road options. A Traffic and Access Management Plan has been compiled. Technical details will be addressed in full during the Project's permitting stage.	4.4.7 5.8.3 24.16 Appendix 5-E

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101	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	"The Harper Creek Project has been designed to include the following considerations to prevent and decrease the likelihood of a motor vehicle accident: a. Speed limits would be established and enforced to prevent accidents b. Access roads would be maintained to ensure that trucks travel on a safe road surface throughout the year c. As a safety precaution, all mine vehicles would be radio-equipped. Pickup trucks and other light vehicles would be equipped with buggy whips as required by mine regulations d. A safety orientation would be provided to all employees driving vehicles. At the mine site, haul trucks have the Right-of–Way. Careless driving would be disciplined e. Driving in a controlled manner and at a reasonable speed will minimize any accidents involving wildlife f. The contractor will also be encouraged to use as few vehicles as possible, with multiple people per vehicle" Where will speed limits be established and how? What roads? How will these recommendations be implemented? (Section 2.0 Project Description 2-96 of 104).	A Traffic and Access Management Plan has been compiled for the project. Additional technical details will be addressed in full during the Project's permitting stage.	5.11.6 24.16
102	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	Traffic Impact AssessmentSince a Traffic Impact Study Terms of Reference was not established prior to application submission, the Ministry was not given an opportunity to outline our expectations for any offsite road improvements associated to development driven traffic and how traffic models need to be prepared through agreed upon distribution and assignment of vehicle trips. Therefore, MoTI requests a meeting between the developer, their consultant and the Ministry to go over submitted TIA and identify items requiring revisions in the meeting. As it stands, the traffic impact study does not meet the requirements of MoTI. It mentions a lot of what needs to be addressed rather than addressing it. Summary of the traffic impact summary is vague and generic. (Section 3.0 Alternatives Assessment 3-28 of 45).	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind road options and a Traffic Impact Assessment has also been carried out.A meeting was held with HCMC and MOTI and the need for specific permits will emerge during the post-EA permitting stage.	4.4.7 Appendix 5-E (Minutes of meeting: HCMC & MOTI, June 12, 2013)
103	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	Traffic Impact Assessment Although Alternative #2 is the preferred alternative of HCMC for economic viability, it seems both alternatives will continue to be used during different stages (or all) of the mine life. Please be specific as to what will be used and when – It is very unclear. (Section 3.0 Alternatives Assessment 3-29 of 45).	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind road options. Access road: upgrades will include, as necessary, widening, improvements to alignment, improvements to the BILCR/Vavenby Mountain FSR junction, and signage improvement. Appendix 5-E, Traffic Impact Assessment, provides a detailed description of the evaluation of transportation and access matters used in the planning of the Project.	4.4.7 5.8.3 Appendix 5-E

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104	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	"With minimal upgrades, the existing road structure is capable of accommodating construction traffic as well as trucks transporting goods and concentrate and staff travelling to and from work throughout the life of the Harper Creek Project." How did HCMC come to this conclusion? (Section 3.0 Alternatives Assessment 3-30 of 45).	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind road options. Access road: upgrades will include, as necessary, widening, improvements to alignment, improvements to the BILCR/Vavenby Mountain FSR junction, and signage improvement. Appendix 5-E, Traffic Impact Assessment, provides a detailed description of the evaluation of transportation and access matters used in the planning of the Project.	4.4.7 5.8.3 Appendix 5-E
105	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	"The intersection of KP Road and Yellowhead Highway #5 has geometric deficiencies that would need to be improved. These deficiencies include safety considerations such as: • Sharp vertical or horizontal curves in the vicinity of the intersection • Intersection configuration including turning radii and auxiliary lanes • Operational conditions such as turning movements at the intersection" How HCMC came to this conclusion, and the improvements required should be addressed in the traffic impact study. Other sections in the application indicate KP road will not be used – information is conflicting. (Section 3.0 Alternatives Assessment 3-30 of 45).	Chapter 4, Project Design and Alternatives Assessment, provides the rationale behind road options. Access road: upgrades will include, as necessary, widening, improvements to alignment, improvements to the BILCR/Vavenby Mountain FSR junction, and signage improvement. Appendix 5-E, Traffic Impact Assessment, provides a detailed description of the evaluation of transportation and access matters used in the planning of the Project.	4.4.7 5.8.3 Appendix 5-E
106	2.2.7 – Operations – Phase Activities	Detailed locations of proposed road and bridge improvements, if needed	2.3, 2.4, 2.11, Appendix A, Appendix R	Y/N	BC MOTI	The feasibility study does not identify specific access management concerns (road, bridge and intersection studies and improvements. (MOT)	Detailed engineering design of possible road upgrades has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage and the importance to fish and fish habitat is recognized.	5.8.3 Appendix 5-E
107	2.2.7 – Operations – Phase Activities	Detailed schedule based on the most available and current information	2.4, 2.8, 2.13, Appendix A	Y	BC EAO	BC Hydro power? (EAO)	The scheduling for power supply is reflected in the revised Project Description in Chapter 5. Finalization of a more detailed schedule will follow during the Project's permitting stage, as needed.	5.7.1.6 5.12
108	2.2.8 – Decommissioning and Reclamation – Phase Activities	Discuss the proposed activities associated with the decommissioning and reclamation of the Project	2.12, 5.5, 10.8, Appendix A	Y	BC MFLNRO	Very vague for access roads – no detail other than access roads reclaimed. (FLNRO)	The access roads are required to access the Project Site during post-closure monitoring activities and will not be reclaimed. Chapter 7, Closure and Reclamation, describes this in more detail.	7.6.14
109	2.2.8 – Decommissioning and Reclamation – Phase Activities	Include conceptual closure and reclamation plans for the site	2.12, 10.8, Appendix A	Y	DFO	Closure and Reclamation (2.12) - Treatment facilities not identified on Figures 2.12-1 or 2.12-3.	No water treatment of the TMF discharge is currently proposed as part of the Project design. Direct discharge from the open pit is no longer included in the Project water management.	--

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110	2.2.8 – Decommissioning and Reclamation – Phase Activities	Discuss plans for the treatment of effluent from site facilities	6.6	N	CEA Agency	Do not see any plans for treatment of effluent from site facilities during closure/post-closure phase	No water treatment of the TMF discharge is currently proposed as part of the Project design. Direct discharge from the open pit is no longer included in the Project water management.	7.5.3.1 7.12.3
111	2.2.8 – Decommissioning and Reclamation – Phase Activities	Detail HCMC's projected methods and timing for the removal of structures and ancillary equipment	2.12, 10.8, Appendix A	Y	BC MFLNRO	Very little detail for access roads. (FLNRO)	The access roads are required to access the Project Site during post-closure monitoring activities and will not be reclaimed. Chapter 7, Closure and Reclamation, describes this in more detail.	7.6.14
112	2.2.8 – Decommissioning and Reclamation – Phase Activities	Regulatory Framework and Requirements	2.12, 10.8	Y/N	CEA Agency	Mines Act and Health, Safety, Reclamation Code are referenced in section 2.12; however, there is no regulatory reference in section 10.8. Assertion statement at start of section 2.12 should be revised as it is up to the regulators to determine the adequacy of the reclamation strategy, i.e.: HCMC has developed the conceptual reclamation and closure plan in accordance with the requirements of the BC Mines Act, ….	Chapter 7, Closure and Reclamation, describes the regulatory background in more detail.	7.2.1
113	2.2.8 – Decommissioning and Reclamation – Phase Activities	Regulatory Framework and Requirements	2.12, 10.8	Y/N	BC MOE	Incomplete; very minimal discussion of this in 2.12 and 10.8; no mention of reclamation bonding or ongoing obligations for maintenance, monitoring and reporting under MOE permits (MOE)	Chapter 7, Closure and Reclamation, describes the closure costs and bonding in more detail.	7.2.1 7.11
114	2.2.8 – Decommissioning and Reclamation – Phase Activities	Closure and Reclamation Objectives	2.12, 10.8	Y	CEA Agency	Important to mention re-establishing historical flow levels in creeks. Key closure and reclamation features depicted in figures 2.1-1, 2.1-2, and 2.1-3 should be described.	Chapter 7, Closure and Reclamation, recognizes the importance of aquatic resources. Historic creek flow levels and the Post-closure implications are described in Chapter 12, Hydrology Effects Assessment.	7.3.3 Chapter 12
115	2.2.8 – Decommissioning and Reclamation – Phase Activities	Closure of Mine Infrastructure	2.12, 10.8, Appendix A	N	CEA Agency	Incomplete – closure of ancillary facilities/buildings should also be included	Closure of ancillary facilities/buildings is described variously in Chapter 7, Section 7.6 and specifically in Section 7.6.1.5.	7.6 7.6.1.5
116	2.2.8 – Decommissioning and Reclamation – Phase Activities	Implementation and Site Supervision	10.8	Y/N	CEA Agency	Supervision not described	Chapter 7, Closure and Reclamation, refers to monitoring of various aspects of the Closure and Post-closure situation, including the need for a qualified technician to undertake the monitoring.	7.1
117	2.2.8 – Decommissioning and Reclamation – Phase Activities	Implementation and Site Supervision	10.8	Y/N	BC MOE	Implementation, YES, but nothing mentioned about site supervision (MOE)	Chapter 7, Closure and Reclamation, refers to monitoring of various aspects of the Closure and Post-closure situation, including the need for a qualified technician to undertake the monitoring.	7.1
118	2.2.8 – Decommissioning and Reclamation – Phase Activities	Monitoring and Reporting	10.8	Y/N	BC MOE	Incomplete; brief general discussion of monitoring in 10.8.1 and 10.8.10 but no specific details. E.g. nothing about monitoring of metals uptake in vegetation and/or animals; nothing about monitoring of surface waters, fish and other aquatic organisms, etc. (MOE)	An overview of Post-Closure monitoring and reporting activities for vegetation, wildlife, surface water quality and groundwater is described in the Closure and Reclamation Plan (Chapter 7) and in more detail in supporting EMPs.	7.12 24.8 24.14 24.17 24.19

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119	2.2.8 – Decommissioning and Reclamation – Phase Activities	Monitoring and Reporting	10.8	Y/N	CEA Agency	Reporting not described	An overview of Post-Closure monitoring and reporting activities for vegetation, wildlife, surface water quality and groundwater is described in Section 7.12 of the Closure and Reclamation Plan, and in more detail in supporting Environmental Management Plans.	7.12
120	2.2.10 – Environmental Management System	Outline and describe the proposed environmental management system (EMS) for the Project	10	Y/N	CEA Agency	General strategy is acceptable; however, a list of key SOPs should be included.	An EMS has been compiled for the project. See reference to EMS in adjacent column. SOPs will be developed as required during permitting.	5.7.2.9 24.1
121	2.2.10 – Environmental Management System	Outline and describe the proposed environmental management system (EMS) for the Project	10	Y/N	CEA Agency	Additional details to be discussed during detailed review of EIS. Subsection 10.5.1.3 requires more details: add another sentence or two to describe what this system may generally entail.	An EMS has been compiled for the project. See reference to EMS in adjacent column.	5.7.2.9 24.1
122	2.2.10 – Environmental Management System	Outline and describe the proposed environmental management system (EMS) for the Project	10	Y/N	CEA Agency	Refer to key environmental management team personnel where applicable throughout Section 10.	An EMS has been compiled for the project. See reference to EMS in adjacent column, particularly the section that addresses personnel.	5.7.2.9 24.1.5.1
123	2.2.10 – Environmental Management System	Include an Environmental Management Plan (EMP) which will detail the environmental practices that will be utilized during the planning, construction, operations, and decommissioning stages of the proposed Project	10	N	CEA Agency	"Proposed mitigation could include additional baseline work, further research, and development of plans to provide an applicable framework and in some instances spell out the specific steps for implementing the impact-mitigating actions" (p. 10-2). Baseline work should not be considered mitigation.	The EMS that has been compiled for the project provides the overarching context for the array of specific EMPs.	5.7.2.9 24.1 24.2 to 24.19
124	2.2.10 – Environmental Management System	Include an Environmental Management Plan (EMP) which will detail the environmental practices that will be utilized during the planning, construction, operations, and decommissioning stages of the proposed Project	10	N	CEA Agency	"The development, implementation, training and continuous improvement of the various SOPs are the responsibility of the manager of the department within which the job assignment will be performed" (p. 10-2). What are these departments? Which job assignments?	An EMS has been compiled for the project. See reference to EMS in adjacent column, particularly the section that addresses personnel.	5.7.2.9 24.1.5.1
125	2.2.10 – Environmental Management System	Include an Environmental Management Plan (EMP) which will detail the environmental practices that will be utilized during the planning, construction, operations, and decommissioning stages of the proposed Project	10	N	CEA Agency	"During the construction phase, private contractors will be responsible for implementation of the construction project…" (p. 10-3). More description is needed on how/if they fit within the EMS/ how they will address environmental management during this phase of the project.	The EMS that has been compiled for the project includes contractors and their responsibilities.	24.1.5.1

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126	2.2.10 – Environmental Management System	Include an Environmental Management Plan (EMP) which will detail the environmental practices that will be utilized during the planning, construction, operations, and decommissioning stages of the proposed Project	10	N	CEA Agency	Sampling and monitoring (p. 10-4): of what? When? How and when does this get finalized?	All EMPs include monitoring and reporting requirements specific to the subject matter.	24.XX.4 24.XX.5
127	2.2.10 – Environmental Management System	Include an Environmental Management Plan (EMP) which will detail the environmental practices that will be utilized during the planning, construction, operations, and decommissioning stages of the proposed Project	10	N	CEA Agency	Data and document management and control measures/approaches to be developed by "on-site environmental staff once hired" (p. 10-5). Who? Shouldn't this be the responsibility of the Environmental Supervisor? Need to specify.	The EMS prepared for the project includes environmental management responsibilities, which will be further refined as the EA process progresses.	24.1.5.1
128	2.2.10 – Environmental Management System	Include an Environmental Management Plan (EMP) which will detail the environmental practices that will be utilized during the planning, construction, operations, and decommissioning stages of the proposed Project	10	N	CEA Agency	Reporting of performance: "a system for monitoring performance will be established for internal reporting", as well as reporting as required by permits, etc. (p. 10-5). Environmental performance monitoring and auditing is important, why is there not more detail? Reporting to whom? Who is responsible?	Besides the overarching reporting towards continual improvement required by the EMS, each EMP includes performance monitoring and reporting requirements specific to the subject matter, which will be further refined as the EA process progresses.	24.1.3 24.XX.4 24.XX.5
129	2.2.10 – Environmental Management System	Include an Environmental Management Plan (EMP) which will detail the environmental practices that will be utilized during the planning, construction, operations, and decommissioning stages of the proposed Project	10	N	CEA Agency	Need a list of EMPs at the start of Section 10, broken down by project phase. The EMPs should be appendicized.	See reference to EMPs in adjacent column.	5.7.2.9 24.1.6.2
130	2.2.10 – Environmental Management System	Include an Environmental Management Plan (EMP) which will detail the environmental practices that will be utilized during the planning, construction, operations, and decommissioning stages of the proposed Project	10	N	BC MOE	Section 10 only provides details for one of several potential Environmental Management Plans: a Terrestrial EMP. EMPs are referred to generally in Section 10.1.1 but no other detailed EMPs provided, e.g., air quality or fugitive dust management plan, sediment and drainage plan, spill prevention plan, waste minimization plan based on 5 Rs. (MOE)	See reference to EMPs in adjacent column.	5.7.2.9 24.1.6.2
131	2.2.10 – Environmental Management System	Describe the proposed adaptive management approach for the Project	10	N	CEA Agency	"as required" statements do not qualify as an adaptive management approach.	The adaptive management approach is described at a high-level in Chapter 24, Environmental Management Plans and Reporting.	24.1.3

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132	2.2.10 – Environmental Management System	Describe the proposed adaptive management approach for the Project		N	CEA Agency	Aside from specifying that "the EMS is a living document which will be modified and updated over the life of the Project" (p.10-1), and that "the EMPs will be further developed and SOPs prepared or adopted at the conclusion of the EA" (p.10-1), the process is very vague and without a plan. What will be modified, how, by whom, and when?	The adaptive management approach is described at a high-level in Chapter 24, Environmental Management Plans and Reporting. All EMPs include monitoring and reporting requirements inherent to adaptive management and specific to the subject matter.	24.1.3 24.XX.4 24.XX.5
133	2.5 – Project Land Use	Describe the land ownership and land use regime	1.2, 1.5, 7.2	Y	BC MFLNRO	p.834 reference to project in Kamloops Forest District- should be DKA and DHW (FLNRO) Only refers to what mine needs to acquire for tenures from FLNRO and makes no mention of existing FLNRO issued tenures that are over the proposed site ie range tenure (FLNRO)	HCMC thanks FLNRO for the comment and has incorporated the edits noted. The proponent has amended its chapter on effects to Land, Water and Resource Use (Chapter 18) to include a characterization of all land use tenures, including those issued by FLNRO.	18.4.3
134	2.5 – Project Land Use	Describe if the Project lies on Crown land, an Indian Reservation or the Agricultural Land Reserve	1.5, 7.2	Y	BC EAO	Indian Reserve, not Reservation (EAO).	HCMC thanks BC EAO for the comment and has made the edit noted.	--
135	2.5 – Project Land Use	Describe if the Project lies on Crown land, an Indian Reservation or the Agricultural Land Reserve	1.5, 7.2	Y	BC MFLNRO	Noted overlap between ALR and proposed powerline location but no measures to address, or alternative (FLNRO)	The overlap has been considered in the assessment of power line route alternatives in Chapter 4, Project Design and Alternatives.	4.4.4.4
136	2.5 – Project Land Use	Include relevant information pertaining to land tenures, licenses, permits or other authorizations that would potentially affect the Project	1.2, 1.5, 7.2	Y	BC MFLNRO	Difficult to quantify number of cut permits as application typically occurs within a short time frame to harvest date Should compensation/absolution of forest licensee's obligations under FRPA be addressed? i.e. free growing There is a permanent sample plot just north of mine site on the Jones Creek FSR, was not mentioned in application. Only refers to what mine needs to acquire for tenures from FLNRO and makes no mention of existing FLNRO issued tenures that are over the proposed site ie range tenure and that need to be resolved – incompatible use Not all permits that may be required for access roads are listed. (FLNRO)	Chapter 18, Commercial and Non-commercial Land Use effects Assessment, addresses forestry and range tenures.	18.4.3.6 18.4.3.7
137	2.5 – Project Land Use	Cover any identified reports on the status of consultations with holders of such tenures and permits	1.5, 7, Appendix B	Y	BC MFLNRO	No reference to consultation with Range Act tenure holders (FLNRO)	Section 3.7.1.5 of Chapter 3, Information Distribution and Consultation, contains details of all consultations undertaken with tenure and license holders. Table 3-K1 of Appendix 3-K provides a record of key communications with tenure and license holders and Appendix 3-L contains a table that lists the issues raised by license and tenure holders and HCMC's responses to address those issues.	Section 3.7.1.5 of Chapter 3; Appendices 3-K and 3-L

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138	2.5 – Project Land Use	List the objectives of the Land and Resource Management Plans	7.2	Y	BC	Generalized, but sufficient	HCMC the reviewer for the comment.	--
139	2.5 – Project Land Use	Disclose existing and proposed management and monitoring programs or regional studies	1.5, 7.2	Y	BC MFLNRO	Nothing identified in this document. I presume that these are programs not directly associated with mine development? - I do not know if there are any programs or studies to report (FLNRO)	HCMC is unclear what is being referred to and clarification needed. Chapter 24, Environmental Management Plans and Reporting, comprises the complete array of EMPs.	23.2 to 24.19
140	2.5 – Project Land Use	Mention other identified developments or foreseeable future developments even if not directly related to the Project	5.8	Y	BC MFLNRO	1.2 – project overview - section appears comprehensive. 1.5.2 appears a bit generic. • What specific land tenures are required outside the mine lease area? • Is the temporary camp located on Mine lease? • Is the rail load out on private land or Crown Land? • I assume the temporary gravel pits will be regulated under the Land Act if they are located outside the Mine lease area. • Not clear on extent of power line location • New road construction for industrial operations? Are new roads required outside the mine lease? There are references in Section 7 about widening and new road construction. 7.2 – It does not appear that consideration has been given to the effect of mine development with respect to Crown Land. Document does not reflect access to Crown lands beyond the site and impacts that may have including legacy impacts related to powerline, roads, etc. 7.2.3 Effects of powerline, road, camps, pits and rail load out are referenced. 7.2.3.6 and 7.2.3.7 are titled the same but are distinctly different with respect to 'registered' stakeholders and user groups of Crown Resource. Trappers and ranchers are not the same as snowmobile club. 7.2.8 Interactions matrix - Effects of powerline, road, camps, pits and rail load out are referenced. (FLNRO)	The proponent has amended its chapter on potential effects to land, water and resource use (Chapter 18) to address the comments provided by MFLNRO.	Chapter 18
141	2.6.2 – Estimated Operating Costs	Indicate the costs for decommissioning closure/abandonment/ reclamation	Appendix A	N	CEAA	Do not see these in Appendix A. They should have their own section/sub-section.	Closure and reclamation costs have been provided in Chapter 7, Section 7.11.	7.11

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
142	2.6.3 – Estimated Employment Opportunities	Discuss employment estimates including direct employment to be created (stated in number of person years (PY)) by major job categories such as general labour, skilled labour, management /supervisors, and business services, during construction and operation, distinguishing among full-time, part-time and seasonal workers	2.14, 7.1, Appendix A	N	BC MOTI	In person-months – no total figures in person-years (EAO)As noted above, wage recruitment in the LSA may be minimal, training opportunities to extend further than study area? (LSIB)The proponent has identified vehicle types to include buses transporting workers (6 per day), light trucks carrying personnel (5 per day), concentrate haulage trucks (16 to 20 per day), and miscellaneous large and small trucks (estimated at 13 per day). The traffic impact study should identify these types of vehicles and the impact they will have on current infrastructure. Please see additional traffic impact study comments. (Section 7.0 Assessment of Socio-economic Effects 7-2 of 171).“During the construction phase of the operation it is anticipated that oversize loads will be routed to site via the Birch Island Bridge and along the Birch Island Lost Creek Road. Oversized loads will be “one time” loads, and limited in number only during Construction.”What is the size of these oversize loads? Are they wide loads or over weight loads? There is an approved 85,000 kg corridor in the Province of BC. All MoTI side roads in the mine area are approved for 63,500 kg only – no more. (Section 7.0 Assessment of Socio-Economic Effects 7-61 of 171).A traffic management plan will be prepared but one has not been submitted in the application. Additional traffic management plans may be a requirement in any of the permits required by MoTI.Changes in school bus routes along public roads should be communicated to MoTI so maintenance contract reflects this. (Section 7.0 Assessment of Socio-economic effects 7-80 of 171).“As with the issue of local traffic within and close to Vavenby, it can be anticipated that transportation and road safety officials will be in a position to monitor traffic patterns on Highway #5 and, if necessary, put controls and/or safeguards in place.”Please elaborate. Who are the road safety officials? What kind of controls and/or safeguards may be implemented? (Section 7.0 Assessment of Socio-Economic Effects 7-102 of 171).“The project will not use KP Road to access the rail load-out facility, and it will remain gated. This will avoid difficult traffic conditions at this driveway into the rail load-out facility.”When will the project use KP road, if at all? The application is unclear and conflicting. Some sections of the application indicate KP will be used. It would be great to see exact routes proposed to be used and when. Routes proposed are too general in their descriptions. (Section 10.0 Environmental and Operational Management Plans 10-85 of 88). (MOT)	A. Project’s average workforce size is anticipated to be 11,248 person years (or approximately 450 jobs) during Project Operations (over 28 years). HCMC will aim to maximize employment benefits within local communities (including First Nation communities), the region (Regional District of Thompson-Nicola), and the province as a whole. Transportation issues are dealt with in Chapter 5, Project Description, a Traffic and Access Management Plan, and in the Traffic Impact Study.	5.8.3 24.16 Appendix 5-E
143	2.6.3 – Estimated Employment Opportunities	Discuss employment estimates including direct employment to be created (stated in number of person years (PY)) by major job categories such as general labour, skilled labour, management /supervisors, and business services, during construction and operation, distinguishing among full-time, part-time and seasonal workers	2.14, 7.1, Appendix A	N	BC MOTI	“The project will not use KP Road to access the rail load-out facility, and it will remain gated. This will avoid difficult traffic conditions at this driveway into the rail load-out facility.” When will the project use KP road, if at all? The application is unclear and conflicting. Some sections of the application indicate KP will be used. It would be great to see exact routes proposed to be used and when. Routes proposed are too general in their descriptions. (Section 10.0 Environmental and Operational Management Plans 10-85 of 88). (MOT)	The Traffic Impact Study states that the Project will not use the KP Road.	Appendix 5-E

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
144	2.7 – Applicable Permits	Include a list of all applicable provincial and federal licenses, permits, and/or approvals required for the construction, operation and decommissioning of the Project and the associated responsible regulatory agencies	1.6	Y	CEA Agency	Additional TC permit likely required for power lines under *Aeronautics Act*. CEA Agency will instruct proponent further on this requirement once the EIS is accepted for detailed review.	The proponent thanks CEA Agency for the comment and has noted the issue for follow-up later in the process.	--
145	2.7 – Applicable Permits	Include a list of all applicable provincial and federal licenses, permits, and/or approvals required for the construction, operation and decommissioning of the Project and the associated responsible regulatory agencies	1.6	Y	BC MOE	There are some errors: 1) Table 1.6-2 lists Min of Health for licensing/permitting for sewage disposal whereas any construction camp with more than 120 persons would come under Min of Env. Registration under Municipal Wastewater Reg would be required for STP effluent discharge during construction period. During mine operations, sewage effluent is often combined with tailings discharge and would be covered under MOE effluent permit for tailings, and seepage discharges. 2) An MOE air discharge permit (or Approval if less than 15 months) would be required for the camp incinerator during construction period. This authorization can be incorporated later into the main air discharge permit for crusher and concentrator. 3) Will need an MOE permit or Approval (if less than 15 months) for effluent discharges from sediment ponds, seepage ponds, etc. 4) All references to "special waste" should be changed to "hazardous waste" as the Reg was amended in 2004. (MOE)	A detailed description of the provincial and federal authorization requirements that apply to the Project appears in Chapter 2, Assessment Process.	2.4-1 2.4-2
146	2.7 – Applicable Permits	Include a list of all applicable provincial and federal licenses, permits, and/or approvals required for the construction, operation and decommissioning of the Project and the associated responsible regulatory agencies	1.6	Y	BC MFLNRO	Section 1.6.7 –no concerns Table 1.6.2 – Defines the list of provincial approvals – I am not clear if there are any roads outside mineral lease? • I believe there is an error in the table. "Mine site facilities occupation" do not require land act approval if they are within the mine lease area. I am not clear on approvals or link to Crown Lands with railway load out. 7.2.3.5 may include authorization to build range improvements on Crown land, and should included consultation with Range staff (FLNRO)	A detailed description of the provincial and federal authorization requirements that apply to the Project appears in Chapter 2, Assessment Process.	2.4-1 2.4-2
147	2.7 – Applicable Permits	Indicate if a request for concurrent permitting is being requested under the Act pursuant to the Concurrent Approval Regulation (BC Reg. 371/2002)	1.6	Y	BC MOE	It is the "synchronous process" as correctly stated in 1.6.7 of the Application report, not "concurrent permitting" as stated in this table. (MOE)	The Proponent is not requesting concurrent permitting for the Project.	2.1.4
148	2.7 – Applicable Permits	Indicate if a request for concurrent permitting is being requested under the Act pursuant to the Concurrent Approval Regulation (BC Reg. 371/2002)	1.6	Y	BC FLNRO	Does not list meetings or discussions with grazing tenure holders but these are covered in another table (FLNRO)	Noted. Section 3.7.1.5 of Chapter 3, Information Distribution and Consultation, contains details of all consultations undertaken with tenure and license holders. Table 3-K1 of Appendix 3-K provides a record of key communications with tenure and license holders and Appendix 3-L contains a table that lists the issues raised by license and tenure holders and HCMC's responses to address those issues.	Section 3.7.1.5 of Chapter 3; Appendices 3-K and 3-L

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
149	2.7 – Applicable Permits	Indicate if a request for concurrent permitting is being requested under the Act pursuant to the Concurrent Approval Regulation (BC Reg. 371/2002)	1.6	Y	CEA Agency	Provincial matter	The Proponent is not requesting concurrent permitting for the Project.	2.1.4
150	3.0 – Assessment Process	Describe the information distribution and consultation activities such as open houses and meetings with interested parties	4.1.1	Y	BC MFLNRO	Described in table 4.4.8 but does not list FLNRO concerns and discussion with loss of AUMS on this area (FLNRO)	The Information Distribution and Consultation Chapter has been revised. Section 3.7.1.5 of Chapter 3, Information Distribution and Consultation, contains details of HCMC's consultations undertaken with tenure and license holders. Table 3-K1 of Appendix 3-K provides a record of key communications with tenure and license holders and Appendix 3-L contains a table that lists the issues raised by license and tenure holders and HCMC's responses to address those issues.	3.7.1.5 Appendix 3-K Appendix 3-L
151	3.0 – Assessment Process	Describe those activities planned during and subsequent to the formal Application review process	4.1.2	Y	BC EAO	Does not cover subsequent to . . . (EAO)	The revised Information Distribution and Consultation Chapter (Chapter 3) contains plans for proposed consultation during the Application review period for Aboriginal groups (section 3.5.3), government agencies and local government (Section 3.6.3), and the public (section 3.7.3).	Section 3.5.3, 3.6.3, and 3.7.3 of Chapter 3
152	3.0 – Assessment Process	Document consultations with federal, provincial, and local government agencies and regulatory authorities, as well as key stakeholders (e.g., land and resource tenure holders in the proposed Project Area)	4.5.1	Y	BC MFLNRO	Documentation is very general in nature, difficult to determine the nature of consultation and specific issuesTable purports to list those who raised issues but it does not list meetings with range tenure holder or FLNRO range staff re impacts to grazing tenure rights and use of area. Table 4.46 has range tenure holder as a landowner, which is incorrect. Should be a resource user (FLNRO)	The Information Distribution and Consultation Chapter has been revised. Section 3.7.1.5 of Chapter 3, Information Distribution and Consultation, contains details of all consultations undertaken with tenure and license holders. Table 3-K1 of Appendix 3-K provides a record of key communications with tenure and license holders and Appendix 3-L contains a table that lists the issues raised by license and tenure holders and HCMC's responses to address those issues.	Section 3.7.1.5; Appendices 3-K and 3-L

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
153	3.0 – Assessment Process	Highlight issues and concerns raised during consultation activities and identify where in the Application they have been addressed	4.5	N	BC FLNRO	Subject areas described, not issues and concerns – does not show where in application they are addressed – Table 4.5-5 (EAO) Table 4.5-5 does not identify where in the application issues and concerns have been addressed. i.e. "comments will be addressed in the application" - Reference E-pic website with detailed comments, but do not identify where in the application they have been addressed. The E-pic site contains responses to the questions/comments provided by public/FN/agencies. (FLNRO)	The Information Distribution and Consultation Chapter has been revised. Section 3.7.1.5 of Chapter 3, Information Distribution and Consultation, contains details of HCMC's consultations undertaken with tenure and license holders. Table 3-K1 of Appendix 3-K provides a record of key communications with tenure and license holders and Appendix 3-L contains a table that lists the issues raised by license and tenure holders and HCMC's responses to address those issues.	Section 3.7.1.5; Appendices 3-K and 3-L
154	3.0 – Assessment Process	Highlight issues and concerns raised during consultation activities and identify where in the Application they have been addressed	4.5	N	CEA Agency	Section 4.5 does not highlight were in the EIS/Application key issue have been addressed.	The Information Distribution and Consultation Chapter has been revised. The issues tracking tables appended to this chapter (Chapter 3) provide HCMC's response describing how the issues have been addressed and where in the Application additional information can be found. Issues tracking tables are included in Appendix 3-F for Aboriginal groups, Appendix 3-J for government agencies, and Appendix 3-L for the public.	Appendices 3-F, 3-J, and 3-L.
155	3.1 – Provincial EA Process	Detail consultation activities completed between provincial government agencies and the HCMC team	4.1	N	BC MFLNRO	Does not detail any meetings between FLNRO range staff and proponent, or phone discussions (FLNRO)	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Table 3-I1 in Appendix 3-1 lists HCMC's communications with provincial agencies.	Section 3.6, Appendix 3-1
156	3.1 – Provincial EA Process	Detail the purpose and methods of consultation with provincial governments, issues raised by governments and how HCMC addressed or proposes to address these issues	4.1	N	BC MFLNRO	Issues not addressed (EAO). Does not detail any meetings between FLNRO range staff and proponent, or phone discussions. No discussion of mitigation of impacts to grazing use of this area (FLNRO)	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Table 3-I1 in Appendix 3-1 lists HCMC's communications with provincial agencies. Chapter 18, Land and Resource Use addressed impacts to land and resource use.	Section 3.6, Appendix 3-1 Chapter 18
157	3.2 – Federal Review	Detail pre-application consultation completed between federal government agencies and HCMC	4.2	Y/N	CEA Agency	This information is contained in Section 4.5 and Appendix B.	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Table 3-I2 in Appendix 3-1 lists HCMC's communications with federal agencies.	Section 3.6, Appendix 3-1

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
158	3.2 – Federal Review	Detail the purpose and methods of consultation with federal governments, issues raised by governments, and how HCMC addressed or proposes to address these issues	4.2	Y/N	CEA Agency	This information is contained in Section 4.5 and Appendix B.	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Issues raised by government agencies and HCMC's responses to address those issues are included in Appendix 3-J.	Section 3.6; Appendix 3-J
159	3.2 – Federal Review	A tracking table detailing issues and concerns raised during the preparation of the AIR and Application	4.2	Y/N	CEA Agency	No mention of issues and concerns raised during preparation of the Application.	Aboriginal comments on the AIR are discussed in Section 3.5.1.3, government comments in Section 3.6.1.1, and public comments in Section 3.7.1.2. Detailed issues tracking tables are included in Appendices 3-F, 3-J, and 3-L for Aboriginal groups, government agencies, and the public respectively.	Section 3.5.1.3, 3.6.1.1, 3.7.1.2; Appendices 3-F, 3-J, and 3-L.
160	3.2 – Federal Review	A list of applicable federal milestones	4.2	Y/N	CEA Agency	Table 4.2-1 should include October 21, 2011 for the acceptance of the EISg (MPMO tracks it as such).	The list of applicable federal milestones has been provided in full in Section 2.3.3.1 of the Application by including information on the Background Information scoping document, as there was no EISg under the federal comprehensive study environmental assessment process.	2.3.3
161	3.3 – First Nations Consultation	Clearly identify the First Nations potentially affected by the Project	4.3	Y/N	CEA Agency	Relationship between the various Secwepemc bands and the project is not clearly explained. Also, reference to Divisions is made in passing, with little explanation provided. This is at odds with the acknowledgement in Section 11 (p. 11-5 of the EIS) that the federal government is consulting with the Sexqeltkemc (Shuswap Lakes) Division.	The introduction to section 3.5 of the revised Information Distribution and Consultation chapter describes the traditional territories and Aboriginal groups in relation to the Project.	Section 3.5
162	3.3 – First Nations Consultation	Clearly identify the First Nations potentially affected by the Project	4.3	Y/N	CEA Agency	The membership of the Lakes Division needs to be clarified, especially with respect to the Splats'in band.	The introduction to section 3.5 of the revised Information Distribution and Consultation chapter describes the traditional territories and Aboriginal groups in relation to the Project.	Section 3.5
163	3.3 – First Nations Consultation	Clearly identify the First Nations potentially affected by the Project	4.3	Y/N	CEA Agency	There is a lack of conceptual clarity about the respective assertions of Aboriginal rights: identification of Aboriginal groups initially follows provincial list, and states that each "First Nation" or "band" has its own traditional territory, but then later makes reference to the fact that Aboriginal rights and title are asserted on the basis of a collective claim by the Secwepemc Nation. There is then later referral to the project as being within Simpcw "traditional territory".	The introduction to section 3.5 of the revised Information Distribution and Consultation chapter describes the traditional territories and Aboriginal groups in relation to the Project.	Section 3.5
164	3.3 – First Nations Consultation	Clearly identify the First Nations potentially affected by the Project	4.3	Y/N	CEA Agency	Section 4.3 overlaps and duplicates portions of Section 11 of the EIS in regards to the identifying of Aboriginal groups.	The introduction to section 3.5 of the revised Information Distribution and Consultation chapter describes the traditional territories and Aboriginal groups in relation to the Project. Consultation requirements are also discussed in section 3.2.1 (provincial requirements) and in Section 3.2.2 (federal requirements).	Section 3.5, 3.2.1, and 3.2.2

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165	3.3 – First Nations Consultation	Clearly identify the First Nations potentially affected by the Project	4.3	Y/N	Neskonlith Indian Band	Proponent consultation efforts based on its internal judgment of project lands being within "Simpcw traditional territory", despite information being provided by Neskonlith Band on its Douglas Reserve claim partially covering these lands and the position that Secwepemc lands are collectively held by all Secwepemc people. (Neskonlith)	The introduction to section 3.5 of the revised Information Distribution and Consultation chapter describes the traditional territories and Aboriginal groups in relation to the Project.	Section 3.5
166	3.3 – First Nations Consultation	Detail pre-application consultation activities carried out between local First Nations and HCMC	4.3	Y/N	CEA Agency	No information providing point of view of Adam's Lake, or fact that capacity funding was offered by proponent but not accepted by ALIB because of engagement disagreements.	Section 3.5.1.4 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses HCMC's offers of capacity funding to ALIB.	Section 3.5.1.4
167	3.3 – First Nations Consultation	Detail pre-application consultation activities carried out between local First Nations and HCMC	4.3	Y/N	Neskonlith Indian Band	Only a cursory description is provided (Neskonlith).	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with Aboriginal groups including NIB. Table 3-E3 of Appendix 3-E details HCMC's consultation efforts with NIB, and Table 3-F3 of Appendix 3-F describes the issues raised by NIB to July 31, 2014 and HCMC's responses to address these issues.	Section 3.5, Appendices 3-E and 3-F
168	3.3 – First Nations Consultation	Include a record of consultation activities	4.3	Y	CEA Agency	Not provided in 4.3…. "Further detail, including a summary of consultation activities to date with each of the four First Nations, specific issues raised by First Nations, and how HCMC addressed or proposed to address such issues is provided in Section 11.6…"—reader should not have to hunt throughout various sections of document to find information.	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with Aboriginal groups. Appendix 3-E details HCMC's consultation efforts with Aboriginal groups and Appendix 3-F describes the issues raised by Aboriginal groups to July 31, 2014 and HCMC's responses to address these issues.	Section 3.5, Appendices 3-E and 3-F
169	3.3 – First Nations Consultation	Include a record of consultation activities	4.3	Y	Neskonlith Indian Band	Table 4.1.1 referred to in this section is actually a summary of Provincial pre-application phase milestones. No detailed record or corresponding table is presented in this section (Neskonlith)	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with Aboriginal groups including NIB. Table 3-E3 of Appendix 3-E details HCMC's consultation efforts with NIB, and Table 3-F3 of Appendix 3-F describes the issues raised by NIB to July 31, 2014 and HCMC's responses to address these issues.	Section 3.5, Appendices 3-E and 3-F
170	3.3 – First Nations Consultation	Outline the purpose and methods of First Nations' consultations, specific issues raised by First Nations, and how HCMC addressed or proposes to address these issues	4.3	Y	CEA Agency	Not provided in 4.3…. "Further detail, including a summary of consultation activities to date with each of the four First Nations, specific issues raised by First Nations, and how HCMC addressed or proposed to address such issues is provided in Section 11.6…"—reader should not have to hunt throughout various sections of document to find information.	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with Aboriginal groups. Appendix 3-E details HCMC's consultation efforts with Aboriginal groups and Appendix 3-F describes the issues raised by Aboriginal groups to July 31, 2014 and HCMC's responses to address these issues.	Section 3.5, Appendices 3-E and 3-F

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
171	3.3 – First Nations Consultation	Outline the purpose and methods of First Nations' consultations, specific issues raised by First Nations, and how HCMC addressed or proposes to address these issues	4.3	Y	BC EAO	No issues addressed (EAO).	Appendix 3-F describes the issues raised by Aboriginal groups to July 31, 2014 and HCMC's responses to address these issues.	Appendix 3-F
172	3.3 – First Nations Consultation	Outline the purpose and methods of First Nations' consultations, specific issues raised by First Nations, and how HCMC addressed or proposes to address these issues	4.3	Y	Little Shuswap Indian Band	More access for LSLIB to be in the loop. (LSIB)	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with Aboriginal groups including LSIB. Table 3-E4 of Appendix 3-E details HCMC's consultation efforts with LSIB, and Table 3-F4 of Appendix 3-F describes the issues raised by LSIB to July 31, 2014 and HCMC's responses to address these issues. HCMC has provided LSIB with opportunities to provide input into various EA studies as described in section 3.5.1.5.	Section 3.5, Appendices 3-E and 3-F
173	3.3 – First Nations Consultation	Outline the purpose and methods of First Nations' consultations, specific issues raised by First Nations, and how HCMC addressed or proposes to address these issues	4.3	Y	Neskonlith Indian Band	No details are presented in this section (Neskonlith)	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with Aboriginal groups including NIB. Table 3-E3 of Appendix 3-E details HCMC's consultation efforts with NIB, and Table 3-F3 of Appendix 3-F describes the issues raised by NIB to July 31, 2014 and HCMC's responses to address these issues. HCMC's consultation objectives are described in section 3.1.1.	Section 3.1.1 and Section 3.5, Appendices 3-E and 3-F
174	3.3 – First Nations Consultation	Include a tracking table detailing issues and concerns raised by First Nations during the preparation of the AIR and Application	4	N	Neskonlith Indian Band	No tracking table is presented in this section (Neskonlith)	Table 3-F3 of Appendix 3-F of the revised Information Distribution and Consultation Chapter (Chapter 3) describes the issues raised by NIB to July 31, 2014 and HCMC's responses to address these issues.	Appendix 3-F
175	3.3 – First Nations Consultation	Include a tracking table detailing issues and concerns raised by First Nations during the preparation of the AIR and Application	4	N	CEA Agency	No reference to a tracking table found in this section	Appendix 3-F of the revised Information Distribution and Consultation Chapter (Chapter 3) describes the issues raised by Aboriginal groups to July 31, 2014 and HCMC's responses to address these issues. A reference to these appendices is made at the beginning of Section 3.5, Aboriginal Information Distribution and Consultation.	Appendix 3-F

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
176	3.4 – Public and Agency Information Distribution and Consultation	A summary of consultations with public and other key stakeholders as well as provincial, federal and local government agencies	4.4	Y	CEA Agency	Information also included in Appendix B	Section 3.7 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with the public and stakeholders. Appendix 3-K details HCMC's consultation efforts with the public and Appendix 3-L describes the issues raised by the public to July 31, 2014 and HCMC's responses to address these issues.	Section 3.7, Appendix 3-K and 3-L
177	3.4 – Public and Agency Information Distribution and Consultation	A summary of consultations with public and other key stakeholders as well as provincial, federal and local government agencies	4.4	Y	BC MFLNRO	Identifies contact with trappers tenures, guide outfitters etc but missed range tenures. (FLNRO)	Section 3.7 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with the public and stakeholders. Appendix 3-K details HCMC's consultation efforts with the public (including range tenure holders) and Appendix 3-L describes the issues raised by the public (including range tenure holders) to July 31, 2014 and HCMC's responses to address these issues. Section 3.7.1.5 summarizes HCMC's consultation with tenure and license holders, including range tenure holders.	Section 3.7, Appendix 3-K and 3-L
178	3.4 – Public and Agency Information Distribution and Consultation	A summary of issues, concerns, and interests identified during consultation activities and how these matters were addressed, where possible cross-referencing relevant sections of the Application	4.4	N	BC MFLNRO	Issues identified but not addressed – Table 4.4-8 (EAO). No cross reference to relevant sections of the application (FLNRO)	The Information Distribution and Consultation Chapter (Chapter 3) has been revised. Detailed issues tracking tables are included in Appendix 3-L for the public. Responses in the issues tracking tables refer to relevant sections of the Application/EIS where applicable.	Appendix 3-L
179	3.4 – Public and Agency Information Distribution and Consultation	A summary of issues, concerns, and interests identified during consultation activities and how these matters were addressed, where possible cross-referencing relevant sections of the Application	4.4	N	CEA Agency	Summary information missing. The number of contacts and contact type is of secondary importance compared with the actual issues that were raised. Emphasis needs to be changed.	Section 3.7 of the revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with the public and stakeholders. Appendix 3-K details HCMC's consultation efforts with the public (including range tenure holders) and Appendix 3-L describes the issues raised by the public (including range tenure holders) to July 31, 2014 and HCMC's responses to address these issues.	Section 3.7, Appendix 3-K and 3-L
180	3.4.1 – Pre-Application Consultation	Include an outline of consultations undertaken in the pre-Application stage of the EA, including both the preparation of the AIR and the Application	4.4.1	Y	BC MFLNRO	Government agencies consultation appears to be in section 4.5 (FLNRO)	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Appendix 3-1 lists HCMC's communications with government agencies and Appendix 3-J describes the issues raised by government agencies to July 31, 2014 and HCMC's responses to address those issues.	Section 3.6, Appendix 3-1 and 3-J

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
181	3.4.1 – Pre-Application Consultation	Summary of Consultations with public and other key stakeholders	4.4.1	Y	BC MFLNRO	Government agencies consultation appears to be in section 4.5(FLNRO)	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Appendix 3-1 lists HCMC's communications with government agencies and Appendix 3-J describes the issues raised by government agencies to July 31, 2014 and HCMC's responses to address those issues.	Section 3.6, Appendix 3-1 and 3-J
182	3.4.1 – Pre-Application Consultation	Include the purpose and methods of consultation with local communities and stakeholders, issues identified, and how HCMC or other appropriate parties have addressed or proposes to address these issues	4.4.1	Y	BC MFLNRO	Issues not addressed (EAO) Government agencies consultation appears to be in section 4.5. Nothing more specific than "Comments will be addressed in the Application" (FLNRO)	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Appendix 3-1 lists HCMC's communications with government agencies and Appendix 3-J describes the issues raised by government agencies to July 31, 2014 and HCMC's responses to address those issues.	Section 3.6, Appendix 3-1 and 3-J
183	3.4.1 – Pre-Application Consultation	Summary of Consultations with federal, provincial, and local government representatives	4.1.1	Y	BC MFLNRO	Government agencies consultation appears to be in section 4.5 Does not identify the range issues for continued use on Crown land or mitigation of loss of AUMs(FLNRO)	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Appendix 3-1 lists HCMC's communications with government agencies and Appendix 3-J describes the issues raised by government agencies to July 31, 2014 and HCMC's responses to address those issues. Appendix 3-L tracks the issues raised by the public, including range tenure holders and other license and tenure holders to July 31, 2014, and includes HCMC's responses to address those issues.	Section 3.6, Appendix 3-1, 3-J, and 3-L
184	3.4.1 – Pre-Application Consultation	Include a summary of responses regarding issues raised by government agencies as well as summaries of discussions indicating how issues were resolved or addressed by HCMC and other relevant parties	4	Y/N	BC MFLNRO	Summary is included – Table 4.4-11 but document indicates that "Comments will be addressed in the Application". This is not an adequate response. We need to know how the issues have been addressed and where. (EAO) Resolution for many of the comments say will address in application-Where in application? (FLNRO)	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Appendix 3-J describes the issues raised by government agencies to July 31, 2014 and HCMC's responses to address those issues. The responses indicate where in the Application additional information can be found, if applicable.	Section 3.6, Appendix 3-J

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
185	3.4.1 – Pre-Application Consultation	Include a summary of responses regarding issues raised by government agencies as well as summaries of discussions indicating how issues were resolved or addressed by HCMC and other relevant parties	4	Y/N	CEA Agency	Should not have to hunt for this information within Section 4 – proponent must provide specific subsection references, tables, etc.	Section 3.6 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with provincial and federal government agencies. Appendix 3-1 lists HCMC's communications with government agencies and Appendix 3-J describes the issues raised by government agencies to July 31, 2014 and HCMC's responses to address those issues. References to Appendices 3-I and 3-J are made in section 3.6 for the reader's ease.	Section 3.6, Appendix 3-1 and 3-J
186	3.4.2 – Consultation Planned During Application Review	Describe the public consultation program proposed for the Application review stage of the EA process	4.5.2	Y/N	CEA Agency	Subsection 4.2.5.1 – public comment period on Application/EIS will be jointly led by EAO and CEA Agency. CEA Agency and EAO will both post on their respective websites the start of the public comment period.	Chapter 3, Information Distribution and Consultation has been revised. Section 3.7.1.2 describes the provincial public comment period and section 3.7.1.3 describes the federal public comment period on the background information documents.	Section 3.7.1.2 and 3.7.1.3
187	3.4.2 – Consultation Planned During Application Review	Describe the proposed methods and plans for consultation with government agencies and the process used to resolve outstanding issues	4.5.2	Y	Neskonlith Indian Band	Don't forget to screen for Aboriginal Consultation Program for the Application Review Stage! (Sec 4.5.2.3) not included in table of concordance. Process to resolve range issue is not documented – says it will be resolved in the application but no commitments made (FLNRO) 4.3.2.3 - Aboriginal Consultation Program for the Application Review Stage of the EA Process is curiously placed in this section although not referenced as such in the Table of Concordance; no mention of intent to address socio-economic or cultural heritage impacts here (Neskonlith)	The revised Information Distribution and Consultation Chapter (Chapter 3) contains a plan for proposed consultation during the Application review period for Aboriginal groups (section 3.5.3). HCMC's consultation with tenure and license holders is summarized in section 3.7.1.5 and detailed in Table 3-K1 of Appendix 3-K. Issues raised by tenure holders and HCMC's responses to address those issues are included in Appendix 3-L	Section 3.5.3, Appendix 3-K and 3-L
188	4.1 – Introduction	The scope of the EA	5.3	Y/N	CEA Agency	Important to provide the story or process as to how the specific VCs for this project were determined. What meetings? Time frame? Relation to key EA milestone events?	The information requested has been provided in Section 8.4.1 of the Application/EIS.	8.4.1

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
189	4.1 – Introduction	Methods used for assessing potential effects of the Project, including the evaluation of the significance of effects (magnitude, geographic extent, duration and frequency, reversibility, context and probability) for construction, operation and decommissioning phases of the Project	5.5	N	CEA Agency	Weak intro. Information presented is too encapsulated and should describe the logical framework to determine potential effects. It should also be stated whether this methodology was employed for each VC or whether certain VCs had special additional or alternative considerations. Intro should also explain what "potential effects" are in the context of this section (effects on the environment or effects in general, source of definition, etc.). The methodology for the section overall is not clear as expressed and lacks critical supporting rationale for arriving at tabled "products". Tell the story—provide a solid intro., and explain the logic in progressing from one table to the next. Information in tables should be supported by an explanation in body text. For example, in Table 5.5.2, the disciplines columns should be explained as to how they should be considered together with the specific VC and the information carried over from Table 5.5.1. Make the progressions of logic clear to the reader, so that the sections can be clearly and easily followed through, step-by-step. This is especially important for any section of the EIS that pertains to descriptions of methodology. It is also very important to provide a thorough rationale for any aspect of the framework where YMI is required to make a judgment call or assumption (i.e.: where quantifications or ratings are made).	The assessment methodology chapter underwent significant changes to address reviewers' concerns; the information requested has been addressed in Section 8 of the Application/EIS by including information on the logical framework to determine potential effects, and the evaluation of the significance of effects.	8
190	4.1 – Introduction	The mitigation measures developed to avoid or reduce adverse effects	5.6	Y	CEA Agency	Good to see measure of anticipated effectiveness of mitigation explained this way. Rather than stating that mitigations are described in each subsection, state that they are described for each VC. Fix opening sentence for section—not sure what it is trying to convey.	The assessment methodology chapter underwent significant changes to address reviewers' concerns; this section has been removed from the Application/EIS. Mitigation measures are addressed in Section 8.6.2.	8.6.2
191	4.1 – Introduction	Baseline studies and assessment analysis, describe each standard used (e.g. provincial Resource Information Standards Committee)	5.4, 6, 7, 8, 9, Appendices	Y	CEA Agency	Section 5.4 – " The results of the baseline for the component being studied, VC or discipline will be summarized in this subsection of the Application and supported by data or discipline-specific reports in the Appendix of the Application."—what is the "subsection" referred to here? If this pertains to each individual VC, then be clear about that. While YMI has opted to integrate baseline information within the effects assessment section for each VC (with reference to appendices), the more typical format is to provide a separate baseline section or to move all baseline information into appendices and refer to appropriate sections of appendices throughout effects assessment sections. This will result in a more reader-friendly document that more logically respects and represents the key chronological phases while placing the appropriate emphasis on the effects assessment rather than baseline (supporting) information.	The assessment methodology chapter underwent significant changes to address reviewers' concerns; this section has been removed from the Application/EIS. The baseline studies undertaken to support the assessment are identified in Section 8.5 of the Application/EIS. The baselines are included in Appendices of the Application/EIS.	8.5.2
192	4.1 – Introduction	Baseline studies and assessment analysis, describe each standard used (e.g. provincial Resource Information Standards Committee)	5.4, 6, 7, 8, 9, Appendices	Y	BC MFLNRO	OGMAs – recently legalized – no X or Y category any longer, only permanent OGMA.don't provide adequate mitigation in terms of replacement. (suggestions?) (FLNRO)	Old-Growth Management Areas are included into the "old-growth forests" valued component, as legally designated on March 5, 2013 for the Barriere and Vavenby landscape units.	Section 15.4.2.4

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
193	4.1 – Introduction	A list of applicable provincially/regionally developed Best Management Practices (BMPs) and guidance documents that will be implemented	10	Y	CEA Agency	Need to specify where in Section 10 this info. can be found (list subsections)—point the reader to exactly where this info. is found—applies to all sections of EIS. Info. found in 10.4.2 and 10.4.9.	The information requested with respect to EMPs has been addressed in full in Section 8.6.2.1 of the Application/EIS.	8.6.2.1
194	4.1 – Introduction	A list of applicable provincially/regionally developed Best Management Practices (BMPs) and guidance documents that will be implemented	10	Y	BC MOE	Some missing, i.e., proponent should be aware of: 1) Guidance for Authorizations under the Environmental Management Act – Consultation 2) Guidance for Assessing the Design, Size and Operation of Sedimentation Ponds Used in Mining – DRAFT May 9, 2001 3) The Effluent Permitting Process Under the Environmental Management Act, April 2013 and 4) Annual Reporting Under the Environmental Management Act for Effluent Permits. A Guidance Document for Mines in the Thompson and Cariboo Regions, Dec 2012 (MOE)	Best Management Practices have been addressed in Section 24.1 of the Application/EIS, and then throughout the subject-area EMPs.	24.124.2 to 24.19
195	4.2 – Valued Components	Describe the methodology and criteria used to identify Valued Components (VCs)	5.3.1	Y/N	BC MFLNRO	5-7 (Table 5.3-1) Valued Components for the Harper Creek Project – Table is inconsistent with table 6.8-1 (FLNRO)	The assessment methodology chapter underwent significant changes to address reviewers' concerns; these tables have been removed from the Application/EIS. The Valued Components selected for assessment are indicated in Table 8.4-3.	Table 8.4-3.
196	4.2 – Valued Components	Describe the methodology and criteria used to identify Valued Components (VCs)	5.3.1	Y/N	CEA Agency	Important to describe the story or process as to how the specific VCs for this project were determined. What meetings? Time frame? Relation to key EA milestone events?	The information requested has been provided in Section 8.4.1 of the Application/EIS.	8.4.1
197	4.3 – Spatial Boundaries	Describe the spatial boundaries used to define baseline study areas and the geographic scope of the effects assessment.	5.3.5	Y/N	CEA Agency	If the spatial and temporal boundaries are different for each VC, then the location of the description of the spatial and temporal boundaries per VC in the EIS should be stated.	The information requested has been provided in Section 8.4.2 of the Application/EIS.	8.4.2
198	4.4 – Temporal Boundaries	Provide an explanation for the temporal boundaries used in the assessment relative to the VCs for the life of the Project	5.3.5	Y/N	CEA Agency	If the spatial and temporal boundaries are different for each VC, then the location of the description of the spatial and temporal boundaries per VC in the EIS should be stated.	The information requested has been provided in Section 8.4.2 of the Application/EIS.	8.4.2
199	4.4 – Temporal Boundaries	Detail the anticipated effects for the various phases of the Project such as pre-construction, construction, operation, decommissioning, closure, and post-closure	5.3.5	N	CEA Agency	Not provided in this section	The information requested has been provided in Table 8.4-2 of the Application/EIS. The detail of the anticipated effects are presented in each assessment chapter.	Table 8.4-2.
200	4.5 – Assessment of Potential Significant Adverse Effects Methodology	Potential impacts, both direct and cumulative of the Project	5.5, 5.7, 5.8	Y/N	CEA Agency	5.8.2 – Methodological correction: residual effects interaction matrix should identify residual effects of the Harper Creek project with residual effects of other past, present, and future potential projects to determine where there may be cumulative effects.	The assessment methodology chapter underwent significant changes to address reviewers' concerns; this section has been removed from the Application/EIS.	--

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
201	4.5 – Assessment of Potential Significant Adverse Effects Methodology	Outline and describe components of the Project's impact assessment that have taken place in parallel with the engineering design for the facilities	5	Y	CEA Agency	Table 5.5-1 – Note: reviewer should not have to hunt for this information. Specify subsections/tables where required information can be immediately found.	Project engineering has occurred in conjunction with the entire EA process. A summary of the changes made to the Project as a result of the EA process is provided in the *Summary of Project Design Changes* section in the Executive Summary.	--
202	4.6 – Cumulative Effects Assessment	Explain the methodology and rationale used to identify other developments, including past and present projects, and reasonably foreseeable future developments	5.8	Y	CEA Agency	Acceptable; however, need to expand on definition of "reasonably forseeable projects" in relation to the Harper Creek Mine project.	The information requested has been provided in Section 8.7.1.2 of the Application/EIS.	8.7.1.2
203	4.6 – Cumulative Effects Assessment	Identify potential limitations and associated uncertainty of the CEA assessment	5.8	N	CEA Agency	Recommend enhancing statements around professional judgment and unpredictability and lack of direct control/influence over other intersecting projects.	The information requested has been provided in the respective assessment chapters in Sections X.6.6 of the Application/EIS.	X.6.6
204	4.6 – Cumulative Effects Assessment	Discuss the predicted effectiveness of proposed mitigation strategies and will suggest if additional monitoring is warranted	5.8	N	CEA Agency	Table 5.8-2 makes mention of the consideration of the effectiveness of mitigation strategies, but there is no discussion around this or whether additional monitoring would be warranted.	The assessment methodology chapter underwent significant changes to address reviewers' concerns; this table has been removed from the Application/EIS.	--
205	5.1 – Environmental Background	Provide a general description of the biophysical environment and surrounding areas within the zone of potential influence	6	N	CEA Agency	List specific subsections where this information is presented.	A general description of the biophysical environment is provided in Section 1.6.1 of the Project Overview, as well as in the existing conditions sections of each assessment chapter (Sections X.4.3 of Chapters 9-16)	Section 1.6.1, Section X.4.3 of Chapters 9-16
206	5.1 – Environmental Background	Each assessment pertaining to a Valued Environmental Component detailed in this chapter will include an introduction, rationale for selection, a description of sampling/assessment methodologies, a summary of baseline conditions, and a reference section	6	Y/N	CEA Agency	Introductory information/rationale for Geochem section is required.	The ML/ARD potential for the Project is assessed in Chapter 6 and Appendix 6-A. Rationale for not including geochemistry as a VC is provided in Section 6.1.	6.1
207	5.1 – Environmental Background	Each Valued Environmental Component will also include a section that discusses potential effects and recommended mitigation measures, follow-up programs, potential residual effects, and their significance	6	Y/N	CEA Agency	List specific subsections where this information is provided.	This information is provided in full in each assessment chapter, please refer to the Table of Concordance for section numbers.	--

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
208	5.1 – Environmental Background	If CEAA is triggered, each component will also summarize key indicators, influence of consultation on issues scoping and assessment (where applicable), and cumulative effects of past, present, or future projects.	6	Y/N	CEA Agency	List specific subsections where this information is provided.	This information is provided in full in each assessment chapter, please refer to the Table of Concordance for section numbers.	--
209	5.2.2 – Climate	Provide the rationale for the selection of this component as a VC and an introduction and background to the local and regional climate	6.2	Y/N	CEA Agency	Introduction to Section 6.2 (2nd paragraph) needs to be made more clear with respect to why an effects assessment was not undertaken for climate.	The proponent has revised the chapter to include further discussion regarding why an effects assessment was not undertaken for climate. The information has been provided in Section 9.3.1.2 of the Application/EIS.	9.3.1.2
210	5.2.2 – Climate	Summarize historic data from Environment Canada (EC) climate stations at Vavenby and Axel Creek (others stations may also be considered as appropriate)	6.2	N	BC MOE	The summary consists of duplication of the climate normals from the historical Environment Canada Archive. There is no attempt to discuss the implications of the climate data from the EC stations (or the two on site stations with partial records) on potential impacts from the mine. In the case of air quality, the key issue is entrainment and transport of particulate matter of various size fractions. The weather plays an important role in these processes. At the very least an analysis of climate data in support of a large mine should include analysis of climate data that predict the potential for short term dust episodes. Presentation of annual mean wind speeds are of no practical use in assessing dust episodes. In this section I would expect to find seasonal windroses, and some simple analysis to determine if short period of high winds are common after dry periods (no precipitation and low humidity periods in parts of year when there is no snow cover). The section on climate also needs a careful review and edit, for instance in table 6.2.5 it states that the station operated from 2007 until 2011 was located at 1837m, but in the preceding text it says that the station installed in August 2011 was at 1827m (the other station is a 1,680 m). (MOE)	The proponent has revised the chapter to include further discussion regarding the implications of climate on the potential impacts from the mine. The chapter includes seasonal wind roses and wind speed frequency distribution charts. The information has been provided in Section 9.4.2.2 of the Application/EIS. An analysis to determine if short period of high winds are common after dry periods (no precipitation and low humidity periods in parts of year when there is no snow cover) has not been carried out. The modelling has been based on worst-case meteorological conditions and are therefore representative of high wind, dry conditions. The section has been carefully reviewed to ensure the accuracy of statements. A baseline meteorological report has also been produced (Appendix 9-B) which includes further details regarding the local and regional meteorological conditions. Data from the Axel Creek station have not been included in the report as the station closed in 1996, data from more recent stations have been included.	9.4.2.2 Appendix 9-B

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
211	5.2.2 – Climate	Discuss the results obtained from a climate station established by HCMC in late 2007 near the vicinity of the proposed tailings facility and pit area	6.2	N	BC MOE	See comments for previous item (MOE): The summary consists of duplication of the climate normals from the historical Environment Canada Archive. There is no attempt to discuss the implications of the climate data from the EC stations (or the two on site stations with partial records) on potential impacts from the mine. In the case of air quality, the key issue is entrainment and transport of particulate matter of various size fractions. The weather plays an important role in these processes. At the very least an analysis of climate data in support of a large mine should include analysis of climate data that predict the potential for short term dust episodes. Presentation of annual mean wind speeds are of no practical use in assessing dust episodes. In this section I would expect to find seasonal windroses, and some simple analysis to determine if short period of high winds are common after dry periods (no precipitation and low humidity periods in parts of year when there is no snow cover). The section on climate also needs a careful review and edit, for instance in table 6.2.5 it states that the station operated from 2007 until 2011 was located at 1837m, but in the preceding text it says that the station installed in August 2011 was at 1827m (the other station is a 1680 m). (MOE)	The proponent has revised the chapter to include further discussion regarding the implications of climate on the potential impacts from the mine. The chapter includes seasonal wind roses and wind speed frequency distribution charts. The information has been provided in Section 9.4.2.2 of the Application/EIS.An analysis to determine if short period of high winds are common after dry periods (no precipitation and low humidity periods in parts of year when there is no snow cover) has not been carried out. The modelling has been based on worst-case meteorological conditions and are therefore representative of high wind, dry conditions.The section has been carefully reviewed to ensure the accuracy of statements. A baseline meteorological report has also been produced (Appendix 9-B) which includes further details regarding the local and regional meteorological conditions.	9.4.2.2 Appendix 9-B
212	5.2.2 – Climate	Results from site-specific snow surveys conducted in 2008 and 2011 within the Project area	6.2	N	BC MOE	No reference made to snow surveys on site in report. In Appendix F sec 2.7.4 it is stated that snow data were regional snowpack data. (MOE)	The snow survey data have been included in the hydrology baseline (Appendix 12-A).	Appendix 12-A

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
213	5.2.3 – Air Quality	Provide local and regional air quality information and the rationale, methodology, and results of an air quality assessment	6.2	N	BC MOE	The report shows the ranges of background levels expected of PM2.5 and PM10 expected in Table 6.2-10, but there is no discussion of their validity or limitations in the specific case of the proposed mine. It is also unclear if these are the values expected at the mine site, or the values expected at the communities of Vavenby and Clearwater.The discussion of the dustfall monitoring should be expanded given the importance of these data. In Table 6.2-1 it states the range and average only. If Appendix E is consulted, it will be found that only 6 of the 7 dustfall stations shown on Figure 6.2-1 have data associated with them (incidentally station DF-01 is not labeled). The data in Appendix E also show that monthly samples were not taken for all sites. In fact it appears that only 6 samples were taken over the period of measurement, and that stations 3, 4, and 5 (which would appear to be the stations on the mine site) were only measured three times. In addition to no comment about the poor data capture, there is no discussion of the seasonal trend or spatial variation in the data collected.There is insufficient information included to assess the results of the CALMET/CALPUFF modelling. Critical information is not supplied and an air quality meteorologist reviewing the modelling results has no way of determining if the model was run appropriately, or if the results are valid. For instance it is not clear which meteorological data were used to run the model (the 2007-2011 station with only a 3m anemometer and partial record, the newer 10m station, in Appendix F it states that "No data have been collected from the KPL climate station to date"). Were data from other surface stations included in the model inputs What was the grid spacing. Which period was modelled. Were any upper air data used. Were MM5 data used as intialization fields. How were the stated emission factors included (continuous over entire run?) In addition, more discussion of modelling results and the QA/QC process used should be included. A description of this is given in the Dispersion Modelling Guidelines which the proponent is familiar with. In complex terrain an assessment of how well CALMET is interpolating the windfields is critical; windroses of CALMET output of representative locations is a minimum requirement. Obviously, much of this is very technical and it may be appropriate to put it into an appendix, but it must be included before Ministry of Environment can review the modelling results. (MOE)	The proponent has revised the chapter to include further discussion regarding the baseline values used in the assessment. An air quality baseline report has also been produced which includes details of all the dustfall monitoring carried out by the proponent (Appendix 9-A).The proponent has revised the chapter to include further discussion regarding the meteorological data used in the modelling study, the chapter includes details regarding which stations were used in the model, the grid spacing, the model period etc, as requested. The information has been provided in Section 9.4.2.1 of the Application/EIS.Further details have also been provided regarding the emission factors used in the model and further discussion has been included regarding the model outputs. The information has been provided in Section 9.5.3.2 of the Application/EIS.The output of the CALMET model was discussed with the MOE before modelling commenced and wind roses at various locations, chosen by the MOE, were provided in the approved Conceptual Model Plan (Appendix 9-C).	9.4.2.1 Appendix 9-A 9.5.3.2 Appendix 9-C
214	5.2.3 – Air Quality	Discuss potential contaminants such as particulate matter, dust, VOCs, and reduced sulphur, and will also address some treatment equipment	6.2	Y/N	HC	Only total suspended particles (TSP), PM10, PM2.5 and dust fall were included as part of the effects assessment for air quality. The EIS does not consider VOCs and reduced sulphur. HC suggests that a more fulsome assessment or discussion of all criteria air contaminants that may apply to this Project be provided.	The proponent has revised the chapter to include a discussion of additional criteria air contaminants. The information has been provided in Section 9.3.1.2 of the Application/EIS. The pollutants included in the modelling assessment were approved by the MOE in the Conceptual Model Plan (Appendix 9-C).	9.3.1.2 Appendix 9-C
215	5.2.4 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on maintaining air quality and climate conditions that are consistent with both provincial and federal standards and quality-of-life related issues	6.2	Y/N	HC	Quality-of-life related issues did not appear to be addressed in the EIS. Section 6.2.1.2 indicates that AQ within the mine site boundary and in the mine site area was excluded from the AQ assessment. However, it is not clear if there could be any FN receptors exercising their traditional or cultural activities within the excluded areas.	First Nation receptors are identified in Chapter 21, Human Health Effects Assessment. Chapter 22, Current Use of Land and Resources for Traditional Purposes, indicates that there is no evidence of First Nations use of the Project Site.	21.3.1.1. 22.5.2

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
216	5.2.5 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project on air quality and climate conditions after appropriate mitigation measures and environmental management strategies have been applied	6.2	Y/N	BC MOE	This is also related to the emission factors used in the modelling and discussed above. Section 6.2.5 and Table 6.2-16 summarize the proposed mitigation measures. However, it is not clear if these are potential mitigation measures should a problem arise in the future, or if these have already been accounted for in the modelling. In addition, there is no indication of if the mitigation measures were included in the modelling. The emission factors listed in Table 6.2-12 do not include any information of what type of mitigation measures were considered in choosing the emission factors. (MOE)	The proponent has revised the chapter to include details of which mitigation measures were included in the model and which measures are additional. The information has been provided in Section 9.5.3.1 and 9.5.2 of the Application/EIS.	9.5.3.1 9.5.2
217	5.2.5 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project on air quality and climate conditions after appropriate mitigation measures and environmental management strategies have been applied	6.2	Y/N	CEAA	Need to explain in more detail the assertion that there are no cumulative effects for this VC—likely a brief description of how this derived from Table 6.2-18.	The proponent has revised the chapter to include a more detailed discussion of the potential cumulative impacts. The information has been provided in Section 9.6.2 of the Application/EIS.	9.6.2
218	5.3.2 – Baseline Conditions	Provide a detail description of the metal leaching (ML) and acid rock drainage (ARD) characteristics of the Harper Creek deposit	2.2, 6.1, Appendix D	Y/N	EC	In reviewing the EIS, Environment Canada is unable to locate information on the detailed geochemical characterization of the pit walls. It is requested that the proponent identify where the information can be found in the EIS or submit it for review. This information is important to the assessment of potential effects of pit wall geochemistry on pit water quality during mine closure and post-closure phases.	Geochemical characteristics are provided in Appendix 6-A. Classification of pit wall ARD potential and development of pit wall source terms are described in Appendix 6-A, Section 5.2.2.	Appendix 6-A, Section 5.2.2
219	5.3.2 – Baseline Conditions	Short term elemental loading rates to the downstream environment	6.1, Appendix D	N	NRCan	NRCan did not find this information in the EIS.	Source terms under all conditions, including short term are provided in Section 5, Appendix 6-A	Section 6, and Appendix 6-A
220	5.3.2 – Baseline Conditions	Short term elemental loading rates to the downstream environment	6.1, Appendix D	N	Little Shuswap Indian Band	Issues, who says stop if levels get too high. (LSIB)	Time series loading rate graphs have been provided for key parameters of concern for mine site features and receiving water quality model nodes in Harper Creek, Baker Creek and Jones Creek. The significance of the predicted concentrations in the downstream environment, including magnitude, is assessed in Section 13.5.	Appendix 13-C (Sections 4,5,6 and Appendix D). Section 13.5
221	5.3.3 – Assessment of Potential Effects and Proposed Mitigation	Apply the results of the geochemical testing and the geochemical model simulations to characterize the ML/ARD potential of waste rock, tailings, ore and low grade ore, final open pit characteristics, and borrow materials	6.1, Appendix D	Y/N	EC	The evaluation of ML potential of the overburden material appears to be based on static tests, leaching tests and trace element analysis, as opposed to humidity cell (kinetic testing). As there are elevated concentrations of lead and arsenic in the overburden samples, the proponent is requested to provide a rationale for not undertaking kinetic tests that would facilitate a better understanding of the long-term drainage chemistry resulting from the overburden material.	The information requested has been provided in full in Section 4.3.5 of Appendix 6-A the Application/EIS.	Section 4.3.5 of Appendix 6-A

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
222	5.3.3 – Assessment of Potential Effects and Proposed Mitigation	Optimize the mine plan to identify volumes of Potentially Acid Generating (PAG) and non-PAG material, mine sequencing of PAG and non-PAG material, and segregation/disposal methods for PAG and non-PAG materials	2.5, 2.9, 6.1, Appendix D	N	NRCan	Insufficient information was provided. NRCan recommends more detailed information be included in this section and that the information be presented in a more organized manner.	The information is provided in a revised Mine Waste and ML/ARD Management Plan.	24.9.3.1
223	5.3.3 – Assessment of Potential Effects and Proposed Mitigation	Provide details of any waste rock segregation plans (segregation of PAG and non-PAG waste materials)	2.5, 2.8, 2.9, 6.1, Appendix D	Y/N	EC	The proponent anticipates that following the segregation of waste rock into potential acid generating (PAG) and non-PAG, the ML potential will be lower. Environment Canada requests additional details on the ML potential of the non-PAG waste rock that would be segregated from PAG waste rock, including quantification of the risk of ML; proportion of non-PAG waste rock that is expected to develop ML; concentrations of parameters of concern for ML and their comparison to the applicable water quality criteria and lag times to the onset of ML (for various parameters of concern).	The information is provided in a revised Mine Waste and ML/ARD Management Plan.	24.9.3.1
224	5.3.3 – Assessment of Potential Effects and Proposed Mitigation	Provide details of any waste rock segregation plans (segregation of PAG and non-PAG waste materials)	2.5, 2.8, 2.9, 6.1, Appendix D	Y/N	EC	The potential for ML from non-PAG waste rock (e.g. cadmium, copper and selenium) exists regardless of the proponent's proposal to segregate waste rock into PAG and non-PAG types. Environment Canada requests that the proponent provide a management plan specific to the non-PAG waste rock that includes contingency measures in the event that a higher than expected ML potential is encountered during or after the mine life.	The information is provided in a revised Mine Waste and ML/ARD Management Plan.	24.9.3.1
225	5.3.3 – Assessment of Potential Effects and Proposed Mitigation	Provide details of any potential engineering approaches (engineered covers, storage facilities, drainage collection, and treatment systems, etc.)	2.5, 2.8, 2.9, 2.10, 6.1, 6.5, 6.6, Appendix D, Appendix H, Appendix L	Y/N	CEA Agency	Some information is provided, but scattered across many sections.	The information is provided in a revised Mine Waste and ML/ARD Management Plan.	24.9.3.1
226	5.3.3 – Assessment of Potential Effects and Proposed Mitigation	Identify monitoring and maintenance requirements for proposed mitigation strategies	6.1, 6.5, 6.6, 10.8, 10.9, Appendix D	Y/N	EC	The proponent has stated that long-term surface water and groundwater quality monitoring down gradient of the non-PAG waste rock stockpile and Tailings Management Facility (TMF)-PAG waste rock stockpile will be established to determine if water quality is being affected by contact water discharge from the stockpiles. Environment Canada requests that the proposed monitoring plans be provided for review and include the proposed locations and conceptual design specifications of the monitoring wells and seepage collection trenches.	Management and monitoring programs are presented in Chapter 24 including: Mine Waste and ML/ARD Management Plan (Section 24.9); Air Quality Management Plan (Section 24.2); Fish and Aquatic Effects Monitoring and Management Plan (Section 24.6); Groundwater Management Plan (Section 24.8); Selenium Management Plan (Section 24.12); Soil Salvage and Storage Plan (Section 24.14); Site Water Management Plan (Section 24.13); and Sediment and Erosion Control Plan (Section 24.11).	24.2 24.6 24.8 24.9 24.11 24.12 24.13 24.14

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
227	5.3.3 – Assessment of Potential Effects and Proposed Mitigation	Identify monitoring and maintenance requirements for proposed mitigation strategies	6.1, 6.5, 6.6, 10.8, 10.9, Appendix D	Y/N	BC EAO	10.8.10 – monitoring not mentioned in other sections (EAO)	Management and monitoring programs are presented in Chapter 24 including: Mine Waste and ML/ARD Management Plan (Section 24.9); Air Quality Management Plan (Section 24.2); Fish and Aquatic Effects Monitoring and Management Plan (Section 24.6); Groundwater Management Plan (Section 24.8); Selenium Management Plan (Section 24.12); Soil Salvage and Storage Plan (Section 24.14); Site Water Management Plan (Section 24.13); and Sediment and Erosion Control Plan (Section 24.11).	24.2 24.6 24.8 24.9 24.11 24.12 24.13 24.14
228	5.3.3 – Assessment of Potential Effects and Proposed Mitigation	Include a sensitivity analysis to assess the effects of imperfect segregation of waste rock	Appendix D	N	NRCan	NRCan did not find this information in the EIS.	The information is provided in a revised assessment of ML/ARD potential in Section 4.1.4 of Appendix 6-A	Section 4.1.4 of Appendix 6-A
229	5.3.3 – Assessment of Potential Effects and Proposed Mitigation	lf engineered cover systems are proposed as a ML/ARD mitigation plan for the Project, a conceptual design will be provided including the design objectives and principles, the characteristics and volumes of cover materials required, construction methods, assessment of expected performance and long-term effectiveness under the expected range of climatic conditions, monitoring and maintenance requirements, contingency plans, costs of constructing and long-term monitoring and maintenance (refer also to ML/ARD guidelines)	6.1, 6.5, 6.6, 10.8, Appendix D, Appendix J, Appendix L	Y/N	CEA Agency	Not clear where this information is provided (scattered across many sections)	Cover materials as a mitigation measure are not proposed for the Project.	--

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
230	5.3.4 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project with regards to site geochemistry after appropriate mitigation measures and environmental management strategies have been applied	6.6, Appendix L	Y/N	CEA Agency	Information not provided in Section 6.6	ML/ARD has the potential to affect surface water and groundwater quality during the construction, operations, and closure phases. As a result, while geochemical processes themselves are not considered a valued component (VC), effective ML/ARD characterization, prediction, and management of excavated and exposed geological materials are critical in preventing deleterious effects to the receiving environment, i.e., surface water and groundwater VCs. Geochemistry studies and analyses are presented in the geochemistry baseline report and will be used to support the effects assessment of relevant VCs, including surface water quality (Chapter 13). A Mine Waste and ML/ARD Management Plan is also included in Section 24.9.	6.1.1 Chapter 13 24.9
231	5.3.4 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project with regards to site geochemistry after appropriate mitigation measures and environmental management strategies have been applied	6.6, Appendix L	Y/N	BC EAO	Deferred to other VCs. Sections. 6.6.7 and 6.6.8 incorrect in Table of Contents (EAO)	ML/ARD has the potential to affect surface water and groundwater quality during the construction, operations, and closure phases. As a result, while geochemical processes themselves are not considered a valued component (VC), effective ML/ARD characterization, prediction, and management of excavated and exposed geological materials are critical in preventing deleterious effects to the receiving environment, i.e., surface water and groundwater VCs. Geochemistry studies and analyses are presented in the geochemistry baseline report and will be used to support the effects assessment of relevant VCs, including surface water quality (Chapter 13). A Mine Waste and ML/ARD Management Plan is also included in Section 24.9.	6.1.1 Chapter 13 24.9

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
232	5.3.4 – Potential Residual Effects and their Significance	The overall significance of residual effects will be discussed and placed into context based on an assessment of predicted magnitude, geographic extent, duration/frequency, reversibility, context, and probability	6.6, Appendix L	Y/N	CEA Agency	Information not provided in Section 6.6	ML/ARD has the potential to affect surface water and groundwater quality during the construction, operations, and closure phases. As a result, while geochemical processes themselves are not considered a valued component (VC), effective ML/ARD characterization, prediction, and management of excavated and exposed geological materials are critical in preventing deleterious effects to the receiving environment, i.e., surface water and groundwater VCs. Geochemistry studies and analyses are presented in the geochemistry baseline report and will be used to support the effects assessment of relevant VCs, including surface water quality (Chapter 13). A Mine Waste and ML/ARD Management Plan is also included in Section 24.9.	6.1.1 Chapter 13 24.9
233	5.4.1 – Introduction	Provide an introduction and background to the assessment of the site hydrogeology based on a literature review of existing information	6.5, Appendix H	Y	BC MFLNRO	- Information not provided in Section 6.5, however some is provided in 6.6.3.1. - No reference to Appendix H is provided in the report. - Literature review information is included in Appendix H. (FLNRO)	An introduction of background and historic information including hydrogeology, meteorology, hydrology and geology, based on the review of the public information and literature (e.g. groundwater supply wells and use, geology), together with the data collected from the site investigations for the proposed project, is provided in the updated EA Chapter 11 (Section 11.4)	11.4
234	5.4.1 – Introduction	Describe and/or map the physical (spatial) boundaries and timeframes (temporal) of the Study Area from which potential effects of construction, operations, and decommissioning phases of the proposed Project are anticipated to occur	6.5	Y/N	EC	The proponent is requested to clarify the spatial boundaries of the hydrogeological model. Three spatial boundaries were identified: mine site, local study area, and regional study area. The regional study area was used for modeling groundwater, although groundwater data is concentrated within the mine site (10 wells at 7 locations; Appendix I, Table 3.3). Justification for applying the regional study area is requested.	The inconsistencies between the spatial boundaries in the previous EA have been resolved, and the new RSA and LSA have been delineated. The LSA for groundwater effects assessment is now consistent with the numerical groundwater model domain and for the baseline hydrogeology study.	11.3.2
235	5.4.2 – Baseline Conditions	Detail the groundwater monitoring program implemented to obtain a baseline understanding of the Project footprint and surrounding area	6.5, Appendix H	Y	BC MFLNRO	- No reference to Appendix H is in the report. - The report does not reference wells MW12- 2S/D and MW12-4 S/D installed in 2012. The rationale for why the other 2012 were not included should be provided. - Hydrogeologic analysis presented in Appendix H apparently did not use any data from wells installed in 2012. The report and Appendix H should be updated with this information. - Geologic logs, well construction diagrams and packer test analysis data are not included in the report or Appendix H. This information should be provided. (FLNRO)	The information requested including 2012 wells, borehole logs, well construction diagrams and packer test analysis has been provided in full in Appendix 11-A of the EIS. Hydrogeological data collected up to April 2014 is used in the effects assessment.	11.4.2, 11.4.3, Appendix 11-A.

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
236	5.4.2 – Baseline Conditions	Current groundwater use in the area	6.5, Appendix H	Y/N	HC	The EIS does not identify water sources (e.g. groundwater) for any community drinking water treatment facilities that serve the neighbouring communities (i.e. Vavenby) if applicable. Need to be clear as to whether there would be any potential overlaps with project water usage and community drinking water.	The groundwater use in the local communities such as Vavenby are provided in the updated Application/EIS (11.4.1.5), and the potential interaction between the proposed mine and the supply wells is discussed in EA Section 11.6 and the effects of the mine on the wells are discussed in Section 11.5.3.	11.4.1.5, 11.5.3, 11.6
237	5.4.2 – Baseline Conditions	Current groundwater use in the area	6.5, Appendix H	Y/N	BC MFLNRO	- Figure 2.1 of Appendix H shows a potable water well in the mine area however this well is not shown (or labeled as such) in App H Figure 3.1 or EIS Figure 6.5-2 - No discussion the site's existing potable water supply is provided in EIS Section 6.5 or in Appendix H (FLNRO)	The locations of the water supply wells are shown in the RSA and LSA (Section 11.3.2.2), and discussed in the updated EA (Sections 11.4.1.5, 11.5.3 and 11.6)	11.3.2.2, 11.4.1.5, 11.5.3, 11.6
238	5.4.2 – Baseline Conditions	Published geology and hydrogeology reports	2.2, 6.5, Appendix H	Y	BC MFLNRO	Geology, no hydrogeology reports included in Sections 2.2 and 6.5; included in Appendix H (FLNRO)	The information for geology and hydrogeology is provided in the updated hydrogeology baseline report (Appendix 11-A) and also in Section 11.4.	Appendix 11-A, EA Chapter 11.4
239	5.4.2 – Baseline Conditions	Surficial geology, geology and watershed maps	2.2, 6.5, Appendix H	Y		- Only watershed map included in main report. - Remaining maps provided in Appendix H. Appendix H Figures 2.5, 2.6 and 2.7 would be improved by color-coding the soil types in the mine area (FLNRO)	Surficial geology and overburden map with color-coding is provided in the updated hydrogeology baseline report (Appendix 11-A Section 1.5.4.3 Figure 1.5-11). Other maps such as bedrock geology and structural geology maps also provided in this report.	Section 1.5.4.3 of Appendix 11-A
240	5.4.2 – Baseline Conditions	Aerial photography	2, 6.5, Appendix H	N	NRCan, EC	NRCan/EC did not find this information in the EIS.	Aerial photography is not included in the updated hydrogeology baseline report (Appendix 11-A), since information from such photography was not of direct use in the assessment. However, the results from the soil, terrain and geology mappings are included in Appendix 11-A and used in the assessment.	--
241	5.4.2 – Baseline Conditions	Aerial photography	2, 6.5, Appendix H	N	EC	Survey information used to support the hydrogeological model would be helpful as the ground elevations shown in Appendix I, Table 3.1 appear to be rounded to the nearest metre	The monitoring wells were surveyed (Appendix 11-A, Section 3.4), and the numerical groundwater model report has been updated (Appendix 11-B). The issue has been resolved.	Section 3.4 of Appendix 11-A, Table 3.3 in Appendix 11-B.
242	5.4.2 – Baseline Conditions	Aerial photography	2, 6.5, Appendix H	N	BC MFLNRO	Only photograph of rail load out area near Vavenby in Section 2, not in Section 6.5. A photograph is provided in Appendix H (FLNRO)	Aerial photography is not included in the updated hydrogeology baseline report (Appendix 11-A), since information from such photography was not of direct use in the assessment. However, the results from the soil, terrain and geology mappings are included in Appendix 11-A and used in the assessment.	--

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243	5.4.2 – Baseline Conditions	Climate data	6.2, 6.5, Appendix F	Y/N	EC	The proponent is requested to provide an assessment of seasonal impacts on groundwater flow directions and discharge volumes.	Seasonal variations of groundwater levels at the baseline pre-mining conditions are provided in the updated hydrogeology baseline report (Appendix 11-A Section 4.2) and also in the updated EA (Chapter 11, Section 11.4.3.2). The variations of the water levels were observed less than 4 m, and therefore the seasonal changes of groundwater flow directions and discharge volumes are not considered to be significant, although there would be some changes.	Section 4.2 of Appendix 11-A; Section 11.4.3.2 of Chapter 11.
244	5.4.2 – Baseline Conditions	Climate data	6.2, 6.5, Appendix F	Y/N	BC MFLNRO	In Section 6.2 and in also Appendix H. (FLNRO)	Climate and meteorological data used for characterization of the hydrogeological system on the project site is provided in the updated hydrogeology baseline report (Section 1.5.2 of Appendix 11-A) and also summarized in Section 11.4.1.2 of the updated EA Chapter 11.	Section 1.5.2 of Appendix 11-A; Section 11.4.1.2 of the updated EA Chapter 11.
245	5.4.2 – Baseline Conditions	Exploration drill holes and test pits	2.1, 6.5	Y/N	EC	To enable a complete understanding of potential project impacts and mitigation needs, the following is required: borehole logs for all geomechanical drill holes, geotechnical drill holes, standpipe piezometers and groundwater monitoring wells used to support the hydrogeological assessment.	The information requested has been provided in full in Appendix 11-A of the EIS.	Appendix 11-A
246	5.4.2 – Baseline Conditions	Exploration drill holes and test pits	2.1, 6.6	Y/N	EC	Require clarification as to how data from the standpipe piezometers, and additional monitoring wells installed in 2012 were incorporated into the hydrogeological assessment. Groundwater levels vary by as much as 4 metres in some monitoring wells (Appendix H, Section 3.3)..	The hydrogeological baseline data collected up to April 2014 was included in the updated hydrogeology baseline report (Appendix 11-A) and also used for the groundwater effects assessment (Chapter 11). The variations of groundwater levels on the project site were observed to be as much as 4 meters, which is considered not very significant with the topography.	Appendix 11-A, EA Chapter 11.4
247	5.4.2 – Baseline Conditions	Exploration drill holes and test pits	2.1, 6.5	Y/N	BC FLNRO	- Not provided in EIS Sections 2.1 or 6.5 - Some exploration drill hole and test pit data is included in Appendix H however no reference to the 2012 drilling and monitoring well installation program is included. - Borehole logs, test pit logs and monitoring well construction diagrams are not included in any document. This information needs to be provided (FLNRO)	The information requested has been provided in full in Appendix 11-A of the Application/EIS.	Appendix 11-A
248	5.4.2 – Baseline Conditions	Hydrometeorology	6.5, Appendix F	Y	BC MFLNRO	Not in Section 6.5; included in Appendix H.(FLNRO)	Climate and meteorological data used for characterization of the hydrogeological system on the project site is provided in the updated hydrogeology baseline report (Section 1.5.2 of Appendix 11-A) and also summarized in Section 11.4.1.2.	Section 1.5.2 of Appendix 11-A; Section 11.4.1.2 of the updated EA Chapter 11.

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
249	5.4.2 – Baseline Conditions	Based on the available data, a conceptual model will be prepared and will be modified, as additional information becomes available	6.5, Appendix I, Appendix J	Y/N	EC	A conceptual model for groundwater flow (for example, figure illustrating groundwater flow in 3 dimensions, including stratigraphy, groundwater, and surface water) is required.	A conceptual hydrogeological model of the LSA is provided in Appendix 11-B Section 2. The conceptualization includes characterization of hydrometeorology, surficial and bedrock geology, hydrostratigraphic units, groundwater elevation, flow directions, recharge and discharge zones and groundwater interaction with the surface hydrology system. Figure 2.6, included therein, illustrates groundwater flow directions and elevation for the conceptual model. The baseline numerical groundwater model discussed in Appendix 11-B Section 3 provides a 3-dimensional representation of the conceptual model.	Appendix 11-B (Sections 2 and 3)
250	5.4.2 – Baseline Conditions	Based on the available data, a conceptual model will be prepared and will be modified, as additional information becomes available	6.5, Appendix I, , Appendix J	Y/N	BC MFLNRO	- No CHM in provided in EIS Section 6.5, although a general hydrogeologic description is provided. - A description of site hydrogeology provided in Appendix H. Hydrogeological cross-sections which illustrate groundwater elevations, flow directions and hydrostratigraphic units are not included and should be provided. - Additional hydrogeologic information provided in Appendices I and J (FLNRO)	A conceptual hydrogeological model of the LSA is provided in Appendix 11-B Section 2. The conceptualization includes characterization of hydrometeorology, surficial and bedrock geology, hydrostratigraphic units, groundwater elevation, flow directions, recharge and discharge zones and groundwater interaction with the surface hydrology system. Groundwater elevations are presented in plan and cross-section views are provided in Appendix 11-B Section 3.	Appendix 11-B (Sections 2 and 3)
251	5.4.2 – Baseline Conditions	A watershed model will be prepared to simulate monthly stream flows in the areas of the proposed mine. It will use climate records, streamflow records and the conceptual groundwater model to develop monthly streamflows over a period of record. The model will include groundwater recharge, groundwater storage and groundwater discharge. The watershed model will include an evaluation of the precipitation, snow melt, evapotranspiration, infiltration and runoff conditions	6.5, Appendix J	Y	BC MFLNRO	- The watershed model discussed in Section 6.5 text only references streamflow data to account for changes in groundwater flow rates. No rationale for how this watershed model accounts for all groundwater flow within and downgradient of the project site is provided - Although a detailed watershed model provided in Appendix J, a discussion of for how this watershed model accounts for all groundwater flow within and downgradient of the project site should be provided - A sensitivity analysis discussion and sensitivity modeling results must be provided. The discussion should include the rationale for the selected parameters and their variations, including why the preferred values were selected, should be provided.(FLNRO)	Detailed discussion of the modelling approach used to simulate groundwater flow within and down-gradient from the Project Site is provided in Appendix 12-B Section 3. The discussion presented therein provides detailed methodology used in the watershed model to simulate groundwater recharge, storage and discharge, groundwater/ surface water interaction and flow of groundwater between sub-catchment areas. The predictive watershed models were developed from a baseline model calibrated to measured and synthetic streamflow at nodes throughout the study area. The calibrated model and input parameters are the best-fit to hydrogeological and hydrological conditions at the site and as such, sensitivity analyses of calibrated model parameters were not conducted. Model sensitivity to variable climatic inputs and the corresponding effects on streamflow and water quality were assessed. The results of these sensitivity cases are provided in Appendix 12-B, Section 5.5.	Appendix 12-B (Sections 3 and 5.5)

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
252	5.4.2 – Baseline Conditions	If warranted, a numerical groundwater flow model will be used to simulate baseline groundwater flow conditions. The numerical model will include the assumptions developed as part of the conceptual model, the parameters and outputs of the watershed model and will be calibrated to onsite measurements	6.5, Appendix I	Y	BC MFLNRO	- A numerical groundwater flow model is mentioned in Section 6.5.3 with reference to estimating flows into the open pit. No discussion of groundwater flow modeling is provided in the EIS- A map showing the location and names of site features should be included in Appendix I- No sensitivity analysis is provided in Appendix I. A sensitivity analysis discussion and sensitivity modeling results must be provided. The rationale for the selected parameters and their variations, including why the preferred values were selected, should be provided.- The model should clearly present data, analyses and findings for pre-mine, operations, closure and post-closure time periods.- The numerical model apparently does not incorporate the potential effects from groundwater extraction by one or more groundwater supply wells. The effects of these wells on groundwater flow and quality should be included in the analysis.(FLNRO)	Groundwater inflow to the Open Pit was simulated in the Operations predictive groundwater model. Results of this analysis and discussion of the methodology used to develop the groundwater model is provided in Appendix 11-B Section 4. Maps showing the project components and features of the study area are provided in Appendix 11-A. Discussion groundwater modelling results for the Baseline, Operations and Post-Closure phases is provided in Appendix 11-B. Groundwater elevation and flow direction for baseline conditions and for the Operations and Post-Closure Project phases are provided in Appendix 11-B. Included therein are project-site and regional scale maps illustrating groundwater elevations and flow directions from the Baseline, Operations and Post-Closure numerical groundwater models. The potential for groundwater flow from the Tailings Management Facility to the North and East was analysed using MODPATH particle tracking completed in the numerical groundwater models. The results of the analysis are provided in Appendix 11-B Section 6. Project-related groundwater extraction wells are not included in the Project Description and therefore were not included in the numerical groundwater models. Existing domestic groundwater wells in the Baker Creek sub-catchment were included in the models and are discussed in Appendix 11-B Section 6.5.	Appendix 11-A Appendix 11-B Sections 4 and 6
253	5.4.2 – Baseline Conditions	General description of the geographic setting, landforms, topography, drainage, climate, soil types, geomorphologic conditions	6.5, Appendix H	Y	BC MFLNRO	Obliquely discussed in Section 6.5; detailed discussion provided in Appendix H (FLNRO)	This related baseline information to support the hydrogeological characterization is provided in the updated hydrogeology baseline report and in the updated EA.	Section 1.5 of Appendix 11; Section 11.4.1 of Chapter 11.
254	5.4.2 – Baseline Conditions	General description of geologic setting; type and nature of geologic materials; vertical and lateral extent of individual geologic units; stratigraphy and structural features	2.2, 6.5, Appendix H	Y	BC MFLNRO	Included in both sections and Appendix H (FLNRO)	The information of the regional and local geology is provided in the updated hydrogeology baseline report (Section 1.5.4 of Appendix 11-A) and in the updated EA (Section 11.4.1.4 of Chapter 11).	Section 1.5.4 of Appendix 11-A; Section 11.4.1.4 of Chapter 11

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255	5.4.2 – Baseline Conditions	Locations and descriptions of aquifers (confined, unconfined, unconsolidated, bedrock); aerial extent and thickness; aquifer properties (transmissivity, etc.)	6.5, Appendix H	Y	BC MFLNRO	- A discussion of aquifers is not provided in Section 6.5; - A limited general aquifer discussion of aquifers is provided in Appendix H. -Artesian conditions in numerous wells suggest confined conditions are present in the mine area, however the model was based on unconfined conditions. This apparent discrepancy should be discussed (FLNRO)	The requested information is provided in full in Section 11.4.3.3 and Figure 11.4-17. The artesian conditions are interpreted to be localized in some part of the mine site valleys only, and the groundwater system in the overall LSA is unconfined, especially in the shallow groundwater and along the receiving surface water creeks/rivers. The updated numerical groundwater model was based on the unconfined conditions (Appendix 11-B).	Section 11.4.3.3; Appendix 11-B
256	5.4.2 – Baseline Conditions	Assessment of aquifer budget, including amount and source(s) of recharge; quantity of ground water in aquifer storage; current amount of ground water extraction; amount of ground water discharge; potential amount available for future ground water extraction	6.5, Appendix H	Y/N	EC	The proponent states that "groundwater recharge occurs on high ground and mountain slopes and discharge occurs in lower lying valleys" and supports this assessment with Figure 4.2 in Section 6.5 (which illustrates groundwater flow directions). This assessment appears to be based primarily on topography. Although groundwater is often influenced by site topography, especially at sites with a high degree of topographic relief, the addition of groundwater level data and seepage observations to Figure 4.2 is requested to support this interpretation, given observed artesian conditions in 6 of the 15 monitoring wells. Also, similar groundwater flow mapping is requested to support the predictions of project impacts, especially in the area of the TMF.	The updated groundwater effects assessment (Chapter 11) provides a map showing the delineated groundwater catchment divides and predicted changes due to the mining, including at the pit and TMF, to support the effects assessment. The updated hydrogeological baseline report (Appendix 11-A) and updated numerical groundwater modeling report (Appendix 11-B) present better characterization of groundwater recharge and discharge zones and groundwater flow directions on the project site.	Chapter 11 (Sections 11.4.3 and 11.5.3), Appendices 11-A (Section 4.3) and 11-B
257	5.4.2 – Baseline Conditions	Assessment of aquifer budget, including amount and source(s) of recharge; quantity of ground water in aquifer storage; current amount of ground water extraction; amount of ground water discharge; potential amount available for future ground water extraction	6.5, Appendix H	Y/N	BC MFLNRO	No discussion of aquifer budget, groundwater storage, current or proposed extraction rate or other information regarding the quantity of groundwater in the project area is provided in either Section 6.5 or Appendix H - The proponent states that overburden in the mine area consists of low permeability sediments and the bedrock is generally has low permeability. However the proponent also states that water wells will be installed in the project area to supply potable water. Information regarding where these wells will be located, their pumping rates and their impacts on ground and surface water flows in the mine area should be provided. (FLNRO)	The groundwater budget is discussed in Section 11.4.3.3. The current groundwater use in the RSA and LSA is provided in Section 11.4.1.5. A potable freshwater well is provided for to the NE of the facilities outside the zone of influence of site facilities. Exact location will be determined prior to permitting well construction.	Sections 11.4.3.3 and 11.4.1.5 of Chapter 11.
258	5.4.2 – Baseline Conditions	Description of local and regional ground water flow systems and rates of movement	6.5, Appendix H	Y	BC MFLNRO	- Brief description is included in the Section 6.5 Introduction; - General discussion of flow systems and rates is provided in Appendix H. Detailed information regard flow rates from specific mine areas should be provided. (FLNRO)	Discussion of surface and groundwater flow systems and flow rates from specific areas are provided in Appendix 12-B.	Appendix 12-B Appendix A
259	5.4.2 – Baseline Conditions	Evaluation of ambient ground water level trends	6.5, Appendix H	Y	BC MFLNRO	Brief description in Section 6.5 Introduction, A discussion of groundwater elevation trends is provided in Appendix H, however it is not clear how up to 4 m of seasonal variation is addressed in the hydrogeologic analyses (FLNRO)	The discussion of groundwater elevation trends and seasonal variations of up to 4 m is provided in Section 4.2 of the updated hydrogeology baseline report (Appendix 11-A) and in Section 11.4.3.2.	Section 4.2 of Appendix 11-A; Section 11.4.3.2 of Chapter 11.

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
260	5.4.2 – Baseline Conditions	Evaluation of surface water / ground water interaction, including quantity and quality	6.5, Appendix H, Appendix J	Y	BC MFLNRO	- Surface/groundwater flow interactions are discussed in Section 6.5, but are not discussed in Appendix H. - EIS Table 6.4.14 states that surface flow reductions up to 98% caused by groundwater pumping may be expected in P-Creek. In late summer/early fall, P-Creek baseflow is dominated by groundwater discharge. Comment on the expected impacts to water quality. - Page 30 of the Surface and Groundwater Quality Baseline report states that all metals referred to are for dissolved concentrations. Provide the rationale for why total metal concentrations were not used. (FLNRO)	The information requested with respect to surface water-groundwater interaction has been addressed in full in Appendix 12-B (Sections 3.1, 3.5, and 3.6) and Appendix 11-B (Section 3.7) of the Application/EIS. The updated groundwater model report (Appendix 11-B) indicates the reduction of groundwater discharge as baseflows into the creeks (including P-Creek) would occur, and residual effects on groundwater quantity and quality have been predicted to be caused by mining (Section 11.5.3 of Chapter 11). Both total and dissolved metals are reported in the updated hydrogeology baseline report (Section 4.3 of Appendix 11-A).	Chapter 11 (Section 11.5.3) Appendix 11-B (Section 3.7) Appendix 12-B
261	5.4.2 – Baseline Conditions	Evaluation of pumping test data from existing test or production wells	6.5, Appendix H	Y	BC MFLNRO	- Pumping test data are not provided in Section 6.5 or Appendix H.- Aquifer tests provide significantly more detailed and accurate hydraulic information compared to packer and falling head test data or the various hydrostratigraphic units in the project area. Provide the rationale for why pumping tests were not conducted and the rationale for why literature values were used for aquifer storativity/storage coefficients. (FLNRO)	No pumping tests have been done to estimate the bulk permeability of the geological materials on site. Such tests are time-consuming and costly, and the results often represent the localized hydrogeological conditions of the test locations even if such tests are done. It is a common practice that literature values for aquifer storativity and storage coefficients are used for the EA purpose of this type of mine project in BC and Canada. The numerical groundwater model was simulated steady-state, and therefore the storativity/storage coefficients have no effect on the model results.	Appendix 11-B
262	5.4.2 – Baseline Conditions	Evaluation of ambient ground water quality conditions	6.6, Appendix K	Y	BC MFLNRO	- Included in Section 6.6 and Appendix K. - No groundwater quality data for downgradient wells is provided (FLNRO)	Groundwater quality data in the wells located immediately downgradient of the mine infrastructure such as under the water management ponds of the TMF and non-PAG waste rock stockpile are available in Appendix 11-A. Yes, it is recognized that monitoring wells located in the downstream receiving environment such as near the mouths of the P- and T- Creeks are not available at this time.	Section 3.5 of Appendix 11-A

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263	5.4.2 – Baseline Conditions	Hydrogeologic maps and cross-sections outlining the extent of unconfined/confined unconsolidated aquifers and bedrock formations; locations of water wells, exploration holes, piezometers, springs, test pits; (potentiometric) water level contours; water quality contours (e.g. nitrates, salinity); directions and rates of ground water flows and locations of surface water courses	6.5, Appendix H	Y	BC MFLNRO	- Not included in Section 6.5; - Only limited information (water well locations, groundwater elevation contour map, groundwater flow direction map) provided in Appendix H - Hydrostratigraphic cross-sections should be provided - Groundwater quality contour maps should be provided (FLNRO)	The updated hydrogeology baseline report (Appendix 11-A) includes all the available hydrogeological information as of April 2014 (water well locations, groundwater elevation contour map, groundwater flow direction map). Section 11.4.3.3 of Chapter 11 describes the hydrostratigraphic units. A Piper diagram is provided to illustrate the groundwater quality and water type information (Section 4.3 of Appendix 11-A).	Appendix 11-A (Sections 4.2 and 4.3); Sections 11.4.3.2 and 11.4.3.3 of Chapter 11.
264	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on hydrogeological conditions	6.5	Y	EC	Groundwater pumping in the P-Creek subcatchment with treatment (if required) and discharge to the pit has been proposed to reduce the impact of poor groundwater quality on Harper Creek (6.4.3). The proponent is requested to clarify whether a pumping system has been designed for this area, and how the extent of the capture zone will be confirmed. Related observations and information requests are as follows:	Groundwater pumping in the P-Creek subcatchment is no longer included in the Project Description. No further response required.	--

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
265	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on hydrogeological conditions	6.5	Y	BC MFLNRO	Potential for long term flow increases to Baker Creek once pit is filled with water? (discharge diverted from Harper Creek to Baker Creek) (FLNRO)-The report provides an evaluation of surface water flow of which groundwater baseflow is one component. - The discussion of groundwater flow rate and the time required for potential contaminants to reach two downgradient water supply wells is very unclear. A discussion and plan maps showing the effect of the project on groundwater flow directions and quality for pre-mine, operations, closure and post-closure periods should be provided.- Groundwater flow from the tailings management facility to the north and east have not been considered. Rationale is required to support this assessment. - The numerical model apparently does not incorporate the potential effects from groundwater extraction by one or more groundwater supply wells. The effects of these wells on groundwater flow and quality should be included in the analysis. A discussion of groundwater quality downgradient from the TMF is not provided. Additional information regarding predicted water quality downgradient of the TMF with and without groundwater pumping is required. Plan maps which illustrate contaminant progress through operations, closure and post-closure periods will be instructive. (FLNRO)	Potential effects of post-closure water storage in the Pit Lake on domestic groundwater extraction wells in the Baker Creek sub-catchment is discussed in Appendix 11-B Section 6. Advective groundwater travel times and flow rates to the wells are provided in Sections 4 and 5 of Appendix 11-B.Discussion of groundwater elevation and flow direction for baseline conditions and for the Operations and Post-Closure Project phases are provided in Appendix 11-B Sections 3, 4, and 5. Included therein are project-site and regional scale maps illustrating groundwater elevations and flow directions from the Baseline, Operations and Post-Closure numerical groundwater models. The potential for groundwater flow from the Tailings Management Facility to the North and East was analyzed using MODPATH particle tracking completed in the numerical groundwater models. The results of the analysis are provided in Appendix 11-B Section 6. Project-related Groundwater extraction wells are not included in the Project Description and therefore were not included in the numerical groundwater models. Existing domestic groundwater wells in the Baker Creek sub-catchment were included in the models and are discussed in Appendix 11-B. Groundwater quality downgradient of the TMF has not been explicitly provided in the model results as there are no groundwater extraction points in that region of the project area. The methodology for numerical groundwater modelling is described in Appendix 11-B. Water quality modelling methodology and predictions that include the proposed water management strategies and mitigations are discussed in detail in Appendix 13-C. The numerical groundwater models are not contaminant transport models, and as such plan maps showing contaminant progress are not provided. Water quality predictions assume instantaneous reporting of unrecovered seepage to downstream water quality modelling locations.	Appendix 11-B & Appendix 13-C

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
266	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on hydrogeological conditions	6.5	Y	EC	If it is determined that additional groundwater collection is needed (Section 6.5-21), the proponent is asked to explain how the treatment system will be modified to manage the additional flow;	The implementation of a water treatment plant is no longer included in the Project Description.	--
267	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on hydrogeological conditions	6.5	Y	EC	Triggers/site specific standards for the management of seepage water (Section 6.5-21) have not been identified. The proponent is requested to identify the triggers/site specific standards and associated management actions; and,	Seepage water management is discussed in the updated EA Chapter 5	Chapter 5
268	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on hydrogeological conditions	6.5	Y	EC	The proponent is asked to clarify whether an assessment of the pit capacity, as well as the potential for impacts from groundwater flow originating from the pit has been considered in the EIS.	The open pit and pit lake were modelled at full capacity to examine the maximum potential effects of the dewatering on groundwater quantity during the Operations and the potential seepage on groundwater quality at Post-Closure, respectively.	Chapter 11.5.3, Appendix 11-B.
269	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	Identify appropriate mitigation measures and environmental management strategies to avoid, minimize, or otherwise mitigate potential effects of the proposed Project on hydrogeology conditions	6.5	Y	BC MFLNRO	- Groundwater mitigation is focused at P-Creek and potential impacts to Harper Creek from TMF seepage- Potential for groundwater flow and negative impacts to the east and north have not been considered. -A discussion of potential impacts to the on-site drinking water well (and future drinking water well) needs to be provided.- Contingency mitigation measures if elevated concentrations of parameters are detected in other areas should be provided. (FLNRO)	The mitigation measures (e.g. water management ponds and progressive reclamations) were included in all the major mine components (pit, non-PAG waste rock stockpile, PAG/non-PAG LGO stockpiles, and TMF) to minimize the potential effects on groundwater in the downstream receiving environment along the major creeks (P, T, Baker and Jones creeks) in the updated EA Chapter 11. Potential effects for groundwater in the north (Baker and Jones catchments) have been assessed in the updated EA Chapter 11. The potential effect on groundwater in the east (towards Barrière River watershed) was not predicted by the updated numerical groundwater model (Appendix 11-B), but follow-up monitoring wells have been proposed along the east of the TMF footprint as part of the Groundwater Management Plan (Section 24.8). Discussion of potential impacts to the water supply wells are provided in the updated EA Chapter 11 based on the model results (Appendix 11-B). An adaptive management plan has been discussed and presented in the Groundwater Management Plan (Section 24.8).	Chapter 11 (Sections 11.5.2, 11.5.3), Section 24.8, Appendix 11-B
270	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	Include proposed monitoring programs, if required, for implementation during Project operations	6.5	Y	BC MFLNRO	General groundwater monitoring information is provided. (FLNRO)	See reference to Groundwater Management Plan in adjacent column.	Chapter 24.8

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
271	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	The watershed model will be updated to include proposed mine site elements and proposed water management plans. The updated watershed model will assess potential reductions in streamflows as a result of mine site construction, operation and closure.	6.5, Appendix J	Y	BC MFLNRO	- Summary discussion in Section 6.5, additional discussion provided in Appendix J - Additional clarification is needed for why potential radial groundwater flow from the TMF at mine closure and during post-closure was not incorporated into the watershed model The Groundwater Flow Direction map (Hydrogeological Report Figure 4.2) should include the mine features (FLNRO)	The potential for 'radial' groundwater flow from the Tailings Management Facility was analyzed using MODPATH particle tracking completed in the numerical groundwater models. The results of the analysis are provided in Appendix 11-B Section 6. The groundwater flow direction maps presented in Appendix 11-B show proposed Project facilities for visual reference.	Appendix 11-B
272	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	Analytical and/or numerical models will be used to assess the potential effects of seepage from waste piles and/or tailings facilities and the potential effects of mine dewatering on the surrounding area	6.5, Appendix I	Y	BC MFLNRO	- Summary discussion in Section 6.5 - Detailed numerical model information and analyses are provided in Appendix I, however additional information, figures and discussion regarding model input and results for operations, closure and post-closure periods is required (FLNRO)	Detailed discussion of the conceptual model used to develop the numerical groundwater models is provided in Appendix 11-B and also in the updated EA Chapter Section 11.4.3.3. Included therein is discussion of model inputs and results during the Operations and Post-Closure Project phases.	Chapter 11 (Section 11.4.3.3), Appendix 11-B
273	5.4.3 – Assessment of Potential Effects and Proposed Mitigation	Include a discussion of the potential impacts of mine development on the groundwater resource quality and quantity and interrelated surface water resource	6.5	Y	BC MFLNRO	- Discussion in Section 6.5 includes impacts on flow only. - Groundwater quality impacts are discussed in Section 6.6. - Additional discussion of surface and groundwater quality downstream of the waste rock stockpile without implementing a permanent groundwater pump and treat system should be provided - Additional discussion and clarification of potential impacts on ground and surface water quality in T-Creek downgradient of the TMF should be provided. (FLNRO)	The updated EA Chapter 11 provides the requested assessment for groundwater quantity and quality effects (Section 11.5.3), including groundwater quality assessment in the downstream of the waste rock stockpile and the T-Creek catchment downgradient of the TMF. The surface water quality effect assessment is provided in the updated EA Chapter 13.	Chapter 11 (Section 11.5.3), Chapter 13 (surface water quality).
274	5.4.4 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project on the site and surrounding hydrogeology after appropriate mitigation measures and environmental management strategies have been applied	6.5	Y	BC MFLNRO	- General information regarding residual effects is provided in Section 6.6- Insufficient information is provided regarding the need for perpetual groundwater pumping in the P-Creek subcatchment (FLNRO)	The predicted residual effects of the Project on groundwater quality and quantity are provided in Section 11.5.3 of the updated EA Chapter 11. This information is provided by Project component (open pit and pit lake, non-PAG waste rock stockpile, PAG and non-PAG LGO stockpiles, overburden and topsoil stockpile, and the TMF) as well as by Project phase. No perpetual groundwater pumping is planned for the P Creek subcatchment.	Chapter 11 (Section 11.5.3)

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275	5.4.4 – Potential Residual Effects and their Significance	The overall significance of residual effects will be discussed and placed into context based on an assessment of predicted magnitude, geographic extent, duration/frequency, reversibility, context and probability	6.5	Y	BC MFLNRO	- The significance of residual effects information is not provided in Table 6.6.7 - Impacts on groundwater flow has been considered; however improved estimates of impacts on groundwater flow directions, especially from the TMF is requested. - Potential impacts to onsite drinking water wells have not been considered. (FLNRO)	The significance of residual effects to groundwater quality and quantity are provided in Table 11.5-13 of the updated EA Chapter 11 (Section 11.5.4). Estimates of the impacts of groundwater flow directions have been updated; a revised discussion is included in Section 11.5.3.1 and displayed visually in Figures 11.5-3 through 11.5-11. The flow pathways downgradient of the TMF at the end of Operations and Post-Closure are provided in Figure 11.5-11. A potable freshwater well is provided for to the NE of the facilities outside the zone of influence of site facilities. Exact location will be determined prior to permitting well construction.	Chapter 11 (Sections 11.5.3 and 11.5.4)
276	5.5.1 – Introduction	Provide an introduction and background to the assessment of the aquatic environment both on-site as well as off-site features potentially impacted by the Project based on a literature review of existing information	6.7, Appendix N	N	BC EAO	1) Overall the write-up is a good description and discussion of the key items we have looked at with the proponent and their consultants. We are not in full agreement with all of the recommendations for effects and look forward to more discussion on these points as described below: 6.7-1 of 46, Mentions Federal and Provincial legislation but examples omit Federal Fisheries Act and Provincial Wildlife Act, etc., however, these are discussed later (6.7.1.3). The discussion does not acknowledge a key piece for a major project of this magnitude and footprint, the provincial mitigation/compensation policy. http://www.env.gov.bc.ca/emop/ 2) Table 6.7-1, Complex table, decisions made on impact or no impact not need final agency/WG concurrence. No interaction/ no evaluation in EA for 1 and 2 imply that these points are now "off the table"? Summary of "2" items in Table 6.7-2 needs a statement confirming agency/WG concurrence. 3) Table 6.7-3, Will have to be developed to be useable for NNL as per the Fisheries Act and for the provincial mitigation/compensation policy. i.e. habitat balance sheet 4) 6.7.3.3, page 6.7-17 of 46; Results, The text mentions a "barrier falls" at river km 18.5, this is an "obstacle" not a barrier. The remaining text is more consistent but the word "barrier" should be removed. Bull trout migration above this 2 meter falls is correctly described as "flow dependant". This is a common situation in B.C. for bull trout and other species in many rivers. The assessment/project will need to ensure that cumulative, project related changes to flow do not prevent this migration to Harper headwaters and preferred spawning/rearing habitats. More work needed on this issue to understand migration timing, flow ranges. See comments for 6.7.7. 6.7.6.2, page 6.7-26 and 6.7-27, potential flow changes and temperature changes to Harper Creek (and others) must be verified through monitoring, so far, only modelling done. Modelling is an approximation of reality to inform decisions. Modelling is not always right! The verification may affect final mitigation/compensation? (FLNRO) Not 6.7- only about selected VCs as "features" (EAO)	1) All applicable federal and provincial acts relating to fish and fish habitat are outlined in Chapter 14. 2) Effects assessment methodology has been used for the revised EA 3) A revised Fish Offsetting Plan (Chapter 14, Appendix 14-E) has been developed and shows a habitat budget for the project. 4) Terminology in regard to the water fall at km 18.5 has been adopted and is consistent in the revised EA. Potential effects due to changes in water quantity (flow) and potential effects to Bull Trout are extensively detailed in Chapter 14 of the revised EA.	1) Chapter 14, Section 14.2; 2) Chapter 14, Section 14.5.1; 3) Chapter 14, Appendix 14-E; 4) The water fall on Harper Creek is described in Chapter 14, Section 14.4.3.2, and consistent terminology is used. Predicted effects due to changes in water quantity are discussed in Section 14.5.3.1

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277	5.5.1 – Introduction	Provide the rationale for the selection of various aquatic features (e.g., fisheries) as a Project specific VEC in consideration of potential issues related to potential interactions with Project infrastructure and activities	6.7	N	BC EAO	Rationale is weak (EAO)	Rationale for VC inclusion is extensively detailed in Chapter 14, Section 14.3.1.	Chapter 14, Section 14.3.1
278	5.5.1 – Introduction	Include habitat compensation plans, as required, for wildlife/habitat impacts that cannot be mitigated or avoided in the section titled, "Summary of Proposed Environmental and Operational Management Plans"	10.7	N	BC MFLNRO	6.7.6.4, page 6.7-28, why have potential effects of reduced forage for bull trout not been carried forward to effects assessment. How do bull trout densities in P and T creek compare to provincial biostandards? These streams appear to be preferred summer bull trout rearing. Water quantity/quality changes will need further consideration/discussion. See page 6.7-34 "Changes to Bull Trout Habitat in T Creek") (FLNRO)	Bull Trout density and habitat use in P and T creeks is described in Chapter 14, Section 14.4.3.2. Potential effects due to changes in water quantity (flow) and potential effects to Bull Trout are extensively detailed in Chapter 14, Section 14.5.3.1 of the revised EA.	Chapter 14, Section 14.4.3.2 and Chapter 14, Section 14.5.3.1
279	5.5.2 – Surface Water Quality	Summarize surface water quality modelling, results, and predictions for selected watercourses in and around the Project area	6.6, Appendix L	Y/N	HC	Predicted arsenic results have not been summarized for Baker Creek, and predicted arsenic and uranium results have not been summarized for Jones Creek (Appendix L, pp. 38-39) even though these creeks are near groundwater wells used for drinking water (Appendix L, p. 23). Arsenic results could have implications for human health risks.	Potential water quality effects in Baker and Jones Creek are presented in Chapter 13 Section 13.5. Predicted arsenic and uranium results are summarized and compared to drinking water guidelines in Appendix 13-D. Potential water quality effects on human health are assessed in Chapter 21.	13.5 Appendix 13-D 21.5.1.3
280	5.5.2 – Surface Water Quality	Summarize surface water quality modelling, results, and predictions for selected watercourses in and around the Project area	6.6, Appendix L	Y/N	BC MFLNRO	6.7.6.6, Degradation of water quality, we will defer to EP comments on water quality and consider implications to significant effects at a later date. (FLNRO) Not clear/concise – scattered (EAO) Groundwater quality predictions are not included in Section 6.6 or Appendix L (FLNRO)	Surface water quality modelling results are presented in Appendix 13-C and summarized in Chapter 13 Section 13.5 and Appendix 13-D watercourses downstream of the Project Site.	13.5 Appendix 13-C Appendix 13-D
281	5.5.2 – Surface Water Quality	For in situ sample locations, details such as sampling frequency, timing, locations, and parameter results will be included	6.6, Appendix K	Y/N	BC MFLNRO	Only generalized information regarding groundwater quality monitoring is provided. (FLNRO)	Baseline surface water quality is summarized in Chapter 13 Sections 13.4.2 and 13.4.3 and further presented in Appendices 13-A and 13-B.	13.4.2 13.4.3 Appendix 13-A Appendix 13-B
282	5.5.2 – Surface Water Quality	Rationale as to water quality sample locations and length of monitoring program will also be discussed	6.6, Appendix K	Y/N	BC MFLNRO	Only generalized information regarding groundwater quality monitoring is provided (FLNRO)	Baseline surface water quality is summarized in Chapter 13 Sections 13.4.2 and 13.4.3 and further presented in Appendices 13-A and 13-B.	13.4.2 13.4.3 Appendix 13-A Appendix 13-B
283	5.5.2 – Surface Water Quality	The results and detection limits for all analyzed parameters will be reported	6.6, Appendix K	Y/N	BC MFLNRO	Groundwater analytical information is provided (FLNRO)	Baseline surface water quality is summarized in Chapter 13 Sections 13.4.2 and 13.4.3 and further presented in Appendices 13-A and 13-B.	13.4.2 13.4.3 Appendix 13-A Appendix 13-B

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284	5.5.2 – Surface Water Quality	The results and detection limits for all analyzed parameters will be reported	6.6, Appendix K	Y/N	DFO	Table 6.6-7 - Does not present conclusion of effects but rather directs reader to other sections of the EIS.	Residual effects to surface water quality are presented in Section 13.5.4.1, characterized in Section 13.5.4.2, and assessed for significance in Section 13.5.5.	13.5.4.1 13.5.4.2 13.5.5
285	5.5.4 – Hydrology and Site Water Balance	Provide the rationale for the selection of hydrology as a Project specific VEC and discuss the baseline condition of watercourses and how they may be affected by the proposed Project	6.4	Y	DFO	Measurable Parameters (6.4.1.4) - The scale of effects percentages identified for mean annual discharge do not demonstrate how they relate to the timing of the predicted flow reduction and the sensitivity of the aquatic species life stage within the watershed(s) that maybe influenced by the flow change predicted.	The information requested with respect to timing of flow reductions has been addressed in full in Section 12.5.3.1 of the Application by including information on monthly flow reductions, and monthly distribution of flow during different phases of the project. Effects of the magnitude and timing of flow reduction on aquatic species is discussed in Chapter 14, Section 14.5.3.1 (Residual Effects to Fish and Fish Habitat Components due to Changes in Water Quantity) and Section 14.5.3.2 (Characterization of Residual Effects to Fish and Fish Habitat Components due to Changes in Water Quantity).	Section 12.5.3.1 Section 14.5.3.1 and 14.5.3.2
286	5.5.4 – Hydrology and Site Water Balance	Provide the rationale for the selection of hydrology as a Project specific VEC and discuss the baseline condition of watercourses and how they may be affected by the proposed Project	6.4	Y	DFO	Table 6.4-1 - Identifies numerous project components or activities that have an interaction but will not be assessed further in the EIS application with little to no discussion or rationale provided.	The information requested has been provided in full in Section 12.5.1 of the Application/EIS. The potential effects were identified through professional experience with other mining project Applications/EIS in BC and through consultation with the Working Group. Components and activities, which were selected in the scoping process were discussed to describe the pathways that can lead to effects on the Hydrology VC. High and moderate risk interactions with potential major or moderate adverse effects were identified as those that warrant further consideration and assessment. Interactions of Project activities with the potential for negligible or minor expected adverse effects that require implementation of best practices or standard mitigation and management measures were not further considered in the effects assessment.	Section 12.5.1
287	5.5.4 – Hydrology and Site Water Balance	Provide the rationale for the selection of hydrology as a Project specific VEC and discuss the baseline condition of watercourses and how they may be affected by the proposed Project	6.4	Y	DFO	Methods (6.4.2.2) -The discussion of methods is difficult to follow with referenced terminology and significance. Clarification of this section would assist readers in understanding the intent and key discussion points being raised.	The concern has been addressed by revising the structure of the Application/EIS in the revised submission of the Application/EIS.	Section 12.3.1 (rationale for selecting hydrology) 12.4 (baseline conditions) 12.5 (effects)

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288	5.5.4 – Hydrology and Site Water Balance	Provide the rationale for the selection of hydrology as a Project specific VEC and discuss the baseline condition of watercourses and how they may be affected by the proposed Project	6.4	Y	DFO	Potential Effects (6.4.3) - The potential effects section does not provide discussion of existing and expected discharge values for each Analysis Node. Qualitative terms such as "large flow reduction" should be clarified.	The concern has been addressed by revising the structure of the Application/EIS in the revised submission of the Application/EIS. Potential effects are first described in Section 12.5.1, and the residual effects are quantified in Section 12.5.3 of the Application/EIS.	Section 12.5.1 Section 12.5.3
289	5.5.4 – Hydrology and Site Water Balance	Provide the rationale for the selection of hydrology as a Project specific VEC and discuss the baseline condition of watercourses and how they may be affected by the proposed Project	6.4	Y	DFO	Residual Effects (6.4.5) - Discussion of residual effects is very brief and does not detail the ramifications of the proposed "significant" effects prediction on flow reductions >25%, nor how other locations were determined to have a prediction of "not likely to be significant" for flows < 25%.	The information requested has been addressed. Quantified residual effects are provided in Section 12.5.3.1. These quantified effects are then used to characterize the significance of flow reduction in Section 12.5.3.2.	Section 12.5.3.1 Section 12.5.3.2
290	5.5.4 – Hydrology and Site Water Balance	Provide the rationale for the selection of hydrology as a Project specific VEC and discuss the baseline condition of watercourses and how they may be affected by the proposed Project	6.4	Y	BC MFLNRO	One general question on groundwater hydrology. Given that low flows including winter flows are sustained by groundwater, can the proponent model how the very large mine footprint affect groundwater baseflows in each stream affected and the Harper Ck. mainstem? MFLNRO experience with large, open pit mines demonstrates that groundwater paths are completely interrupted through development and excavation.(FLNRO)	The magnitude of the reduction in groundwater discharge (as baseflows) into the P, T, Harper, Baker and Jones creeks due to the mining have been predicted in the updated numerical modeling (Appendix 11-B) and also assessed in the groundwater quantity effect in Chapter 11 (Tables 11.5-3 and 11.5-4 in Section 11.5.3.1). The groundwater flow paths were predicted to change significantly at the open pit area during the dewatering.	Chapter 11 (Section 11.5.3.1), Appendix 11-B.
291	5.5.4 – Hydrology and Site Water Balance	Look at groundwater and surface water interactions including groundwater recharge and potential seasonal effects on surface water and ground water levels	6.4, 6.5	Y	BC MFLNRO	General seasonal flow variations are mentioned but no detailed discussion is provided. (FLNRO)	Surface water-groundwater interactions, as well as groundwater flow between sub-watersheds have been discussed in Appendix 12-B (Sections 3.1, 3.5, and 3.6) of the Application. The seasonal variations of groundwater level elevations were observed to be as much as 4 m at the Project site, and details of the discussion is available in Appendix 11-A (Section 4.2) and Chapter 11 (Section 11.4.3.2).	Appendix 12-B; Chapter 11 (Section 11.4.3.2), Appendix 11-A (Section 4.2).
292	5.5.4 – Hydrology and Site Water Balance	Discuss the results of a detailed water balance assessment	2.10.4.5, Appendix J	Y/N	EC	For the mine operations phase in section 2.2, the EIS states that "All water is stored in the TMF from the start of operations until Year 23", however the supporting information with respect to the sizing and timing of the TMF construction (as adequate storage to achieve a no-discharge situation) is not referenced.	The information requested has been provided in Appendix P within Appendix 12-B of the Application/EIS.	Appendix P in Appendix 12-B
293	5.5.4 – Hydrology and Site Water Balance	Discuss the results of a detailed water balance assessment	2.10.4.5, Appendix J	Y/N	EC	In section 2.10, the proponent is requested to confirm Environment Canada's understanding that water will be released from the TMF during pre-production and post-closure, but not during operations. The expected water surplus during operations is anticipated to yield a fairly large volume of stored water, though a large degree of uncertainty appears to exist regarding this projection. The proponent is requested to indicate whether a discharge and associated water treatment plant (if necessary) during operations is a reasonable alternate.	No effluent water treatment of the TMF discharge is currently planned as part of the Project design. There is not envisaged to be direct discharge from the pit. Additional related information is provided in the TMF water balance calculations in Appendix P within Appendix 12-B, and Appendix 5-D.	Appendix 12-B Appendix 5-D

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294	5.5.4 – Hydrology and Site Water Balance	Include a detailed site water balance assessment for the Project	2.10.4.5, Appendix J	N	EC	The EIS states, "The water balance indicates that the TMF is in surplus conditions during all years of operations", but the supporting information to demonstrate annual water balance results is not referenced.	The information requested has been provided in Appendix P within Appendix 12-B of the Application/EIS.	Appendix P in Appendix 12-B
295	5.5.4 – Hydrology and Site Water Balance	Include a detailed site water balance assessment for the Project	2.10.4.5, Appendix J	Y	BC MFLNRO	The water balance information is discussed in detail in Appendix J (FLNRO)	In the revised submission of the Application/EIS, water balance information has been provided in Appendix P within Appendix 12-B.	Appendix P in Appendix 12-B
296	5.5.4 – Hydrology and Site Water Balance	Discuss various components of the Project in each phase of development, including water balance calculations, consideration for the potential use of make-up water, and will provide estimates of parameters such as stream flow, groundwater flow, soil permeability, precipitation, evaporation, and hydraulic roughness	2.10, Appendix J	Y	BC MFLNRO	Groundwater flow component only cursorily discussed in Section 2.10. Groundwater flow discussed in Appendices H and I and hydrogeologic components of the water balance is discussed in Appendix J (FLNRO)	The information requested has been addressed in full in Appendix 12-B (Sections 3.1, 3.5, and 3.6) of the Application. Groundwater flow is presented in Appendix 11-A (Section 4.2).	Appendix 12-B; Appendix 11-A (Section 4.2).
297	5.5.4 – Hydrology and Site Water Balance	Identify recharge and discharge locations within the Project area and the surrounding area	2.1	N	BC MFLNRO	Groundwater recharge and discharge is not discussed in this section (FLNRO)	The information requested has been addressed in full in Appendix 12-B (Sections 3.1, 3.5, and 3.6) of the Application. Groundwater recharge and discharge is mapped in Figure 11.4-18 in Section 11.4.3.2 of Chapter 11.	Appendix 12-B; Chapter 11 (Section 11.4.3.2).
298	5.5.6 – Fish Surveys	Site-specific studies will be completed to determine/confirm fish presence/absence, spatial distribution, and fish habitat values	6.7, Appendix N	N	DFO	Limits of Fish Distribution (Table 6.7-5) - The application should clearly identify the sampling effort conducted and the rationale that is used to establish non-fish bearing status. (e.g. identification of standard, effort conducted, conclusions)	Limits to fish distribution in the Project LSA, sampling locations and effort, and non-fish-bearing status determination are extensively discussed in Chapter 14, Section 14.4.3.2.	Chapter 14, Section 14.4.3.2.
299	5.5.6 – Fish Surveys	Seasonal fish surveys will be conducted to fully characterize fish use of the local study area	6.7, Appendix N	N	DFO	Changes to Fish Habitat (6.7.6.2) - No estimates or discussion of Bull Trout populations occupying P Creek and T Creek are provided, nor how they relate to the larger Harper Creek population.	Bull Trout density, habitat use, population and life history in P and T creeks is described in Chapter 14, Section 14.4.3.2, and Appendix 14-A.	Chapter 14, Section 14.4.3.2. Appendix 14-A
300	5.5.6 – Fish Surveys	Seasonal fish surveys will be conducted to fully characterize fish use of the local study area	6.7, Appendix N	N	DFO	Impacts to fish habitat have been summarized for P Creek and T Creek as a combined total. Require a complete breakdown of impacts based on habitat type for each system (area) and whether sampling efforts have noted fish in which habitats. This should be expanded for creeks north of the project footprint, Baker and Jones Creeks.	Fish habitat and fish sampling is described in detail for P, T, and Baker creeks. Sampling locations and effort, and non-fish-bearing status determination are extensively discussed in Chapter 14, Section 14.4.3.2 and 14.4.3.4.	Chapter 14, Section 14.4.3.2 and 14.4.3.4.

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
301	5.5.7 – Fish Tissue Analysis	Fish tissues will be analyzed for metals and will provide valuable data for baseline characterization for future monitoring	6.7, Appendix N	Y/N	HC	The consideration of fish species and metal contaminants appear to be incomplete from a human health risk perspective. Other than bull trout and rainbow trout, it is not clear why coho (and other salmonid species) were not analyzed for fish tissue metals concentrations – even though these species are important country foods for the local First Nations.	Coho are an anadromous fish species and as such their residence in receiving environment streams is too brief to effectively monitor for changes in fish tissue metals concentrations. Tissue metal content in the adult stage of anadramous fish (such as Pacific salmon) are reflective of the quality of the ocean environment and food chains, since this is where the juvenile fish mature to adults for years prior to returning to freshwater to spawn. Since it is predominantly the returning adult fish that are eaten and their tissue residues are not related to the area in which the proposed Project is located, migratory fish were not selected as sentinel species. In other words, even though anadramous Coho Salmon (or other salmonid species) may be important to consumers of country foods, they are not good sentinel species for monitoring or for assessing the potential for effects due to a proposed Project. Sentinel species used to monitor changes in fish tissue are commonly occurring and abundant species that are resident in an area (i.e., not migratory). Rainbow Trout were selected as the primary sentinel species. Tissue metal residues in both Bull Trout and Rainbow Trout were considered for their potential to affect human health under baseline conditions (Section 21.4.2.2, 21.4.3.2, Appendix 21-A). Potential effects to human health due to Project-related changes in the quality of (aquatic) country foods is assessed in Section 21.5.1.2 (potential effects), 21.5.2.2 (mitigation), and 21.5.3.2 (residual effects).	Chapter 21, Sections 21.5.1.2, 21.5.2.2, and 21.5.3.2Chapter 21, Section 21.4.2.2 and 21.4.3.2, Appendix 21-A
302	5.5.7 – Fish Tissue Analysis	Fish tissues will be analyzed for metals and will provide valuable data for baseline characterization for future monitoring	6.7, Appendix N	Y/N	HC	In addition to considering mercury, lead and selenium concentrations in fish tissues, it is not clear why arsenic, cadmium, zinc and chromium concentrations were also not discussed as having potential toxicological or human health effects (Appendix N, p. 58). HC notes that elevated concentrations of these metals were found in aquatic sediments (pp. 75, 77).	A country foods baseline report has been prepared following Health Canada guidance and is included in the Application/EIS as Appendix 21-A. All metals measured during baseline studies were considered, and contaminants of potential concern (COPCs) were selected based on a screening procedure that takes into account the concentration of metals in environmental media (i.e., soil, water) or biota (i.e., fish tissue). The updated assessment for the potential effects to human health considers metals other than just mercury, lead, and selenium.	Chapter 21, Sections 21.4.2.2 and 21.4.3.2; Appendix 21-A

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303	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on aquatic features	6.7	N	DFO	Changes to Fish Habitat (^.7.6.2) - No specific discussion of impacts to habitats as they relate to the Bull Trout population occupying those habitats and the contribution of those systems to the larger Harper Creek population.	Limits to fish distribution in the Project LSA, sampling locations and effort, and non-fish-bearing status determination are extensively discussed in Chapter 14, Section 14.4.3.2. Potential effects due to changes in water quantity (flow) and potential effects to Bull Trout are extensively detailed in Chapter 14, Section 14.5.3.1 of the revised EA. A rigorous Bull Trout population study for the watershed was not included in the AIR.	Section 14.4.3.2 and 14.5.3.1
304	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on aquatic features	6.7	N	DFO	Impacts to Harper Creek from flow reductions are noted however no area of specific habitat types affected is provided. No discussion of impacts to Bull Trout occupying these habitats provided.	Bull Trout and habitat use in P and T creeks is described in Chapter 14, Section 14.4.3.2. Potential effects due to changes in water quantity (flow) and potential effects to Bull Trout are extensively detailed in Chapter 14, Section 14.5.3.1 of the revised EA.	Chapter 14, Sections 14.4.3.2 and 14.5.3.1
305	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on aquatic features	6.7	N	DFO	Impacts to Rainbow Trout habitat are anticipated to be modes but not quantified by type or area, nor are impacts carried forward in assessment with no justification provided.	Effects are not predicted for Rainbow Trout in Baker or Jones Creek.	Chapter 14, Section 14.5.3.1
306	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on aquatic features	6.7	N	DFO	Changes to fish habitat within Baker Creek flow regime prior to closure are referenced but not quantified by habitat type or area. Full discussion of post closure discharge scenario from Pit to Baker Creek required which details potential positive and negative project aspects to fish and fish habitats of Baker Creek.	Effects are not predicted for Rainbow Trout in Baker or Jones Creek.	Chapter 14, Section 14.5.3.1
307	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on aquatic features	6.7	N	DFO	Stream Temperature Changes (6.7.6.3) - No discussion of potential changes to stream temperature and the effects on Bull Trout life stages within Harper Creek.	Potential effects on stream temperature are discussed in detail in Section 14.5.3.1	Chapter 14, Section 14.5.3.1

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308	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on aquatic features	6.7	N	DFO	Loss of Aquatic Habitat and Aquatic Life (6.7.6.4) - The application quantifies the invertebrate communities within P Creek and T Creek, however fails to identify the length of streams that are impacted and what that contribution of "food organisms" provides to the downstream fish habitat of those systems and Harper Creek. The loss of a significant invertebrate producing stream can be considered as important habitats contributing to fish habitat and should be discussed and potential effects rationalized.	The potential Project effects on the benthic invertebrate communities is part of the assessment of the Aquatic Resources VC (Sections 14.5.3.3 and 14.5.3.4). The assessment of potential Project effects on aquatic resources was supported by quantitative models of streamflows and water quality, and was conducted for a number of stream sections in the Harper Creek watershed, including P Creek, T Creek, upper Harper Creek, and lower Harper Creek. This assessment included the analysis of the potential for indirect effects from the loss of upstream subsidies on downstream communities (Section 14.5.3.4).	Chapter 14, Sections 14.5.3.3 and 14.5.3.4
309	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on aquatic features	6.7	N	DFO	Changes to Fish Passage (6.7.6.5) - Negative effects are anticipated with predicted reduced flows at the falls on Harper Creek impeding Bull Trout migration. A discussion of the specific flow changes at this location over the period of BT migration should be provided.	Potential effects on flow over the falls on Harper Creek in relation to Bull Trout migration are discussed in detail in Section 14.5.3.1	Chapter 14, Section 14.5.3.1
310	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on aquatic features	6.7	N	BC MFLNRO	6.7.7 Proposed Mitigation Measures – the list (Table 6.7-8, 6.7-9) based on professional judgement of proposed mitigation is a starting point for future discussions and negotiation. Based on the mining history in this region, we consider the closure dates very uncertain and potential detrimental effects could continue for several decades, even after full closure. (FLNRO)	Mitigation measures are discussed in detail in relations to individual effects in Section 14.5.2, including consideration of the effectiveness of the mitigation measures. The significance determination for the residual effects assessment takes into account the duration of the effect (i.e., how long the residual effect is predicted to last; Section 14.5.3 Predicted Residual Effects and Characterization). Rationale for how the residual effects were characterized is provided in Section 14.5.3 and definitions of the residual effects criteria are provided in Table 14.5-3.	Chapter 14, Section 14.5.2 (Mitigation Measures), Section 14.5.3 (Predicted Residual Effects and Characterization)
311	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and describe proposed mitigation measures and environmental management strategies to avoid, minimize, or mitigate potential adverse effects on aquatic flora and fauna during proposed construction, operations, and decommissioning phases of the Project	6.7	Y	DFO	Proposed Mitigation Measures (6.7.7) - Proposed mitigations are listed in a Table but are not discussed how they individually relate to each potential effect identified.	Mitigation measures are discussed in detail in relations to individual effects in Section 14.5.2.	Chapter 14, Section 14.5.2

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312	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Identify and describe proposed mitigation measures and environmental management strategies to avoid, minimize, or mitigate potential adverse effects on aquatic flora and fauna during proposed construction, operations, and decommissioning phases of the Project	6.7	Y	BC EAO	Mitigation measures not discussed in the application – just listed in a table (EAO).	Mitigation measures are discussed in detail in relations to individual effects in Section 14.5.2.	Chapter 14, Section 14.5.2
313	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Development and implementation of appropriate erosion and sediment control plans specific to each phase of the mine	10.4	Y/N	EC	In terms of the site preparation / pre-production phase, Environment Canada notes that the EIS focuses on erosion and sediment control, and does not consider the likelihood of metals-laden contact water from the mine development area.	Mitigation measures are discussed in detail in relations to individual effects in Section 14.5.2. Mitigation measures and management plans to address potential effects due to direct mortality (Section 14.5.2.1), changes in water quantity (Section 14.5.2.2), and changes in water quality (Section 14.5.2.3) are provided. This includes discussion of mitigation measures to address water quality due to metals (from metal leaching, TMF discharge, seepage, etc).	Chapter 14, Section 14.5.2.1 (direct mortality), Section 14.5.2 (mitigation measures in general), Section 14.5.2.3 (mitigation measures for water quality specifically)
314	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	Development and implementation of a detailed site water management plan	2.10, 10.4	Y/N	EC	The 'Water Quality Management Plan' does not include predictions of the volume and chemistry of expected site discharges.	In the current submission there is no "Water Quality Management Plan". Water quality predictions and relative loadings are provided in Appendix 13-C (Surface Water Quality Model Report, KP 2014) for the TMF, open pit, and downstream environment. Average monthly rates of discharge from the TMF in Closure are presented in Appendix 13-C. The TMF water quality in Closure (after Year 31) and in Post-Closure is equivalent to the discharge quality.	Appendix 13-C
315	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	If required, develop (in consultation with regulators) a suitable fish habitat compensation plan	10.7	Y	DFO	· Fish Habitat Compensation Plan (10.7) - The overview of the identified impacts to fish habitat within the Fish Habitat Compensation Plan (FHCP) does not quantify the habitat types, areas, food production areas, and fish populations potentially impacted by predicted various project components.	The revised Fish Offsetting Plan describes and quantifies the habitat types, areas, food production areas, and fish populations potentially impacted by predicted various project components.	Chapter 14, Appendix 14-E
316	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	If required, develop (in consultation with regulators) a suitable fish habitat compensation plan	10.7	Y	DFO	The FHCP references 5 Options but fails to quantify the area of habitat types to be gained for each of the options.	The revised Fish Offsetting Plan quantifies the area of habitat types gained (i.e., habitat budget) for each option.	Chapter 14, Appendix 14-E

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317	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	If required, develop (in consultation with regulators) a suitable fish habitat compensation plan	10.7	Y	DFO	There appears to be no Prioritization of Options based on technical and economic feasibility and consultations with interested parties, such as Provincial / Federal regulators and First Nations.	The revised Fish Offsetting Plan provides prioritized, technically feasible options.	Chapter 14, Appendix 14-E
318	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	If required, develop (in consultation with regulators) a suitable fish habitat compensation plan	10.7	Y	DFO	The FCHP does not identify any potential effects related to carrying out any of the proposed compensation options.	The revised Fish Offsetting Plan identifies potential effects of construction and option development.	Chapter 14, Appendix 14-E
319	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	If required, develop (in consultation with regulators) a suitable fish habitat compensation plan	10.7	Y	DFO	The FHCP does not appear to identify or discuss impacts to fish populations and corresponding target numbers associated with proposed compensatory works to be achieved.	A detailed monitoring plan is included within the Fish Offsetting Plan which includes targets and metrics for success determination.	Chapter 14, Appendix 14-E
320	5.5.11 – Assessment of Potential Effects and Proposed Mitigation	The modelled results will be assessed against criteria to protect aquatic life to assess potential impacts	6.6, 6.7, Appendix L, Appendix M	N	NRCan	NRCan notes the omission of reference to DFO guidelines around fish and blasting activities.	Reference to DFO guidelines around fish and blasting activities has been included in the revised submission.	Chapter 14, Section 14.5.2.3
321	5.5.12 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project on aquatic features/components after appropriate mitigation measures and environmental management strategies have been applied	6.7	Y	DFO	Residual Effects and Significance (6.7.8) - Significance predictions for changes to Bull Trout passage at the falls on Harper Creek; changes to Bull Trout habitat in Harper Creek; changes to stream temperature; and changes to Baker Creek hydrology from Open Pit closure; all require additional rationalization to support the conclusions of "not significant". Details and justification for the predictions needs to be presented for reader consumption.	Potential effects on flow over the falls on Harper Creek in relation to Bull Trout migration, and changes to water quantity are discussed in detail in Section 14.5.3.1	Chapter 14, Section 14.5.3.1
322	5.5.12 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project on aquatic features/components after appropriate mitigation measures and environmental management strategies have been applied	6.7	Y	BC MFLNRO	6.7.8 Residual Effects..- "Changes to Bull Trout passage at falls", until the flow range for bull trout passage is understood this topic should be reviewed further (see comments for 6.7.3.3). 6.7.8 Residual Effects.. – have the potential water quantity/quality changes been considered for potential effects to coho salmon and other species in lower Harper Creek or other streams? The "Changes to Bull Trout habitat in Harper Creek" rating of "not significant" is only a prediction through limited information and needs verification. (FLNRO)	Potential effects on flow over the falls on Harper Creek in relation to Bull Trout migration, and changes to water quantity are discussed in detail in Section 14.5.3.1	Chapter 14, Section 14.5.3.1

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323	5.5.12 – Potential Residual Effects and their Significance	The overall significance of residual effects will be discussed and placed into context based on an assessment of predicted magnitude, geographic extent, duration/frequency, reversibility, context and probability	6.7	Y	BC FLNRO	6.7.9 "Cumulative Effects Assessment" and following sections - this discussion is too general and generic. Groundwater path changes missed as a permanent, residual effect that could impact fish and fish habitat. More work needed on CE.Table 6.7-12 "Proposed Mitigation for Cumulative Effects..." too general/generic, "'Implement Best Management Practices"? Page 6.7-45 conclusion that "None of the seven residual effects were rated as having a "significant" effect on fish and aquatic habitat valued components." This conclusion is premature, only supported by modelling and very limited time series biological information. Further discussions needed about this conclusion and for the preliminary Fish and Aquatic Habitat Compensation Plan. (FLNRO)	A revised cumulative effects assessment is discussed in Section 14.6.	Chapter 14, Section 14.6
324	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Section 6.8 and Appendix P: these are very disjointed and difficult to read and understand a comprehensive overview of data, analyses and results for each species.	The structure of the report has been revised and includes additional text to clarify analysis, results and conclusions.	Appendix 15-A, Chapters 15.4 and 16.4
325	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Section 6.8 and Appendix P: suggest organizing all detailed info together in one place by species to provide a clear picture of background info, studies, data, analyses, rationale, and results for that species. If this was the intention for Appendix P, it does not provide a clear picture. Furthermore, the EIS relies heavily on Appendix P in certain places but expands into greater detail in other places; the EIS should maintain a consistent level of detail throughout. Also suggest compiling all study methodologies and references in one place, not scattered throughout.	The structure of the report has been reorganized and includes additional text to provide background information and clarify methods, analysis, results and conclusions.	Appendix 15-A, Chapters 15.4 and 16.4
326	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Section 6.8.3.1: species summaries presented in the EIS main document are incomplete and disjointed. Much of this information can be found in Appendix P but if summaries are to be included in the main document then they should be complete summaries.	The structure of the report has been revised and includes additional text to clarify analysis, results and conclusions.	Chapters 15.4 and 16.4, Appendix 15-A

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327	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Surveys and studies are incomplete. More detail is required in all surveys. For example, regarding grizzly den surveys: method? What area did the surveys cover? Map? Why were there three surveys conducted in only one year, and why in April and July? Where was the den that was observed? How many kilometers away from LSA? Map? Were there any tracks observed in the vicinity of the den when first observed in April? Regarding Terrestrial Invertebrate Surveys: "Thirty-nine butterfly species and 15 dragonfly/damselfly species were identified during the surveys" (pg. 6.8-38). Are these listed somewhere? Regarding Amphibian Surveys (pg. 6.8-58), rationale for the dates and times used? Why June/July in 2008, and July/August in 2011, and why nothing in the years between (this appears inconsistent)?	The request to provide additional detail on surveys and studies has been addressed in full in Appendix 15-A of the application by including additional information on methods and by providing additional detail in maps. The request for a list of butterfly species observed during netting surveys has been provided in full in Appendix 15-A - Appendix 7 of the Application/EIS.	Appendix 15-A
328	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Results of the Snow-Tracking Transects are unclear and difficult to follow (pg. 6.8-65). Where were the transects (map?). It is unclear whether the results from 2011 are included in Table 6.8-21.	The structure of the report has been revised and includes additional text to clarify methods, analysis, results and conclusions.	Appendix 15-A, Figure 17
329	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Incidental wildlife observations are presented in Table 6.8-22, but lack a significant amount of data. What kind of observations are they (tracks? Individuals?), how may observed, location, map?	The application has been revised to provide addition information on incidental observations in the survey results by species.	Appendix 15-A
330	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Appendix P states that surveys were conducted "to collect baseline data and to fill data gaps" (pg. 38). What data gaps were there and did the surveys successfully fill them?	Data gaps consisted of a lack of site-specific or up-to-date site specific data on the presence, location and abundance of potential VCs. Extensive surveys in the area were conducted and provided the information necessary to conduct an effects assessment.	Appendix 15-A

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
331	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	The EIS states that "grizzly bear habitat selection is mainly determined by the availability of suitable forage habitat" but recognizes that "security and thermal habitat are important" (pg. 6.8-38). This is also repeated in Appendix P. Given that a den was discovered 5km away from the Project site, would it not be valuable to have an evaluation of denning habitat as part of the EIS analysis?	The Proponent thanks the Agency for this question. Suitable denning habitat for grizzly bears occurs at the micro site scale. Mapping grizzly bear denning habitat at 1:20,000 would not add rigor to the assessment.	Appendix 15-A
332	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	There does not seem to be any information provided regarding the caribou within the two planning units that overlap the LSA (pg. 6.8-40).	There is minor overlap of RSA with the caribou planning units. The Project is not expected to have an effect on mountain caribou.	(Appendix 15-A, Section 2.2.25, Figure 5)
333	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Although there was some introduction of security/thermal etc. habitat for grizzly bear in the species summary, it was not well discussed for caribou, yet it is a significant part of the caribou habitat suitability section and security/thermal was not mentioned at all in the grizzly habitat suitability section (if it was not assessed there should be a statement explaining that).	Security/Thermal habitat was modeled for caribou.	Appendix 15-A, Appendix 3
334	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Discussion of any "critical habitat" within the LSA as defined by SARA seems to be missing.	The Proponent thanks the Agency for this question. There is no critical habitat as defined by SARA within the LSA.	--

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
335	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	Caribou presence doesn't seem well established in the study area. Studies? Data? Maps? Analysis? The overview of this species is disjointed. Would like to see all information in one section.	Caribou are not likely to be present in the area. The structure of the report has been revised and includes additional text to clarify methods, analysis, results and conclusions.	Appendix 15-A, Section 2.2.25 Figure 5
336	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	More maps are required, particularly where referenced in Appendix P but are missing. Habitat Suitability Mapping maps? "Appendix P shows location of field plots surveyed in 2008 and 2011" (pg. 6.8-46) can't find this in Appendix P.	The information requested has been provided in full in Appendix 9 of Appendix 15-A of the Application/EIS.	Appendix 15-A, Appendix 9
337	5.6.1 – Introduction	Include a summary of existing historical information (based on a literature review) and the results of site-specific surveys completed on site to provide a complete understanding of the terrestrial environment of the Project area and surrounding areas	6.8, Appendix P	Y/N	CEA Agency	The "EA Application Section Where Relevant Information is Provided" provided in this Table of Concordance needs to be more specific in some cases.	More specific Sections have been provided throughout the revised Application/EIS.	--
338	5.6.2 – Baseline Conditions	Present the results of various site-specific surveys pertaining to wildlife presence/absence, potential abundance, distribution, and habitat within and immediately adjacent to the Project area and truck haul route	6.8, Appendix P	Y/N	CEA Agency	Site-specific surveys require more detail.	The structure of the report has been revised and includes additional text to clarify methods, analysis, results and conclusions.	Appendix 15-A, Section 3
339	5.6.2 – Baseline Conditions	Present the results of various site-specific surveys pertaining to wildlife presence/absence, potential abundance, distribution, and habitat within and immediately adjacent to the Project area and truck haul route	6.8, Appendix P	Y/N	CEA Agency	No reference to other, previously conducted relevant surveys outside of the Project.	Surveys undertaken focused on the potential impact of the project to the LSA. There was limited additional survey information for the area.	--

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
340	5.6.2 – Baseline Conditions	Present the results of various site-specific surveys pertaining to wildlife presence/absence, potential abundance, distribution, and habitat within and immediately adjacent to the Project area and truck haul route	6.8, Appendix P	Y/N	BC EAO	Where are the habitat suitability maps? Discussion of suitable habitat often does not specify suitability class (EAO)	The information requested has been provided in full in Appendix 15-A of the Application.	Appendix 15-A, Appendix 9
341	5.6.2 – Baseline Conditions	Confirm presence of target wildlife and vegetation species and ecosystems	6.8, Appendix P	Y/N	CEA Agency	Difficult to ascertain without more detail provide in site-specific surveys.	The structure of the report has been revised and includes additional text to clarify methods, analysis, results and conclusions.	Appendix 15-A, Section 3
342	5.6.2 – Baseline Conditions	Confirm habitat associations of target species	6.8, Appendix P	Y/N	CEA Agency	Habitat assessments require more detail.	The structure of the report has been revised and includes additional text to clarify methods, analysis, results and conclusions.	Appendix 15-A, Section 3, Appendix 3
343	5.6.2 – Baseline Conditions	Confirm locations of important wildlife features	6.8, Appendix P	Y/N	CEA Agency	More detail required.	No wildlife habitat features have been identified by the Ministry in the LSA. Special management for bird nests, and potential bat roost are detailed in the Wildlife Management Plan.	Section 24.19
344	5.6.2 – Baseline Conditions	Confirm habitat characteristics and accuracy of the typed polygons within mapped areas	6.8, Appendix P	N	CEA Agency	What maps?	The Proponent thanks the Agency for this question. Ecosystem mapping as suggested was not provided as the scale would not allow polygon attributes for the TEM to be discernible on the figures. Additional text (and inclusion of missing maps) has been added to provide more detail.	Appendix 15-A, Section 4.2.1.1
345	5.6.2 – Baseline Conditions	Locations of field studies and of any special habitat features will be documented using Global Positioning System (GPS) receivers and recorded in North American Datum (NAD 83) Universal Transverse Mercator (UTMs)	6.8, Appendix P	N	CEA Agency	Could not find reference to this being done and no maps to demonstrate it. If it is present in the text, the Table of Concordance needs to be more specific in identifying where it is.	Maps with species locations are provided in Appendix 9 of 15-A.	Appendix 15-A, Appendix 9
346	5.6.2 – Baseline Conditions	Representational habitats and any significant habitat features will be photographed	6.8, Appendix P	Y/N	CEA Agency	Did not see reference to photographs in EIS document, although there are a few provided at the end of Appendix P.	References to photographs has been provided in full in Section 15-A of the Application/EIS.	Appendix 15-A, Appendix 2

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
347	5.6.2 – Baseline Conditions	Describe the rationale for selecting and assessing the specific VC, based on baseline data, consultation activities, and any available and relevant traditional ecological or community knowledge in consideration of potential issues related to potential interactions with Project infrastructure and activities	6.8	Y/N	CEA Agency	This is very poorly described-- more detail required.	The information requested has been provided in full in the Application/EIS.	Chapter 15, Section 15.3; Chapter 16, Section 16.3
348	5.6.2 – Baseline Conditions	Describe the rationale for selecting and assessing the specific VC, based on baseline data, consultation activities, and any available and relevant traditional ecological or community knowledge in consideration of potential issues related to potential interactions with Project infrastructure and activities	6.8	Y	BC EAO	Describes VC's and focal species but not specific rationale for their selection (EAO)	Additional text to provide rationale and clarification as requested has been provided in full in the Application/EIS.	Chapter 15, Section 15.3; Chapter 16, Section 16.3
349	5.6.2 – Baseline Conditions	VCs will include terrestrial wildlife species/subspecies, vegetation species/subspecies, and sensitive/rare ecological communities	6.8	Y	CEA Agency	Info. present; however, rationale for selection is not well described.	Additional text to provide rationale and clarification as requested has been provided in full in the Application/EIS.	Chapter 15, Section 15.3; Chapter 16, Section 16.3
350	5.6.2 – Baseline Conditions	A rationale for VC selection will be provided in the Application	6.8	Y/N	CEA Agency	Info. present; however, rationale for selection is not well described.	Additional text to provide rationale and clarification as requested has been provided in full in the Application/EIS.	Chapter 15, Section 15.3; Chapter 16, Section 16.3
351	5.6.2 – Baseline Conditions	Lists of Red and Blue-listed wildlife and plant taxa thought to occur within the Headwaters Forest District as provided by the BC Conservation Data Centre	6.8	Y/N	CEA Agency	What is the Headwaters Forest District? Is this the LSA? Clarification required.	The Headwaters Forest District overlaps the LSA and was used to select a list of potential species occurring in the area. Clarification has been provided in full in the Application/EIS.	Appendix 15-A, Section 1.7
352	5.6.2 – Baseline Conditions	Lists of Red and Blue-listed wildlife and plant taxa thought to occur within the Headwaters Forest District as provided by the BC Conservation Data Centre	6.8	Y/N	CEA Agency	BC Red and Blue-listed wildlife taxa potentially occurring within the LSA are provided in the EIS.	The Headwaters Forest District overlaps the LSA and was used to select a list of potential Red- and Blue-listed species occurring in the area. Clarification has been provided in full in the Application/EIS.	Appendix 15-A, Section 1.7

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
353	5.6.2 – Baseline Conditions	Lists of Red and Blue-listed wildlife and plant taxa thought to occur within the Headwaters Forest District as provided by the BC Conservation Data Centre	6.8	Y/N	CEA Agency	Summary tables of conservation concern (e.g. Table 6.8-10) are provided for invertebrates but not for other taxa. Why not? This would be very helpful.	The Proponent thanks the Agency for this question. Summary tables of conservation concern were provided for VCs that were not species specific (e.g. invertebrates, rare plants, ECAR).	Appendix 15-A, Section 2.2
354	5.6.2 – Baseline Conditions	Information on actual known location records of Red or Blue-listed taxa in or near the study area (provided by the BC Conservation Data Centre)	6.8	N	CEA Agency	Could not find this information in the EIS.	The Proponent thanks the Agency for this question. The CDC has very little information on known location records of Red and Blue-listed species in the area (Mountain caribou, rare plants).	Appendix 15-A. Section 1.7, Appendix 1, 3
355	5.6.2 – Baseline Conditions	Information on SARA-listed taxa provided by the Government of Canada	6.8	Y/N	CEA Agency	Provided, although again, inclusion of this information in summary tables for all taxa would be helpful.	The information requested has been provided in full in the Application/EIS.	Appendix 15-A, Section 2.1.1.1
356	5.6.2 – Baseline Conditions	Taxa listed as part of the Identified Wildlife Management Strategy (IWMS)	6.8	N	CEA Agency	Explicit mention of IWMS is missing.	The information requested has been provided in full in the Application/EIS.	Section 16.2.2
357	5.6.2 – Baseline Conditions	Taxa of regional concern	6.8	Y/N	CEA Agency	Provided, although again, inclusion of this information in summary tables for all taxa would be helpful.	The information requested has been provided in full in Tables 15.3-1 and 16.3-1 of the Application/EIS.	Chapter 15, Table 15.3-1 and Chapter 16, Table 16.3-1
358	5.6.2 – Baseline Conditions	Data from targeted wildlife surveys and from incidental observations	6.8, Appendix P	Y/N	CEA Agency	Largely insufficient data provided on targeted wildlife surveys and incidental observations.	The information requested has been provided in full in Section 4 of Appendix 15-A in the Application/EIS.	Appendix 15-A, Section 4
359	5.6.2 – Baseline Conditions	Data from targeted wildlife surveys and from incidental observations	6.8, Appendix P	Y/N	CEA Agency	Observation and transect locations/maps needed.	The information requested has been provided in full in the Application/EIS.	Appendix 15-A, Appendix 9
360	5.6.2 – Baseline Conditions	Data from targeted wildlife surveys and from incidental observations	6.8, Appendix P	Y/N	CEA Agency	Data tables summarizing survey results would be helpful.	The information requested has been provided in full in Section 4 of Appendix 15-A in the Application/EIS.	Section 4, Appendix 15-A
361	5.6.2 – Baseline Conditions	Data from targeted wildlife surveys and from incidental observations	6.8, Appendix P	Y/N	CEA Agency	Section 6.8.3.2 could use an introductory paragraph summarizing the types of analyses that will follow i.e. Habitat Suitability Mapping, Road Density Analysis, field surveys (and which species). Why were there no moose or caribou field surveys? If this data is coming from somewhere else, this needs to be discussed.	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full in the Application/EIS.	Section 3, Appendix 15-A
362	5.6.3 – Summary of Rare, Threatened and Endangered Species	Summarize known rare, threatened, and endangered terrestrial species identified through the literature review process and site specific surveys	6.8	Y/N	CEA Agency	Incomplete for site specific surveys.	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full in the Application/EIS.	Section 2, Appendix 15-A

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
363	5.6.3 – Summary of Rare, Threatened and Endangered Species	Summarize known rare, threatened, and endangered terrestrial species identified through the literature review process and site specific surveys	6.8	Y	BC MFLNRO	Two new plant species, nice. (LSIB) Specific information on local wildlife populations (e.g. grizzly bear and caribou) should be included – what populations are overlapping with the LSA and what is the status of those populations? (EAO) Table 6.8-14 Road Density in LSA - Because of the high/very high road density within the LSA, has the proponent explored the mitigation measure of deactivating some of the non-status roads within the LSA 6.8-67 Incidental Observations - Can the proponent please provide details on the timing and location of the incidental observations of one set of grizzly bear tracks and two sets of mountain caribou tracks 6.8-70 Mountain Goats - Ensure that the mitigation proposed by the proponent 'helicopters will not be required as part of the project due to the availability of alternative ground access' is carried forward into the Wildlife Management Plan. Table 6.8-23 - Project Focal Species-Interaction Matrix (pre-mitigation). MFLNRO found the layout of the table to be confusing, but likes the idea of the table and the information it provides on the level of interaction between project activities and the terrestrial environment. (FLNRO)	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested with respect to caribou and grizzly bear tracks has been addressed in full in Appendix 15-A, Section 4 and Appendix 3 of the Application/EIS. The impact matrix has been updated and modified in Section 16.3-2. Helicopters will not be required, ground access has been carried forward to the Wildlife Management Plan as discussed in Section 24.19 of the application/EIS. HCMC does not have authority for road deactivation.	Appendix 15-A, Section 4, Section 16.3-2, Section 24.20
364	5.6.3 – Summary of Rare, Threatened and Endangered Species	Species listed on Schedule 1 of SARA and/or species of Special Concern under COSEWIC with the potential to occur within the study area will be listed and discussed	6.8	Y/N	CEA Agency	While species summaries note whether they are listed on Schedule 1 of SARA and/or are of Special Concern under COSEWIC, it is difficult to piece together the whole picture of each species, their potential to occur within the study area, and potential effects on them.	The information requested has been provided in full in the Application/EIS.	Table 1 of Appendix 15-A
365	5.6.3 – Summary of Rare, Threatened and Endangered Species	Mitigation and/or management measures will be included as required	6.8	Y/N	CEA Agency	Insufficient detail provided—as it is difficult to piece together the whole picture of each species, study area, and potential effects, proposed mitigation/management measures cannot be readily affirmed—Section 6.8 needs to be made more clear overall.	The structure of the report has been revised and includes additional text to provide more detail and clarification. The request to include more information on proposed mitigation/management measures and the subsequent effects on particulars VCs has been provided in Section 16.5 of the Application/EIS.	Section 16.5
366	5.6.3 – Summary of Rare, Threatened and Endangered Species	include an assessment of species of special interest (e.g., species significant to First Nations and/or local stakeholders) that may be found in the Project area	6.8	N	BC EAO	Did not see this in 6.8 (EAO)	The information requested has been provided in full in Table 16.3-1 of the Application/EIS.	Section: 16.3.1.1; Table 16.3-1
367	5.6.3 – Summary of Rare, Threatened and Endangered Species	include an assessment of species of special interest (e.g., species significant to First Nations and/or local stakeholders) that may be found in the Project area	6.8	Y/N	CEA Agency	There is no assessment of species of special interest in this section beyond a brief sentence on choosing focal taxa which itself does not contain enough detail on the selection process (pg. 6.8-1, "focal taxa were chosen based on their presence within the study area, their provincial and federal status, and identified concerns from First Nations, provincial and/or federal government agencies"). More information is required, such as why these species may be of special interest. Also no mention of local stakeholders if there are any—is this an omission or are there none?	Additional information has been provided in Section 16.3 of the Application/EIS. Local stakeholder information is continues to be minimal.	Section 16.3

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
368	5.6.4 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on terrestrial flora and fauna	6.8	Y/N	CEA Agency	Potential effects and mitigations are a very important part of the EA, and as such should be easier to find. Suggest creating a new section specifically addressing these immediately following background info, studies and data analyses/results (e.g. Section 6.8 = Vegetation and Wildlife background info, baseline studies, results, analyses, conclusions; Section 6.9 = Vegetation and Wildlife effects assessment, mitigations, etc.). Given the complicated nature of cumulative effects, might also consider a separate section (6.10) for this alone.	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full in Section16.5 of the Application/EIS.	Section 16.5
369	5.6.4 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on terrestrial flora and fauna	6.8	Y/N	CEA Agency	Because the background and survey data are not adequately presented in enough detail, it is difficult to evaluate these conclusions.	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full in Section 16.4 and Appendix 15-A of the Application/EIS.	Appendix 15-A, Section 16.4
370	5.6.4 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on terrestrial flora and fauna	6.8	Y/N	CEA Agency	Effects summaries are very difficult to read and are not clearly presented. They are also often repetitive and lack references to back up statements: E.g. “Given that there is very limited use of the LSA by mountain caribou…” (pg. 6.8-100 to 6.8-101) as demonstrated where?	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full in Section 16.5 of the Application/EIS.	Section 16.5
371	5.6.4 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential effects of the proposed Project on terrestrial flora and fauna	6.8	N	BC MFLNRO	Rare plant inventory will be conducted but an invasive plant inventory and risk assessment needs to be conducted to mitigate risk (FLNRO) MFLNRO likes how the proponent evaluated the potential effects to valued components by separating effects into 3 categories (construction effects, operations effects, closure effects). (FLNRO)	Details of the invasive species management plan has been addressed in full in the Vegetation Management Plan, Section 24.17.	Chapter 24.17

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
372	5.6.4 – Assessment of Potential Effects and Proposed Mitigation	Identify and describe mitigation measures and environmental management strategies to avoid, minimize or mitigate potential adverse effects on vegetation and wildlife resources during proposed construction, operations, and decommissioning phases of the Project	6.8	N	BC MFLNRO	Invasive plant risk is identified but no mitigating strategies (preventative, monitoring and control of new sites) is identified (FLNRO) 6.8-9 (6.8.1.3- Spatial and Temporal Boundaries)Mitigation measures are not linked to specific project effects (EAO) 6.8-92 Exposure to elements at concentrations higher than BCWQG within the TMF could be a potential source of mortality for bats drinking from the TMF. Proponent has not addressed this potential effect and needs to develop a mitigation strategy to prevent bats and other wildlife from drinking from the TMF. 6.8-104 (6.8.5 Proposed Mitigation Measures) - Proponent defines mitigation measure according to CEAA and states 3 categories to reduce adverse project effects. 1) impact avoidance; 2) impact reduction and technical mitigation; 3) reclamation. Proponent has missed a fourth critical category to address potential effects 4) offset for adverse effects remaining following implementation of mitigation measures.To mitigate impacts on environmental values (vegetation and wildlife) the Province is implementing the following mitigation measures (avoid, minimize, restore on-site, and/or offset)• Avoid impacts on environmental values and associated components. • Minimize impacts on environmental values and associated components. • Restore on-site the environmental values and associated components that have been impacted. • Offset residual impacts on environmental values and associated components.* When the proponent is unable to avoid impacts, minimize impacts, or restore on-site the Province requires offset for the residual impacts on environmental values. The provincial mitigation/compensation policy. http://www.env.gov.bc.ca/emop/6.8-104 (6.8.5.2 Impact Reduction and Technical Mitigation) The language within many of the mitigation measures is insubstantial (ie. wherever possible, where possible, where practicable). No mitigation measures to prevent wildlife from drinking or accessing the pit lake/TMF.6.8-105 - Where rare plant occurrences have been identified (Howell's quillworti), has the proponent considered conducting additional rare plant surveys outside of the LSA and researching the feasibility of transplanting this rare species to other viable locations?Proponent states that they will incorporate protective buffers of at least 50m from all wetlands. Please provide rational when the protective buffer will be more than 50m. Will the protective buffer be sufficient to mitigate indirect effects (ie. introduction of contaminants, run-off from project roads contaminated with salt, oil, fluids and the spread of invasive species)? 6.8-107 - If project construction directly conflicts with any bald eagle nest and the project cannot be altered to avoid these sites, the Ministry of Environment. - This needs to be changed to the Ministry of Forests, Lands and Natural Resource Operations. 6.8-108 - Within the Wildlife Management Plan MFLNRO will be looking for garbage removal from construction campsite/facilities occurring on a daily basis to minimize animal attractants. (FLNRO)	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full. An invasive species management plan is included in the vegetation environmental management plan in Section 24.17. The structure of the report has been revised and includes additional text relating mitigations measures to specific project effects in Section 16.5 Mitigation measures to discourage wildlife from drinking from the TMF have not been considered necessary or incorporated at this time, but can be implemented as part of an adaptive management strategy based on the results of water quality monitoring from the TMF pond. Offsetting for adverse effects remaining following implementation of mitigation measures is discussed in Section 16.5. Additional Rare Plant surveys are described in the vegetation management plan (24.17) and mentioned in Sections 16.5. Rare-plant transplants were not recommended due to a lack of information on the success of such programs. Much text has been rewritten, revised or removed. Several of these comments have been addressed through revision of the report format.	Section 16.5, Section 24.17

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
373	5.6.4 – Assessment of Potential Effects and Proposed Mitigation	Identify and describe mitigation measures and environmental management strategies to avoid, minimize or mitigate potential adverse effects on vegetation and wildlife resources during proposed construction, operations, and decommissioning phases of the Project	6.8	N	CEA Agency	Mitigation measures are not clearly linked to the effects they are attempting to mitigate.	The structure of the report has been revised and includes additional text in Section 16.5 of the Application/EIS. This additional section provides more detail and clarification on mitigation measures and their link to project effects.	Section 16.5
374	5.6.4 – Assessment of Potential Effects and Proposed Mitigation	Identify and describe mitigation measures and environmental management strategies to avoid, minimize or mitigate potential adverse effects on vegetation and wildlife resources during proposed construction, operations, and decommissioning phases of the Project	6.8	N	CEA Agency	Monitoring is an important part of the effects mitigation process but is presented here as an afterthought. More detail should be provided, such as which mitigation measures require monitoring in order to be effective, who will be responsible for the monitoring activities. A monitoring plan should be included.	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full in Section 24 of the Application/EIS.	Chapter 24, Sections 24.17 and 24.19
375	5.6.5 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project on terrestrial flora and fauna after appropriate mitigation measures and environmental management strategies have been applied	6.8	Y/N	CEA Agency	As the background and survey data are not adequately presented in enough detail, it is difficult to evaluate these conclusions.	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full in Section 16.5 of the Application/EIS.	Section 16.5
376	5.6.5 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project on terrestrial flora and fauna after appropriate mitigation measures and environmental management strategies have been applied	6.8	Y/N	CEA Agency	Link from residual effects assessment to cumulative effects assessment not clear. For example, Table 6.8-49 shows caribou are not expected to have any residual effects involving disturbance/displacement or mortality, but the link back to residual effects section is not clear, and it has not been clearly established through the body of the EIS that this would not occur.	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full in Section 16.6 of the Application/EIS.	Section 16.6
377	5.6.5 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project on terrestrial flora and fauna after appropriate mitigation measures and environmental management strategies have been applied	6.8	Y/N	CEA Agency	Some supporting info was found in section 6.10. Appropriate subsections within section 6.8 should be pointed out to address this requirement.	The structure of the report has been revised and includes additional text to provide more detail and clarification. The information requested has been provided in full in Section 16.5.3 of the Application/EIS.	Section 16.5.3

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
378	5.6.5 – Potential Residual Effects and their Significance	Identify potential residual effects of the proposed Project on terrestrial flora and fauna after appropriate mitigation measures and environmental management strategies have been applied	6.8	N	BC MFLNRO	Invasive plant risk needs to be mitigated and discussion on seeding of disturbed sites, species to be chosen. Reclamation speaks to seeding as soon as possible. This is neither measurable nor enforceable. Plan is to document invasives, but identifies no preventative measures or action other than record. The report comes to the conclusion that the mine "will have significant impact on wildlife and rare plants" yet it does not speak to the livestock grazing interest in any way(FLNRO) Table with VC, Effects, Mitigation, Residual effects is not included (EAO) 6.8-109 (6.8.6.1 Terrestrial Wildlife and Vegetation Residual Effects methodology) - MFLNRO agrees with the proponent that one of the dominant effects to focal species will be habitat alteration, with a second effect being direct habitat loss (wetlands) 6.8-111 Table 6.8-32 Residual Effects to Rare Plants - MFLNRO agrees with the determination that the effect of the Project on rare plants is considered to be a significant effect. Because the proponent is unable to avoid impacts, minimize impacts, or restore on-site the Province requires offset for the residual impacts on environmental values. 6.8-113 Table 6.8-34 Residual Effects to Wetlands - MFLNRO agrees with the determination that the effect to wetlands are considered to be significant. MFLNRO disagree with the duration period being Long-term and would recommend it be changed to Permanent because of the uncertainty of the success of wetland reclamation at high elevation and the long-term timeframe to mine closure. For the same reasons MFLNRO also disagrees with the determination of the Reversibility of wetlands and recommends this be changed to Irreversible. (FLNRO)	The structure of the report has been revised and includes additional text to provide more detail and clarification. A revised and updated invasive species management plan has been provided in Section 24.17 of the Application/EIS. The addition of a table with VC, effects, mitigation and residual effects has been provided in Section 16.5.6 of the Application/EIS.	Section 24.17 and Section 16.5.6
379	5.6.5 – Potential Residual Effects and their Significance	The overall significance of residual effects will be discussed and placed into context based on an assessment of predicted magnitude, geographic extent, duration/frequency, reversibility, context and probability	6.8	Y	BC EAO	Evaluation of residual effects is not detailed enough – for example, how and why are effects on grizzly bear considered to be reversible? More detail needed in these tables (EAO)	The structure of the report has been revised and includes additional text to provide more detail and clarification. Additional detail on the evaluation of residual effects as requested has been provided in full in Section 16.5.3 of the Application/EIS.	Section 16.5.3
380	5.6.5 – Potential Residual Effects and their Significance	The overall significance of residual effects will be discussed and placed into context based on an assessment of predicted magnitude, geographic extent, duration/frequency, reversibility, context and probability	6.8	Y	BC MFLNRO	6.8-136 (Rare Plants / Wetlands) - MFLNRO agrees with the determination that the cumulative effects to rare plants and wetlands are significant. Because the proponent is unable to avoid impacts, minimize impacts, or restore on-site the Province requires offset for the residual impacts on environmental values.	Additional surveys within the ESSFwc2 have been proposed as requested to establish if additional occurrences of rare plants are found in the RSA. Details can be found in Section 24.17.	Section 24.17

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
381	5.6.5 – Potential Residual Effects and their Significance	The overall significance of residual effects will be discussed and placed into context based on an assessment of predicted magnitude, geographic extent, duration/frequency, reversibility, context and probability	6.8	Y/N	CEA Agency	Cannot evaluate without more detail. To again use the example of caribou, how the proponent has reached the conclusion that caribou have a limited presence within the LSA has not been adequately established through the preceding sections. Pieces of the rationale for this conclusion seem to be scattered throughout the document and it is not clear whether enough information is present.	The structure of the report has been revised and includes additional text to provide more detail and clarification. Additional detail on the evaluation of residual effects as requested has been provided in full in Section 16.5.3 of the Application/EIS.	Section 16.5.3
382	5.6.5 – Potential Residual Effects and their Significance	The overall significance of residual effects will be discussed and placed into context based on an assessment of predicted magnitude, geographic extent, duration/frequency, reversibility, context and probability	6.8	Y/N	CEA Agency	Discussion of significance is minimal.	The structure of the report has been revised and includes additional text to provide more detail and clarification. Additional detail on the evaluation of residual effects as requested has been provided in full in Section 16.5.4 of the Application/EIS.	Section 16.5.4
383	5.6.5 – Potential Residual Effects and their Significance	The overall significance of residual effects will be discussed and placed into context based on an assessment of predicted magnitude, geographic extent, duration/frequency, reversibility, context and probability	6.8	Y/N	CEA Agency	Some supporting info. was found in subsection 6.10. Appropriate subsections within section 6.8 should be pointed out to address this requirement.	The structure of the report has been revised and includes additional text to provide more detail and clarification. Additional detail on the evaluation of residual effects as requested has been provided in full in Section 16.5.3 of the Application/EIS.	Section 16.5.3
384	6.0 – Assessment of Potential Social and Economic Effects	Describe the socio-economic project setting and baseline characterization	7.1	N	BC MFLNRO	States that farming and grazing occur but does not describe scope and that these are large tenures that could be impacted, which could impact farm income if not mitigated. Very large focus on forestry while range interests appear to be minimal, yet these ranches support local industry as well as are the primary farm income. It also ignores the impact this will have on the marketing strategy for "alpine fed beef and lamb" (FLNRO)	The proponent has amended the chapter on potential effects to Commercial and Non-Commercial Land Use (Chapter 18) to more accurately characterize agriculture and range in the vicinity of the Project (section 18.4.3.7), and to more thoroughly assess the potential effects of the Project on these interests (sections 18.5.1 and 18.5.1.1.	18.4.3.7 18.5.1 18.5.1.1

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
385	6.1 – Project Setting and Baseline Characterization	Include a review of regional and community profiles featuring, among other things, discussion of historical development, political organization, and cultural characteristics, and an examination of recent data and trends in population, demographic characteristics, main economic activities, and labour force, employment and labour income	7.1	Y	BC MFLNRO	Sec 7.1 – The social and economic conditions have an indirect link to Crown Lands. Section appears comprehensive. I believe there is adequate property available within the communities for future growth development of residential, commercial and community services. Downplays importance of agriculture in the valley and calls them small ranches. Perhaps in 'Clearwater but a 300 head ranch is not a small ranch, that will be impacted by the mine. Ranching is an economic generator as well in the valley and this should be recognized. (FLNRO)	The proponent has amended its chapter on potential effects to Commercial and Non-Commercial Land Use (Chapter 18) to more accurately characterize agriculture and range in the vicinity of the Project (section 18.4.3.7), and to more thoroughly assess the potential effects of the Project on these interests (sections 18.5.1 and 18.5.1.1).	18.4.3.7 18.5.1 18.5.1.1
386	6.2 – Land Use	Provide an overview of existing land use in and around the Project area	7.2	Y	BC MFLNRO	7.2 – It does not appear that consideration has been given to the effect of mine development with respect to Crown Land. Document does not reflect access to Crown lands beyond the site and impacts that may have including legacy impacts related to powerline, roads etc. Information appears sufficient for forestry, agriculture and recreation land use. 7.2.3 Effects of powerline, road, camps, pits and rail load out are referenced. 7.2.3.6 and 7.2.3.7 are titled the same but are distinctly different with respect to 'registered' stakeholders and user groups of Crown Resource. Trappers and ranchers are not the same as snowmobile club. 7.2.8 Interactions matrix - Effects of powerline, road, camps, pits and rail load out are referenced. Speaks to the one sheep tenure but neglects to mention the 300 head cattle tenure over top of the mine site as a VC (FLNRO)	The proponent has amended its chapter on potential effects to Commercial and Non-Commercial Land Use (Chapter 18) to more accurately characterize all Crown land tenures, including agriculture and range in the vicinity of the Project (section 18.4.3.7) and to more thoroughly assess the potential effects of the Project on Crown tenures (section 18.5).	18.4.3.7 18.5
387	6.2 – Land Use	Include information pertaining to forestry, agriculture, and recreation land uses. Information sources from the Kamloops Land and Resource Management Plan (1995) and through ongoing consultation with local stakeholders	7.2	N	BC MFLNRO	Incorrect terminology. These are not grazing leases but grazing licences issued under the Range Act. Should mention that the ranch has developed a niche marketing strategy with alpine raised beef and the "pure" connotation that has been quite successful. Rather than saying it is 60 km north of Kamloops, why isn't it stated that it is 1 km north of Barriere, and the primary summer tenure area is on top of the mine site? There is no mention of the overlap of these tenures with the mine. (FLNRO)	The proponent has amended its chapter on potential effects to Commercial and Non-Commercial Land Use (Chapter 18) to more accurately characterize agriculture and range in the vicinity of the Project (section 18.4.3.7). The text has been modified to reflect the edits requested by FLNRO.	18.4.3.7

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
388	6.2.2 - Agriculture	Describe the status of agricultural activity within the surrounding communities	7.2	N	BC MFLNRO	Map only has RAN numbers, does not have spatial overlay of tenure areas so does not show significance of tenure. Speaks to ALR lands; these are ag land reserve lands which are classified by their potential value for agricultural land and pasture. Wording is incorrect, as they are legislated, not just bound by the LRMP. The LRMP will support retention of the ALR lands (not impacted by this mine) but more importantly it supports maintaining AUMS. There will be a net loss of AUMS with this mine on the Harp Unit, and this is not identified at all. Totally incorrect statements around the ALR and ranching that must be corrected. Sec 7.2.3.5 generally understates the significance of the impacts of this mine on the available AUMS and the AUMS that will be lost, which aren't meeting LRMP objectives (over 1000 AUMS or 300 c/c pairs). This is not stated in this section in any way. Regardless of whether FLNRO is able to move the AUMS there is a net loss of AUMS as a result of this mine. If the mine approval/implementation is delayed beyond this year there may be no opportunity to relocate these AUMS as a vacancy may be advertised and reallocated in the interim. MFLNRO still needs to know that at closure there will be a range to pasture cattle on and this issue is not addressed. It is not up to MFLNRO to just relocate this tenure. FLNRO communication with the proponent had a funding commitment to address salvaging at least a portion of this range and putting improvements in place. This is not clearly committed to in this document and this section is very very non committal and undermining the impacts we see. 7.2 speaks to the minor amount of agriculture and impacts, when the primary range of the tenure holder will be rendered unusable, yet this is not stated and should be. There is mention in section 10 re an agreement with the existing tenure holder but it is not included. This is not a small magnitude to the tenure holder and his business of ranching. It also assumes that after closure that the mine footprint is minor and only reclamation is required. There may be other activities that need to occur beyond revegetation such as access control etc to allow for continued livestock grazing to occur. There is also no well defined commitment to fund and implement improvements such that a smaller tenure area west of the mine can be made feasible…. (FLNRO)	The proponent has amended its chapter on potential effects to Commercial and Non-Commercial Land Use (Chapter 18) to more accurately characterize agriculture and range in the vicinity of the Project (section 18.4.3.7), and to more thoroughly assess the potential effects of the Project on these interests (sections 18.5.1 and 18.5.1.1).	18.4.3.7 18.5.1 18.5.1.1
389	6.2.3 – Recreational Land Use	Conduct Visual Quality Assessments for this purpose from strategic viewpoints	7.2	N		No comments	N/A	--
390	6.3 – Water Use	Provide an overview of existing water use in and around the Project area	7.2	N	BC MFLNRO	Did not comment on groundwater wells and potential effects on water quality/ quantity. Surface and groundwater are inherently connected. Most groundwater wells are not registered/ tracked. No comment on licenced sources and supply (Jones Creek Possible water shortage (PWS) restriction and Avery Creek Refused No Water (RNW) and Fully Recorded (FR) restrictions) (FLNRO)	The proponent has amended its chapter on potential effects to Commercial and Non-Commercial Land Use (Chapter 18) to more accurately characterize water use and water licenses in the vicinity of the Project (section 18.4.3.8), and to more thoroughly assess the potential changes in water quantity on the users of these wells and licenses (sections 18.5.1 and 18.5.1.1). Effects of the Project on groundwater and groundwater wells are assessed in Chapter 11 (Groundwater) and, with regards to drinking water quality, in Chapter 21 (Human Health).	18.4.3.8 18.5.1 18.5.1.1 Chapter 11 Chapter 21

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391	6.3.2 – Water Licenses	Outline known existing water licenses on streams located within and near the proposed Project area	7.2	Y	BC MFLNRO	Note this data is subject to change at any time (table is outdated) (FLNRO)	The proponent thanks FLNRO for this comment and this statement has been added to section 18.4.2 of Chapter 18.	18.4.2
392	6.4 – Project Effects, Mitigation Requirements, and Residual Effects	Include the rationale for inclusion of socio-economic VCs, the measurement of social and economic effects, the design of mitigation and enhancement measures (for negative and positive effects, respectively), the characterization of residual effects and their significance, and the manner in which cumulative effects will be assessed	7.1	N	BC MFLNRO	Not enough information to assess economic losses, and possible mitigation, with regard to forestry and agriculture (grazing). Quantifying any reductions in allowable annual cut and AUM's would be helpful. Socio-economic impact of disruption to Harper Creek water monitoring station and historical data links should also be considered. (replacement in surrogate watershed?) (FLNRO)	The proponent has amended its chapter on potential effects to Commercial and Non-Commercial Land Use (Chapter 18) to more thoroughly assess the potential effects of the Project on economic loss to forestry and agriculture operations (section 18.5.1.1).	18.5.1.1
393	7.2.2 – Baseline Conditions	Include results of an Archaeological Overview Assessment (AOA), and a site specific Archaeological Impact Assessment (AIA) which will be completed with the assistance of local First Nations communities	8.2, Appendix S	Y	BC EAO	Comment on section 8.2.2.2 – See letter of April 4, 2013 from Archaeology Branch to EAO.	The April 4, 2013 letter from the Archaeology Branch was referenced in Section 20.5.1.1 and the mitigations in Section 20.5.2.1 follow the same logic as is outlined in the letter.	20.5.1.1 and 20.5.2.1
394	8.1 – Background	Include an introduction, methodology and a summary of existing baseline conditions	7, 9	Y/N	HC	To determine whether potential bioaccumulation of trace metals has occurred in the project area, only those species that feed in the local study area (e.g. small mammals and fish) were sampled for baseline tissue concentrations (p. 9-2). Large mammals were not sampled due to the rationale that the home ranges of these species are not confined to the affected project area. This justification is more appropriate for effects assessment rather than for baseline studies, given that these species may be found in the regional study area, and that First Nations regularly hunt large game in the area (as noted in the Traditional Land Use Study – Appendix U). As such, HC advises that species such as deer, moose, elk and caribou also be sampled (if possible) to more accurately represent the country foods that are being consumed by First Nations. The possibility of obtaining opportunistic large mammal tissue samples from First Nations or other hunters is encouraged.	The country foods baseline report includes measured tissue metal concentrations for small mammals, berries, and fish (Bull Trout and Rainbow Trout). Due to the difficulty in obtaining sufficient tissue samples of larger species, tissue metal concentrations in other country food species (moose, snowshoe hare, and grouse) were calculated with a food chain model, as recommended by Health Canada, by using metal concentrations in environmental media (surface water, soil, and vegetation). The country foods baseline assessment predicted no unacceptable health risks to people from consuming moose, snowshoe hare, grouse, fish (Rainbow and Bull Trout), and berries under the existing pre-Project conditions. Thus consumption of these country foods at the quantities and frequencies used in the assessment would be considered safe and would not adversely affect human health.	Chapter 21, Section 21.4.2.2 and 21.4.3.2; Appendix 21-A

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395	8.1 – Background	Include a section that discusses potential effects and recommended mitigation measures, potential residual effects and their significance	7, 9	Y/N	HC	The proposed mitigation measures provided in Table 9.6-2 (p. 9-31) don't provide sufficient detail and/or do not capture all mitigation measures that may need to be considered by the Proponent (i.e. future country foods consumption advisories), as may be applicable.	Mitigation measures are discussed in detail in the human health effects assessment. However, no unacceptable risks to country foods consumers were identified in the Human Health Risk Assessment (HHRA), thus consumption advisories are not required. Mitigation measures proposed to protect environmental quality (i.e., air quality, water quality) will also serve to minimize potential effects to the quality of country foods, and these are noted in Section 21.5.2.2	21.5.2.2
396	8.3.1 – Introduction	Summarize existing air quality, noise, country foods, groundwater, and surface water quality conditions associated with the proposed Project in reference to human health	9.2	Y/N	HC	The focus of the discussion of baseline conditions appears to be on ecosystem or environmental impacts rather than human health. For example, WQ guidelines for some elements in groundwater are reported to exceed drinking water guideline objectives. However, for those objectives that are not health-based, the potential human health implications of these exceedances are not discussed.	The effects of the various environmental media metal concentrations on human health were calculated: 1) Baseline drinking water quality was compared to the BC and Canadian drinking water quality guidelines (DWQGs). Only one exceedance of the DWQGs occurred under baseline conditions and this was for mercury. Human health is not likely to be negatively affected by baseline drinking water quality due to this one exceedance of the BC mercury guideline since the exceedance is very small, the exceedance only occurred once at one site, and thus can be considered an anomaly. Drinking water quality guidelines that are not health based (i.e,. aesthetic objectives) would not be expected to cause health effects in consumers of drinking water. This is because the guideline is intended to prevent staining of fixtures, taste/odor issues, or other aesthetic issues. 2) A baseline country foods risk assessment was conducted and hazard quotients were calculated to assess human health effects. As described above, there were no unacceptable health risks to people from consuming country foods under pre-Project conditions. 3) Baseline air quality monitoring was focused on dustfall; background concentrations of criteria air contaminants were not measured but were assumed to be low and representative of a rural area (as per BC MOE recommendation). 4) Baseline noise monitoring was conducted. Natural background noise sources observed included birds, small mammals, wind, and rain. Anthropogenic noise sources observed included aircraft (helicopters and fixed wing), road vehicles, trains, and general human activity. Baseline noise levels were within the range expected for a rural area and would not negatively affect human health.	21.4, Appendix 21-A

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
397	8.3.1 – Introduction	Describe the human environment and include a map depicting the proximity of people to mining activities such as to the rail loadout facility and mine access roads	9.1	Y/N	HC	The locations of temporary human receptors (i.e. overnight cabins, seasonal fishing and hunting camps etc.) are not shown on any figures on which human locations are identified or on which human health effects are assessed (i.e. air, noise, etc.). HC notes that the Traditional Land Use & Ecological Knowledge Study (Appendix U) identifies the locations of 20 traditional use sites in the local study area (pp. 52-53). Health Canada advises that these sites are important for exposure assessment and should be carried forward and considered in the human health effects assessment such that potential impacts to all human receptors (not just communities) in the Project area can be more fully understood.	Within the human health regional study area, 488 temporary and permanent human receptors have been identified and their locations are depicted on a map (Figure 21.3-1). The receptors include cabins, campgrounds, towns, surface water licences, ground water licences and wells, tourism/recreation sites, snowmobile pullout areas, First Nations reserves, and the on-site worker camp.	21.3, Figure 21.3-1.
398	8.3.2 – Drinking Water Quality	Focus on the quality of drinking water within the Project area and end users that could potentially be impacted by the Project	9.2	Y/N	HC	The EIS contains no identification of community drinking water treatment facilities (i.e. for Vavenby, Birch Island, Clearwater) if applicable, that may be affected by Project related changes to drinking water quality. As well, the Human Health and Ecological Risk Assessment – Baseline Technical Date Report (Appendix T) acknowledges that: "If traditional land use information reveals the presence of specific locations where people drink surface waters, further water quality sampling may be required in order to evaluate human health risks from drinking water at these locations" (p. 15). Additional information may therefore be required to understand potential project related changes to drinking water quality. **Note: The figures provided in Appendix T are of low quality and are difficult to read (e.g. Figure 4).	Groundwater and surface water extraction points for drinking water (by individuals, communities, and businesses) were identified and included as human health receptors for the assessment of drinking water quality (see Figure 21.3-1). There were no specific sites identified as locations where people drink surface waters; however, surface water quality was assessed on a regional basis in case land users consume surface water anywhere in the regional study area for human health.	Chapter 21, Sections 21.3, 21.4.2.3, 21.4.3.3, 21.5.1.3, 21.5.2.3, and 21.5.3.3
399	8.3.2 – Drinking Water Quality	Focus on the quality of drinking water within the Project area and end users that could potentially be impacted by the Project	9.2	N	BC MFLNRO	There is discussion of water quality relative to drinking water standards but no discussion of end users that could be potentially impacted. (MOE)This section includes a brief discussion of groundwater quality. Additional groundwater quality information with respect to provincial drinking water quality guidelines is provided in Section 6.6 (FLNRO)	Predicted surface and groundwater metal concentrations were compared to relevant drinking water quality guidelines. This included assessment of 448 drinking water-related human receptor locations within the human health regional study area.	Chapter 21, Sections 21.3,21.4.2.3, 21.4.3.3, 21.5.1.3, 21.5.2.3, and 21.5.3.3
400	8.3.2 – Drinking Water Quality	Complete an assessment of water intakes, including existing groundwater wells used for drinking water, within and near the Project site. Report results in the Application	9.2	Y/N	HC	See comment above	See comment above	Chapter 21, Sections 21.3, 21.4.2.3, 21.4.3.3, 21.5.1.3, 21.5.2.3, and 21.5.3.3
401	8.3.2 – Drinking Water Quality	Complete an assessment of water intakes, including existing groundwater wells used for drinking water, within and near the Project site. Report results in the Application	9.2	N	BC MFLNRO	No information on intakes or existing wells. Outside of study area perhaps? (FLNRO) No assessment (or listing) of water intakes or existing groundwater wells used for drinking water… perhaps there are none??? Then report should say so. (MOE) No information for wells downgradient of the project site is provided in this section (FLNRO)	There were 227 groundwater extraction points and wells for drinking water (by individuals, communities, and businesses) identified and included as human health receptors for the assessment of drinking water quality within the regional study area for human health. The locations are depicted on a map (Figure 21.3-1).	Chapter 21, Sections 21.3, Figure 21.3-1, 21.4.2.3, 21.4.3.3, 21.5.1.3, 21.5.2.3, and 21.5.3.3

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402	8.3.2 – Drinking Water Quality	Aim to identify intake sources that may potentially be impacted by the Project and would review items such as provincial databases and local records, and provide maps that depict the identified extraction points and sensitive areas	7.2	Y/N	HC	See comment above	See comment above	Chapter 21, Sections 21.3, Figure 21.3-1, 21.4.2.3, 21.4.3.3, 21.5.1.3, 21.5.2.3, and 21.5.3.3
403	8.3.2 – Drinking Water Quality	Aim to identify intake sources that may potentially be impacted by the Project and would review items such as provincial databases and local records, and provide maps that depict the identified extraction points and sensitive areas	7.2	N	BC MFLNRO, BC MOE	No maps provided (FLNRO) I don't see a list of water intake sources/extraction points or a map showing their locations.(MOE)	Groundwater and surface water extraction points for drinking water (by individuals, communities, and businesses) were identified and included as human health receptors for the assessment of drinking water quality. There were no specific sites identified as locations where people drink surface waters; however, surface water quality was assessed on a regional basis in case land users consume surface water anywhere in the regional study area for human health. The locations are depicted on a map (Figure 21.3-1).	Chapter 21, Sections 21.3, Figure 21.3-1, 21.4.2.3, 21.4.3.3, 21.5.1.3, 21.5.2.3, and 21.5.3.3
404	8.3.2 – Drinking Water Quality	Include information pertaining to water licences within and near the Project area in the "Water Use" section under "Assessment of Potential Social and Economic Effects". If mitigation measures are required, they will be detailed in Section 3.8.5.	7.2	N	BC MFLNRO	Note this data is subject to change at any time (table is outdated) Referenced section is 8.3.5 (FLNRO)	See comment above. Mitigation measures are also discussed.	See sections listed above. Mitigation can be found in section 21.5.2
405	8.3.3 – Noise	Detail the rationale, methodology, and results of site specific assessments	6.3	Y/N	CEA Agency	Noise baseline and impact assessments do not appear to consider temporary and seasonal human receptors, e.g. First Nations peoples	The noise baseline monitored noise at three stations that were selected to characterize the range of baseline conditions in the region. The noise effects assessment included all human receptors identified to be within the noise regional study area, which included 66 human receptors: snowmobile pullout areas, cabins, surface water licences (due to associations with houses), towns, groundwater wells (due to the association with houses), and tourism facilities.	Chapter 21, Sections 21.3, 21.4.2.4, 21.4.3.4, 21.5.1.4, 21.5.2.4, 21.5.3.4

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406	8.3.3 – Noise	Assess modeled noise and predicted vibration levels in accordance with Environment Canada (2010)	6.3	Y/N	CEA Agency	The reference "Environment Canada (2010)" does not appear to be the most suitable primary guidance for assessing modeled noise and vibration levels.	Noise was assessed using a variety of internationally recognized standards for noise: World Health Organization (WHO) Guidelines for Community Noise (1999); Health Canada's Useful Information for Environmental Assessments (Section 6: Noise Effects [2010]); US Environmental Protection Agency's Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (1974); US Federal Transit Administration's Transit Noise and Vibration Impact Assessment (Harris Miller Miller Hanson Inc. 2006).	Chapter 21, Sections 21.2.4 21.5.1.4, 21.5.2.4, 21.5.3.4, 21.5.4.4, and 21.5.5.4
407	8.3.3 – Noise	Conduct the assessment of noise baseline and Project effects according to Health Canada (2011) and ISO (1996)	6.3	Y/N	HC	The EIS identifies human receptors for noise including the owners of the nearest residences to the Project, and residents of the communities of Vavenby and Birch Island. The EIS does not discuss the locations/proximity of temporary residents in the area (ie. First Nations camps, tourism organizations/companies, guide/outfitters etc.) or how these may be affected by project related noise increases. However the EIS (pg. 11-127) states that during the dAIR review, First Nations raised concerns about the noise/vibration effects of blasting. As such, HC advises that that potential noise impacts to temporary First Nations receptors in the project area be addressed.	The noise effects assessment included all human receptors identified to be within the noise regional study area, which included 66 human receptors: snowmobile pullout areas, cabins, surface water licences (due to associations with houses), towns, groundwater wells (due to the association with houses), and tourism facilities.	Chapter 21, Sections 21.5.1.4, 21.5.2.4, 21.5.3.4, 21.5.4.4, and 21.5.5.4
408	8.3.4 – Country Foods	Discuss the local land use within and near the Project footprint in the context of "country foods"	7.2, 9, 11	Y/N	HC	Information on small mammals and game wildlife has not been provided in Section 9.	The country foods baseline report includes measured tissue metal concentrations for small mammals. Due to the difficulty in obtaining sufficient tissue samples of large game species, tissue metal concentrations in moose were calculated with a food chain model, as recommended by Health Canada by using metal concentrations in environmental media (surface water, soil, and vegetation). The country foods baseline assessment predicted no unacceptable health risks to people from consuming moose under the existing pre-Project conditions. Thus consumption of these country foods at the quantities and frequencies used in the assessment would be considered safe and would not adversely affect human health.	Chapter 21, Sections 21.4.2.2 and 21.4.3.2; Appendix 21-A
409	8.3.4 – Country Foods	Discuss the local land use within and near the Project footprint in the context of "country foods"	7.2, 9, 11	Y/N	HC	Hunting and trapping information has not been provided in Section 11.	Hunting and trapping is included in the baseline and effects assessment of country foods.	Chapter 21, Sections 21.4.2.2, 21.4.3.2, 21.5.1.2, 21.5.2.2, 21.5.3.2, 21.5.4.2, and 21.5.5.2; Appendix 21-A

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
410	8.3.4 – Country Foods	Include hunting, angling, trap lines, and farming that may be affected by Project activities	7.2	N	BC MFLNRO	Little recognition of the impacts to the loss of tenure for livestock grazing on this area and the impact that has on the tenure and ability to continue, or on the need to shrink the tenure area west of the mine and the impact the mine will have and need to mitigate with improvements to manage livestock (FLNRO)	The proponent has amended its chapter on potential effects to Commercial and Non-Commercial Land Use (Chapter 18) to more accurately characterize agriculture and range in the vicinity of the Project (Section 18.4.3.7), and to more thoroughly assess the potential effects of the Project on these interests (Sections 18.5.1 and 18.5.1.1).	18.4.3.6 18.5.1 18.5.1.1
411	8.3.4 – Country Foods	Assess the human health risks due to consumption of contaminated country foods (wild game, fish, berries, plants, etc.) according to the tiered risk assessment methodology presented in Chapter 8 of Health Canada (2004)	9.3	Y/N	HC	See comments below regarding the HHERA.	See comment below	See sections listed below
412	8.3.4 – Country Foods	Conduct the review of any relevant government data (i.e. hunting statistics) and surveys of the local population to identify country food use in the Human Health Local and Regional Study Areas	7.1, 7.2	Y/N	HC	The human health and ecological risk assessment (HHERA) acknowledges that use of some traditional land use information to identify vegetation species that may be used by local community members, however the selection of wildlife (fish, small mammals and large game) for tissue analysis does not appear to have been made on the basis of country foods that are consumed (e.g. as indicated by country foods surveys). Please note that the EISg states that the Proponent will review "…any relevant government data (i.e. hunting statistics) and surveys of the local population will be conducted to identify country food use…" (EISG, pg. 46).	The Project is located within the asserted traditional territories of the Simpcw First Nation, and the Lakes Division Secwepemc (represented by the Adams Lake Indian Band and Neskonlith Indian Band). Although historical and current harvest of country foods for traditional purposes within the human health local and regional study areas has been noted for the Simpcw First Nation (2012. *Traditional Land Use and Ecological Knowledge Study Regarding the Proposed Yellowhead Mining Inc. Harper Creek Mine*), no information on the serving sizes or consumption frequencies is available. Information on country foods use by the Lakes Division Secwepemc was unavailable at the time of writing. Thus the selection of country foods for evaluation was based on findings presented in the *First Nations Food Nutrition & Environment Study* (Chan et al. 2011). Human receptor consumption characteristics (country food intake amounts, frequencies and country food species) for the Simpcw FN and the Lakes Division Secwepemc were obtained from the *First Nations Food Nutrition & Environment Study* (Chan et al. 2011). Hunting statistics for the area were reviewed; however, the statistics do not indicate if the species were hunted for consumption, fur, or trophies, thus the data could not be used for the selection of country food species.	Chapter 21, Section 21.4.2.2 and 21.4.3.2; Appendix 21-A

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413	8.3.4 – Country Foods	Conduct the review of any relevant government data (i.e. hunting statistics) and surveys of the local population to identify country food use in the Human Health Local and Regional Study Areas	7.1, 7.3	Y/N	HC	NOTE: The HHERA (Appendix T, pg. 38) concludes that there are "elevated levels for Cadmium, Mercury, and Arsenic in small mammals and some fish and vegetation samples, indicat[ing] that mitigation measures and monitoring will be recommended to reduce human health and ecological risk…", and yet no country foods monitoring has been proposed in this section. In addition to completing a defensible HHRA during the EA of this Project, HC advises that the Proponent provide a description of country foods monitoring plans and/or follow-up programs (consideration for Section 10.2).	The country foods baseline report includes measured tissue metal concentrations for small mammals, berries, and fish (Bull Trout and Rainbow Trout). Due to the difficulty in obtaining sufficient tissue samples of larger species, tissue metal concentrations in other country food species (moose, snowshoe hare, and grouse) were calculated with a food chain model, as recommended by Health Canada by using metal concentrations in environmental media (surface water, soil, and vegetation). The country foods baseline assessment predicted no unacceptable health risks to people from consuming moose, snowshoe hare, grouse, fish (Rainbow and Bull Trout), and berries under the existing pre-Project conditions. Thus consumption of these country foods at the quantities and frequencies used in the assessment would be considered safe and would not adversely affect human health. Mitigation measures are discussed in detail in the human health effects assessment. However, no unacceptable risks to country foods consumers were identified in the HHRA, thus consumption advisories are not required. Mitigation measures proposed to protect environmental quality (i.e., air quality, water quality) will also serve to minimize potential effects to the quality of country foods. Monitoring plans for water, soil, vegetation, and fish have been designed such that future potential risks to country foods can be evaluated.	Chapter 21, Sections 21.4.2.2, 21.4.3.2, 21.5.1.2, 21.5.2.2, 21.5.3.2, 21.5.4.2, 21.5.5., and 21.6.2.2; Appendix 21-A

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
414	8.3.5 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential human health risks related to predicted Project induced effects to audible noise, air quality, country foods, and drinking water quality	9.1	Y/N	HC	Health Canada considers the human health risk assessment (HHRA) contained within the Human Health and Ecological Risk Assessment – Baseline Technical Data Report (Appendix T) to be incomplete and/or lacking in sufficient documentation to allow a critical review of the potential impacts of the project on human health. The HHERA states that: "Potential health effects will be identified from the risk characterization process... This process assesses the potential for each metal concentration to cause adverse effects to each receptor of concern, based on the resultant HQ [hazard quotients] produced" (Appendix T, pg. 19). And yet, the HHERA provides an incomplete exposure assessment, and conducts no actual risk characterization, which includes: identifying potential human receptors (i.e. country foods consumers), identifying the amount and frequency of exposure to environmental media (i.e. consumption of country foods), and ultimately calculating a resultant HQ for each metal of potential concern. Please note that the Proponent's comparison of baseline country foods metals concentrations to Canadian Food Inspection Agency guidelines for contaminants in retail/commercial foods is not appropriate as a screening tool for assessing the risks to First Nation consumers of country foods. Notwithstanding the omissions and inappropriate guidelines noted above, the HHERA concludes that there are "elevated levels for Cadmium, Mercury, and Arsenic in small mammals and some fish and vegetation samples, indicating] that mitigation measures and monitoring will be recommended to reduce human health and ecological risk…" (pg. 38). The HHERA as presented is incomplete from HC's perspective, and precludes an understanding of both current and future risks to human health from exposure to elevated metals in country foods and other environmental media. HC advises that the Proponent complete a defensible, fully documented HHRA – one which includes a baseline risk characterization, a risk characterization of the possible impacts from project activities, and possible risk management strategies, if appropriate.	See comment above	Chapter 21, Sections 21.3, 21.4, 21.5, 21.6; Appendix 21-A
415	8.3.5 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential human health risks related to predicted Project induced effects to audible noise, air quality, country foods, and drinking water quality	9.1	Y/N	HC	Insufficient information may have been provided regarding potential human health impacts from project related changes to drinking water and air quality – particularly since temporary human receptors (i.e. First Nations use areas) have not been identified in the Project area.	Within the human health regional study area, 488 temporary and permanent human receptors have been identified and their locations are depicted on a map (Figure 21.3-1). The receptors include cabins, campgrounds, towns, surface water licences, ground water licences and wells, tourism/recreation sites, snowmobile pullout areas, First Nations reserves, and the on-site worker camp).	21.3 21.4 21.5
416	8.3.5 – Assessment of Potential Effects and Proposed Mitigation	Identify and evaluate potential human health risks related to predicted Project induced effects to audible noise, air quality, country foods, and drinking water quality	9.1	Y	BC MFLNRO	Groundwater quality included in risk analysis (FLNRO)	Groundwater quality has been incorporated into the Human Health Effects Assessment (Chapter 21) as one of the potential sources of drinking water. Groundwater quality has been considered for both existing conditions and potential effects, as it relates to human health.	Chapter 11, Sections 11.4.1.5 and Appendix 11-A; Chapter 21, Sections 21.4.2.3 and 21.4.3.3 (baseline); and Sections 21.5.1.3, 21.5.2.3, and 21.5.3.3 (Project effects)

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
417	8.3.5 – Assessment of Potential Effects and Proposed Mitigation	Evaluate other potential human health risks as appropriate and may include information such as perceived risk of consuming fish and wildlife located within and/or adjacent to the Project area	9.1, 9.3	N	HC	This does not appear to have been addressed in the EIS.	Air quality, country foods quality, drinking water quality, and noise have been assessed in the human health effects assessment. Other risks were considered but were scoped out as discussed in the chapter. The perceived risk of consuming country foods is also discussed in the chapter.	Chapter 21, 21.4, 21.5, 21.6; Appendix 21-A; Section 21.5.2.2 (perceived risk)
418	8.3.5 – Assessment of Potential Effects and Proposed Mitigation	Identify and describe appropriate mitigation measures and environmental management strategies to avoid, minimize, or mitigate potential adverse effects on human health during proposed Project construction, operations, and decommissioning	9.4	Y/N	HC	As mentioned previously for Table 9.6-2 (p. 9-31), the mitigation measures provided in Table 9.4-1 (p. 9-23) do not contain sufficient detail and/or capture all mitigation measures that may need to be considered by the Proponent (i.e. country foods consumption advisories), as may be applicable.	Detailed mitigation measures are presented in other chapters (air, noise, water quality), and in the human health chapter if applicable to human health issues. Mitigation measures proposed to protect other VCs (e.g., air quality, water quality, fish, wildlife, etc) are useful to mitigate effects to country foods.	Chapter 21, Section 21.5.2
419	8.3.5 – Assessment of Potential Effects and Proposed Mitigation	Identify and describe appropriate mitigation measures and environmental management strategies to avoid, minimize, or mitigate potential adverse effects on human health during proposed Project construction, operations, and decommissioning	9.4	Y/N	BC MFLNRO	Mitigation measures not defined according to project phases (EAO).Mitigation for groundwater used for drinking water included in summary table (FLNRO)	See comment above	Chapter 21, Section 21.5.2
420	8.3.5 – Assessment of Potential Effects and Proposed Mitigation	May include measures for ongoing communications with the public regarding potential public health risks	9	Y/N	HC	This has not been specifically discussed/committed to in relation to potential human health risks.	Mitigation measures for human health are discussed in detail in the human health effects assessment.	Chapter 21, Section 21.5.2
421	8.3.6 – Potential Residual Effects and their Significance	Identify and describe potential residual effects following implementation of mitigation measures and management strategies	9.5	Y/N	HC	This section consists of a Table which identified, but did not describe potential residual effects	All potential human health residual effects following implementation of mitigation measures and management strategies have been described.	Chapter 21, Section 21.5.3
422	8.4 – Summary of Assessment of Potential Health Effects	Include a table summarizing completed assessments of potential effects to valued health components	9.6	Y	HC	Table 9.6-1 summarizes the assessments of potential effects to valued health components. However, a more issue-specific discussion of the rationales for the conclusions would be desirable	Potential residual and cumulative effects to the human health VC and sub-components (air quality, drinking water quality, country foods quality, and noise) have been described in an issue-specific manner with rationale for the conclusions provided.	Chapter 21, Sections 21.5.3 and 21.6

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423	9.0 – Cumulative Effects Assessment	Outline other existing, confirmed future and reasonably foreseeable projects/activities within the regional study area	5.8	N	BC MFLNRO	Consideration of existing, and planned, major resort developments should probably be considered in cumulative effects (impacts to Caribou, Grizzly, Simpcw rights) *probably outside of RSA as described. (FLNRO)	The information requested has been provided in Section 8.7.1.3 of the Application/EIS.	8.7.1.3
424	9.0 – Cumulative Effects Assessment	Outline other existing, confirmed future and reasonably foreseeable projects/activities within the regional study area	5.8	N	BC MOE	Hunting and trapping activity is not quantified in any meaningful way. (EAO)	The information requested has been provided in Section 8.7.1.3 of the Application/EIS.	8.7.1.3
425	9.0 – Cumulative Effects Assessment	Discussion of the effect of other projects and activities on components	6, 7, 8, 9	Y	BC EAO	In 6.8 description of other projects/activities and contributions to cumulative effects on focal species is weak (EAO).	The assessment methodology chapter underwent significant changes to address reviewers' concerns; this section has been removed from the Application/EIS. The information requested has been provided respectively in Section X.6.2 of each assessment chapter of the Application/EIS.	X.6.2
426	10.0 – Summary of Proposed Environmental and Operational Management Plans	Provide an overview of HCMC's Environmental Management System (EMS) for the proposed Project	10.1	Y	CEA Agency	Info. also provided in subsection 2.2.10.	The EMS for the Project is described in Section 2.4.1 of the Application/EIS.	24.1
427	10.0 – Summary of Proposed Environmental and Operational Management Plans	Include the organizational structure, planning activities, staff responsibilities, practices, procedures, and resources for developing, implementing, reviewing, and maintaining environmental policies associated with the Project	10.1	Y	CEA Agency	Info. also provided in subsection 2.2.10.	Chapter 24 provides the EMS for the Project, as well as an array of 18 subject area-specific EMPs.	Chapter 24, Sections 1 to 19
428	10.0 – Summary of Proposed Environmental and Operational Management Plans	Include the organizational structure, planning activities, staff responsibilities, practices, procedures, and resources for developing, implementing, reviewing, and maintaining environmental policies associated with the Project	10.1	N	BC MFLNRO	See comments re invasives and weak language in this proposal (FLNRO)	Chapter 24 provides the EMS for the Project, as well as an array of 18 subject area-specific EMPs. Invasive vegetation management is addressed in the Vegetation Management Plan (24.17).	Chapter 24, Sections 1 to 19 24.17

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429	10.0 – Summary of Proposed Environmental and Operational Management Plans	Provide a consistent approach to environmental management through resource allocation, the assignment of responsibilities, and ongoing evaluation of environmental practices, procedures, and processes	10	Y	CEA Agency	Info. also provided in subsection 2.2.10.	Chapter 24 provides the EMS for the Project, as well as an array of 18 subject area-specific EMPs.	Chapter 24, Sections 1 to 19
430	10.0 – Summary of Proposed Environmental and Operational Management Plans	Provide a consistent approach to environmental management through resource allocation, the assignment of responsibilities, and ongoing evaluation of environmental practices, procedures, and processes	10	Y	CEA Agency	Procurement practices should be included.	A commitment to procurement practices appears in the Proponent's environmental policy. See reference to EMS in adjacent column.	24.1.5
431	10.0 – Summary of Proposed Environmental and Operational Management Plans	Develop various Environmental Management Plans (EMPs) to address environmental and operational concerns in a consistent manner in the Application	10	Y	CEA Agency	Info. also provided in subsection 2.2.10.	See reference to EMPs in adjacent column.	24.1 to 24.19
432	10.0 – Summary of Proposed Environmental and Operational Management Plans	Develop various Environmental Management Plans (EMPs) to address environmental and operational concerns in a consistent manner in the Application	10	Y/N	BC MOE	See comments under 2.2.10 (MOE)	See reference to EMPs in adjacent column.	24.1 to 24.19
433	10.0 – Summary of Proposed Environmental and Operational Management Plans	Detail the environmental practices and procedures to be applied, as appropriate, during the construction, operations, maintenance, and closure of the Project, and where relevant, decommissioning	10	Y/N	CEA Agency	Info. also provided in subsection 2.2.10.	Chapter 24 contains the EMPs that will implement mitigation and monitoring strategies during various Project phases. Chapter 7, Closure and Reclamation, also summarizes the reclamation strategy for the Project Site and footprint. More detailed EMPs and the Closure and Reclamation Plan will be developed during the permitting phase.	24.1 to 24.19 7.3
434	10.0 – Summary of Proposed Environmental and Operational Management Plans	Detail the environmental practices and procedures to be applied, as appropriate, during the construction, operations, maintenance, and closure of the Project, and where relevant, decommissioning	10	Y/N	CEA Agency	Need more details on closure/decommissioning phase.	Chapter 7, Closure and Reclamation, provides the current details of the decommissioning approach for the project.	7.1 to 7.12

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435	10.0 – Summary of Proposed Environmental and Operational Management Plans	Detail the environmental practices and procedures to be applied, as appropriate, during the construction, operations, maintenance, and closure of the Project, and where relevant, decommissioning	10	N	BC MFLNRO, BC MOE	See section 10 comments re invasive plant management strategies (FLNRO) See comments under 2.2.10 (MOE)	Chapter 24 contains the EMPs that will implement mitigation and monitoring strategies during various Project phases. A Vegetation Management Plan specifically addresses invasive plants.	24.17
436	10.0 – Summary of Proposed Environmental and Operational Management Plans	Soil salvage and storage	2.9, 2.12, 10.8	Y	CEA Agency	Info. also provided in section 10.4.	Information on soil salvage and storage is provided in the Soil Salvage and Storage Plan (Section 24.14)	Section 24.14
437	10.0 – Summary of Proposed Environmental and Operational Management Plans	Soil salvage and storage	2.9, 2.12, 10.8	N	BC MFLNRO	Application appears to address quantity of soils stored (Soils Balance), but not enough information to assess soil quality. Soil classification, plans for separation of surface horizons (developed soils) would be useful in assessing potential success in reclamation. Table 10.4.7 makes a reference to "organic – rich" component. (FLNRO)	Soil quality is described in the Terrain and Soil Baseline Report (Appendix 5-B, Section 4.3: Table 4.3-5 and 4.3.2.3 SMU details, and Section 4.4: 4.4.1 Soil Physical and Chemical Characteristics).	EA - Appendix 5-B
438	10.0 – Summary of Proposed Environmental and Operational Management Plans	Soil salvage and storage	2.9, 2.12, 10.8	N	BC MOE	Primarily focused on TMF dam failure, not routine TMF operations. Not sure if more was intended at this stage??? (drainage diversion, seepage recovery, foundation sealing, dam construction, spiggotting, cycloning, dust control, wave action erosion control, etc.) (MOE)	It is not clear to which section of the EA this comment pertains. Information on TMF management is provided in the Project Description (Chapter 5). Information on soil salvage and storage is provided in the Soil Salvage and Storage Plan.	5.8.2 24.14
439	10.0 – Summary of Proposed Environmental and Operational Management Plans	Air quality and dust control plan	10.2	Y/N	HC	The Air Quality Management Plan indicates that monitoring will focus on suspended particulate matter (TSP, PM 10, PM2.5), and yet the proposed particulate monitoring program appears to rely solely on "visual monitoring" to "provide feedback to modify the dust and air quality management procedures" (p. 10-7). It is not clear how this type of (non-quantitative) monitoring would provide any reliable information on which to adjust procedures that could improve air quality.	The proponent has revised the Air Quality Management Plan to include quantitative monitoring. The information has been provided in Section 24.2.4 of the Application/EIS.	24.2.4
440	10.0 – Summary of Proposed Environmental and Operational Management Plans	Air quality and dust control plan	10.2	Y/N	HC	For the Fugitive Dust Management plan, it is suggested that the Proponent adhere to the BC Open Burning Smoke Control Regulation when vegetation is being cleared from construction areas, as applicable.	The proponent has revised the Air Quality Management Plan to include the BC Open Burning Smoke Control Regulation. The information has been provided in Section 24.2.3 of the Application/EIS.	24.2.3

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441	10.0 – Summary of Proposed Environmental and Operational Management Plans	Air quality and dust control plan	10.2	Y	BC MOE	A dust monitoring plan is described; however, the plan uses only visual observation of dusting episodes as a trigger to management activities. It is the intention of the Ministry of Environment to require a more comprehensive monitoring program. In our experience, this is most effectively accomplished after the mine begin operations as the first phase of any dust monitoring and mitigation plan is to determine which sources, if any, were of concern. At a minimum the Ministry of Environment would require the collection of dustfall to continue for a period during construction and after operations begin. (MOE)	The proponent has revised the Air Quality Management Plan to include quantitative monitoring. The information has been provided in Section 24.2.4 of the Application/EIS.	24.2.4
442	10.0 – Summary of Proposed Environmental and Operational Management Plans	Noise management plan	10.3	Y	HC	Noise monitoring may be advisable depending on the locations and proximity of temporary human receptors to the Project site, as well as the proximity of sensitive human receptors along the routes that haul trucks will take.	The Noise Management Plan makes reference to monitoring. The information has been provided in Section 24.10.4 of the Application/EIS.	24.10.4.1
443	10.0 – Summary of Proposed Environmental and Operational Management Plans	Wildlife management plan	10.5	Y	CEA Agency	Is this referring to the Terrestrial Environment Management Plan on page 10-24 of 88? Clarification required.	The Application has been revised to include vegetation and wildlife management plans which are components of Chapter 24.	24.17 and 24.19
444	10.0 – Summary of Proposed Environmental and Operational Management Plans	Wildlife management plan	10.5	Y	CEA Agency	Need to define what "wildlife trees" are.	The Application has been revised to include a vegetation management plan and a wildlife management plan which are components of Chapter 24. There is no mention of wildlife trees in these updated plans.	24.17 and 24.19
445	10.0 – Summary of Proposed Environmental and Operational Management Plans	Wildlife management plan	10.5	Y	CEA Agency	"Forested areas (structural stages 5-7)" (pg. 10-24 of 88) needs to be defined: is this early successional stage?	The information requested has been provided in full in Appendix 15-A, Table 8.	Appendix 15-A, Table 8
446	10.0 – Summary of Proposed Environmental and Operational Management Plans	Wildlife management plan	10.5	Y	CEA Agency	Plan/standards for managing attractants is recommended, e.g. how will attractants be made inaccessible to bears?	The information as requested is provided in full in the revised Wildlife Management Plan (Section 24.19) and Waste Management Plan (Section 24.18).	24.19 and 24.18

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447	10.0 – Summary of Proposed Environmental and Operational Management Plans	Wildlife management plan	10.5	N	BC MFLNRO	10-24 (10.5 – Terrestrial Environment Management Plan) - MFLNRO requests involvement in the development and review of the Terrestrial Environment Management Plan. Wildlife habitat management measures - The language within many of the mitigation measures is insubstantial (ie. wherever possible, where possible, where practicable). Proponent needs to determine and implement wetland buffers that will be sufficient to mitigate indirect effects (ie. introduction of contaminants, run-off from project roads contaminated with salt, oil, fluids and the spread of invasive species) (FLNRO)	The application has been restructured and revised to include vegetation and wildlife management plans which are components of Chapter 24.	24.17 and 24.19
448	10.0 – Summary of Proposed Environmental and Operational Management Plans	Vegetation management plan including management of invasive species	10.5	Y/N	CEA Agency	Is this referring to the Terrestrial Environment Management Plan on page 10-24 of 88? Clarification required.	The application has been restructured and revised to include a vegetation management plan. The information requested has been provided in full in Section 24.17.	24.17
449	10.0 – Summary of Proposed Environmental and Operational Management Plans	Vegetation management plan including management of invasive species	10.5	Y/N	CEA Agency	"Invasive plant control program" (pg. 10-26 of 88) is vague. Explain what this entails.	The application has been restructured and revised to include a vegetation management plan. The information requested has been provided in full in Section 24.17.	24.17
450	10.0 – Summary of Proposed Environmental and Operational Management Plans	Vegetation management plan including management of invasive species	10.5	Y/N	CEA Agency	"Efforts will be made to control the spread of invasive species" (pg. 10-26 of 88) is vague. Explain what the efforts would likely be.	The application has been restructured and revised to include a vegetation management plan. The information requested has been provided in full in Section 24.17.	24.17
451	10.0 – Summary of Proposed Environmental and Operational Management Plans	Vegetation management plan including management of invasive species	10.5	N	BC MFLNRO	Would like to see a commitment to training all field staff re environmental awareness of and identification of invasive plantsNo reference to weed control acts and regulations etc when legislation is cited.Seeding as soon as practicable…within one year of disturbance max is preferred, and seeded with suitable spp for purpose that includes suitable spp for livestock grazing and seed is certified to lower risk of invasive species. Native spp are known to be slow to germinate so site should be evaluated for risk of invasion by noxious spp.Monitoring under 10.5 – would like to see some measurable commitments as to frequency and training and more importantly, prevention What does invasive plant control program to limit the introduction actually mean – needs to be measurable and enforceable.Treatment – methods of treatment are not identified and should be a commitment to working with SIWMC to identify best possible methods for control. Revegetation monitoring – when, frequency? Needs to be measurable. (FLNRO)	Training of field staff addressed. Reference to regulatory requirements has been included (24.17). Details of reclamation plan can be found in Chapter 7. The application has been revised to include a vegetation management plan including invasive species management.	24.17 Chapter 7

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452	10.0 – Summary of Proposed Environmental and Operational Management Plans	Species at Risk management plan	10.5	Y	CEA Agency	Is this referring to the Terrestrial Environment Management Plan on page 10-24 of 88? There is no specific reference to managing Species at Risk in this plan. A few SARA species are mentioned, but what about the others?	The Application has been revised to include a wildlife management plan in Chapter 24, Section 24.19.	Section 24.19
453	10.0 – Summary of Proposed Environmental and Operational Management Plans	Species at Risk management plan	10.5	N	BC MFLNRO	10-24 (10.5 – Terrestrial Environment Management Plan) - Proponent only provided Western toad management measures (FLNRO)	The Application has been revised to include a wildlife management plan in Chapter 24, Section 24.19.	Section 24.19
454	10.0 – Summary of Proposed Environmental and Operational Management Plans	Reclamation and closure plan	10.8	Y/N	CEA Agency	Need to explain what is being referred to as "proven treatment technology".	No water treatment technology is required for the Harper Creek Project. Closure and Reclamation plans are provided in Chapter 7 of the Application/EIS.	Chapter 7
455	10.0 – Summary of Proposed Environmental and Operational Management Plans	Reclamation and closure plan	10.8	Y/N	CEA Agency	Final reclamation activities section: what about other ancillary structures, i.e.: mine dry, offices, lab, etc.?	Chapter 7 provides details of the Closure and Reclamation for the Project that includes ancillary structures.	Chapter 7, Sections 7.5.2 and 7.6.9
456	10.0 – Summary of Proposed Environmental and Operational Management Plans	Reclamation and closure plan	10.8	Y/N	CEA Agency	Why is there a subsection on soils baseline conditions included here?-- Seems orphaned. If establishing soil conditions is important to the context of the decommissioning phase, then it should be referenced to the section of the report that describes baseline soil conditions. By placing this information here, it takes the focus away from the reclamation and closure plan itself. Soils baseline information and supporting tables should be appendicized.	Relevant details of slopes, soil salvage by infrastructure area and a soils balance are discussed in Chapter 7, Closure and Reclamation. Baseline soil conditions have been summarized in Appendix 5-B Terrain and Soils Baseline report.	Chapter 7, Section 7.4 Appendix 5-B
457	10.0 – Summary of Proposed Environmental and Operational Management Plans	Reclamation and closure plan	10.8	Y/N	CEA Agency	Subsection 10.8.6 – Mine Facilities Closure – need to specify whether this will include ancillary building structures such as lab, mine dry, offices, etc.	Chapter 7 provides details of the Closure and Reclamation for the Project that includes ancillary structures.	Chapter 7, Sections 7.5.2 and 7.6.9
458	10.0 – Summary of Proposed Environmental and Operational Management Plans	Reclamation and closure plan	10.8	Y/N	CEA Agency	Subsection 10.8.10 – Need to specify who will monitor revegetation progress and effectiveness.	Monitoring and reporting sections that include responsibilities appear in all the EMPs. The Vegetation Management Plan is to be found in Section 24.17.	24.17.5

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
459	10.0 – Summary of Proposed Environmental and Operational Management Plans	Reclamation and closure plan	10.8	N	BC MFLNRO	Would like to see both native and agronomic spp in the toolkit, with preference given to native spp where appropriate and risk is low for invasive spp development. Would like to see spp chosen on basis of meeting needs for ground cover as well as palatability for grazing to wildlife and livestock to ensure the site is still of value for grazing at the end of the mine cycle. (FLNRO) 10-46 (10.8 Mine Reclamation and Closure Plan) - Information is very preliminary with limited detail. (FLNRO)	Chapter 7, Closure and Reclamation, contains information on plant species thought to be appropriate for the need. The rationale for the selection of plant species appears in Section 7.7.1.	7.7.1
460	10.0 – Summary of Proposed Environmental and Operational Management Plans	Surface water and storm water management (including construction, operational, closure and post-closure, water management mitigation and contingencies, and monitoring) and erosion and sediment control plans	10.4	Y/N	CEA Agency	Need to specify what key HCMC personnel and what contractors will be responsible for monitoring/implementation activities.	Monitoring and reporting sections that include responsibilities appear in all the EMPs. The Site Water Management Plan is to be found in Section 24.13.	24.13.4 24.13.5
461	10.0 – Summary of Proposed Environmental and Operational Management Plans	Groundwater monitoring plan	6.5	N	BC MFLNRO	Only very general, indicating that groundwater monitoring will continue down gradient from mine components like the TMF and LGO and non-PAG waste rock piles to check for changes to groundwater quality but no further details provided. (MOE) Only general discussion of groundwater monitoring plan is provided in Section 6.5 (FLNRO)	A more detailed Groundwater Monitoring Plan is now in place in Chapter 24.	24.8
462	10.0 – Summary of Proposed Environmental and Operational Management Plans	Wildlife habitat compensation planning	10.5	N	CEA Agency	Information not found/missing.	The Application has been revised to include a Wildlife Management Plan in Chapter 24, Section 19.	Section 24.19
463	10.0 – Summary of Proposed Environmental and Operational Management Plans	Wildlife habitat compensation planning	10.5	N	BC MFLNRO	When the proponent is unable to avoid impacts, minimize impacts, or restore on-site the Province requires offset for the residual impacts on environmental values. This was not found in the application. (FLNRO)	Additional offsetting of wetlands beyond what is suggested in the reclamation plan has not been incorporated.	--
464	10.0 – Summary of Proposed Environmental and Operational Management Plans	Materials handling and management plan	10.1	Y/N	CEA Agency	Section 10.10 is the Waste Management Plan. Clarification required as to how Waste Management Plan relates to the requirement for a materials handling and management plan.	See reference to EMPs in adjacent column. Materials handling and management is addressed in several EMPs.	24.5 24.7 24.9 24.14 24.15 24.16 24.18

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465	10.0 – Summary of Proposed Environmental and Operational Management Plans	Materials handling and management plan	10.1	Y/N	CEA Agency	Subsection 10.10.2 –applicability of these guidance documents should be clearly described and referenced within the appropriate and corresponding subsections of the EIS.	See reference to EMPs in adjacent column. Materials handling and management is addressed in several EMPs.	24.5 24.7 24.9 24.14 24.15 24.16 24.18
466	10.0 – Summary of Proposed Environmental and Operational Management Plans	Materials handling and management plan	10.1	Y/N	CEA Agency	Subsection 10.10.5 - Need to make clear that incinerator will only be used for construction phase; also need to specify sewage treatment strategy for operations phase	See reference to EMP in adjacent column.	24.18
467	10.0 – Summary of Proposed Environmental and Operational Management Plans	Materials handling and management plan	10.1	Y/N	CEA Agency	Table 10.10-1 – need to specify sewage treatment strategy/domestic wastewater processing strategy for operations phase	See reference to Project Description (Chapter 5) and relevant EMP in adjacent column.	5.7.2.8 24.18
468	10.0 – Summary of Proposed Environmental and Operational Management Plans	Materials handling and management plan	10.1	Y/N	CEA Agency	Subsection 10.10.8 - need more info. on design of landfill – proposed liner system (if applicable), approximate capacity volume, excavations, etc.	Detailed engineering design of the landfill has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage.	5.7.1.12 5.7.2.8
469	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	Need to specify who will be responsible for inspecting hazardous waste storage and handling areas, and with what frequency	The Mine Environmental Supervisor and Health and Safety Supervisor will be responsible for such inspections, per the stipulations of the EMS, Fuel and Hazardous Materials Management Plan, and permitting requirements.	24.1 24.7
470	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	Management of hydrocarbon-contaminated materials – need to specify who will be collecting contaminated soils, water, etc. (presumably, this would be done by mine personnel who will be trained in spill response; however, it should be specified).	See reference to hazardous materials and spill prevention EMPs in adjacent column.	24.7 24.15
471	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	Subsection 10.10.12 – Used Tires – "Stockpiling in the landfill" seems to be another way of stating disposed of in the landfill, and this seems somewhat contradictory to the first part of the paragraph which implies that reusing and recycling the tires will be pursued. Clarification required regarding repurposing or ultimate disposal of used tires.	Tires that cannot be reused or recycled on-site may be removed for disposal off-site, per the EMP referred to in the adjacent column. If the EMA permit for the landfill allows for disposal of tires, tires may be disposed of in the site landfill.	24.18.3.4

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
472	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	The WMP "presents the various disposal methods, and also defines the roles and responsibilities, specific requirements, and monitoring controls" (p. 10-67). Table 10.10-1 outlines these but does not explain the different waste types. Complete life cycles of all wastes are missing e.g. storage. Unclear as to why some wastes are listed in the table without classifying waste type.	See reference to EMP in adjacent column.	24.18.3
473	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	P. 10-68 high level summary does not consider storage of wastes, sewage disposal during operations, or waste management during decommissioning/closure.	Chapter 7 Closure and Reclamation Section 7.6.9 describes the closure of facilities associated with the Plant Site, including the truck shop, fuel storage, sewage treatment plant, process water pond etc.	7.6.9
474	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	Sewage treatment facility (p. 10-70) does not specify where it will be located, conditions/guidelines for installation.	A holding tank and off-site disposal during the construction phase, and a package plant and tile field during operations phase, are the two means of sewage treatment, as described in the EMP referred to in the adjacent column.	24.18.3
475	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	P. 10-71 "a landfill will be constructed near the Mine Site". Where? Description of wastes to be disposed of here not clear. The landfill "will be engineered for closure": what does this mean? Requirements for closure/abandonment? Explanation required.	Detailed engineering design of the landfill has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage.	5.7.1.12 5.7.2.8
476	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	Section 10.10.10: need the full story in one place including full listing of hazardous materials, collection, storage, disposal, inspections and damage control, responsibilities.	See reference to EMP in adjacent column.	24.7
477	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	Section 10.10.9: location of bone yard and what about gasoline/oils in equipment/vehicles?	See references to EMPs in adjacent column.	24.7.3 24.18.3.3
478	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	Section 10.10.13: "any leaks… must be addressed" -- how? Monitoring of the landfill should include runoff/seepage. Description of hazardous wastes here is poorly written, partly repetitive, unclear and disjointed; this section should be included as part of full life cycle described in one place; currently have to flip back and forth for the whole story.	Detailed engineering design of the landfill has not been undertaken yet, although the Project Description in Chapter 5 provides available information. This question will be addressed in full during the Project's permitting stage.	5.7.1.12 5.7.2.8

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
479	10.0 – Summary of Proposed Environmental and Operational Management Plans	Construction waste and hazardous waste management plans	10.1	Y/N	CEA Agency	There is nothing addressing attractant management of wastes for wildlife.	See references to EMPs in adjacent column.	24.16.2 24.18.3.3 24.18.3.5 24.19.3.1
480	10.0 – Summary of Proposed Environmental and Operational Management Plans	Clearing around wildlife sensitivities plan	10.5	Y	CEA Agency	Mitigations section 6.8.5 (starting on pg. 6.8-104) has some mention of this. Also on pg. 10-24 of 88 as part of Terrestrial Mgmt Plan.	Clearing will be minimized beyond development areas where practical. Commitment to not clear during breeding bird season (March 15 to August 15), unless nest surveys were conducted, at which point buffers would be created around those nests.	Section 24.20
481	10.0 – Summary of Proposed Environmental and Operational Management Plans	Clearing around wildlife sensitivities plan	10.5	N	BC MFLNRO	Not sufficient (FLNRO)	Clearing will be minimized beyond development areas where practical.	Section 24.20
482	10.0 – Summary of Proposed Environmental and Operational Management Plans	Accidents and malfunctions planning including emergency and spill response and contaminated site clean-up plan	2.17	Y	CEA Agency	Information spans sections 2.17 and 10.11. Some EMPs are typically will be rolled up under others, so further thought should be given to reforming existing lateral organization of EMPs. EMPs should be described generally in body of EIS with the EMPs themselves all appendicized. This will improve the readability of the EIS.	An EMS provides the overarching context to the array of EMP's, as referenced in the adjacent column.	24.1 24.2 to 24.19
483	10.0 – Summary of Proposed Environmental and Operational Management Plans	Accidents and malfunctions planning including emergency and spill response and contaminated site clean-up plan	2.17	Y	CEA Agency	P. 10-75 introduction should include a list of types of emergencies that will be covered in greater detail below (e.g. power outage, lack of adequate shelter, etc.).	Besides information provided in the Accidents and Malfunction chapter (Chapter 26), the Emergency Response Plan addresses different types of emergencies.	24.4.3
484	10.0 – Summary of Proposed Environmental and Operational Management Plans	Accidents and malfunctions planning including emergency and spill response and contaminated site clean-up plan	2.17	Y	CEA Agency	Section 10.11.6 “Equipment required to prevent or minimize the effects of an emergency will be identified during construction and operations”, and a list of equipment will be included. Shouldn’t these be addressed as part of this plan now? What about locations of emergency supplies?	See reference to EMP in adjacent column. The required details will be provided during the permitting stage.	24.4.3.13
485	10.0 – Summary of Proposed Environmental and Operational Management Plans	Accidents and malfunctions planning including emergency and spill response and contaminated site clean-up plan	2.17	Y	CEA Agency	P. 10-77, “Harper Creek will be prepared to handle a number of minor incidents or a combination of a major and a minor incident; with effective response plans and training in place”. This is a vague statement and shouldn’t response plans be included in this plan now?	See references to EMP in adjacent column.	24.4

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486	10.0 – Summary of Proposed Environmental and Operational Management Plans	Accidents and malfunctions planning including emergency and spill response and contaminated site clean-up plan	2.17	Y	CEA Agency	Section 10.11.11: there should be a subheading for types of emergencies.	Besides information provided in the Accidents and Malfunction chapter (Chapter 26), the Emergency Response Plan addresses different types of emergencies.	24.4.3
487	10.0 – Summary of Proposed Environmental and Operational Management Plans	Accidents and malfunctions planning including emergency and spill response and contaminated site clean-up plan	2.17	Y	CEA Agency	Section 10.11.20: bear safety training will be provided by whom? Should be a qualified professional/CO. "Specific personnel will be provided with training to monitor and respond to bear encounters" is vague. Who will have this responsibility?	See references to EMP in adjacent column. Bear awareness training has been included as a component of site orientation and training. Training will be conducted by personnel hired specifically for safety training.	24.4.3.32
488	10.0 – Summary of Proposed Environmental and Operational Management Plans	Accidents and malfunctions planning including emergency and spill response and contaminated site clean-up plan	2.17	Y	CEA Agency	There is no description, procedure or actions describing spill or contaminated site response/clean-up.	See reference to EMP in adjacent column.	24.15
489	10.0 – Summary of Proposed Environmental and Operational Management Plans	Accidents and malfunctions planning including emergency and spill response and contaminated site clean-up plan	2.17	Y	NRCan	NRCan notes the absence of a spill contingency plan related to explosives. Some of the spills and leaks information already included in Section 2.17 applies here. Therefore, this could be remedied by referencing explosives information in table 2.17.4.	See reference to EMP in adjacent column.	24.15.3
490	10.0 – Summary of Proposed Environmental and Operational Management Plans	Environmental supervision during works in sensitive areas, such any works in riparian areas	10.5	Y	BC MFLNRO	Environmental Monitor will need to be on site for all works within sensitive areas (FLNRO).	Monitoring and reporting sections that include responsibilities appear in all the EMPs.	24.XX.4 24.XX.5
491	10.0 – Summary of Proposed Environmental and Operational Management Plans	Include objectives, methods, and critical thresholds (triggers) for management response for each program/contingency plan	10	Y/N	CEA Agency	Need to specify what subsections to refer to.	Objectives and measures are provided in each EMP and thresholds will emerge from the envisaged monitoring, to be further developed during permitting as required.	24.XX.2 24.XX.3 24.XX.4
492	10.0 – Summary of Proposed Environmental and Operational Management Plans	Include objectives, methods, and critical thresholds (triggers) for management response for each program/contingency plan	10	Y/N	CEA Agency	No objective, method, threshold/triggers provided for spill/contaminated sites in emergency response plan.	The Spill Prevention and Response Plan contains such information.	24.15.3.4

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493	10.0 – Summary of Proposed Environmental and Operational Management Plans	Continue to grow and re-evaluate the dataset, where required (i.e. assessment of seasonal changes in groundwater levels)	10	Y/N	CEA Agency	Need to specify what subsections to refer to	See reference to EMPs in adjacent column.	24.8.4 24.8.5
494	10.0 – Summary of Proposed Environmental and Operational Management Plans	Describe proposed training programs and/or environmental procedures manuals that may be developed for site staff	10	Y/N	CEA Agency	Need to specify what subsections to refer to.	The overarching commitment to training and related materials is referred to in the EMS.	24.1.5.2
495	10.0 – Summary of Proposed Environmental and Operational Management Plans	Describe proposed training programs and/or environmental procedures manuals that may be developed for site staff	10	Y/N	CEA Agency	Need to include information on bear/wildlife awareness training.	See references to EMP in adjacent column.	24.4.3.32
496	11.0 – Compliance Reporting	Provide a detailed description of anticipated reporting including the type and frequency of reports to be submitted to the EAO and/or other regulatory federal or provincial agencies, as required	10.15	Y/N	CEA Agency	Section is currently a high-level summary and will be appropriately discussed in further detail during the detailed review of the EIS. Section will eventually need to "provide a detailed description of anticipated reporting…" prior to finalization of EIS.	Chapter 2, Assessment Process, recognizes the need for compliance monitoring and this will be further addressed as the EA process progresses and in the permitting stage.	2.1 2.4.1
497	11.0 – Compliance Reporting	Provide a detailed description of anticipated reporting including the type and frequency of reports to be submitted to the EAO and/or other regulatory federal or provincial agencies, as required	10.15	N	BC MFLNRO, BC MOE	Cursory overview of reporting. To be developed in more detail during the EA process and permitting phases. (FLNRO) Just a brief statement of commitment to provide the required reports under various Acts & Regs. No details re anticipated contents or timing. E.g. annual environmental monitoring and compliance reporting to MOE for effluent, air and refuse permits – not mentioned. Not sure why we'd need more detail at this point… details can come with permitting. (MOE) Not sufficient detail provided on compliance reporting (FLNRO)	Chapter 2, Assessment Process, recognizes the need for compliance monitoring and this will be further addressed as the EA process progresses and in the permitting stage.	2.1 2.4.1
498	11.0 – Compliance Reporting	Consistent with approved EMPs, monitoring plans, or other commitments	10.15	Y/N	CEA Agency	Need to include a statement to refer to approved EMPs and monitoring plans.	Chapter 2, Assessment Process, recognizes the need for meeting the objectives of approved EMPs and this will be further addressed as the EA process progresses and in the permitting stage.	2.1 2.4.1
499	11.0 – Compliance Reporting	Consistent with approved EMPs, monitoring plans, or other commitments	10.15	Y/N	CEA Agency	Reporting description for waste management is disjointed.	See references to EMP in adjacent column.	24.18.5

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
500	Part C – First Nations Information Requirements	Include an assessment of the potential effects of the Project on First Nations activities related to aboriginal rights, title, and other interests raised by First Nations regarding environmental, economic, social, heritage, and health effects	11	N	CEA Agency	Information about potential effects on Aboriginal rights provided in Section 11 (p. 1066) is severely inadequate. No effort has been made to inform a discussion around impacts to Aboriginal rights with relevant information contained in the Traditional Use Study (dated August 30, 2012, produced by the Simpcw FN, and included as Appendix U) which identified specific potential impacts/effects on Simpcw historical/current use of the area and related exercise of potential Aboriginal rights.	The proponent has amended its EA application to include a more accurate characterization of the traditional and current use of lands and resources by Aboriginal groups in the vicinity of the Project (Chapter 22, Section 22.4.3), and to assess potential effects of the Project on current aboriginal use (section 22.5). The results of this assessment has been carried over into the assessment of potential effects to Aboriginal rights and Interests (Chapter 23, Section 23.5), along with information on potential effects to the resources utilized by Aboriginal groups, such as fish (Chapter 14, Fish and Aquatic Resources), plants (Chapter 15, Terrestrial Ecology), and wildlife (Chapter 16, Wildlife and Wildlife Habitat).	22.4.3 22.5 23.5
501	Part C – First Nations Information Requirements	Include an assessment of the potential effects of the Project on First Nations activities related to aboriginal rights, title, and other interests raised by First Nations regarding environmental, economic, social, heritage, and health effects	11	N	CEA Agency	Section 11.4 discusses traditional knowledge and traditional use related to the area, but makes no links to potential Aboriginal rights.	The proponent has amended its chapter on the potential effects of the Project on Aboriginal rights and interests (Chapter 23) to provide a more thorough assessment of potential effects to Aboriginal rights (section 23.5) and to discuss the incorporation of traditional knowledge and traditional use information provided by Aboriginal groups, where available (section 23.4.3). Data on the traditional and current use of lands and resources by Aboriginal peoples in the vicinity of the Project are discussed in Section 22.4.3 of Chapter 22 (Current Use of Lands and Resources for Traditional Purposes), while an ethnographic summary of the aboriginal groups is provided in section 23.2 of Chapter 23 (Aboriginal Rights and Interests).	23.5 23.4.3 22.4.3 23.2

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
502	Part C – First Nations Information Requirements	Include an assessment of the potential effects of the Project on First Nations activities related to aboriginal rights, title, and other interests raised by First Nations regarding environmental, economic, social, heritage, and health effects	11	N	CEA Agency	Section 12 provides very high-level "Summary of Potential Effects on Aboriginal Activities and Accommodation Measures" without making any reference to potential Aboriginal rights. The lack of specificity in this section, combined with the dearth of information in section 11, does not allow for any substantial discussion of project impacts on potential Aboriginal rights.	The proponent has amended its EA application to include a more accurate characterization of the traditional and current use of lands and resources by Aboriginal groups in the vicinity of the Project (section 22.4.3), and to assess potential effects of the Project on current aboriginal use (section 22.5). The results of this assessment has been carried over into the assessment of potential effects to Aboriginal rights and Interests (Chapter 23, Section 23.5), along with information on potential effects to the resources utilized by Aboriginal groups, such as fish (Chapter 14, Fish and Aquatic Resources), plants (Chapter 15, Terrestrial Ecology), and wildlife (Chapter 16, Wildlife and Wildlife Habitat).	22.4.3 22.5 23.5
503	Part C – First Nations Information Requirements	Include an assessment of the potential effects of the Project on First Nations activities related to aboriginal rights, title, and other interests raised by First Nations regarding environmental, economic, social, heritage, and health effects	11	N	CEA Agency	It should also be noted that the report does not provide any information regarding potential effects/impacts on Aboriginal rights of the Adams Lake Indian Band or the Shuswap Lakes Division of the Secwepemc.	The proponent has amended its EA application to include a more accurate characterization of the traditional and current use of lands and resources by Aboriginal groups in the vicinity of the Project (section 22.4.3), and to assess potential effects of the Project on current aboriginal use (section 22.5). The results of this assessment has been carried over into the assessment of potential effects to Aboriginal rights and Interests (Chapter 23, Section 23.5), along with information on potential effects to the resources utilized by Aboriginal groups, such as fish (Chapter 14, Fish and Aquatic Resources), plants (Chapter 15, Terrestrial Ecology), and wildlife (Chapter 16, Wildlife and Wildlife Habitat).	22.4.3 22.5 23.5
504	Part C – First Nations Information Requirements	Include an assessment of the potential effects of the Project on First Nations activities related to aboriginal rights, title, and other interests raised by First Nations regarding environmental, economic, social, heritage, and health effects	11	N	DFO	Fish (11.4.4) - Within Table 11.4-2, fish species important to the Simpcw Nation are identified but does not identify how the potential effects of the Project relate back to those species specifically referenced. Referring the reader to alternate sections is not sufficient discussion.	The characterization of fish species important to Simpcw First Nation and other Aboriginal groups is detailed in section 22.4.3. Effects to Aboriginal land and resource use, including fishing, is discussed in section 22.5. The effects to fish and fish habitat are summarized in Table 23.5-1 as inputs to the assessment on effects to Aboriginal rights in section 23.5.	22.4.3 22.5 Table 23.5-1 23.5

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505	Part C – First Nations Information Requirements	Include an assessment of the potential effects of the Project on First Nations activities related to aboriginal rights, title, and other interests raised by First Nations regarding environmental, economic, social, heritage, and health effects	11	N	DFO	General - The application does not provide a clear understanding that the potential effects of the project has been communicated and understood by the First Nations potentially impacted by the Project.	In May 2013, the BC EAO requested HCMC conduct additional consultation with Aboriginal groups to obtain information: on past and current Aboriginal interests in the vicinity of or in relation to the area of the Project; potential impacts of the proposed Project on those Aboriginal interests; and measures that could be used in the proposed Project's design or operation to avoid, mitigate, or otherwise address those potential impacts. In response to this request, HCMC prepared and distributed a set of eight Working Tables to the SFN, ALIB, NIB and LSIB in July 2013 to engage on the identification of potential Project impacts and HCMC's proposed mitigation measures. These Working Tables have been discussed with the Aboriginal groups.	23.4.1
506	Part C – First Nations Information Requirements	Include an assessment of the potential effects of the Project on First Nations activities related to aboriginal rights, title, and other interests raised by First Nations regarding environmental, economic, social, heritage, and health effects	11	N	DFO	There is no indication if the Fish Habitat Compensation Plan has been presented to First Nations.	The Fish Habitat Offsetting Plan will be presented to First Nations as part of the Application/EIS.	
507	Part C – First Nations Information Requirements	Include an assessment of the potential effects of the Project on First Nations activities related to aboriginal rights, title, and other interests raised by First Nations regarding environmental, economic, social, heritage, and health effects	11	N	Neskonlith Indian Band	This section is now in Part D of the application. Official correspondence between the Proponent and the impacted Bands was markedly different, as determined by the Proponents' own judgment on which Bands were the most affected by the project. The scope of opportunities for engagement were deeply affected from the earliest point of communication through to the submission of the EA Application in April, 2013. (Neskonlith)	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with Aboriginal groups including NIB. Table 3-E-3 of Appendix 3-E lists HCMC's communications with NIB.	3.5 Appendix 3-E
508	Part C – First Nations Information Requirements	Outline the potential effects and cumulative impacts the Project may pose on nearby First Nations communities	11	N	Neskonlith Indian Band	As above (Neskonlith) (NOTE FROM JUSTINE: THIS COMMENT ACTUALLY REFERS TO ALL THE CEA AGENCY COMMENTS BELOW) - comments 730 through 734	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with Aboriginal groups including NIB. Table 3-E-3 of Appendix 3-E lists HCMC's communications with NIB	3.5 Appendix 3-E

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
509	Part C – First Nations Information Requirements	Outline the potential effects and cumulative impacts the Project may pose on nearby First Nations communities	11	N	CEA Agency, Neskonlith Indian Band	There is no reference to cumulative impacts – in the context of traditional uses of the project area and surrounding vicinity - the Project may pose on nearby First Nation communities	The proponent has amended its EA Application to provide a more thorough assessment of effects to traditional uses of the Project area (section 22.4.3) as well as effects to the resources utilized by Aboriginal groups in their current harvesting practices (summarized in Table 23.5-1 of Chapter 23), including the cumulative effects (if any) to those practices.	22.4.3 Table 23.5-1
510	Part C – First Nations Information Requirements	Outline the potential effects and cumulative impacts the Project may pose on nearby First Nations communities	11	N	CEA Agency, Neskonlith Indian Band	Sub-section 11.4 – repeatedly indicates that information about how traditional uses in the vicinity of the project would be impacts was "not provided to HCMC at the time of submission of the Application". For instance, page 11-101, "While it is acknowledged that historically traditional activities likely took place in the Project area, it is unclear as to the extent to which the Project area is currently utilized for traditional purposes." If no information is to be provided, the EIS report should indicate that the proponent made reasonable efforts to obtain this information; in addition, explanation is needed why the proponent felt it was warranted to submit the Application without this information.	The proponent has amended its EA Application to provide a more accurate characterization of the traditional uses in the vicinity of the Project by Aboriginal groups, in particular by Simpcw First Nation (section 22.4.3), incorporating data provided in their Traditional Use and Ecological Knowledge Study (Appendix 22-A)..	22.4.3 Appendix 22-A
511	Part C – First Nations Information Requirements	Outline the potential effects and cumulative impacts the Project may pose on nearby First Nations communities	11	N	CEA Agency, Neskonlith Indian Band	It is difficult to reconcile the stated findings of the Simpcw Traditional Use – EK Study with the statements in the EIS. The introduction of the Study states that it "presents evidence of Simpcw First Nation current and past uses of an area subject to the development of the Harper Creek Mine by Yellowhead Mining Inc." On page 3, the report indicates that interviews with "Simpcwemc identified the locations of past and current uses of Simpcwel'ecw," and that a ground-truthing trip to the Harper Creek Mine location confirmed locations of traditional use sites identified during the interviews and archival research. Further in the study, there is discussion about potential impacts of the project on current traditional uses of the area by Simpcw band members.	The proponent has amended its EA Application to provide a more accurate characterization of the traditional uses in the vicinity of the Project by Simpcw First Nation (section 22.4.3), incorporating data provided in their Traditional Use and Ecological Knowledge Study (Appendix 22-A). It also includes a more thorough assessment of effects to traditional uses of the Project area (section 22.5), as well as an assessment of effects to the exercise of Simpcw First Nation Aboriginal rights (section 23.5) using a methodology adapted from the framework described in Chapter 8 (Assessment Methodology).	22.4.3 Appendix 22-A 22.5 23.5
512	Part C – First Nations Information Requirements	Outline the potential effects and cumulative impacts the Project may pose on nearby First Nations communities	11	N	CEA Agency, Neskonlith Indian Band	It appears that most of the work assessing potential effects or impacts of the project on traditional uses is being deferred by the proponent to the "Application review stage", i.e.: p. 11-109. The level of information provided and degree of effort made wrt assessing potential effects or impacts of the project on traditional uses is currently unacceptable for consideration of the EIS for detailed review.	The proponent has amended its EA Application to provide a more accurate characterization of the traditional uses in the vicinity of the Project by Simpcw First Nation (section 22.4.3), incorporating data provided in their Traditional Use and Ecological Knowledge Study (Appendix 22-A). It also includes a more thorough assessment of effects to traditional uses of the Project area (section 22.5), as well as an assessment of effects to the exercise of Simpcw First Nation Aboriginal rights (section 23.5) using a methodology adapted from the framework described in Chapter 8 (Assessment Methodology).	22.4.3 Appendix 22-A 22.5 23.5

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
513	Part C – First Nations Information Requirements	Outline the potential effects and cumulative impacts the Project may pose on nearby First Nations communities	11	N	CEA Agency, Neskonlith Indian Band	The EIS does not interweave biophysical and other dimension of the assessment into the consideration of effects on current uses, which includes cultural/spiritual/ceremonial practices. For example, "Potential adverse effects to identified spiritual or culturally important sites outside of the Project area are considered associated with potential changes in visual quality. The assessment of the effects on Visual Quality is detailed in Section 7.4." p. 11- 10	The proponent has amended its EA Application to include a more thorough assessment of effects to traditional uses of the Project area (sections 22.5). Potential effects to the resources utilized by Aboriginal groups in their current harvesting practices (including any residual or cumulative effects to those resources) are summarized in Table 23.5-1 of Chapter 23, and are utilized as inputs into the assessment of effects to the exercise of Aboriginal rights in the vicinity of the Project.	22.5 Table 23.5-1
514	12.1 – Summary and Overview	Include details pertaining to First Nations that could potentially become impacted by the activities of the Project	11.1.1	Y		*Note: Poorly-worded requirement*	N/A	--
515	12.1 – Summary and Overview	Include details pertaining to First Nations that could potentially become impacted by the activities of the Project	11.1.1	N	Neskonlith Indian Band	This information is not clearly outlined in this section(Neskonlith)	The proponent has amended its EA Application to more clearly identify the Aboriginal groups listed in the Section 11 and 13 orders (Section 23.1), and to characterize the ethnographic, cultural, social and economic conditions of these Aboriginal groups (Sections 23.3).	23.1 23.3
516	12.1 – Summary and Overview	If First Nations have been identified as being impacted by the Project, include maps of the asserted and/or traditional territory, along with possible information regarding, but not limited to: ethnography, language, land-use setting and planning, governance, economy, and reserves	11.1	Y/N	CEA Agency	Cannot find map of asserted territory of the Shuswap Lakes Division, or the ALIB/LSL/Neskonlith claim area.	These maps are no included in the Application/EIS as Figure 23.1-2 and Figure 23.1-4, respectively	Figure 23.1-2 Figure 23.1-4
517	12.1 – Summary and Overview	If First Nations have been identified as being impacted by the Project, include maps of the asserted and/or traditional territory, along with possible information regarding, but not limited to: ethnography, language, land-use setting and planning, governance, economy, and reserves	11.1	N	Neskonlith Indian Band	No maps included(Neskonlith)	Maps relevant to Aboriginal groups and their traditional territories and reserves are now included in the Application/EIS as Figures 23.1-1 through 23.1-4.	Figure 23.1-1 through 23.1-4

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
518	12.1 – Summary and Overview	Reflect in this section of the EA, as applicable, a "Strength of Claim" analysis completed by the Province	11.1	N	Neskonlith Indian Band	This information is not clearly outlined in this section (Neskonlith)	Upon guidance from BC EAO, this information has been removed from the Application/EIS.	--
519	12.1 – Summary and Overview	Identify and describe the First Nations identified as having an actual or potential interest in the Project and those potentially affected by the Project, in consultation with the EAO	11.1	N	Neskonlith Indian Band	This information is not clearly outlined in this section (Neskonlith)	The proponent has amended its EA Application to more clearly identify the Aboriginal groups listed in the Section 11 and 13 orders (Section 23.1), and to characterize the ethnographic, cultural, social and economic conditions of these Aboriginal groups (Sections 23.3).	23.1 23.3
520	12.1 – Summary and Overview	Explain why the listed First Nations communities were identified and included in consultation activities	11.1.1	Y	CEA Agency	Information about engagement with Shuswap Lakes division is unclear	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with Aboriginal groups including ALIB, NIB and LSIB as representatives of the Shuswap Lakes Division. Tables 3-E-2 through 3-E-4 of Appendix 3-E lists HCMC's communications with these groups	3.5 Tables 3-E-2 through 3-E-4
521	12.1 – Summary and Overview	Explain why the listed First Nations communities were identified and included in consultation activities	11.1.1	N	Neskonlith Indian Band	Rationale provided is not clearly described and is overly judgmental on the Proponent's part (Neskonlith)	Aboriginal groups were identified, and efforts were made to engage with them, based on the guidance provided by BC EAO (through their Section 11 and 13 orders) and guidance from CEA Agency	3.5 23.1
522	12.1 – Summary and Overview	Describe in Section 11.6 and Section 12.0 the nature of the expressed interests, if such information is provided by First Nations to HCMC on the timeline set out by the EAO	11.6, 12.0	Y/N	CEA Agency	Very high-level outline of interests only. Defer further comment to individual Aboriginal groups.	A revised list of issues, interests and concerns raised by Aboriginal groups, and the responses to those issues, are provided in Appendix 3-F. A characterization of the Aboriginal rights of each Aboriginal group is provided in Chapter 23 (Aboriginal Rights and Interests).	Appendix 3-F Chapter 23
523	12.1 – Summary and Overview	Describe in Section 11.6 and Section 12.0 the nature of the expressed interests, if such information is provided by First Nations to HCMC on the timeline set out by the EAO	11.6, 12.0	N	Neskonlith Indian Band	The information provided on Neskonlith's interests, concerns and the Proponents responses to these both misrepresents Neskonlith's interests and concerns and does nothing to address them (Neskonlith)	A revised list of issues, interests and concerns raised by Aboriginal groups, and the responses to those issues, are provided in Appendix 3-F. A characterization of the Aboriginal rights of each Aboriginal group is provided in Chapter 23 (Aboriginal Rights and Interests).	Appendix 3-F Chapter 23
524	12.1 – Summary and Overview	Describe the surrounding traditional territory of the Secwepemc (Shuswap) Nation	11.1	Y	CEA Agency	Map provided	N/A	--
525	12.2 – Aboriginal Rights	Focus on aboriginal rights	11.2	N	CEA Agency	Very undeveloped section on Simpcw FN, and does not meet requirement for addressing Aboriginal rights.	The proponent has amended its application to more clearly characterize Simpcw Aboriginal rights (Chapter 23) and Simpcw traditional and current use of lands and resources (section 22.4.3)	Chapter 23 22.4.3

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
526	12.2 – Aboriginal Rights	Focus on aboriginal rights	11.2	N	CEA Agency	Virtually no information related to Shuswap Lakes division (i.e., ALIB, Splats'in and Neskonlith)	The proponent has amended its application to more clearly characterize Lakes Division Secwepemc Aboriginal rights (Chapter 23) and Lakes Division traditional and current use of lands and resources (section 22.4.3)	Chapter 23 22.4.3
527	12.2 – Aboriginal Rights	Focus on aboriginal rights	11.2	N	CEA Agency	Proponent states it will conduct further work in detailed EIS Review phase. Acknowledged that further work is to be done, but need more info. and details for purpose of EIS at this stage.	Section 3.5 of the revised Information Distribution and Consultation Chapter (Chapter 3) reports on HCMC's consultations with Aboriginal groups including planned future consultation. Tables 3-E-1 through 3-E-5 of Appendix 3-E lists HCMC's communications with these groups	3.5 Tables 3-E-1 through 3-E-5
528	12.2 – Aboriginal Rights	Focus on aboriginal rights	11.2	N	Neskonlith Indian Band	There is no description of Aboriginal rights from a Secwepemc point of view (Neskonlith)	The proponent has amended its assessment of Aboriginal Rights and Interests (Chapter 23) to more thoroughly characterize the Aboriginal Rights of SFN, ALIB, NIB and LSIB	Chapter 23
529	12.2 – Aboriginal Rights	Focus on past, present and anticipated customs, practices, and future uses of the Project area by aboriginal groups	11.2	N	CEA Agency	Ibid	The proponent has amended its assessment of Aboriginal Rights and Interests (Chapter 23) to more thoroughly characterize the Aboriginal Rights of SFN, ALIB, NIB and LSIB. A more detailed characterization of Aboriginal groups' customs and practices are provided in section 22.4.3 (as they relate to the use of lands and resources) and section 23.2 and 23.3 (as they relate to other customs and practices) based on information that was publically available.	22.4.3 23.2 23.3
530	12.2 – Aboriginal Rights	Focus on past, present and anticipated customs, practices, and future uses of the Project area by aboriginal groups	11.2	N	Neskonlith Indian Band	There is only a cursory description provide and that is focused on the Simpcw First Nation (Neskonlith)	The proponent has amended its assessment of Aboriginal Rights and Interests (Chapter 23) to more thoroughly characterize the Aboriginal Rights of SFN, ALIB, NIB and LSIB. A more detailed characterization of Aboriginal groups' customs and practices are provided in section 22.4.3 (as they relate to the use of lands and resources) and section 23.2 and 23.3 (as they relate to other customs and practices) based on information that was publically available.	22.4.3 23.2 23.3

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
531	12.2 – Aboriginal Rights	Identify specific asserted aboriginal rights and titles	11.2	N	CEA Agency	Aboriginal title is ruled out by the proponent, which is reasonable; however, specificity is lacking around Aboriginal rights asserted in the project area.	The proponent has amended its assessment of Aboriginal Rights and Interests (Chapter 23) to more thoroughly characterize the Aboriginal Rights of SFN, ALIB, NIB and LSIB. A more detailed characterization of Aboriginal groups' customs and practices are provided in section 22.4.3 (as they relate to the use of lands and resources) and section 23.2 and 23.3 (as they relate to other customs and practices) based on information that was publically available..	22.4.3 23.2 23.3
532	12.2 – Aboriginal Rights	Identify specific asserted aboriginal rights and titles	11.2	N	Neskonlith Indian Band	As above; viewpoint is Province's, not Secwepemc (Neskonlith)	The issue of Aboriginal title is the subject of discussion between the Provincial and Federal Crowns and the First Nations; no procedural aspects of consultation related to Aboriginal title have been delegated to the Proponent. Therefore, an assessment of the potential effects of the Project on Aboriginal Title is not included in Chapter 23 (Aboriginal Rights and Interests). The proponent has amended its assessment of Aboriginal Rights and Interests (Chapter 23) to more thoroughly characterize the Aboriginal Rights of SFN, ALIB, NIB and LSIB. A more detailed characterization of Aboriginal groups' customs and practices are provided in section 22.4.3 (as they relate to the use of lands and resources) and section 23.2 and 23.3 (as they relate to other customs and practices) based on information that was publically available	22.4.3 23.2 23.3
533	12.3 – Socio-economic Setting	Focus on the socio-economic setting of the four First Nations that could potentially become impacted, both positively and/or negatively, by the activities of the Project	11.3	N	Neskonlith Indian Band	Comments and recommendations received by Neskonlith have been completely ignored in the current application (Neskonlith)	The proponent has amended its application to include a more robust characterization of the Neskonlith Indian Band's current socio-economic setting (section 23.3.4) based on a Socio-economic baseline report provided by Neskonlith Indian Band following the initial submission of the application.	23.3.4
534	12.3 – Socio-economic Setting	Include information pertaining to their social situation and discuss topics such as population, demographics, language, cultural practices, traditional learning, and infrastructure	11.3	N	Neskonlith Indian Band	Comments and recommendations received by Neskonlith have been completely ignored in the current application (Neskonlith)	The proponent has amended its application to include a more robust characterization of the Neskonlith Indian Band's current socio-economic setting (section 23.3.4) based on a Socio-economic baseline report provided by Neskonlith Indian Band following the initial submission of the application.	23.3.4

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535	12.3 – Socio-economic Setting	Include information pertaining to their economic situation such as development opportunities, employment, labour force, food source, and general economic setting	11.3	N	Neskonlith Indian Band	Comments and recommendations received by Neskonlith have been completely ignored in the current application (Neskonlith)	The proponent has amended its application to include a more robust characterization of the Neskonlith Indian Band's current socio-economic setting (section 23.3.4) based on a Socio-economic baseline report provided by Neskonlith Indian Band following the initial submission of the application.	23.3.4
536	12.4 – Traditional Knowledge	Include a discussion regarding Traditional Knowledge and Traditional Land Use related to the Project area	11.4	Y/N	CEA Agency	Appendix U provides such a discussion for Simpcw only. Note, however, it is not integrated into the EIS	The proponent has requested traditional use information from each of the Lakes Division First Nations on a number of occasions but has yet to receive any specific information. The ALIB, NIB and LSIB did not undertake a TK/TU study for the Project. Therefore, no information was available on site-specific uses in the vicinity of the Project except from desk-based, secondary source literature. A characterization of Shuswap Lakes Division use of lands and resources is now found in section 22.4.3 using information available to the proponent.	22.4.3
537	12.4 – Traditional Knowledge	Include a discussion regarding Traditional Knowledge and Traditional Land Use related to the Project area	11.4	Y/N	CEA Agency	Virtually no information related to Shuswap Lakes division (i.e., ALIB, Splats'in and Neskonlith)	The proponent has requested traditional use information from each of the Lakes Division First Nations on a number of occasions but has yet to receive any specific information. The ALIB, NIB and LSIB did not undertake a TK/TU study for the Project. Therefore, no information was available on site-specific uses in the vicinity of the Project except from desk-based, secondary source literature. A characterization of Shuswap Lakes Division use of lands and resources is now found in section 22.4.3 using information available to the proponent.	22.4.3
538	12.4 – Traditional Knowledge	Include a discussion regarding Traditional Knowledge and Traditional Land Use related to the Project area	11.4	N	Neskonlith Indian Band	The traditional knowledge and related interests of Neskonlith Indian Band are lacking from this description (Neskonlith)	The proponent has requested traditional use information from each of the Lakes Division First Nations on a number of occasions but has yet to receive any specific information. The ALIB, NIB and LSIB did not undertake a TK/TU study for the Project. Therefore, no information was available on site-specific uses in the vicinity of the Project except from desk-based, secondary source literature. A characterization of Shuswap Lakes Division use of lands and resources is now found in section 22.4.3 using information available to the proponent.	22.4.3

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
539	12.4 – Traditional Knowledge	Discuss the current use of lands and resources for traditional purposes by local First Nations	11.4	Y/N	CEA Agency	Appendix U provides such a discussion for Simpcw only. Note, however, it is not integrated into the EIS	The proponent has requested traditional use information from each of the Lakes Division First Nations on a number of occasions but has yet to receive any specific information. The ALIB, NIB and LSIB did not undertake a TK/TU study for the Project. Therefore, no information was available on site-specific uses in the vicinity of the Project except from desk-based, secondary source literature. A characterization of Shuswap Lakes Division use of lands and resources is now found in section 22.4.3 using information available to the proponent. A characterization of Simpcw First Nation and use of lands and resources is now found in section 22.4.3 using information available to the proponent, including the Simpcw First Nation Traditional Use and Ecological Knowledge Study (Appendix 22-A).	22.4.3 Appendix 22-A
540	12.4 – Traditional Knowledge	Discuss the current use of lands and resources for traditional purposes by local First Nations	11.4	Y/N	CEA Agency	Virtually no information related to Shuswap Lakes division (i.e., ALIB, Splats'in and Neskonlith)	The proponent has requested traditional use information from each of the Lakes Division First Nations on a number of occasions but has yet to receive any specific information. The ALIB, NIB and LSIB did not undertake a TK/TU study for the Project. Therefore, no information was available on site-specific uses in the vicinity of the Project except from desk-based, secondary source literature. A characterization of Shuswap Lakes Division use of lands and resources is now found in section 22.4.3 using information available to the proponent.	22.4.3
541	12.4 – Traditional Knowledge	Discuss the current use of lands and resources for traditional purposes by local First Nations	11.4	N	Neskonlith Indian Band	Current use of lands and resource by Neskonlith members is lacking from the description (Neskonlith)	The proponent has requested traditional use information from each of the Lakes Division First Nations on a number of occasions but has yet to receive any specific information. The ALIB, NIB and LSIB did not undertake a TK/TU study for the Project. Therefore, no information was available on site-specific uses in the vicinity of the Project except from desk-based, secondary source literature. A characterization of Shuswap Lakes Division use of lands and resources is now found in section 22.4.3 using information available to the proponent.	22.4.3

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542	12.4 – Traditional Knowledge	Discuss potential impacts of the Project on traditional use and asserted rights	11.4	Y/N	CEA Agency	Not developed in the EIS	The proponent has amended its application to provide a more thorough assessment of potential effects to current use of lands and resources (Chapter 22) as well as the potential effects on the exercise of Aboriginal rights (section 23.5) utilizing a methodology modified from that outlined in Chapter 8 (Assessment Methodology).	Chapter 22 23.5
543	12.4 – Traditional Knowledge	Discuss potential impacts of the Project on traditional use and asserted rights	11.4	Y/N	CEA Agency	Appendix U provides such a discussion for Simpcw only. Note, however, it is not integrated into the EIS	The proponent has requested traditional use information from each of the Lakes Division First Nations on a number of occasions but has yet to receive any specific information. The ALIB, NIB and LSIB did not undertake a TK/TU study for the Project. Therefore, no information was available on site-specific uses in the vicinity of the Project except from desk-based, secondary source literature. A characterization of Shuswap Lakes Division use of lands and resources is now found in section 22.4.3 using information available to the proponent. A characterization of Simpcw First Nation use of lands and resources is now found in section 22.4.3 using information available to the proponent, including the Simpcw First Nation Traditional Use and Ecological Knowledge Study (Appendix 22-A). The proponent has amended its application to provide a more thorough assessment of potential effects to current use of lands and resources (Chapter 22) as well as the potential effects on the exercise of Aboriginal rights (section 23.5) utilizing a methodology modified from that outlined in Chapter 8 (Assessment Methodology).	22.4.3 Appendix 22-A Chapter 22 23.5

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544	12.4 – Traditional Knowledge	Discuss potential impacts of the Project on traditional use and asserted rights	11.4	Y/N	CEA Agency	Virtually no information related to Shuswap Lakes division (i.e., ALIB, Splats'in and Neskonlith)	The proponent has requested traditional use information from each of the Lakes Division First Nations on a number of occasions but has yet to receive any specific information. The ALIB, NIB and LSIB did not undertake a TK/TU study for the Project. Therefore, no information was available on site-specific uses in the vicinity of the Project except from desk-based, secondary source literature. A characterization of Shuswap Lakes Division use of lands and resources is now found in section 22.4.3 using information available to the proponent. A characterization of Simpcw First Nation use of lands and resources is now found in section 22.4.3 using information available to the proponent, including the Simpcw First Nation Traditional Use and Ecological Knowledge Study (Appendix 22-A). The proponent has amended its application to provide a more thorough assessment of potential effects to current use of lands and resources (Chapter 22) as well as the potential effects on the exercise of Aboriginal rights (section 23.5) utilizing a methodology modified from that outlined in Chapter 8 (Assessment Methodology).	22.4.3 Appendix 22-A Chapter 22 23.5
545	12.4 – Traditional Knowledge	Discuss potential impacts of the Project on traditional use and asserted rights	11.4	N	Neskonlith Indian Band	There is no description of impacts on Neskonlith's interests (Neskonlith)	In September 2012, the BC EAO carried out strength of claim assessments for each Aboriginal group in conjunction with the Ministry of Aboriginal Relations and Reconciliation (BC MARR) and Ministry of Forests Lands and Natural Resource Operations (BC MFLNRO). The assessments assumed that Aboriginal rights within Secwepemc territory are held at the level of the historic divisions of the Secwepemc Nation. Therefore, Aboriginal rights and interests of the Nekonlith Band has been characterized and assessed at the level of the Shuswap Lakes Division.The proponent has amended its assessment of effects to Aboriginal rights and Interests (Chapter 23) to include a characterization of Lakes Division Secwepemc Aboriginal rights. An assessment of potential impacts to the exercise of Lakes Division Aboriginal rights and interests is provided in section 23.5.5.	23.5.5

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546	12.4 – Traditional Knowledge	Discuss appropriate mitigation measures to avoid or reduce the identified potential impacts	11.4	N	Neskonlith Indian Band	There is no description of mitigation measures for impacts to Neskonlith's interests (Neskonlith)	The proponent has amended its application to include an assessment of effects to Aboriginal rights (section 23.5), as well as a summary of other issues, interests and concerns raised by Aboriginal groups that are not necessarily rights based (section 23.6). These assessments include mitigation minimize or offset potential effects.	23.5 23.6
547	12.4 – Traditional Knowledge	Discuss appropriate mitigation measures to avoid or reduce the identified potential impacts	11.4	N	CEA Agency	Proponent claims they sought information but it wasn't provided in time for the EIS submission	Noted. The revised EIS submission will obviate this shortcoming.	--
548	12.5 – Other Aboriginal Interests	Detail aboriginal interests regarding potential environmental, heritage and health effects that may result due to Project development	11.5	N	CEA Agency	*Defer to Aboriginal groups for comment on adequacy*	Details of aboriginal interests regarding potential environmental, heritage and health effects that may result due to Project development are included in Chapter 23.	Chapter 23
549	12.5 – Other Aboriginal Interests	Detail aboriginal interests regarding potential environmental, heritage and health effects that may result due to Project development	11.5	N	Neskonlith Indian Band	Information is lacking pertaining to Neskonlith's interests (Neskonlith)	In September 2012, the BC EAO carried out strength of claim assessments for each Aboriginal group in conjunction with the Ministry of Aboriginal Relations and Reconciliation (BC MARR) and Ministry of Forests Lands and Natural Resource Operations (BC MFLNRO). The assessments assumed that Aboriginal rights within Secwepemc territory are held at the level of the historic divisions of the Secwepemc Nation. Therefore, Aboriginal rights and interests of the Nekonlith Band has been characterized and assessed at the level of Shuswap Lakes Division. The proponent has amended its assessment of effects to Aboriginal rights and Interests (Chapter 23) to include a characterization of Shuswap Lakes Division Aboriginal rights. An assessment of potential impacts to the exercise of Lakes Division Aboriginal rights and interests is provided in section 23.5.5. A summary of effects and mitigation related to other interests, issues and concerns raised by Aboriginal groups is provided in section 23.6.	23.5.5 23.6

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
550	12.5 – Other Aboriginal Interests	Include a summary of how these concerns/interests have been addressed	11.5, 11.6	N	Neskonlith Indian Band	No summary pertaining to how impacts to Neskonlith's interests have/will be addressed (Neskonlith)	In September 2012, the BC EAO carried out strength of claim assessments for each Aboriginal group in conjunction with the Ministry of Aboriginal Relations and Reconciliation (BC MARR) and Ministry of Forests Lands and Natural Resource Operations (BC MFLNRO). The assessments assumed that Aboriginal rights within Secwepemc territory are held at the level of the historic divisions of the Secwepemc Nation. Therefore, Aboriginal rights and interests of the Nekonlith Band has been characterized and assessed at the level of Shuswap Lakes Division. The proponent has amended its assessment of effects to Aboriginal rights and Interests (Chapter 23) to include a characterization of Shuswap Lakes Division Aboriginal rights. An assessment of potential impacts to the exercise of Lakes Division Aboriginal rights and interests is provided in section 23.5.5. A summary of effects and mitigation related to other interests, issues and concerns raised by Aboriginal groups is provided in section 23.6.	23.5.5 23.6
551	12.5 – Other Aboriginal Interests	Include a summary of how these concerns/interests have been addressed	11.5, 11.6	N	CEA Agency	*Defer to Aboriginal groups for comment on adequacy*	A summary of how these concerns have been addressed is provided in Chapter 23.	Chapter 23
552	12.6 – Aboriginal Consultation	Provide a summary of past and planned aboriginal consultation activities	11.6	Y	Neskonlith Indian Band	Planned activities are poorly defined, leaving much to "chance" There is no mention of structured consultation agreements or of capacity funding, the lack of which to date has severely restricted Neskonlith's ability to engage with the Proponent. (Neskonlith)	The revised Information Distribution and Consultation Chapter (Chapter 3) contains plans for proposed consultation during the Application review period for Aboriginal groups (section 3.5.3). Section 3.5.1.4 discusses HCMC's offers of EA-related funding to NIB.	Section 3.5.3, and 3.5.1.4
553	12.6 – Aboriginal Consultation	Detail key aboriginal issues of relevance to the EA and the responses to these issues	11.6	Y	Neskonlith Indian Band	Neskonlith's issues have either been misrepresented or are absent and the Proponents responses are inadequate or lacking (Neskonlith)	The revised Information Distribution and Consultation Chapter (Chapter 3) includes a revised issues tracking table for Neskonlith (Table 3-F3 of Appendix 3-F) that contains HCMC's detailed responses to address the issues. HCMC continued to consult with NIB following receipt of this comment. Any new issues raised by NIB since that time are included in Table 3-F3. Comments NIB provided on the Working Tables are discussed in section 3.5.1.9.	Section 3.5.1.9, Appendix 3-F

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
554	12.6 – Aboriginal Consultation	Reflect issues included in this section to those recorded in the tracking table that will be included in Section 3.1 of the Application and posted on the EAO website	Table 11.6-10	Y	Neskonlith Indian Band	Information is either lacking, inadequate or contrary to the comments provided by Neskonlith (Neskonlith)	The revised Information Distribution and Consultation Chapter (Chapter 3) includes a revised issues tracking table for Neskonlith (Table 3-F3 of Appendix 3-F) that contains HCMC's detailed responses to address the issues. HCMC continued to consult with NIB following receipt of this comment. Any new issues raised by NIB since that time are included in Table 3-F3. Comments NIB provided on the Working Tables are discussed in section 3.5.1.9.	Section 3.5.1.9, Appendix 3-F
555	12.6 – Aboriginal Consultation	Work closely with local First Nations to develop working agreements, such as a Memorandum of Understanding (MOU) and/or economic and Impact Benefit Agreements (IBAs)	11.6, 12.0	Y	Neskonlith Indian Band	Not addressed in application (Neskonlith)	Section 3.5.1.4 discusses the agreements HCMC has signed to date with Aboriginal groups (SFN and ALIB). HCMC and NIB have not signed any agreements to date.	Section 3.5.1.4
556	12.6 – Aboriginal Consultation	Report ongoing consultation with First Nations	11.6.5	Y	Neskonlith Indian Band	Consultation efforts have been marginal and ineffective throughout the process (Neskonlith)	The revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with Aboriginal groups, including NIB, in Section 3.5. A revised communications summary table for NIB is included in Table 3-E3 of Appendix 3-E. A revised issues tracking table for NIB (Table 3-F3 of Appendix 3-F) contains HCMC's detailed responses to address the issues NIB raised. HCMC continued to consult with NIB following receipt of this comment. Any new issues raised by NIB since that time are included in Table 3-F3. HCMC provided NIB with a Section 11 Order Consultation Report in October 2014 that included a summary of HCMC's consultations to date with NIB and a proposal for continued consultation during the Application review period. NIB had the opportunity to provide feedback on this document.	Section 3.5, Appendices 3-E and 3-F
557	13.0 – Summary of Potential Effects on Aboriginal Activities and Accommodation Measures	Discuss accommodation measures	12	N	CEA Agency	If present, not well-developed in any way	The proponent has amended its application to include a summary of potential effects on Aboriginal rights and mitigation/accommodation measures, if required. This information is provided in Table 23.7-1 of Chapter 23 (Aboriginal rights and interests).	Table 23.7-1

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558	13.0 – Summary of Potential Effects on Aboriginal Activities and Accommodation Measures	Discuss accommodation measures	12	N	Neskonlith Indian Band	Other than in specific instances involving Simpcw First Nation, no detailed consultation measures are outlined and a number of recommendation raised by Neskonlith appear to have been ignored (Neskonlith)	The revised Information Distribution and Consultation Chapter (Chapter 3) discusses consultation with Aboriginal groups, including NIB, in Section 3.5. A revised communications summary table for NIB is included in Table 3-E3 of Appendix 3-E. A revised issues tracking table for NIB (Table 3-F3 of Appendix 3-F) contains HCMC's detailed responses to address the issues NIB raised. HCMC continued to consult with NIB following receipt of this comment. Any new issues raised by NIB since that time are included in Table 3-F3. HCMC provided NIB with a Section 11 Order Consultation Report in October 2014 that included a summary of HCMC's consultations to date with NIB and a proposal for continued consultation during the Application review period. NIB had the opportunity to provide feedback on this document.	Section 3.5, Appendices 3-E and 3-F
559	13.0 – Summary of Potential Effects on Aboriginal Activities and Accommodation Measures	Include topics such as design considerations, mitigation measures, and specific commitments which address potential effects of the matters identified in earlier sections	12	N	Neskonlith Indian Band	Specific details for mitigation is generally lacking (Neskonlith)	The proponent has amended its application to include a summary of potential effects on Aboriginal rights and mitigation/accommodation measures, if required. This information is provided in Table 23.7-1 of Chapter 21 (Aboriginal rights and interests).	Table 23.7-1
560	13.0 – Summary of Potential Effects on Aboriginal Activities and Accommodation Measures	Include topics such as design considerations, mitigation measures, and specific commitments which address potential effects of the matters identified in earlier sections	12	N	CEA Agency	If present, not well-developed in any way	The proponent has amended its application to include a summary of potential effects on Aboriginal rights and mitigation/accommodation measures, if required. This information is provided in Table 23.7-1 of Chapter 21 (Aboriginal rights and interests).	Table 23.7-1
561	14.1 – Effects of the Environment on the Project	Discuss environmental factors that may potentially affect the proposed Project and attempt to predict the impacts of those environmental factors	6.9	Y/N	CEA Agency	Section 6.9.2 references Section 6.2 which presents the relevant data, but Appendix F that analyzes the data is not referenced.	The environmental factors that may potentially affect the proposed Project area discussed in Section 27.1, Introduction of Effects of the Environment on the Project. The remainder of Section 27 discusses the potential impacts of those environmental factors on the Project.	Chapter 27
562	14.1 – Effects of the Environment on the Project	Discuss environmental factors that may potentially affect the proposed Project and attempt to predict the impacts of those environmental factors	6.9	Y/N	CEA Agency	Should include an explanation here of why extreme weather events might be expected.	A discussion of why extreme weather events might be expected is included in Section 27.2.	Section 27.2

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563	14.1 – Effects of the Environment on the Project	Discuss environmental factors that may potentially affect the proposed Project and attempt to predict the impacts of those environmental factors	6.9	Y/N	NRCan	While the proponent has identified that the Tailings Management Facility (TMF) embankment is classified as high risk under the Canadian Dam Association (CDA) Dam Safety Guidelines, NRCan has not identified, from the information provided, any detailed analysis of earthquake hazard to justify this design level. NRCan notes that large structures can be affected by long-period ground motions that may be generated by large earthquakes at large distances (e.g. earthquakes on the Cascadia subduction zone). NRCan recommends that the proponent provide detailed information to identify the earthquake hazard (e.g. through Probabilistic Seismic Hazard Analysis). NRCan would also like clarification on the proponent's information for their statement "that 5 to 15 percent of single-family dwellings will experience substantial damage within a 50-year period". These figures appear quite high for the study region. Furthermore, the seismic design and performance of single-family dwellings is not comparable to the structures that are proposed in the Harper Creek mine project.	A probabilistic seismicity assessment for the Project was carried out by Knight Piésold in 2012, as a required informant into the design parameters for the tailings management facility (TMF) and other Project geotechnical structures (Appendix 5-F, Seismicity Assessment). The findings indicated that shallow crustal earthquakes in the southeastern region of BC would be the predominant seismic hazard for the Project. Return periods of 5,000 and 10,000 years for earthquakes of 7.0 and 7.3 magnitude respectively were selected as conservative design parameters. Peak Ground Acceleration (PGA) is a measure of how vigorously the earth shakes, and is measured in units of acceleration due to gravity (g). PGA was calculated for the Project area for six return periods. The range of results indicates that the Project area could experience PGA associated with earthquakes which range between 0.04 g (1:100 year event) and 0.26 g (1:10,000 year event). Events of these magnitudes in turn could be expected to result in "very light" (1:100 year event) to "moderate" (1:10,000 year event) structural damage.	Section 27.5
564	14.1 – Effects of the Environment on the Project	Discuss environmental factors that may potentially affect the proposed Project and attempt to predict the impacts of those environmental factors	6.9	Y/N	NRCan	NRCan notes that the proponent has not discussed the potential hazard from known active faults (e.g. Cascadia subduction zone). In addition, while only a minor hazard for this location, NRCan notes that the proponent has not addressed the potential for volcanic hazards (e.g. lahar flows, volcanic ash, etc) from the nearby Wells Gray-Clearwater volcanic field.	No active faults occur in the Project area (the nearest is over 300 km away), and are expected to affect the Project. The risk of volcanicism effecting the Project from the nearby Wells Gray-Clearwater volacanic field during the life of the Project is expected to be negligible.	Section 27.5.3
565	14.1 – Effects of the Environment on the Project	Be consistent with Section 2(1)(c) of CEAA which defines "environmental effects", in part, as "any change to the proposed Project that may be caused by the environment, whether any such change or effect occurs within or outside Canada."	6.9	Y	CEA Agency	Section 6.9.2 lists and provides a brief overview of extreme weather events that may affect the project, but does not give a rationale for these choices.	The rational for the choices of extreme weather events are provided in Section 27.2	Section 27.2

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566	14.1 – Effects of the Environment on the Project	Discuss environmental factors that may potentially affect the proposed Project and attempt to predict the impacts of those environmental factors	6.9	Y	CEA Agency	Flooding is a common consideration for projects, and while it may not be a factor for this project, it should be described as such.	The potential effects of flooding (i.e., extreme surface water flows) on the Project is considered in Section 27.3.2.	Section 27.3.2
567	14.1 – Effects of the Environment on the Project	Discuss how trends and extremes in current climate, seismic activity, and other natural hazards such as fire and floods could impact Project related infrastructure such as the pit and tailings facility	6.9	N	CEA Agency	P. 6.9-2: what about possibility of effects from extreme freezing events on the TMF?	The possibility of effects from extreme freezing events on the TMF are discussed in Section 27.2.2.3	Section 27.2.2.3
568	14.1 – Effects of the Environment on the Project	Discuss how trends and extremes in current climate, seismic activity, and other natural hazards such as fire and floods could impact Project related infrastructure such as the pit and tailings facility	6.9	N	NRCan	NRCan notes there are no details of where past seismic events are located; only a general description based on the NRCan 2010 Seismic Hazard Map is provided.	Figure 1 of Appendix 5-F (Seismicity Assessment) presents the details of where past seismic events are located.	Appendix 5-F
569	14.1 – Effects of the Environment on the Project	Discuss how trends and extremes in current climate, seismic activity, and other natural hazards such as fire and floods could impact Project related infrastructure such as the pit and tailings facility	6.9	N	NRCan	The level of seismicity quoted by the proponent does not seem to be appropriate for the region. NRCan recommends that this information should be revised.	A probabilistic seismicity assessment for the Project was carried out by Knight Piésold in 2012, as a required informant into the design parameters for the tailings management facility (TMF) and other Project geotechnical structures (Appendix 5-F, Seismicity Assessment). The findings indicated that shallow crustal earthquakes in the southeastern region of BC would be the predominant seismic hazard for the Project. Return periods of 5,000 and 10,000 years for earthquakes of 7.0 and 7.3 magnitude respectively were selected as conservative design parameters. Peak Ground Acceleration (PGA) is a measure of how vigorously the earth shakes, and is measured in units of acceleration due to gravity (g). PGA was calculated for the Project area for six return periods. The range of results indicates that the Project area could experience PGA associated with earthquakes which range between 0.04 g (1:100 year event) and 0.26 g (1:10,000 year event). Events of these magnitudes in turn could be expected to result in "very light" (1:100 year event) to "moderate" (1:10,000 year event) structural damage	Appendix 5-F

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
570	14.1 – Effects of the Environment on the Project	Discuss how trends and extremes in current climate, seismic activity, and other natural hazards such as fire and floods could impact Project related infrastructure such as the pit and tailings facility	6.9	N	BC MFLNRO	13-7 (Table 13.0-1 Summary of Overall Residual/Cumulative Effects) Western Toad - Key mitigation measure missing from the table – If vegetation clearing is to occur in western toad breeding habitat between April 1 and September 1, surveys will be performed by a QEP to identify whether breeding has occurred within the habitat, and a mitigation plan developed to mitigate against mortalities. (FLNRO)	Misplaced comment.	--
571	14.1 – Effects of the Environment on the Project	Identify measures to mitigate these effects	6.9	Y/N	CEA Agency	Mitigations description including Table 6.9-1: more detail needed. E.g. what is "a factor of safety"?	The Effects of the Environment on the Project chapter has been significantly revised; no "factor of safety" is mentioned in the chapter. Mitigation measures specific to each potential effect are discussed throughout the chapter.	Chapter 27
572	14.1 – Effects of the Environment on the Project	Identify measures to mitigate these effects	6.9	Y/N	NRCan	The proponent is aware of the CDA Dam Safety Guidelines and has identified a "high" risk category and design level (for a 1 in 2,500 year event) for the TMF. Without detailed hazard assessments underpinning this classification, NRCan cannot comment on the appropriateness of the classification. The fundamental driver for this level of design is to guard the TMF embankment dam against liquefaction hazards caused by strong ground shaking.	The TMF has been classified as having a "Very High" CDA Guidelines safety classification. The rational driving this classification is provided in Appendix 5-D, Mine Waste and Water Management Report (KP 2014), Section 5.3.	Appendix 5-D, Section 5.3
573	14.1 – Effects of the Environment on the Project	Identify measures to mitigate these effects	6.9	Y/N	NRCan	The proponent has also identified that mine-site structures will also be required to withstand strong ground-motions and have recognized the potential for soft surficial sediments to exacerbate ground-shaking levels. However, NRCan could not find any reference to the appropriate building code (i.e. 2010 National Building Code of Canada (NBCC)). NRCan recommends all engineered structures within the mine site be designed to the 2010 NBCC.	The Proponent thanks NRCan for this question, but believes the question is relevant to Project permitting rather than this Application/EIS. This question will be addressed in full during the Project's permitting stage.	N/A
574	14.1 – Effects of the Environment on the Project	Discuss potential effects of any contingency plans proposed to minimize effects of the environment on the proposed Project	6.9	N	CEA Agency	No contingency plans described. Need to specify whether any apply or whether proposed mitigations effectively negate the need for additional contingency consideration.	Contingencies for each potential effect of the environment on the Project are discussed throughout Chapter 27.	Chapter 27
575	14.1 – Effects of the Environment on the Project	Discuss potential effects of any contingency plans proposed to minimize effects of the environment on the proposed Project	6.9	N	NRCan	The proponent is cognizant of the consequences of the failure of the TMF owing to a variety of mechanisms. Consequently, the proponent recommends routine monitoring and inspection by mine site personnel to identify any potential weaknesses in the structure that may be exacerbated during strong earthquake ground-shaking. This will help to minimize the risk of catastrophic dam failure. However, it is not clear to NRCan whether these actions will continue beyond decommissioning of the mine. Please clarify.	Chapter 7, Closure and Reclamation, confirms that monitoring will continue, inter alia of the TMF, beyond the decommissioning of the mine.	7.12

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576	14.2 – Accidents and Malfunctions	If applicable, address potential accidents and malfunctions (and an assessment of potential effects to the environment as a result of them) during the construction, operation, and decommissioning phases of the Project	2.17	Y/N	CEA Agency	Pg. 2-82 - stockpiled contaminated soil needs to consider storage measures/containment and prevention of erosion/runoff.	The information requested has been provided in Section 26.4.1.2 under Emergency Response Procedures, and in Section 26.6.1.2 of the Application/EIS.	26.4.1.2; 26.6.1.2
577	14.2 – Accidents and Malfunctions	If applicable, address potential accidents and malfunctions (and an assessment of potential effects to the environment as a result of them) during the construction, operation, and decommissioning phases of the Project	2.17	Y/N	CEA Agency	Section 2.17.3.1: "…managed through the facilities and procedures in place for this project" --which are what? Summarized in the Waste Management Plan? Explain.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; Section 2.17.3.1 has been removed from the Application/EIS.	n/a
578	14.2 – Accidents and Malfunctions	If applicable, address potential accidents and malfunctions (and an assessment of potential effects to the environment as a result of them) during the construction, operation, and decommissioning phases of the Project	2.17	Y/N	CEA Agency	Section 2.17.3.2: paragraph on spills of hazardous waste may be more appropriately placed in the spills section. Also, spill reporting requirement and PEP program regarding fuel spills should be addressed in the leaks and spills section.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; Section 2.17.3.2 has been removed from the Application/EIS. The information requested has been addressed in full in Section 26.4.1.2.	26.4.1.2.
579	14.2 – Accidents and Malfunctions	If applicable, address potential accidents and malfunctions (and an assessment of potential effects to the environment as a result of them) during the construction, operation, and decommissioning phases of the Project	2.17	Y/N	CEA Agency	Section 2.17.9.1: need explanation of what a catastrophic failure is and how this is different from the other modes.	The information requested has been provided in Table 26.3-6 of the Application/EIS.	Table 26.3-6
580	14.2 – Accidents and Malfunctions	If applicable, address potential accidents and malfunctions (and an assessment of potential effects to the environment as a result of them) during the construction, operation, and decommissioning phases of the Project	2.17	Y/N	CEA Agency	Table 2.17-11: Emergency Response Plan's description of measures has nothing to do with dam failure.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; Section 2.17.11 has been removed from the Application/EIS.	n/a

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581	14.2 – Accidents and Malfunctions	Identification of potential accidents and malfunctions that could lead to environmental, health, economic, social, and/or heritage impacts on-site and during transport of concentrate (e.g., tailings dam failure, fuel spills, concentrate spills, settling pond water release, etc.)	2.17	Y/N	CEA Agency	Section 2.17: sources are identified but potential accidents and malfunctions that could occur are generally unclear, disorganized or not explained.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; Section 2.17 has been removed from the Application/EIS. The information requested has been addressed in full in Section 26.4-1, 26.4-2, 26.4-3, 26.4-4.	26.4-1, 65.4-2, 26.4-3, 26.4-4.
582	14.2 – Accidents and Malfunctions	Identification of potential accidents and malfunctions that could lead to environmental, health, economic, social, and/or heritage impacts on-site and during transport of concentrate (e.g., tailings dam failure, fuel spills, concentrate spills, settling pond water release, etc.)	2.17	Y/N	CEA Agency	Section 2.17.2: spills and leaks of what materials? Specify. Chemicals and reagents are mentioned during the decommissioning phase (pg. 2-82) but are not identified and are not considered during other phases.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; Section 2.17.2 has been removed from the Application/EIS. The information requested has been addressed in full in Table 26.4-1.	Table 26.4-1
583	14.2 – Accidents and Malfunctions	Identification of potential accidents and malfunctions that could lead to environmental, health, economic, social, and/or heritage impacts on-site and during transport of concentrate (e.g., tailings dam failure, fuel spills, concentrate spills, settling pond water release, etc.)	2.17	Y/N	CEA Agency	Section 2.17.2.1 a: spills and leaks of fuel and oil can occur from vehicles and equipment during activities other than refueling and servicing (e.g. while in use, fording of streams). Where is this discussed?	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; Section 2.17.2.1 has been removed from the Application/EIS. The information requested has been addressed in full in Section 26.4-1 and 26.4-2.	26.4-1 and 26.4-2
584	14.2 – Accidents and Malfunctions	Identification of potential accidents and malfunctions that could lead to environmental, health, economic, social, and/or heritage impacts on-site and during transport of concentrate (e.g., tailings dam failure, fuel spills, concentrate spills, settling pond water release, etc.)	2.17	Y/N	EC	Section 2.17.3: what hazardous materials are included? The final risk assessment and subsequent plans should include a comprehensive inventory of hazardous materials which might be stored at all permanent and temporary work sites, including Standard Operating Procedures or Best Management Practices for proper storage of materials (e.g. compatibility issues, secondary containment). It is requested that the proponent clarify how it will factor these considerations into its risk assessment and environmental planning efforts.	The information requested has been provided in full in Section 26.4.2, Section 26.4.3 and Table 26.4-1 of the Application/EIS.	Section 26.4.2, Section26.4.3 and Table 26.4-1

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585	14.2 – Accidents and Malfunctions	Identification of potential accidents and malfunctions that could lead to environmental, health, economic, social, and/or heritage impacts on-site and during transport of concentrate (e.g., tailings dam failure, fuel spills, concentrate spills, settling pond water release, etc.)	2.17	Y/N	CEA Agency	Section 2.17.3.1: inconsistency in considering human waste in scope of hazardous materials accidents when in the waste management plan it is not considered a hazardous material. Explanation/reconciliation required.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; Section 2.17.3.1 has been removed from the Application/EIS.	n/a
586	14.2 – Accidents and Malfunctions	Identification of potential accidents and malfunctions that could lead to environmental, health, economic, social, and/or heritage impacts on-site and during transport of concentrate (e.g., tailings dam failure, fuel spills, concentrate spills, settling pond water release, etc.)	2.17	Y/N	NRCan	NRCan is satisfied that the proponent has identified and understands the social and environmental consequences of failure of the TMF Containment Dam caused by a variety of environmental factors (including earthquakes). However, NRCan recommends that the proponent put in place, a strategy for continuing to monitor the structural integrity of the tailings dam beyond the life-cycle of the mine itself.	Post-closure, long-term monitoring of the integrity of the TMF is described in Section 26.7.1.2.	26.7.1.2
587	14.2 – Accidents and Malfunctions	Identification of potential accidents and malfunctions that could lead to environmental, health, economic, social, and/or heritage impacts on-site and during transport of concentrate (e.g., tailings dam failure, fuel spills, concentrate spills, settling pond water release, etc.)	2.17	Y/N	EC	All storage and handling of petroleum products and allied petroleum products should be undertaken in accordance with the CCME Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (2003). Environment Canada considers the CCME Environmental Code of Practice to be the basis of good storage tank management and its applicability extends to "temporary" fuelling facilities and construction activities. It is requested that the proponent describe how it has considered the CCME Environmental Code of Practice in its plans for minimizing environmental risks. For clarity, this code, acknowledged in the EIS (p. 10-75), is a set of standards and practices and is referenced by certain regulations, but itself is not a regulatory document.	The information requested has been provided in full in Section 26.4.1.2 of the Application/EIS.	26.4.1.2
588	14.2 – Accidents and Malfunctions	Identification of potential accidents and malfunctions that could lead to environmental, health, economic, social, and/or heritage impacts on-site and during transport of concentrate (e.g., tailings dam failure, fuel spills, concentrate spills, settling pond water release, etc.)	2.17	Y/N	EC	While the importance of spill prevention to protection of watercourses is recognized in the EIS, site-specific sensitive environmental receptors should be identified and described to facilitate an understanding of potential impacts and appropriate mitigation measures. For example, the proponent is requested to identify sensitive habitats that could be impacted in the event of a spill or release, and outline specific response strategies accordingly. In this regard, particular attention should be given to species protected under the Species at Risk Act.	The information requested has been provided in full in Section 26.4 of the Application/EIS by including information on the sensitive habitats that could be impacted in the event of: a fuel spill on land in section 26.4.1.3, a fuel spill on water in section 26.4.2.3, a spill of hazardous substance in water in section 26.4.3.3, and a spill of hazardous substances on land in section 26.4.4.3.	26.4.1.3, 26.4.2.3, 26.4.3.3, 26.4.4.3

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
589	14.2 – Accidents and Malfunctions	Identification of potential accidents and malfunctions that could lead to environmental, health, economic, social, and/or heritage impacts on-site and during transport of concentrate (e.g., tailings dam failure, fuel spills, concentrate spills, settling pond water release, etc.)	2.17	Y/N	EC	In section 10.11, the Emergency Response Plan (ERP) needs to be fully developed and operational during the construction, operations and decommission phases of the proposed mine. The scope and site-specific details within the ERP can be relative to the risk presented by the facility (work site). For relatively small storage areas, simple posted response instructions may be adequate. An acceptable guidance document is the CSA Z731-03 (Emergency Preparedness and Response) standard in producing the spill contingency plan. Training, communications, and exercise design should follow CSA Z731-03 or similar industry recognized standard. Note that if the facility / operations are deemed subject to the Canadian Environmental Protection Act (CEPA) Environmental Emergencies Regulation, then it is possible that the ERP is a legislative requirement. The proponent is requested to describe how it has considered the CSA standard or similar industry-recognized standard, as well as potential applicability of the CEPA Environmental Emergency Regulations, in advancing development of an ERP.	The Canadian Standards Association document titled *Emergency Preparedness and Response: A National Standard of Canada* (CAN/CSA-Z731-03) is acknowledge. However, the EMP has been prepared according to the legislative requirement contained in the *Health, Safety and Reclamation Code for Mines in British Columbia* (BC MEMPR 2008), which is empowered under the *Mines Act* (1996). Thus, an industry-recognized and statutory standard has been considered in the preparation of the initial ERP, as described in Chapter 24, Environmental Management Plans and Reporting. More detailed information will be developed during the permitting process.	24.4.2
590	14.2 – Accidents and Malfunctions	An assessment of potential failure hazards (including natural hazards such as landslides and seismic activity) and consequences for Project components and infrastructure	2.17	Y/N	CEA Agency	Table 2.17-3 categories of likelihoods: how are these assessed for the different types of accidents/malfunctions? Are they based on studies, and if so, references are needed. E.g. <1% likelihood of dam failure occurring is based on what (pg. 2-100).	The information requested has been provided in full in Section 26.3.2.4 of the Application/EIS.	26.3.2.4
591	14.2 – Accidents and Malfunctions	An assessment of potential failure hazards (including natural hazards such as landslides and seismic activity) and consequences for Project components and infrastructure	2.17	Y/N	CEA Agency	What could cause the failure of Sediment and Erosion Control Measures?	The information requested has been provided in full in Section 26.6.1 of the Application/EIS.	26.6.1
592	14.2 – Accidents and Malfunctions	An assessment of potential failure hazards (including natural hazards such as landslides and seismic activity) and consequences for Project components and infrastructure	2.17	Y/N	CEA Agency	Section 2.17.4.1: Failure of sediment ponds would not only damage fish habitat, would cause direct damage to fish as well, and possibly fish mortality. What fish and fish habitat are in the path of this potential danger?	The information requested has been provided in full in Section 26.6.1.3 of the Application/EIS.	26.6.1.3
593	14.2 – Accidents and Malfunctions	An assessment of potential failure hazards (including natural hazards such as landslides and seismic activity) and consequences for Project components and infrastructure	2.17	Y/N	CEA Agency	Assessment and effects of potential failures from natural hazards discussed in section 6.9 (Effects of the Environment on the Project), not 2.17.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; Section 2.17 and 6.9 have been removed from the Application/EIS. The information requested has been addressed in Chapter 27: Effects of the Environment on the Project	Chapter 27

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594	14.2 – Accidents and Malfunctions	An assessment of potential failure hazards (including natural hazards such as landslides and seismic activity) and consequences for Project components and infrastructure	2.17	Y/N	CEA Agency	It is not clear what the cause and consequences of pump failure would be. From power outages? Failure of sediment-laden water and water level control? Explanation required.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; this section has been removed from the Application/EIS.	n/a
595	14.2 – Accidents and Malfunctions	An assessment of potential failure hazards (including natural hazards such as landslides and seismic activity) and consequences for Project components and infrastructure	2.17	Y/N	NRCan	NRCan is satisfied that the proponent has identified and understands the social and environmental consequences of failure of the TMF Containment Dam caused by a variety of environmental factors (including earthquakes). However, NRCan recommends that the proponent put in place, a strategy for continuing to monitor the structural integrity of the tailings dam beyond the life-cycle of the mine itself.	Post-closure, long-term monitoring of the integrity of the TMF is described in Section 26.7.1.2 of the Application/EIS.	26.7.1.2
596	14.2 – Accidents and Malfunctions	An assessment of potential failure hazards (including natural hazards such as landslides and seismic activity) and consequences for Project components and infrastructure	2.17	N	BC MOE	No discussion of landslides, except as a consequence of a seismic event, e.g., what about a failure of a waste rock dump or pit wall? MOE)	The information requested has been addressed in Chapter 27: Effects of the Environment on the Project. Appendices 5-C and 5-D contain additional information related to landslides and waste rock dump structural integrity.	Chapter 27 Appendix 5-C Appendix 5-D
597	14.2 – Accidents and Malfunctions	A summary of proposed groundwater protection measures from spills and leaks that may occur on-site or during the transport of concentrate	2.17	Y/N	CEA Agency	Section 2.17.2.2: level of hazardousness of the copper concentrate needs to be clear, along with response procedure for clean-up-- "Appropriate controls and care will be taken to prevent spillage or gradual accumulation" -- what care and controls? Details required/reference to relevant section in relevant EMP required.	The information requested has been provided in full in Section 26.4.3.2 and Section 26.4.4.2 of the Application/EIS.	26.4.3.2 and 26.4.4.2
598	14.2 – Accidents and Malfunctions	A list of on-site storage locations for chemicals and reagents anticipated for use on site (e.g. in the mill circuits and process plant) along with the estimated maximum volume and concentration of the reagents	2.17	N	CEA Agency	Not clear/missing.	The information requested has been provided in full in Table 26.4-1 of the Application/EIS.	Table 26.4-1
599	14.2 – Accidents and Malfunctions	A list of on-site storage locations for chemicals and reagents anticipated for use on site (e.g. in the mill circuits and process plant) along with the estimated maximum volume and concentration of the reagents	2.17	N	BC MOE	Did not see this (MOE)	The information requested has been provided in full in Table 26.4-1 of the Application/EIS.	Table 26.4-1

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
600	14.2 – Accidents and Malfunctions	A description of on-site containment features, such as concrete pads and dykes, and detection systems used for early warning and containment of spills	2.17	Y/N	CEA Agency	Mentioned sporadically (e.g. "all hazardous material would be stored in lined or sealed areas", pg. 2-84), more details needed.	The information requested has been provided in full in Section 26.4.3.2 and Section 26.4.4.2 of the Application/EIS.	26.4.3.2 and 26.4.4.2
601	14.2 – Accidents and Malfunctions	A description of on-site containment features, such as concrete pads and dykes, and detection systems used for early warning and containment of spills	2.17	N	BC MOE	Just very brief and general… spill containment pads/basins mentioned but nothing about detection systems (MOE)	The information requested has been provided in full in Section 26.4.1.2 of the Application/EIS.	26.4.1.2
602	14.2 – Accidents and Malfunctions	A summary of potential accidents and/or malfunctions associate with each stage of the Project from routine activities to other activities such as blasting	2.17	Y/N	CEA Agency	A table summarizing this information per stage would satisfy this requirement.	The information requested has been provided in full in Table 26.3-2 of the Application/EIS.	Table 26.3-2
603	14.2 – Accidents and Malfunctions	The rationale for each selected storage location and measures that may be taken to protect the immediate environment from spills and/or leaks	2.17	N	CEA Agency	Rationale not provided.	The information requested has been provided in full in Table 26.4-1 of the Application/EIS.	Table 26.4-1
604	14.2 – Accidents and Malfunctions	The rationale for each selected storage location and measures that may be taken to protect the immediate environment from spills and/or leaks	2.17	N	CEA Agency	Measures to protect the immediate environment also supposed to be included in the Emergency Response Plan in Section 10.	The Emergency Response Plan has been provided in full in Section 24.4 of the Application/EIS. The information requested with respect to measures to protect the immediate environment following a spill or a leak has been addressed in section 26.4.1.2 for a fuel spill on land, in section 26.4.2.2 for a fuel spill on water, in section 26.4.3.2 for a spill of hazardous substances in water, and in section 26.4.4.2 for and a spill of hazardous substances on land.	24.4; 24.4.1.2; 24.4.2.2; 24.4.3.2; 24.4.4.2
605	14.2 – Accidents and Malfunctions	The rationale for each selected storage location and measures that may be taken to protect the immediate environment from spills and/or leaks	2.17	N	CEA Agency	Table 2.17-4: how do the plans address spills/leaks differently from each other? The Emergency Response Plan does not include "measures to respond to and control and mitigate spills or other accidental releases". Why is the location of spill kits buried in the Sediment and Drainage Plan? How does the Terrestrial Environment Management Plan address spills and leaks?	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; table 2.17-4 has been removed from the Application/EIS. The Emergency Response Plan has been provided in full in Section 24.4 of the Application/EIS; the Spill Prevention and Response Plan has been provided in full in Section 24.15 of the Application/EIS.	24.4; 24.25

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
606	14.2 – Accidents and Malfunctions	The rationale for each selected storage location and measures that may be taken to protect the immediate environment from spills and/or leaks	2.17	N	CEA Agency	There does not seem to be any measures described for response to spills and leaks on site during normal operational activities, particularly regarding fuel (outside of refueling and servicing).	The information requested has been provided in full in Table 26.3-2 of the Application/EIS by identifying the project routine activities that could lead to spills and leaks, and in section 26.4.1.2 for measures for a fuel spill on land, in section 26.4.2.2 for a fuel spill on water, in section 26.4.3.2 for a spill of hazardous substances in water, and in section 26.4.4.2 for and a spill of hazardous substances on land.	Table 26.3-2; 24.4; 26.4.1.2; 26.4.2.2; 26.4.3.2; 26.4.4.2
607	14.2 – Accidents and Malfunctions	The rationale for each selected storage location and measures that may be taken to protect the immediate environment from spills and/or leaks	2.17	N	CEA Agency	Section 2.17.2.3 on page 2-81, part a): ''relevant government laws and regulations'' which are what? Part b) and c): if the proponent/contractor will also be refueling equipment then they also need a spill response plan, not just the supplier.	The information requested has been provided in full in Section 26.4.1.2 and 24.15.3.4 of the Application/EIS by including references to relevant laws and regulations. The Proponent's Spill Prevention and Response Plan is included in Section 24.15 of the Application/EIS.	26.4.1.2; 24.15.3.4
608	14.2 – Accidents and Malfunctions	The rationale for each selected storage location and measures that may be taken to protect the immediate environment from spills and/or leaks	2.17	N	CEA Agency	Pg. 2-82 a) "refueling and servicing cannot take place close to waterbodies" what about standard setbacks? Needs to be more specific. E.g. 30m?	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; this section has been removed from the Application/EIS.	n/a
609	14.2 – Accidents and Malfunctions	The rationale for each selected storage location and measures that may be taken to protect the immediate environment from spills and/or leaks	2.17	N	CEA Agency	Pg. 2-82 spill response needs to include: training of personnel, equipment that works and is supplied in adequate amounts, designated and clearly marked emergency/clean-up supply stations with MSDS data sheets.	The information requested has been provided in full in Section 26.4.1.2 for a fuel spill on land, in Section 26.4.2.2 for a fuel spill on water, in Section 26.4.3.2 for a spill of hazardous substances in water, and in Section 26.4.4.2 for and a spill of hazardous substances on land.	24.4.1.2; 24.4.2.2; 24.4.3.2; 24.4.4.2
610	14.2 – Accidents and Malfunctions	The rationale for each selected storage location and measures that may be taken to protect the immediate environment from spills and/or leaks	2.17	N	CEA Agency	Relationship between Section 2.17 and Section 10 needs to be improved. Ideally, as Section 10 pertains to EMS/EMPs, it should be placed in its own appendix with references to the appropriate subsections of the EMP placed throughout Section 2.17.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns; Section 2.17 has been removed from the Application/EIS.	n/a
611	14.2 – Accidents and Malfunctions	The rationale for each selected storage location and measures that may be taken to protect the immediate environment from spills and/or leaks	2.17	N	BC MOE	Generally stated that fuel/chemical storage locations will be such that spills won't run directly into creeks or other surface waters. No list of specific locations for specific products. (MOE)	The information requested has been provided in full in Table 26.4-1 of the Application/EIS.	Table 26.4-1
612	14.2 – Accidents and Malfunctions	The likely environmental, economic, social, heritage, or health effects that could result from these occurrences	2.17	Y/N	CEA Agency	Rationale/basis of likelihood of effects not explained.	The information requested has been provided in full in Table 26.3-5 of the Application/EIS, and provided in full for each scenario, in the respective sections 26.X.X.4: Risk Assessment.	Table 26.3-5; 26.X.X.4

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613	14.2 – Accidents and Malfunctions	The likely environmental, economic, social, heritage, or health effects that could result from these occurrences	2.17	Y/N	CEA Agency	Effects that could result from accidents/malfunctions are not adequately explored. For example, sediment release could cause direct mortality and damage to fish, not just fish habitat.	The information requested has been provided in full for each scenario, in the respective sections 26.X.X.3, Potential Effects in the Application/EIS.	26.X.X.3
614	14.2 – Accidents and Malfunctions	Proposed mitigation including a commitment to appropriate environmental management/contingency plans and on-site emergency response procedures	2.17	Y/N	CEA Agency	Need clarity on the organization/coordination of the EIS summaries and the management plans. It is unclear what text should be located where between the EIS and mgmt plans because of the degree of overlap. Relationship between section 2.17 and Section 10/EMS/EMPs needs to be improved.	The Accidents and Malfunctions chapter underwent significant changes to address reviewers' concerns. All relevant management plans to the accident and malfunction scenario being discussed are included under the respective heading 26.X.X.2 and under Environmental Management Plans in Chapter 24..	26.X.X.2 24.1 to 24.19
615	14.3.1 – Alternatives to the Proposed Project	Identify and evaluate "alternatives to" the proposed Project (i.e., functionally different ways to meet the Project need and achieve the Project purpose) in accordance with Section 16(1)€ of CEAA based on environmental, engineering, and socio-economic considerations	3.2	Y	CEA Agency	Environmental analysis should include a statement about how the project does not intersect with any park land, critical habitat, or other highly environmentally sensitive biotic or abiotic components for environmental considerations to weigh significantly in the analysis of alternatives. This can be further substantiated by including a statement of confidence in the mitigation measures proposed within the EIS for the environmental factors that were determined by the working group to be most important in light of the proposed project. This would help to characterize/explain the environmental acceptability statement in the first column of Table 3.2-1	The introduction of the alternatives assessment analysis text has been amended to include a statement that the Project area generally does not overlap environmentally and socio-economically sensitive areas; however, when an alternative does have the potential to affect an environmental or socio-economic area or receptor, the potential effect to this receptor is discussed. The confidence of the effectiveness of individual mitigation measures is included in the relevant assessment chapters.	4.1
616	14.3.2 – Alternative Means of Carrying Out the Project	Describe alternative means of carrying out the Project that are technically and economically feasible	3.3	Y	CEA Agency	First paragraph needs to be revised to clarify the purpose of the alternative means analysis. Recommend citing or restating the CEA Agency Ops Policy statement section text: "Alternative means" are the various technically and economically feasible ways the project can be implemented or carried out. This could include, for example, alternative locations, routes and methods of development, implementation and mitigation". This will also help to explain the regulatory context for the requirement.	The first paragraph of the alternatives assessment analysis has been adjusted to include the definition of "alternative means" included in the Operational Policy Statement Addressing "Need for," "Purpose of," "Alternatives to," and "Alternative Means" under the Canadian Environmental Assessment Act (CEA Agency 2007).	4.1
617	14.3.2 – Alternative Means of Carrying Out the Project	Describe alternative means of carrying out the Project that are technically and economically feasible	3.3	N	BC MFLNRO	No acceptable alternatives are provided for the majority of project components or phases. "Go /No Go" scenarios (FLNRO)	All options considered in the analysis have been expanded to include at least one feasible alternative.	4.3 4.4
618	14.3.2 – Alternative Means of Carrying Out the Project	Include the identification of potential environmental effects of any such alternative means for each alternative presented	3.3	Y		For clarity of organization and document structure, recommend including alternative mining methods, alternative ore processing methods, and employee accommodations in the bulleted list near the start of the section. Can keep the same text, but provide each with their own subsection as done for the other alternatives in the existing list. This list in this case creates a preface for the reader of what to expect next, so if the list starts with alternatives considerations for TMF locations, then that is what presumably should be the first section immediately after the list.	The alternatives assessment chapter has been restructured to better follow the structure outlined in the Project's Application Information Requirements.	4

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619	14.3.2 – Alternative Means of Carrying Out the Project	Include the reasons for selecting the preferred option, an analysis of the alternative means of carrying out the Project that are technically and economically feasible and the associated environmental effects of the alternative option, if associated effects are anticipated	3.3	N	CEA Agency	Associated environmental effects of the preferred alternative option should be explained, i.e.: for TMF alternative, "HCMC will implement measures to ensure the proper segregation and storage of PAG wastes" — should refer to appropriate section of the EIS where this is considered and/or provide a brief explanation as to how this will be done. This applies to each alternatives assessment summary section.	The alternatives assessment chapter has been restructured to include more fulsome references to relevant EIS chapters.	4
620	14.4 – Follow-up Programs	Describe the follow-up programs and its associated requirements	10.15	Y/N	CEA Agency	Key anticipated follow-up programs should be identified and outlined at this stage in the EA with the understanding that detailed characterization of the follow-up programs will take place through the detailed review/regulatory phase of the EA.	Follow-up programs are identified for groundwater, and fish and aquatic resources as presented in Section 28.6.4.	Section 28.6.4
621	14.4 – Follow-up Programs	Include a summary table of proposed commitments such as mitigation, emergency response, environmental management plan activities, design features, commitments to a follow-up plan and commitments to meeting specific environmental, health, or social standards/guidelines	14	Y/N	CEA Agency	This should be labeled as a table of commitments, not conditions.	Table 28.8-1 is labelled as "Table of Commitments"	Section 28.8
622	14.4 – Follow-up Programs	Include a summary table of proposed commitments such as mitigation, emergency response, environmental management plan activities, design features, commitments to a follow-up plan and commitments to meeting specific environmental, health, or social standards/guidelines	14	Y/N	CEA Agency	Information provided in table is very high level/general and does not provide an appropriate level of detail or a comprehensive list of commitments that could be obtained at this point in the EA. However, it is acknowledged that this table will be substantially populated and articulated as the EA enters the detailed review phase.	The Table of Commitments has been provided in Table 28.8-1.	Table 28.8-1
623	14.4 – Follow-up Programs	Include an assessment of whether or not the monitoring conducted during construction, operations, and decommissioning was appropriate to measure potential effects and whether or not the effects predicted in the environmental assessment were valid	10.15	N	CEA Agency	Information missing.	The evaluation of whether monitoring is appropriate to determine effects of the predictions of the environmental assessment are inherent in the Project's Environmental Management Plans, including those intended for the Follow-up Program.	Section 28.6.4

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624	14.4 – Follow-up Programs	Complete follow-up program, if applicable, in accordance with the CEAA "Operational Policy Statement: Follow-up Programs documents"	10.15	Y/N	CEA Agency	Key anticipated follow-up programs should be identified and outlined at this stage in the EA with the understanding that detailed characterization of the follow-up programs will take place through the detailed review/regulatory phase of the EA.	Follow-up programs are identified for groundwater, and fish and aquatic resources as presented in Section 28.6.4.	Section 28.6.4
625	15.0 – Summary of Residual Effects	Summarize the effects of the Project, mitigation measures, and commitments	13	Y/N	CEA Agency	Mitigation measures in table 13.0-1 can be translated into commitments to address deficiencies identified for Follow-up Programs section (14). Commitments not explicit, but rather implicit through proposed mitigations—commitments should be made clear and an explanation provided as to how info. in table 13.0-1 is used to populate Table 14.0-1.	The mitigation measured listed in Table 28.4-1 have been used to populate the Commitments provided in Table 28.8-1.	Section 28.8.
626	15.0 – Summary of Residual Effects	Summarize the effects of the Project, mitigation measures, and commitments	13	N	BC MOE	Residual effects not characterized for vegetation and wildlife (EAO) No commitments stated (other than FN-related); only proposed mitigation measures. (MOE)	Residual effects for vegetation and wildlife are characterized in Table 28.4-1 and Sections 28.4.7 (Terrestrial Ecosystems) and 28.4.8 (Wildlife and Wildlife Habitat). The Table of Commitments has been provided in Table 28.8-1.	Sections 28.4.7 and 28.4.8; Tables 28.5-1 and 28.8-1.
627	15.0 – Summary of Residual Effects	Include a conclusion from the assessment of effects and cross reference the findings with the section on the assessment of the Project impacts, mitigation requirements, and residual effects	13	N	CEA Agency	Information missing.	Chapter 28, Summary and Conclusions, provides a table that reflects the assessment of the Project impacts, mitigation requirements, and residual effects.	28.4 Table 28.4-1
628	15.0 – Summary of Residual Effects	Include a conclusion from the assessment of effects and cross reference the findings with the section on the assessment of the Project impacts, mitigation requirements, and residual effects	13	N	BC MOE	Conclusions offered but no cross referencing. (MOE)	Appropriate and full cross-referencing has been provided in Section 28.6.	Section 28.6.4
629	15.0 – Summary of Residual Effects	Use table to summarize the information for each environmental, economic, social, heritage and/or health effect that cannot be completely avoided or mitigated through the re-design or relocation of the Project	13	Y	CEA Agency	Information is not in a separate table, but embedded in summary of effects/mitigations table (13.0-1).	This information has been provided in full in Table 28.4-1.	Table 28.4-1.

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Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
630	16.0 – Summary of Commitments	Summarize HCMC's commitment to minimizing the potential for the Project to generate adverse environmental, economic, social, heritage or health effects	14, 15	Y/N	CEA Agency	No obvious reaffirmation of YMI's commitment in section 15. Table of conditions is not accompanied by any supporting text in this regard (opening sentence to section 14 isn't even a complete sentence). Opportunity to reintroduce YMI's corporate policy and stated environmental/socio-cultural commitments here.	The Table of Commitments has been provided in Table 28.8-1, and Section 28.9 affirms HCMC's dedication to minimizing the long-term environmental impacts of the Project, while ensuring that lasting benefits accrue to local communities, and economic and social advantage is generated for shareholders, employees, and the community at large."	Table 28.8-1; Section 28.9
631	16.0 – Summary of Commitments	Identify the specific commitments HCMC will implement	14	Y/N	CEA Agency	Section needs to be further developed and detailed as per mitigations identified throughout EIS.	The Table of Commitments has been provided in Table 28.8-1.	Table 28.8-1
632	16.0 – Summary of Commitments	Summarize specific comments using table provided	14	N	BC MOE	No comments… what was intended here? (MOE)	Comment noted.	--
633	16.0 – Summary of Commitments	Summarize specific comments using table provided	14	Y		*Note: unclear as to what this requirement entails*	N/A	--
634	17.0 – Conclusion	Summarize HCMC's understanding of the BC EA process (and if required, the harmonized provincial/federal process) in promoting sustainable development while minimizing effects to the environmental, economic, social, heritage and health valued components	15	N	CEA Agency	Information missing.	This information has been provided in full in Sections 28.1 and 28.9.	Sections 28.1 and 28.9
635	17.0 – Conclusion	Include a statement describing how the Project aligns with the goal of the BC EA process (and CEAA process, if required)	15	Y/N	CEA Agency	Should include statement of efforts made to comply with requirements of EISg/AIR.	This information has been provided in full in Section 28.9.	Section 28.9
636	17.0 – Conclusion	State HCMC's request for an Environmental Assessment Certificate for the Project and a federal Environmental Assessment, if needed, and subsequent permitting/ authorization processes prior to proceeding with the proposed Project construction, operation, maintenance and decommissioning	15	Y/N	CEA Agency	EAO and CEAA requests provided; however, permitting/authorization process not stated as per the requirement.	This information has been provided in full in Section 28.9.	Section 28.9
637	18.0 – References and Supporting Documentation	Include a complete list of references cited.	16	Y/N	CEA Agency	References in-line within each section of EIS are missing—no direct linkage between most of the references and how they have been applied throughout various sections of the EIS.	The full references for cited literature are included at the end of each respective Application/EIS chapter.	--

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	19.0 - Appendices	Provide applicable appendices.	Appendices	N	CEA Agency	Appendices will need to be reorganized to include EMPs and other tabled information that is currently in body of EIS in order to improve the readability of the EIS overall.	Relevant appendices have been named according to the first Application/EIS chapter they are references in.	--
639	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix F · Project Stations (3.1) – Hydrometric data collected at project monitoring stations were not used to estimate hydrologic conditions at the site.	The hydrometric data collected at project monitoring stations (Section 3.1 in Appendix 12-A) were used to estimate hydrologic conditions (please see section 3.2.1 in Appendix 12-B).	Appendix 12-A Appendix 12-B
640	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix F · Day Low Flows (3.5.7) – No site specific winter low flow data was utilized to select 7 day low flows.	Site specific winter flows that were incorporated to estimate low flows are provided in Table 4.7 (Section 4.4) in Appendix 12-A of the Application/EIS.	Appendix 12-A
641	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix F - No discussion of model limitations provided based on absence of site specific data.	Site specific data are available; however a discussion of model limitations appears in Appendix 12-B.	Appendix 12-B
642	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix G · Low Flows (2.1.4.2) – Long term flow data not available for mine study area, low flows collected during fall and winter of 2011/2012 season only.	Methodology and results of the low flow analysis are provided in Section 4.4 of Appendix 12-A.	Appendix 12-A
643	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix N · Periphyton (4.4) – Data summaries only reference 2011 data and not 2012.	Baseline data for periphyton sampling has been provided in Appendix 14-A, and is summarized in Chapter 14 (Section 14.2.3 and 14.3.5)	Chapter 14, Sections 14.2.3 and 14.3.5; Appendix 14-A
644	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix N · Benthic Invertebrates (4.5) – Data summaries only reference 2011 data and not 2012.	Baseline data for benthic invertebrate sampling has been provided in Appendix 14-A, and is summarized in Chapter 14 (Section 14.2.3 and 14.3.5)	Chapter 14, Sections 14.2.3 and 14.3.5; Appendix 14-A
645	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix N · Discussion or quantification of the benthic community in non-fish bearing portions of P and T Creeks as is relates to the contribution to fish bearing portions of those systems is not provided.	Baseline data for benthic invertebrate sampling has been provided in Appendix 14-A, and is summarized in Chapter 14 (Section 14.2.3 and 14.3.5). The contribution of the non-fish bearing portions of P and T Creek on downstream fish bearing areas is discussed in the context of potential effects due to water quantity and water quality.	Chapter 14, Sections 14.2.3, 14.3.5, 14.5.3.3, and 14.5.3.4; Appendix 14-A
646	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix N · Sampling during overwintering periods for P and T Creeks not provided.	Fish sampling for P and T Creeks is described in Chapter 14, Section 14.4.3.2 and in Appendix 14-A Sections 4.2.2.1 and 4.2.2.2. Overwinter sampling was not conducted, however the Instream Flow Study (Appendix 14-D) and residual effects assessment (Chapter 14, figures 14.5-5 and 14.5-4) indicate that stream discharge is insufficient to meet fish bearing threshold (BC Modified-Tennant Guideline) from November to March in P and T Creeks.	Chapter 14 and Appendix 14-A

Table 2-A1. Table of Concordance

Comment #	AIR Section Number and Title	Brief Description of Section and Sub-section in AIR	Original Application Section Reference	Information Present? *(Y/N)*	Agency/ First Nation	Screening Comments	Final Proponent Response	Application Section Where Information Will Be Found
647	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix N ·Summary quantification of habitat types located within the fish bearing portions of P and T Creeks is not provided.	Summary quantification of habitat types located within the fish bearing portions of P and T Creeks is provided in Appendix 14-A	Appendix 14-A
648	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix N ·Summary quantification of habitat types located within portions of Harper Creek that may be influenced by flow alterations from mine activities is not provided.	Summary quantification of habitat types located within the fish bearing portions of upper Harper Creek is provided in Appendix 14-A	Appendix 14-A
649	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix N ·Discussion of the standards used to declare a system non-fish bearing in context of the fish information obtained, including professional judgement is not provided. It is important for the application to clearly demonstrate how the standard has been achieved.	Discussion of the standards used to declare a system non-fish bearing in context of the fish information obtained, including professional judgment is provided in Appendix 14-A and reference throughout Chapter 14.	Appendix 14-A
650	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix O ·Site Description (2.1.2.1) - Two transects used to inform model over a 430 meters stream length of P Creek. Of which 210 meters were mapped as pool habitat and the two transects were placed in pool habitat locations located near Harper Creek. Representation of habitats from the remaining 220 meters stream length not discussed in this assessment.	Instream flow methodologies are discussed in detail in a revised ISF Modelling Report.	Appendix 14-D
651	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix O ·Similarly 3 transects were developed to inform model over a 340 meter stream length of T Creek. All three transects placed in pool habitats and located near the confluence with Harper Creek. 180 meters of T Creek was mapped as pool habitat. Representations of habitats from the remaining 160 meters of stream length not discussed in this assessment.	Instream flow methodologies are discussed in detail in a revised ISF Modelling Report.	Appendix 14-D
652	19.0 - Appendices	Provide applicable appendices.	Appendices	N	DFO	Appendix O - Conclusions (4.0) - A summary of the habitat types and area representation (spawning, rearing and overwintering) for the affected portions of P Creek, T Creek and Harper Creek from flow related impacts is not provided.	Potential effects to various Bull Trout life history stages relating to changes in water quantity are discussed in detail in Section 14.5.3.1	Section 14.5.3.1
653	19.0 - Appendices	Provide applicable appendices.	Appendices	N	EC	Appendix A - In Figure 1-3 of Appendix A, drill hole coverage of the eastern side of the proposed open pit area is less than the coverage of the other pit areas. The majority of drill holes on the eastern side of the proposed pit area appear to be historical, with a limited number of recent drill holes (labeled as YMI 2007 drill holes). Environment Canada requests that the Harper Creek Mining Corp (the proponent) provide a rationale for the uneven distribution of drill holes and describe how this could influence the geological and geochemical modeling undertaken for the EIS.	Complete drill hole coverage for all aspects of the program is provided	Section 3.2.1 of Appendix 6-A
654	19.0 - Appendices	Provide applicable appendices.	Appendices	N	EC	Appendix D - In Section 4.3.5 of Appendix D, the proponent has indicated that additional mineralogical characterization of the overburden material is in progress. This information is requested for review once it is available as an understanding of the geochemical characteristics of the overburden material is important to the assessment and management of potential impacts.	Refer to Appendix E3 of Appendix 6-A	Appendix E3 of Appendix 6-A

Table 2-A2. Simpcw First Nation Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1000	Geotechnical information pertinent to slope stability assessment appears to be lacking, as is a substantive geohazard assessment.	Geotechnical information pertinent to slope stability and geohazard assessment are provided in Terrain Stability Report (Appendix 5-C).	Appendix 5-C
1001	Absence of costing for decommissioning closure/abandonment/reclamation is essential to determining if there is a viable decommissioning plan, and is absent.	Closure costs for the Project are included in Section 7.11 of the Closure and Reclamation Plan.	7.11
1002	A summary of issues tracking for the pre-application process is lacking.	The Information Distribution and Consultation Chapter (Chapter 3) has been revised. Table 3-F1 in Appendix 3-F tracks issues that SFN raised by SFN to July 31, 2014 and HCMC's responses to address those issues.	Appendices 3-F, 3-J and 3-L
1003	A list of agencies, First Nations and interest groups having provided feedback is absent from the AIR.	The Information Distribution and Consultation Chapter (Chapter 3) has been revised. Section 3.3 discusses the BC EAO Working Group, Section 3.5 summarizes consultation with Aboriginal groups, Section 3.6 summarizes consultation with government agencies, and Section 3.7 summarizes consultation with the public. Each of these sections describes HCMC's efforts to provide Project information to, and obtain feedback from, these groups, and summarizes the feedback received.	Sections 3.3, 3.5, 3.6, and 3.7
1004	Snow survey data are inadequate for assessing the potential vulnerability of slopes in the tailings pond area to extreme weather events such as record spring rainfall like what occurred in the West Kootenay in 2012. Under global warming unpredictable and extreme weather can result in excessive snow accumulation that, combined with extreme spring rainfall, can pose a threat to the tailings pond and slopes in the surrounding area.	The effects of climate change to the Project, including the TMF, is assess in Section 27.6.	Chapter 27; Section 27.6
1005	Waste rock segregation is an important issue that can adversely affect both run-off and air pollution - this is not properly documented in the AIR.	Waste rock segregation based on acid rock drainage (ARD) potential is proposed and is presented in Chapter 6 and Appendix 6-A.	Chapter 6; Appendix 6-A
1006	The issue of "make up" water is important to aboriginal stewards of the land, in that it affects impacts the habitats of aquatic and riparian species.	Results of operational water balance and watershed modelling indicate that the TMF operates in a surplus condition without the need for additional make-up water to support the process water needs of the mill. Discussion is provided in Appendix 5-D and Appendix 12-B.	Appendix 5-D, Section 6.7 and Appendix 12-B, Section 5
1007	First Nation community information is lacking.	The proponent has amended its application to provide a more thorough characterization of the socio-economic and cultural characteristics of the Aboriginal groups identified in the Section 11 and 13 orders. This information is provided in section 21.2.2 of Chapter 21 (Aboriginal rights and Interests).	21.2.2
1008	Natural filtering of water affected by the project is not discussed, raising the question of how the project will affect surface and ground water.	Surface water and groundwater interactions were considered in the life-of-mine watershed model that was used to develop a predictive water quality model. The potential effects of groundwater seepage from Project components on the downstream environment are detailed in Appendix 13-C, analyzed in Section 13.5.2.3, and assessed in Section 13.5.4.1.	13.5.2.3 13.5.4.1 Appendix 13-C
1009	It is not clear whether/to what extent/how the issue of aquifers in the vicinity of the project was assessed - this begs the question of whether there are, in fact aquifers in the area that could be affected by the project.	The extents of the aquifers in the vicinity of the project were delineated in the updated EA (Section 11.4.3.3 Figure 11.4-17). No aquifers of significant value with high yield for the water supply purpose exist within the proposed Project site. The aquifers in which the existing water supply wells are located are mainly along the valleys of Thompson River and Barrière River. The numerical model results indicate that those aquifers will not be affected by the proposed mining. The model results indicate the aquifer in the Harper Creek valley may be affected, but no water supply wells exist in there.	Chapter 11 (Section 11.4.3.3)

Table 2-A2. Simpcw First Nation Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1010	A tailings pond operating plan is missing from the AIR, raising the question of whether, in fact, the proposed tailings pond will be properly and safely managed.	The TMF design and operating criteria for the current level of study are described in detail in Appendix 5-D, Section 5. In addition to the criteria described in the reference report listed above, there are several key steps for the project to advance from the study level into an operating tailings facility. The project must completed the EA approval process, and obtain a Mines Act Permit and many other applicable permits. Detailed design of Stage 1 of the facility will commence following permitting, and will include preparation of technical specifications and tender documents, as well as construction quality assurance and quality control (CQAQC) guidelines. The TMF will be constructed following these CQAQC guidelines with engineering supervision and record keeping. A construction completion report will be prepared to document the as-built conditions. An Operations Maintenance and Surveillance (OMS) Manual and Emergency Response and Preparedness Plan (ERPP) will then be prepared prior to commissioning of the TMF, and will provide comprehensive operating and inspection instructions for the TSF and related facilities. Annual inspections of the facility will be completed by the design engineers and an annual report will be provided. In addition, it is expected that the TMF will require a Dam Safety Review every 5 years based on the Dam Hazard Classification of "very high". The TMF will be constructed with an observational approach, and each subsequent dam raise will require design, technical specifications, updated CQAQC guidelines, and construction completion documentation.	Appendix 5-D, Section 5
1011	Archaeological impact monitoring is of key importance to Simpcw First Nation and the Adams lake Indian Band, but is absent from the AIR.	An Archaeology and Heritage Management Plan has been developed by the proponent to monitor impact to known and unknown archaeological sites at the Project Site. The plan is included as Section 24.3.	Section 24.3
1012	A wildlife compensation plan is absolutely critical to safeguarding aboriginal interests, but is missing from the AIR.	A wildlife management plan is included as section 24.20 to manage potential impacts to wildlife due to the Project. Reclamation of habitat is described in Chapter 7, Closure and Reclamation. The Fish Habitat offsetting Plan also includes provision for creation of additional western toad habitat, included as Appendix 14-D.	Chapter 7, Section 24.20 and Appendix 14-D.
1013	There is no plan for protection of groundwater in the event of leaks or spills, whereas groundwater quality can affect the habitat quality of both aquatic and riparian and riparian species in the Harper Creek and Thompson watersheds.	The measures to prevent and mitigate the potential degradation of groundwater quality by sudden releases of dangerous goods and hazardous materials, explosives, fuel supply/storage and distribution, and waste disposal are available in Emergency Response Plan (Section 24.4), Explosives Handling Plan (Section 24.5), Spill Prevention and Response Plan (Section 24.15), Fuel and Hazardous Materials Management Plan (Section 24.7), Waste Management Plan (Section 24.18), and Groundwater Management Plan (Section 24.8).	Chapter 24

Table 2-A3. Environment Canada Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1100	In Figure 1-3 of Appendix A, drill hole coverage of the eastern side of the proposed open pit area is less than the coverage of the other pit areas. The majority of drill holes on the eastern side of the proposed pit area appear to be historical, with a limited number of recent drill holes (labeled as YMI 2007 drill holes). Environment Canada requests that the Harper Creek Mining Corp (the proponent) provide a rationale for the uneven distribution of drill holes and describe how this could influence the geological and geochemical modeling undertaken for the EIS.	There are anomalies which exist throughout HCMC mineral claims, which may be assessed in the future. However these are not currently being considered. Infill drilling has confirmed assumptions with regards orebody continuity.	Appendix 5-A, Section 10
1101	In reviewing the EIS, Environment Canada is unable to locate information on the detailed geochemical characterization of the pit walls. It is requested that the proponent identify where the information can be found in the EIS or submit it for review. This information is important to the assessment of potential effects of pit wall geochemistry on pit water quality during mine closure and post-closure phases.	Geochemical characteristics are provided in Appendix 6-A. Classification of pit wall ARD potential and development of pit wall source terms are described in Appendix 6-A, Section 5.2.2.	Appendix 6-A, Section 5.2.2
1102	In Section 4.3.5 of Appendix D, the proponent has indicated that additional mineralogical characterization of the overburden material is in progress. This information is requested for review once it is available as an understanding of the geochemical characteristics of the overburden material is important to the assessment and management of potential impacts.	The information requested has been provided in full in Section 4.3.5 of Appendix 6-A the Application/EIS.	Section 4.3.5 of Appendix 6-A
1103	The evaluation of ML potential of the overburden material appears to be based on static tests, leaching tests and trace element analysis, as opposed to humidity cell (kinetic testing). As there are elevated concentrations of lead and arsenic in the overburden samples, the proponent is requested to provide a rationale for not undertaking kinetic tests that would facilitate a better understanding of the long-term drainage chemistry resulting from the overburden material.	The information requested has been provided in full in Section 4.3.5 of Appendix 6-A the Application/EIS.	Section 4.3.5 of Appendix 6-A
1104	The proponent anticipates that following the segregation of waste rock into potential acid generating (PAG) and non-PAG, the ML potential will be lower. Environment Canada requests additional details on the ML potential of the non-PAG waste rock that would be segregated from PAG waste rock, including quantification of the risk of ML; proportion of non-PAG waste rock that is expected to develop ML; concentrations of parameters of concern for ML and their comparison to the applicable water quality criteria and lag times to the onset of ML (for various parameters of concern).	ML Characteristics of waste rock are discussed	Section 4.1.5 of Appendix 6-A, and Section 24.10.2
1105	The proponent has stated that long-term surface water and groundwater quality monitoring down gradient of the non-PAG waste rock stockpile and Tailings Management Facility (TMF)-PAG waste rock stockpile will be established to determine if water quality is being affected by contact water discharge from the stockpiles. Environment Canada requests that the proposed 2 monitoring plans be provided for review and include the proposed locations and conceptual design specifications of the monitoring wells and seepage collection trenches.	Groundwater monitoring wells are proposed in Groundwater Management Plan (Section 24.8). The Fish and Aquatic Effects Monitoring Program will monitor water quality in the downstream receiving environments of the Project. The conceptual design of the FAEMP, including proposed sampling locations, is described in Chapter 24.6.	Section 24.8, Section 24.6
1106	The potential for ML from non-PAG waste rock (e.g. cadmium, copper and selenium) exists regardless of the proponent's proposal to segregate waste rock into PAG and non-PAG types. Environment Canada requests that the proponent provide a management plan specific to the non-PAG waste rock that includes contingency measures in the event that a higher than expected ML potential is encountered during or after the mine life.	ML potential of non-PAG rock is considered explicitly by developing a range of source terms for assessment of the project	Section 5.2 of Appendix 6-A
1107	Section 2.1 describes several designed situations involving the release of effluent to the receiving environment. All such situations are likely to be *Metal Mining Effluent Regulations* final discharge points that occur once the mine has exposed bedrock material.	Release of effluent is proposed to occur from the TMF in Closure and Post-Closure only. It is expected that the final discharge point will be subject to the *Metal Mining Effluent Regulations.*	--
1108	In terms of the site preparation / pre-production phase, Environment Canada notes that the EIS focuses on erosion and sediment control, and does not consider the likelihood of metals-laden contact water from the mine development area. In addition, the 'Water Quality Management Plan' does not include predictions of the volume and chemistry of expected site discharges.	Water quality predictions are provided in Appendix 13-C (Surface Water Quality Model Report, KP 2014) and Appendix 13-D for the TMF, open pit, and downstream environment for Construction, Operations, Closure, and Post-Closure phases. Construction phase predictions include metal loading from relevant stockpiles. Average monthly rates of discharge from the TMF in Closure are presented in Appendix 13-C. The TMF water quality in Closure (after Year 31) and in Post-Closure is equivalent to the discharge quality.	--

Table 2-A3. Environment Canada Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1109	For the mine operations phase in section 2.2, the EIS states that "All water is stored in the TMF from the start of operations until Year 23", however the supporting information with respect to the sizing and timing of the TMF construction (as adequate storage to achieve a no-discharge situation) is not referenced. Furthermore, the EIS states, "The water balance indicates that the TMF is in surplus conditions during all years of operations", but the supporting information to demonstrate annual water balance results is not referenced.	The information requested has been provided in Appendix P within Appendix 12-B of the Application/EIS.	Appendix P in Appendix 12-B
1110	In section 2.10, the proponent is requested to confirm Environment Canada's understanding that water will be released from the TMF during pre-production and post-closure, but not during operations. The expected water surplus during operations is anticipated to yield a fairly large volume of stored water, though a large degree of uncertainty appears to exist regarding this projection. The proponent is requested to indicate whether a discharge and associated water treatment plant (if necessary) during operations is a reasonable alternate.	No effluent water treatment of the TMF discharge is currently planned as part of the Project design. There is not envisaged to be direct discharge from the pit. Additional related information is provided in the TMF water balance calculations in Appendix P within Appendix 12-B, and Appendix 5-D.	Appendix 5-D Appendix 12-B
1111	The following observations and information requests relate to Part C Project Effects Assessment – 6.5 Hydrogeology, Baseline Hydrogeology Report (Appendix H), and Numerical Groundwater Modelling Report (Appendix I). Deficiencies in hydrogeological information could impact the assessment of the current groundwater regime, water management, and groundwater quality impacts to surrounding surface water bodies, as well as potable water.	The baseline hydrogeology report and numerical groundwater model (and report) have been updated to support the re-submitted EA. It is recognized that more hydrogeological baseline and modeling studies may be required for better characterization of the groundwater system and assessment of the potential effects of the Project on groundwater, and the work can be done in the EA review process.	Chapter 11, Appendices 11-A and 11-B
1112	The proponent is requested to clarify the spatial boundaries of the hydrogeological model. Three spatial boundaries were identified: mine site, local study area, and regional study area. The regional study area was used for modeling groundwater, although groundwater data is concentrated within the mine site (10 wells at 7 locations; Appendix I, Table 3.3). Justification for applying the regional study area is requested. 3	The inconsistencies of using three spatial boundaries in the previous EA were fixed in the newly submitted EA, in which one RSA and one LSA for the groundwater effects assessment were delineated and the LSA is consistent with the study boundary for baseline hydrogeology and numerical groundwater modeling.	Chapter 11, Appendices 11-A and 11-B
1113	The following baseline information related to hydrogeology should be provided to facilitate an understanding of potential project impacts and mitigation needs:	N/A	--
1114	• Conceptual model for groundwater flow (for example, figure illustrating groundwater flow in 3 dimensions, including stratigraphy, groundwater, and surface water);	A conceptual hydrogeological model of the LSA is provided in Appendix 11-B Section 2. The conceptualization includes characterization of hydrometeorology, surficial and bedrock geology, hydrostratigraphic units, groundwater elevation, flow directions, recharge and discharge zones and groundwater interaction with the surface hydrology system. Figure 2.6, included therein, illustrates groundwater flow directions and elevation for the conceptual model. The baseline numerical groundwater model discussed in Appendix 11-B Section 3 provides a 3-dimensional representation of the conceptual model.	Appendix 11-B Sections 2 and 3
1115	• Borehole logs for all geomechanical drill holes, geotechnical drill holes, standpipe piezometers and groundwater monitoring wells used to support the hydrogeological assessment;	The borehole logs are provided in Appendix 11-A of the new EA.	Appendix 11-A of Chapter 11
1116	• Aerial imagery referenced in Section 6.7.2.2; and,	Fish habitat was characterized based on Detailed Level 1 fish habitat surveys, not aerial imagery. A detailed description of these methods can be found in Chapter 14, section 14.4.2.2.	Chapter 14, section 14.4.2.2
1117	• Survey information used to support the hydrogeological model (ground elevations shown in Appendix I, Table 3.1 appear to be rounded to the nearest meter).	Yes, that was true in the Appendix I of the previous EA, as commented. The groundwater model has been updated for the new EA and the problem is solved.	Appendix 11-B of Chapter 11
1118	The proponent states that "groundwater recharge occurs on high ground and mountain slopes and discharge occurs in lower lying valleys" and supports this assessment with Figure 4.2 in Section 6.5 (which illustrates groundwater flow directions). This assessment appears to be based primarily on topography. Although groundwater is often influenced by site topography, especially at sites with a high degree of topographic relief, the addition of groundwater level data and seepage observations to Figure 4.2 is requested to support this interpretation, given observed artesian conditions in 6 of the 15 monitoring wells. Also, similar groundwater flow mapping is requested to support the predictions of project impacts, especially in the area of the TMF.	The updated groundwater effects assessment (Chapter 11) provides a map showing the delineated groundwater catchment divides and predicted changes due to the mining, including at the pit and TMF, to support the effects assessment. The updated hydrogeological baseline report (Appendix 11-A) and updated numerical groundwater modeling report (Appendix 11-B) present better characterization of groundwater recharge and discharge zones and groundwater flow directions on the project site.	Chapter 11 (Sections 11.4.3 and 11.5.3), Appendices 11-A (Section 4.3) and 11-B

Table 2-A3. Environment Canada Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1119	Further, the proponent is requested to clarify how data from the standpipe piezometers, and additional monitoring wells installed in 2012 were incorporated into the hydrogeological assessment. Groundwater levels vary by as much as 4 metres in some monitoring wells (Appendix H, Section 3.3). The proponent is requested to provide an assessment of seasonal impacts on groundwater flow directions and discharge volumes.	The hydrogeological baseline data collected up to April 2014 was all used in characterizing the baseline conditions. Seasonal variations of groundwater elevations and discharge are documented and discussed in the updated hydrogeological baseline report (Appendix 11-A).	Appendix 11-A (Section 4.2), Chapter 11 (Section 11.4.3)
1120	The current use and quality of water in the on-site drinking water well was not discussed. Potential impacts to this well and potential for using other onsite water as proposed in Section 2.4.12 merits additional assessment.	The current use of the existing water supply wells and the potential effects of the proposed project to the quantity and quality of groundwater in the existing water supply wells are discussed in the updated EA Chapter 11, the water supply wells were predicted not to be affected, based on the updated groundwater modeling results (Appendix 11-B). Groundwater quality sampling in some of the water supply wells were documented in the updated baseline hydrogeology report (Appendix 11-A) and also collected in the ongoing 2014 field program (the data will be provided in the 2014 hydrogeology data report, as addendum of the updated EA.	Chapter 11 (Sections 11.4.1.5 and 11.5.3), Appendices 11-A (Section 4.3) and 11-B (Section 6.2.2.2)
1121	Groundwater pumping in the P-Creek subcatchment with treatment (if required) and discharge to the pit has been proposed to reduce the impact of poor groundwater quality on Harper Creek (6.4.3). The proponent is requested to clarify whether a pumping system has been designed for this area, and how the extent of the capture zone will be confirmed. Related observations and information requests are as follows:	The capture zone extent of the open pit dewatering has been simulated in the updated groundwater modeling (Appendix 11-B) and the effect is discussed in the EA Chapter 11. A conceptual level adaptive groundwater management plan including the option of using a groundwater pumping system to minimize the residual effect of potential seepage from e.g. non-PAG waste rock stockpile to P-Creek is discussed in the Groundwater Management Plan (Section 24.8), but not yet designed for the project.	Chapter 11 (Section 11.5.3), Appendix 11-B (Section 4.3), EA Chapter 24.8.
1122	• If it is determined that additional groundwater collection is needed (Section 6.5-21), the proponent is asked to explain how the treatment system will be modified to manage the additional flow;	Adaptive management plan will be developed and initiated if collection of groundwater seepage using a groundwater pumping system is required. No water treatment is planned for this project at this stage.	Chapter 24.8
1123	• Triggers/site specific standards for the management of seepage water (Section 6.5-21) have not been identified. The proponent is requested to identify the triggers/site specific standards and associated management actions; and,	Seepage water management is discussed in the updated EA Chapter 5	Chapter 5
1124	• The proponent is asked to clarify whether an assessment of the pit capacity, as well as the potential for impacts from groundwater flow originating from the pit has been considered in the EIS.	The effect of the open pit on groundwater flow at operations and post-closure was assessed in the updated EA.	Chapter 11 (Section 11.5.3)
1125	Accurate input data derived from site geochemistry (ARD/ML), hydrogeology and groundwater information, and site water balance projections is key to a reliable assessment of potential impacts on water quality. If the inputs to water quality modeling are not sufficiently accurate, water quality impact predictions will be impaired.	ML/ARD characterization studies are presented in Chapter 6 and Appendix 6-A. Hydrogeological baseline studies and effects assessment are presented in Chapter 11 and Appendix 11-A. The watershed modelling used to develop the water balance is presented in Appendix 12-B. The water quality model is presented in Appendix 13-C and effects on water quality are assessed in Chapter 13 Section 13.5. Water quality mitigation measures are presented in Section 13.5.3.	Chapter 6 Appendix 6-A Chapter 11 Appendix 11-A Appendix 12-B 13.5 13.5.3 Appendix 13-C
1126	It is important that the identified deficiencies in ARD/ML, hydrogeological, and water management information be addressed in advance of a determination on the adequacy of water quality information in the EIS. The requested information (supporting confidence in water quality modeling inputs and water quality predictions) will support an assessment of the predicted water quality from the Harper Creek Mine Project and enable i) a comparison to standards, and ii) a determination of the potential need for additional mitigation measures.	ML/ARD characterization studies are presented in Chapter 6 and Appendix 6-A. Hydrogeological baseline studies and effects assessment are presented in Chapter 11 and Appendix 11-A. Water management information can be found in the Project Description (Chapter 5) and Site Wide Water Management Plan (Section 24.14). The water quality model is presented in Appendix 13-C and effects on water quality are assessed in Chapter 13 Section 13.5. Water quality mitigation measures are presented in Section 13.5.3.	Chapter 6 Appendix 6-A Chapter 11 Appendix 11-A Chapter 5 24.14 13.5 13.5.3 Appendix 13-C

Table 2-A3. Environment Canada Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1127	In 1.1 Part B, section 3 – Alternatives Assessment and subsection 3.1 Methodology, the EIS describes the TMF as "situated on a plateau that does not contain a natural fish-bearing water body and therefore the Harper Creek Project does not require a MMER Schedule 2 regulatory amendment". The chosen alternative, "TMF-2 is located in a shallow bowl shaped basin that drains towards Harper Creek down a steep unnamed bedrock channel, which acts as a natural fish barrier". As standard procedure, Environment Canada will await confirmation from Fisheries and Oceans Canada regarding the presence/absence of fish, and the adequacy of the EIS to substantiate that claim.	Comment noted. See Chapter 14, Section 14.4.3.1. Fish were not captured above the 1.8-m waterfall on T Creek in multiple years 2008, 2011, 2012 and 2013. A total of 4,699 s of electrofishing effort was conducted in T Creek above the waterfall and within the potential TMF area.	Chapter 14, Section 14.4.3.1.
1128	In section 2.17 Accidents and Malfunctions, the final risk assessment and subsequent plans should include a comprehensive inventory of hazardous materials which might be stored at all permanent and temporary work sites, including Standard Operating Procedures or Best Management Practices for proper storage of materials (e.g. compatibility issues, secondary containment). It is requested that the proponent clarify how it will factor these considerations into its risk assessment and environmental planning efforts.	An inventory is provided Section 26.4.1 of Chapter 26, Accidents and Malfunctions. The appropriate management plans, project design influences, and emergency response preparedness are described.	Chapter 26 26.4.1
1129	All storage and handling of petroleum products and allied petroleum products should be undertaken in accordance with the *CCME Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products* (2003). Environment Canada considers the CCME Environmental Code of Practice to be the basis of good storage tank management and its applicability extends to "temporary" fuelling facilities and construction activities. It is requested that the proponent describe how it has considered the CCME Environmental Code of Practice in its plans for minimizing environmental risks. For clarity, this code, acknowledged in the EIS (p. 10-75), is a set of standards and practices and is referenced by certain regulations, but itself is not a regulatory document.	The information requested has been addressed in Section 26.4.1.2, where it is indicated that transportation, storage, dispensing and use of fuels at the site will be conducted in compliance with all relevant government laws and regulations, i.e., all storage and handling of petroleum and allied products will be in accordance with the Canadian Council of Ministers of the Environment (CCME) Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (2003), as a project design measure to minimize risk related to fuel spills.	--
1130	While the importance of spill prevention to protection of watercourses is recognized in the EIS, site-specific sensitive environmental receptors should be identified and described to facilitate an understanding of potential impacts and appropriate mitigation measures. For example, the proponent is requested to identify sensitive habitats that could be impacted in the event of a spill or release, and outline specific response strategies accordingly. In this regard, particular attention should be given to species protected under the Species at Risk Act.	Table 26.3.3 lists the specific environmental receptors in case of a spill or leak. Fuel spill on land is most likely to affect ecological communities at risk and old-growth forests. Specific responses strategies are discussed in Section 26.4.1.2, and potential impacts to species protected under the *Species at Risk Act* are addressed in Section 26.4.1.3. Fuel spill on water is most likely to affect surface water quality, fish, fish habitat, and aquatic resources. Specific responses strategies are discussed in Section 26.4.2.2, and potential impacts to species protected under the *Species at Risk Act* are addressed in Section 26.4.2.3. Hazardous substances spill on land is most likely to affect ecological communities at risk and old-growth forests. Specific responses strategies are discussed in Section 26.4.3.2, and potential impacts to species protected under the *Species at Risk Act* are addressed in Section 26.4.3.3. Hazardous substances spill on water is most likely to affect fish, fish habitat and aquatic resources. Specific responses strategies are discussed in Section 26.4.4.2, and potential impacts to species protected under the *Species at Risk Act* are addressed in Section 26.4.4.3.	--
1131	In section 10.11, the Emergency Response Plan (ERP) needs to be fully developed and operational during the construction, operations and decommission phases of the proposed mine. The scope and site-specific details within the ERP can be relative to the risk presented by the facility (work site). For relatively small storage areas, simple posted response instructions may be adequate. An acceptable guidance document is the CSA Z731-03 (Emergency Preparedness and Response) standard in producing the spill contingency plan. Training, communications, and exercise design should follow CSA Z731-03 or similar industry recognized standard. Note that if the facility / operations are deemed subject to the *Canadian Environmental Protection Act* (CEPA) Environmental Emergencies Regulation, then it is possible that the ERP is a legislative requirement. The proponent is requested to describe how it has considered the CSA standard or similar industry-recognized standard, as well as potential applicability of the CEPA Environmental Emergency Regulations, in advancing development of an ERP.	The Canadian Standards Association document titled *Emergency Preparedness and Response: A National Standard of Canada* (CAN/CSA-Z731-03) is acknowledge. However, the EMP has been prepared according to the legislative requirement contained in the *Health, Safety and Reclamation Code for Mines in British Columbia* (BC MEMPR 2008), which is empowered under the *Mines Act* (1996). Thus, an industry-recognized and statutory standard has been considered in the preparation of the initial ERP, as described in Chapter 24, Environmental Management Plans and Reporting. More detailed information will be developed during the permitting process.	Chapter 24 24.4.2

Table 2-A4. Interior Health Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1200	The documents provided for our review should demonstrate the environmental health hazards the proposed mine could create.	The human health effects assessment evaluated the potential health hazards the proposed mine could create in regards to air quality, drinking water quality, country foods, and noise.	21.5.3.1 21.5.3.2 21.5.3.3 21.5.3.4
1201	The assessment needs to evaluate the potential impacts from the mining activities on the transportation corridors, traffic flow for all modes of transport, air quality and noise.	Potential impacts to air quality and noise from mining activities on the transportation corridors and traffic flow for all modes of transport were assessed.	21.5.3.1 21.5.3.4
1202	Additionally, the groundwater study for the mine site does not elaborate on the potential impact to the aquifer.	Potential impacts from mining activities to groundwater quantity and quality were assessed in the updated EA, including the potential effects to the drinking water in the supply wells.	Chapter 11 (Section 11.5.3)

Table 2-A5. SRK Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1300	The majority of the information of relevance to the pit slope design was found in Section 2.5.1 of the EA Application document and Section 6.2 of the amended & restated technical report. An overview description of the pit slope design is provided below. The ore at the Harper Creek Project will be mined using a single open pit, the walls of which will reach heights of approximately 210 to 450 m. Knight Piésold Ltd. (KP) undertook a geotechnical investigation in 2011 to collect geomechanical and hydrogeological data to support the development of feasibility-level pit slope design angles. Based on the acquired data and subsequent analyses, four to six design sectors were identified within the bedrock (the number of sectors varies depending on which document is referenced). The inter-ramp slope angles recommended for the pit are 44° within the North, East and West pit sectors and 35° for the South sector. The slope angle in the South sector is driven by the attitude of the schistocity and a dominant co-planar joint system. The benches are designed with a height of 12 m, a minimum width of 8 to 10 m and a bench face angle between 60° and 70° (the wider benches and flatter bench face angle are required in the South sector).	The Open Pit Geotechnical Design Report is included as Appendix 5-G. It appears that this report was not previously included in the Application and the omission may be the source of confusion for Comments 1300 - 1306.	Appendix 5-G
1301	The geotechnical investigation was based on seven oriented core holes, point load testing, in situ packer testing, standpipe piezometer installations and laboratory testing. The level of investigation and analysis appears to be reasonable based on the written descriptions within the report sections noted above. References are made to the data analysis, but the actual data is not provided, i.e. core hole logs, core photos, sector specific phreatic levels, etc. This information is required. **[EA Information Requirement]**	The Open Pit Geotechnical Design Report is included as Appendix 5-G, and reference data is provided in the 2011 Geotechnical Site Investigation Factual Report included as Appendix 7-A	Appendix 5-G and Appendix 7-A.
1302	There is no information regarding the thickness of the overburden or whether the slopes in the overburden warrant design recommendations. The thickness of the overburden and the potential need for overburden slope recommendations require clarification. **[EA Clarification]**	Overburden thickness and treatment during excavation of the open pit is described in Appendix 5-G, Section 3.5.	Appendix 5-G, Section 3.5
1303	The recommended slope angles for the North, East and West pit sectors are the same (44°). However, artesian conditions were noted in the South and West sectors. The South sector has a flatter slope angle (35°), but there is no explanation as to why the West sector should have the same slope angle as the North and East sectors. **[EA Clarification]**	The analysis of pit design sectors and associated recommendations are described in full in Appendix 5-G.	Appendix 5-G
1304	The pit has a relatively unusual shape in that, there is a significant portion of the pit on the west wall which has a convex shape. This geometry raises the possibility of an elevated risk of slope failure that must be accounted for within the design process, but it is unclear that this has occurred. **[EA Clarification]**	The analysis of pit design sectors and associated recommendations are described in full in Appendix 5-G.	Appendix 5-G
1305	The reports contain remarks regarding the work done to define the regional and pit-specific structure of relevance to pit slope design, but the structural details and their linkage to the kinematic analyses are not provided. This information is required. **[EA Information Requirement]**	The analysis of pit design sectors and associated recommendations are described in full in Appendix 5-G.	Appendix 5-G
1306	The key design section(s) for each design sector, pore pressure distributions and design criteria are not provided. This information is required. **[EA Information Requirement]**	The analysis of pit design sectors and associated recommendations are described in full in Appendix 5-G.	Appendix 5-G

Table 2-A5. SRK Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1307	The majority of the information of relevance to the design of the low grade ore (LGO) and waste stockpiles was found in Section 2.9 of the EA Application document and Sections 16.1.3, 16.3.3 and 20.2.3 of the amended & restated technical report. An overview description of the stockpile designs is provided below. Stockpiles have been established for LGO (one for non-PAG and one for PAG), waste rock (one for non-PAG and one for PAG), overburden (one) and topsoil (four). The water management and geochemical characteristics of these materials were influential in the layout of these stockpiles. In particular, the PAG LGO stockpile is positioned to drain to the TMF. The PAG waste rock stockpile is situated within the TMF and will, near the end of the mine life, be completely covered by tailings and water. The non-PAG LGO stockpile and waste rock stockpile are positioned so that runoff from these stockpiles can be directed to a sedimentation pond and then pumped to the plant site process water pond. The positioning of the overburden and topsoil stockpiles is less influenced by water management and geochemistry characteristics due to the fact these stockpiles represent a much lower environmental risk compared to the low grade ore and the waste rock. In general, ditching systems will be used to separate contact and non-contact water associated with these stockpiles. LGO will be stockpiled over the first 23 years of mining and processed over the next five years; slope angles at the LGO stockpiles are not specified. The overall final slopes at the non-PAG waste rock stockpile will be 2H:1V. The slopes at the overburden and topsoil stockpiles will be revegated during construction and operations; slope angles at the overburden and topsoil stockpiles are not specified.	The design of the non-PAG waste rock, low-grade ore, overburden and topsoil stockpiles is described in Appendix 5-D Section 5.11 and includes size, slope angles, foundation conditions, construction technique and associated stability classification based on the waste dump and stockpile stability rating system described in the interim guidelines provided by the BC Mine Waste Rock Pile Research Committee (BCMWRPRC, 1991). The PAG waste rock stockpile is described in Appendix 5-D Section 5.4.	Appendix 5-D Sections 5.4 and 5.11
1308	Details regarding the geotechnical investigation, design criteria, design analyses and the proposed design for the various stockpiles noted above were not included in the documents available for this review. Some or all of this information is presumably provided in the KP document entitled Waste and Water Management Facilities Feasibility Design Report, Ref. No. VA101-458/4-6 Rev 0 March 29, 2012. This document is required. **[EA Information Requirement]**	Applicable geotechnical investigations and design information is summarized in the Mine Waste and Water Management Design Report in Appendix 5-D. It appears that this report was not previously included in the Application and the omission may be the source of confusion for Comments 1307 - 1310.	Appendix 5-D, multiple sections.
1309	Notwithstanding the content of the document noted above, the following general information is required: the geotechnical and hydrogeological characterization of the foundation at each of the main stockpiles (LGO, waste rock and overburden); the geotechnical characterization of the LGO, waste rock and overburden materials; the design criteria and analyses (stability under static and dynamic loading conditions, phreatic levels, etc.) used to develop the proposed stockpile designs; the details of each stockpile design (including cross-sections, drainage requirements, if any, etc.); plus any incremental details of relevance to the physical stability of these stockpiles (such as construction concepts, water management features, etc.). **[EA Information Requirement]**	The design information for the current level of study is included in Appendix 5-D.	Appendix 5-D, multiple sections.
1310	The site layout figure (Figure 2.3-1 from the EA Application) suggests the sedimentation pond dam near the stockpiles for the non-PAG LGO and non-PAG waste rock will be in the order of 100 m long and 10 m high. The following general information is required: the geotechnical and hydrogeological characterization of the dam foundation; the geotechnical characterization of the dam construction materials; the dam classification and design criteria; the analyses (stability under static and dynamic loading conditions, phreatic levels, seepage rates, etc.) used to develop the proposed dam design; the dam design details (including cross-sections, etc.); plus any incremental details of relevance to the performance of this dam (such as construction concepts, water management features, etc.). **[EA Information Requirement]**	The designs for the water management ponds for the project at the current level of study are described in Appendix 5-D (Section 6 and Appendix A of Appendix 5-D).	Appendix 5-D, multiple sections.

Table 2-A5. SRK Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1311	The majority of the information of relevance to the TMF was found in Section 2.8 of the EA Application document and Section 20.2 of the amended & restated technical report. An overview description of the TMF is provided below. Tailings from the first 23 years of operation (704 Mt) will report to the TMF situated immediately south of the open pit; the final TMF footprint will also be used to accommodate the PAG waste rock stockpile (206 Mt). Thereafter, as the LGO stockpiles are processed between years 23 and 28, tailings will report to the open pit. The TMF will be situated in a bowl-shaped basin that was selected as a result of a comparative assessment of three candidate sites. The selected site is topographically contained on two sides, and almost contained on a third side. A very large, zoned earthfill tailings dam will be constructed across the low point in the basin. As the TMF approaches its maximum height (approximately 180 m), a small dam will be constructed at the opposite end of the basin. The tailings dam will be constructed in stages, starting with a 32 m high, glacial till cofferdam at its upstream toe to facilitate the construction of the initial 70 m high starter dam. Subsequent raises will range from about 10 m (early in its operational life) to 4 m (near the end of its operational life) and will occur every two years using the centreline method of construction. Construction materials will consist of material sourced from borrow areas close to the dam and from waste materials (overburden and non-PAG waste rock) obtained from the open pit. The initial starter dam will be constructed with a glacial till core, two downstream filter/transition zones, and upstream and downstream shells constructed of general fill. The two filter/transition zones will be carried up through the centreline portion of the dam. Seepage will be collected in a longitudinal drain and directed to an outlet drain near the basin thalweg. The classification for this tailings dam is "very high" based on the Dam Safety Guidelines published in 2007 by the Canadian Dam Association. Design criteria related to seismic and flood events have been selected on the basis of this classification.	This is not a question. Some modifications have been made in the updated design, although it is generally consistent with the previous TMF arrangement. Details are provided in full in Appendix 5-D.	Appendix 5-D, multiple sections.
1312	Details regarding the geotechnical investigation, design analyses and the proposed TMF were not included in the documents available for this review. As with item 7, above, some or all of this information is presumably provided in the KP document entitled Waste and Water Management Facilities Feasibility Design Report, Ref. No. VA101-458/4-6 Rev 0 March 29, 2012. This document is required. [EA Information Requirement]	The design report is included as Appendix 5-D. Geotechnical site investigation factual reports are included in Appendices 7-A, 7-B, and 5-C and contain all available field data.	Appendix 5-D, Appendix 7-A, Appendix 7-B, Appendix 5-C.
1313	Notwithstanding the content of the document listed above, the following general information is required: laboratory data supporting the geotechnical characterization of the tailings; the geotechnical and hydrogeological characterization of the TMF foundation, particularly at the main tailings dam; field and laboratory data supporting the geotechnical characterization of the dam construction materials; the design criteria for the tailings dam; the analyses (stability under static and dynamic loading conditions, phreatic levels, seepage rates, etc.) used to develop the proposed TMF design (including both dams); the TMF design (including dam cross-sections, drainage requirements, etc.); plus any incremental details of relevance to the physical stability of the tailings dam and the general performance of the TMF (such as water management features, etc.). **[EA Information Requirement]**	The design information for the current level of study is included in Appendix 5-D.	Appendix 5-D, multiple sections.

Table 2-A5. SRK Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1314	The site layout figure (Figure 2.3-1 from the EA Application) suggests the seepage collection pond dam downstream of the TMF will be in the order of 300 m long and 20 m high. The following general information is required: the geotechnical and hydrogeological characterization of the dam foundation; the geotechnical characterization of the dam construction materials; the dam classification and design criteria; the analyses (stability under static and dynamic loading conditions, phreatic levels, seepage rates, etc.) used to develop the proposed dam design; the dam design details (including cross-sections, etc.); plus any incremental details of relevance to the performance of this dam (such as construction concepts, water management features, etc.). **[EA Information Requirement]**	The water management pond design has been revised. The designs for the water management ponds for the project at the current level of study are described in Appendix 5-D (Section 6 and Appendices A and D of Appendix 5-D).	Appendix 5-D, multiple sections.

Table 2-A6. MEMNG Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1400	It is unclear if the base case for the proposed project includes water treatment. Section 6.4 indicates that water treatment is included in water quality modelling results used in the effects assessment. Appendix D lists treatment as a contingency, and Appendix L, sub-Appendix G, states that treatment options presented in that appendix should be considered as secondary mitigation options for the project. Text throughout the application document refers to treatment as if it a primary mitigation strategy (i.e. the base case for this assessment). Please provide additional information regarding the requirements for water treatment for this project and if it part of the proposed base case for the assessment. Water quality modelling must reflect the base case (i.e. primary) management strategies for the project.	The updated Project design no longer includes water treatment. Water quality modelling includes the primary mitigation measures for the Project (detailed in Appendix 13-C and summarized in Section 13.5.3).	13.5.3 Appendix 13-C
1401	If water treatment is a requirement for the project, further site-specific conceptual plans are required to confirm that the proposed treatment option(s) is technically feasible. The SKR memo in Appendix G of Appendix l presents a number of treatment options involving in-pit treatment and water plants. The memo acknowledges that quantitative performance data for in-pit treatment campaigns is relatively sparse, and that in-pit treatment provides fewer options for controlling treatment performance. Additional information that is required for all proposed water treatment (in-pit and(or) water treatment plants) includes: conceptual design of the treatment process; predicted reagent use; design criteria to manage the expected range of flow and climatic conditions; sludge disposal plans (if applicable); and, identification of the operating, monitoring and maintenance requirements. For pit lake treatment, additional information on the expected physical characteristics of the pit lake and the biological and geochemical processes and controls that will occur must be provided. Analogue data from other mines with similar treatment technology along with site performance data should be provided. EMNG acknowledges that it is possible that there will be advances in treatment technologies over the life of the proposed project, however for the assessment of the potential effects of the project, reviewers must have confidence in the effectiveness of mitigation strategies that are currently proposed.	The updated Project design no longer includes water treatment. Water quality modelling includes the primary mitigation measures for the Project (detailed in Appendix 13-C and summarized in Section 13.5.3).	13.5.3 Appendix 13-C
1402	Additional information is required regarding aspects of water management related to the open pit lake. The application notes that the pit lake must remain approximately 25 m below the pit rim in order to minimize seepage to groundwater and associated impacts. Is this required only during deposition of tailings from processing of low grade ore, or is this a requirement during closure and post-closure? The application states that water will begin discharging from the pit at year 30, please clarify from what elevation and how this will occur? Also note that the Executive Summary states that the open pit may be used for tailings disposal. Please update this text to reflect the application, which is clear that the open pit will be used for disposal of tailings resulting from processing of the low grade ore stockpiles.	When filling of the pit lake is complete, the water surface elevation will be maintained at a maximum elevation of 1530 masl in order to reduce seepage rates from the tailings and pit lake into the downstream receiving environment. The lowest elevation of the pit wall is expected to be 1555 masl, which allows for 25 m of freeboard to manage storm or freshet inflows. Excess water will be pumped and released to the TMF pond, and subsequently flow through the TMF spillway. Pumping of excess water will begin when the pit lake reaches its maximum storage volume and will continue into perpetuity. Pumping from the pit was simulated using a 7-month, dual-rate pumping strategy to mitigate effects on downstream water quality. Additional discussion of the pumping strategy and pit lake water management is provided in Appendix 12-B Section 5 and additional detail on the closure and reclamation concept is provided in Appendix 5-D Section 7.	Appendix 5-D (Section 7) and Appendix 12-B (Section 5)
1403	Additional information is required regarding if groundwater pump-back is part of the primary mitigation strategy and base case for the proposed project. If it is proposed, additional information is required to show that it is technically feasible as proposed. The water quality model includes this as a mitigation strategy, but the application text is unclear as to whether it is part of the base-case for assessment.	Groundwater pump-back is no longer proposed in the Project's designs. It is only considered as part of the adaptive groundwater management plan that may or may not be utilized, depending on the results of the proposed follow-up groundwater monitoring network.	Section 24.8

Table 2-A6. MEMNG Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1404	Overburden and weathered bedrock have been characterized for the pit area. These materials are proposed to be used for construction of site infrastructure. Characterization data indicates that some of the weathered bedrock is potentially acid generating (PAG) and some of the overburden has elevated levels of leachable copper, selenium and zinc. The application does not appear to specify how or if this material will be managed. EMNG does not support the use of PAG or neutral leaching materials for construction. Additional information is required in the management plan for metal leaching and acid rock drainage (ML/ARD) to address management of this material.	Provided in Environmental Management and Monitoring Plans	24.10.3.3
1405	Management plans for the low grade ore stockpile, in the event that they are not processed, appear to be missing from the application. This is a requirement of the AIR (page 22).	A separate management plan for unused low grade ore stockpiles has not been compiled. However, the Mine Waste and ML/ARD Management Plan makes provision for their closure treatment as a consequence of early temporary or permanent mine closure. This would amount to unused low grade ore stockpiles receiving the same treatment as prescribed for their closure at the end of the life of the mine.	7.10 24.9.2.2
1406	A management plan for ML/ARD that incorporates prediction, prevention, management and monitoring is required, as specified by the AIR. The ML/ARD Testing Plan provided in Section 10.9 of the Application provides a summary of waste rock segregation criteria and identifies storage locations for potentially acid generating (PAG) and non-PAG waste rock (directly copied from Section 6.1). The application is missing information about operational geochemical testing requirements and operational management aspects of waste rock segregation. This is a key aspect of the mine plan and mitigation plan for the Harper Creek Project. Additional information is required: - to demonstrate that it is operationally feasible to segregate waste rock and low grade ore; - to demonstrate that materials produced by mining (i.e. waste rock, tailings, ore and low grade ore) will be handled successfully during operations; and, - to provide a sensitivity analysis to assess the effects of imperfect segregation.	Provided in Environmental Management and Monitoring Plans	See Section 4.1.4 of Appendix 6-A, and Section 24.10.3.1

Table 2-A7. EAO Consultation Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1500	EAO notes that the Proponent has complied with the requirement to provide its First Nations consultation plan and summary to First Nations in advance of submitting as part of the Application. However, EAO is concerned with the responses provided by the Proponent. In many instances the Proponent has stated that concerns raised by First Nations are "addressed in the Application", which does not indicate whether the Proponent has consulted with First Nations regarding the proposed mitigation or accommodation in the Application. The consultation that the Proponent is directed to undertake in the section 11 order requires an iterative consultation process with the First Nations which needs to be clearly documented in the application.	HCMC has tracked the issues raised throughout the consultation process in the appendices to Chapter 3, Information Distribution and Consultation by Aboriginal groups (Appendix 3-F), government agencies (Appendix 3-J), and the public (Appendix 3-L). Responses describe how HCMC has considered and addressed the issue and indicates where in the Application additional information can be located, if applicable.	Chapter 3 Appendix 3-F Appendix 3-J Appendix 3-L
1501	Summary of Past Consultation Activities: While EAO notes that the Proponent has initiated dialogue with each of the four First Nations listed in the section 11 order (as amended by the section 13 order), limited efforts have been made to meet with First Nations in the pre-Application stage. The nature of the documentation in the Application makes it difficult to understand to what extent the Proponent has had discussions with First Nations on their interests and concerns, the mitigation measures proposed, and any proposed approach to addressing outstanding issues.	Guided by the Section 11 and 13 Orders, the AIR, and CEA Agency, HCMC has consulted with Simpcw First Nation (SFN), Adams Lake Indian Band (ALIB), Neskonlith Indian Band (NIB), Little Shuswap Indian Band (LSIB), and Metis Nation BC (MNBC) throughout the pre-Application stage. These efforts are documented, along with a proposal for continued consultation during the Application review stage, in Section 3.5 Chapter 3 of the Application/EIS, Information Distribution and Consultation. HCMC authored and distributed pre-Application consultation summary reports for SFN, ALIB, NIB, LSIB, and MNBC to each group for review and comment in October 2014, prior to submission of the Application/EIS. Detailed communication summaries with each group are included as appendices to Chapter 3: Appendix 3-E for Aboriginal groups, Appendix 3-I for government agencies, and Appendix 3-K for the public. HCMC has tracked the issues raised throughout the consultation process in the appendices to Chapter 3, Information Distribution and Consultation by Aboriginal groups (Appendix 3-F), government agencies (Appendix 3-J), and the public (Appendix 3-L).	Chapter 3 (Section 3.5) Appendix 3-E Appendix 3-F Appendix 3-I Appendix 3-J Appendix 3-K Appendix 3-L
1502	*Below is a list of concerns and issues that were noted in the application. Specific requests for follow-up by the Proponent are underlined.*	--	--
1503	**Section 11.6 – Aboriginal Consultation** The first sentence on the 6th paragraph states that "Prior to October 2012, communication and consultation with the Neskonlith and Little Shuswap Indian Bands was on an information sharing basis as directed by the EAO and CEAA." This sentence should be deleted as EAO did not provide this direction to the Proponent.	This sentence has been deleted.	--
1504	**Section 11.6 – Aboriginal Consultation** It's concerning to see that consultation efforts after September 2012 have not been documented in the Application other than to say that "issues raised since September 2012 and during the review phase will be documented and tracked." Provide an up to date record of the consultation up to the time of submitting the Application including subsequent versions of the Application.	Chapter 3 of the Application/EIS, Information Distribution and Consultation, reports on HCMC's consultation up until July 31, 2014. Detailed communication summary and issues tracking tables are included as appendices to the Chapter.	Section 3.5 of Chapter 3 Appendix 3-E Appendix 3-F
1505	**Section 11.6 – Aboriginal Consultation** Statements in the 2nd and 3rd paragraphs of subsection 11.6.2.2 that the Proponent initially contacted the Chief and Council of each of the four First Nations and that many letters, meetings and other communications were undertaken with First Nations seems to contradict the statement that communications and consultation with the Neskonlith and Little Shuswap was on an information sharing basis. Capacity Funding is mentioned in the Early Consultation Activities – Please provide details on how much capacity funding was provided and to whom.	In a letter dated July 21, 2011, ALIB advised HCMC that it was acting on behalf of the Lakes Division Bands (ALIB, NIB and Splats'in First Nation). In September 2012, the NIB informed HCMC that they wished to be independently consulted. Prior to September 2012, HCMC was providing information and meeting directly with NIB regarding the Project. The BC EAO issued a section 13 Order adding NIB as a First Nation for consultation purposes to the section 11 Order and HCMC adjusted its consultation approach as each First Nation is self-representing for the purposes of consultation for this Project. HCMC met with SFN in June 2006 and ALIB, NIB, and LSIB (separately) between August and November 2007 to provide an introduction to the Project and meet with the leadership of each group. Consultation with Aboriginal groups is summarized in Section 3.5 of Chapter 3 of the Application/EIS, Information Distribution and Consultation. Communication summaries with Aboriginal groups are included in Appendix 3-E and Aboriginal issues tracking tables are included in Appendix 3-F. HCMC's Environmental Assessment (EA)-related funding is documented in section 3.5.1.4, though exact amounts are confidential. HCMC offered funding to SFN, ALIB, NIB, and LSIB.	Section 3.5.1.1 Section 3.5.1.4

Table 2-A7. EAO Consultation Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1506	**Section 11.6.2.3 – Consultation on the Draft AIR** With respect to the 2nd paragraph, EAO does not consider inviting First Nations to an Open House for the public comment period as First Nations consultation. The paragraph goes on to say that the Proponent "also provided other opportunities for First Nations to participate in the review of the draft AIR outside of the public review process." Please provide information about the other opportunities for First Nations participation and about the issues that were raised and how they were addressed.	Section 3.5 of Chapter 3, Information Distribution and Consultation describes HCMC's consultation efforts with Aboriginal groups including early Project notification, capacity funding, opportunities for Aboriginal groups to provide input into EA studies, consultation on Aboriginal interests, a HCMC-hosted community meeting, and site visits.	Section 3.5 Appendix 3-E
1507	**Section 11.6.2.3 – Consultation on the Draft AIR** A link to a website for information on comments received from First nations and how the Proponent responded to those comments does not meet the section 11 requirement (section 14.1). This information must be included in the Application. It is an important component of the story of what issues were raised and how they were addressed and/or mitigated. Include a summary of the comments received on the draft AIR and how they were addressed or responded to.	Section 3.5.1.3 describes which Aboriginal groups (SFN, ALIB on behalf of the Lakes Division Bands, and MNBC) commented on the draft AIR, and summarizes the comments received by each group. MNBC's issues are not captured in the two draft AIR issues tracking tables posted to the e-PIC site. For this reason they are included in the MNBC issues tracking table with HCMC's responses (Table 3-F5 in Appendix 3-F).	Section 3.5.1.3 Table 3-F5 in Appendix 3-F
1508	**Section 11.6.2.5 – Consultation to Support the Development of the Application** The first half of this section including the dates of the Working Group meetings relates to consultation by EAO and does not represent consultation activities by the Proponent. Provide information on what the Proponent has been doing and does not rely on EAO's consultation.	HCMC's consultation with Aboriginal groups is described in Section 3.5, with government agencies and local government in Section 3.6, and the Public in Section 3.7. These sections describe HCMC's efforts to consult with these groups and does not focus on the BC EAO's consultation efforts. Associated summaries of communications included as appendices focus on HCMC's consultation efforts only.	Chapter 3 Appendices 3-E, 3-I, and 3-K.
1509	**Section 11.6.2.5 – Consultation to Support the Development of the Application** In the 2nd last paragraph it is noted that "a response was received from the Neskonlith Indian Band on November 02, 2012. Although recommendations for further work were identified, this information was received too late to include in the Application prior to submission." The Application was submitted in April 2013 so it's concerning that efforts weren't made to include this information since it appears that there was ample time to incorporate into the Application. Provide an up to date consultation record for Frist Nations up to the submission of the Application including subsequent versions of the Application.	Consultation records provided in the Application are current to July 31, 2014.	Section 3.5 Appendices 3-E and 3-F
1510	**Section 11.6.3 – Summary of First Nations Consultation** Provide a summary of the First Nations consultation that has occurred after September 2012. Provide an up to date consultation record for First Nations up to the submission of the Application including subsequent versions of the Application.	Consultation records provided in the Application are current to July 31, 2014.	Section 3.5 Appendices 3-E and 3-F
1511	**Section 11.6.3 – Summary of First Nations Consultation** It is noted in subsection 11.6.3.1 (Simpcw First Nation) and in subsection 11.6.3.2 (Adams Lake Indian Band) that workshops and open houses occurred. If you are referring to EAO's open house at the start of the public comment period then this should not be referenced in this section. Please provide information on when these open houses occurred and what issues were raised and how they were addressed.	HCMC held a workshop for a number of First Nations in December of 2007 (Section 3.5.1.6). HCMC's consultation with Aboriginal groups is described in Section 3.5.	Section 3.5 Section 3.5.1.6
1512	**Section 11.6.4 – Key Aboriginal Issues and Responses** The Proponent has provided a link to the draft AIR tracking table posted on ePIC on EAO's website. This does not fulfil the AIR requirement that "issues included in this section will reflect those recorded in the tracking table that will be included in Section 3.1 of the Application and posted on EAO's website." Please provide a summary and analysis of issues raised and how they were addressed and responded to.	Section 3.5.2 of Chapter 3 summarizes the issues raised by Aboriginal groups and HCMC's responses (to July 31, 2014). Appendix 3-F contains detailed issues tracking tables for each Aboriginal group that include specific issues raised throughout the consultation process and HCMC's response. Aboriginal comments on the draft AIR are discussed in Section 3.5.1.3,	Section 3.5.1.3 Section 3.5.2 Appendix 3-F

Table 2-A7. EAO Consultation Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1513	**Section 11.6.5.** The first sentence states that the Proponent "has developed a Project specific Aboriginal consultation and engagement plan for the Application Review Phase." Please provide information and details about Aboriginal consultation and engagement plan, as well as the comments that were received from Frist Nations on Yellowhead Mining Inc's proposed plan.	In December 2012, HCMC provided a First Nation Consultation Summary and Planned Application Review Consultation in December to SFN, ALIB, NIB, and LSIB for review and comment. HCMC authored and distributed another round of pre-Application consultation summary reports for SFN, ALIB, NIB, LSIB, and MNBC to each group for review and comment in September/October 2014. These reports included a plan for consultation during the Application review phase. This plan is also included in section 3.5.3.	Section 3.5.1.5 Section 3.5.1.11 Section 3.5.3
1514	**Section 11.6.5.** It does not appear that the Proponent has determined what First Nations interests may exist in and around the proposed Project site. This information is needed for the Proponent to "structure and implement the Application Review consultation process to ensure that potentially adverse effects are minimized. Please provide information regarding First Nations interests in and around the proposed Project site.	Chapter 23, Aboriginal Rights and Related Interests assesses the potential adverse effects on asserted or established Aboriginal rights and interests which may arise from the Project during the Construction, Operations (I and II), Closure, and Post-Closure phases. The assessment identifies measures to mitigate or accommodate for potential effects. Section 3.5.2 of Chapter 3 summarizes the issues raised by Aboriginal groups to date and Appendix 3-F provides issues tracking tables for each Aboriginal group that contain detailed issues and HCMC's responses to address those issues.	Chapter 23 Section 3.5.2 Appendix 3-F
1515	**Section 11.6.5.** Stating that the Proponent will ensure that First Nations receive notice of the public comment period and the open house 7 days prior to commencement is not consultation and should not be included in this section. There is also a note in the First Nations Consultation Summary about the Open House for the public comment period during the review of the draft AIR which is not specific First Nations consultation and should not be in the summary. The Proponent needs to consider First Nations consultation that goes beyond following EAO's process.	Section 3.5 of Chapter 3, Information Distribution and Consultation describes HCMC's consultation efforts with Aboriginal groups including early Project notification, capacity funding, opportunities for Aboriginal groups to provide input into EA studies, consultation on Aboriginal interests, a HCMC-hosted community meeting, and site visit. Appendix 3-E contains detailed communication summary tables for each Aboriginal group.	Section 3.5 Appendix 3-E
1516	**Table 11.6-6 – Consultation Summary** Full Consultation Summary should be an appendix. Summarize in a few pages for each First Nation for the consultation that has occurred in the Application focusing on important issues discussed and how they were resolved.	A record of communication is provided from notification of the Project until July 31, 2014 for each Aboriginal group (Appendix 3-E), and issues tracking tables for each group are included in Appendix 3-F. The record of communication is summarized in the Application (section 3.5).	Section 3.5 Appendices 3-E and 3-F
1517	**Table 11.6-6 – Consultation Summary** Capacity funding is mentioned many times in the Consultation summary in regards to communications between the Proponent and the various First Nations. Please provide information and details about how much capacity funding has been provided and to which First Nations.	HCMC's Environmental Assessment (EA)-related funding is documented in section 3.5.1.4, though exact amounts are confidential. HCMC offered funding to SFN, ALIB, NIB, and LSIB.	Section 3.5.1.4
1518	**Table 11.6-6 – Consultation Summary** It's mentioned on several occasions with various First Nations that "agreements" were negotiated. Please provide information and details about the agreements that have been completed and with which First Nation. Please also provide information on agreements that currently being negotiated and with whom.	Section 3.5.1.4 discusses the agreements HCMC has signed to date with Aboriginal groups (SFN and ALIB).	Section 3.5.1.4
1519	**In Table 11.6-10** In two instances under the Proponent Response column, one involving a comment by Adams Lake Indian band and another by the Neskonlith Indian Band, it is stated that "the Proponent is being guided by strength of claim assessments by the Crown." Delete these responses. EAO's direction for First Nations consultation to the Proponent is included in the section 11 and section 13 orders. The Proponent is not being guided by strength of claim assessments by the Crown.	Provincial and federal consultation requirements with respect to Aboriginal peoples, including the Section 11 and 13 Orders are discussed in section 3.2.	Section 3.2
1520	*First Nations consultation plan for Application Review Phase* EAO agrees with the overall objectives and goals' regarding the Proponent's proposed ongoing First Nations consultation. However, there is very little detail on exactly how and when the Proponent's proposed First Nations consultation will occur during the Application review stage and therefore it is unclear how these objectives and goals will be met.	Section 3.5.3 of Chapter 3 describes a plan for consultation with Aboriginal groups during the Application review period.	Section 3.5.3

Table 2-A7. EAO Consultation Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1521	*Direction on Additional First Nations Consultation Required* It is EAO's assessment that the Proponent has not yet meaningfully consulted with First Nations regarding the potential impacts of the proposed Project on their interests. For example, the Proponent has noted that there have been 193 phone calls, emails and letters between the Proponent and the Simpcw First Nation on baseline studies, but does not mention if First Nations interests have also been discussed.	HCMC acted on BC EAO's request (May 16, 2013 letter to HCMC) to conduct additional consultation by sending letters between May and July to SFN, ALIB, NIB, and LSIB requesting (individual) meetings to discuss the Working Tables (Appendices 3-G and 3-H). Each Working Table sets out a particular concern raised regarding a Project activity, identifies proposed mitigation measures, summarizes the effects assessment (residual effects and cumulative effects), and provides a space to identify and provide HCMC with additional information on concerns regarding impacts on Aboriginal interests , and suggestions for mitigation and accommodation. HCMC's offers of capacity funding in July 2013 (described in Section 3.5.1.4) was to cover the costs associated with First Nations' review of the Working Tables. NIB and LSIB provided comments on the Working Tables. HCMC also provided other opportunities for Aboriginal groups to review and comment on various EA studies, including the Traditional Land Use and Ecological Knowledge Study prepared by the Simpcw First Nation (August 2012; Section 3.5.1.5). Communication summary tables with each Aboriginal group are included in Appendix 3-E, and Appendix 3-F includes issues tracking tables for each Aboriginal group. Chapter 23, Aboriginal Rights and Related Interests assesses the potential adverse effects on asserted or established Aboriginal rights and interests which may arise from the Project during the Construction, Operations (I and II), Closure, and Post-Closure phases.	Section 3.5.1.4 Section 3.5.1.5 Appendices 3-E, 3-F, 3-G and 3-H Chapter 23
1522	EAO needs to know the answers to the following questions: 1. Has the Proponent, in discussions with First Nations, attempted to find out about practices, traditions or customs currently engaged in by First Nations, and how the proposed Project might potentially impact those traditions and practices? 2. What accommodation has the Proponent proposed for these potential impacts? 3. How did the involvement of First Nations in the baseline studies inform or change the proposed Project?	HCMC acted on BC EAO's request (May 16, 2013 letter to HCMC) to conduct additional consultation by sending letters between May and July to SFN, ALIB, NIB, and LSIB requesting (individual) meetings to discuss the Working Tables (Appendices 3-G and 3-H). Each Working Table sets out a particular concern raised regarding a Project activity, identifies proposed mitigation measures, summarizes the effects assessment (residual effects and cumulative effects), and provides a space to identify and provide HCMC with additional information on concerns regarding impacts on Aboriginal interests , and suggestions for mitigation and accommodation. HCMC's offers of capacity funding in July 2013 (described in Section 3.5.1.4) was to cover the costs associated with First Nations' review of the Working Tables. NIB and LSIB provided comments on the Working Tables. HCMC also provided other opportunities for Aboriginal groups to review and comment on various EA studies, including the Traditional Land Use and Ecological Knowledge Study prepared by the Simpcw First Nation (August 2012; Section 3.5.1.5). Communication summary tables with each Aboriginal group are included in Appendix 3-E, and Appendix 3-F includes issues tracking tables for each Aboriginal group. Chapter 23, Aboriginal Rights and Related Interests assesses the potential adverse effects on asserted or established Aboriginal rights and interests which may arise from the Project during the Construction, Operations (I and II), Closure, and Post-Closure phases.	Section 3.5.1.4 Section 3.5.1.5 Appendices 3-E, 3-F, 3-G and 3-H Chapter 23
1523	To provide further guidance and assistance, I am attaching a copy of the draft Proponent Guide to First Nations Consultation in the Environmental Assessment Process to this letter.	Noted.	N/A

Table 2-A7. EAO Consultation Comments

Comment #	Comment	Proponent Response	Application Section Where Information Will Be Found
1524	Due to the deficiencies in First Nations consultation conducted to date, EAO requires the Proponent to undertake the following additional consultation measures: 1. Prior to submitting the next version of the Application for screening, the Proponent must undertake the following activities: a. Contact Chiefs and Councils of all First Nations with a request for a meeting to discuss: past and current Aboriginal interests in the vicinity of or in relation to the area in which the proposed Project would be situated; what are the potential impacts of the proposed Project on those Aboriginal interests; and, what measures could be used in the proposed Project's design or operation to avoid, mitigate or otherwise address those potential impacts; b. Develop a revised First Nations consultation plan for Application Review with specific details about First Nations community meetings and opportunities for First Nations to participate during Application Review; and c. Submit a report to EAO about the meetings that have occurred, the issues that were raised, how those issues will be addressed and the proposed mitigation that will be in the Application and provide a copy of this report to each of the First Nations.	HCMC acted on BC EAO's request (May 16, 2013 letter to HCMC) to conduct additional consultation by sending letters between May and July to SFN, ALIB, NIB, and LSIB requesting (individual) meetings to discuss the Working Tables (Appendices 3-G and 3-H). Each Working Table sets out a particular concern raised regarding a Project activity, identifies proposed mitigation measures, summarizes the effects assessment (residual effects and cumulative effects), and provides a space to identify and provide HCMC with additional information on concerns regarding impacts on Aboriginal interests , and suggestions for mitigation and accommodation. HCMC's offers of capacity funding in July 2013 (described in Section 3.5.1.4) was to cover the costs associated with First Nations' review of the Working Tables. NIB and LSIB provided comments on the Working Tables. HCMC also provided other opportunities for Aboriginal groups to review and comment on various EA studies, including the Traditional Land Use and Ecological Knowledge Study prepared by the Simpcw First Nation (August 2012; Section 3.5.1.5). Communication summary tables with each Aboriginal group are included in Appendix 3-E, and Appendix 3-F includes issues tracking tables for each Aboriginal group. Section 3.5.3 describes a plan for continuing consultation during the Application review period. HCMC authored five Section 11 Order Aboriginal Consultation Reports (for ALIB, NIB, LSIB, SFN, and MNBC). HCMC provided each group with the opportunity to review and comment on their respective report in October 2014.	Section 3.5.1.4 Section 3.5.1.5 Appendices 3-E, 3-F, 3-G and 3-H Chapter 23
1525	If, at any time, the Proponent believes it cannot meet the requirements listed above, or required additional time to complete an activity, the Proponent must immediately advise EAO of the problem, reasons, and potential alternative approaches or timelines as appropriate. If the Proponent is unable to meet with or receive feedback from any First Nation, the Proponent must document what efforts the Proponent made to obtain a meeting or receive feedback.	The communication summary tables in Appendix 3-E document HCMC's efforts to distribute information to, and obtain feedback from Aboriginal groups. Section 3.5.3 describes a plan for continuing consultation during the Application review period. HCMC will notify BC EAO if for any reason it is unable to implemented the measures noted in section 3.5.3.	Section 3.5.3 Appendix 3-E