

Appendix 15-B

Aboriginal Groups Issues Tracking Tables

AJAX PROJECT

**Environmental Assessment Certificate Application / Environmental Impact Statement
for a Comprehensive Study**

**APPENDIX 15-B. ABORIGINAL GROUPS ISSUES
TRACKING TABLES**

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Table 1: Key Issues Expressed by SSN and KAM Responses

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
Water quality and quantity	Potential deterioration of water quality (e.g. Peterson Creek watershed, Jacko Lake, Thompson River).	Mitigation Report Consultation	<p>Potential effects of the Project on surface water and groundwater quality (including Jacko Lake, Peterson Creek, and Thompson River) are assessed in Sections 6.3 and 6.5 of the Application/EIS.</p> <p>The Application/EIS identifies mitigation strategies required to maintain water quality and discusses the effectiveness of proposed mitigation measures. Key measures include ML/ARD management (Section 11.5), maximizing collection and re-use of site contact water (Section 11.7), and establishing the Peterson Creek Diversion System. Potential effects are identified for Peterson Creek, but are considered negligible by the time the creek reaches the Thompson River.</p> <p>KAM will monitor water quality on an on-going basis throughout the life of the Project and will implement Surface Water and Groundwater Quality Management and Monitoring Plans (Sections 11.23 and 11.24) to ensure protection of human and environmental health is accounted for through all phases of the Project development.</p>
	Contamination of nearby waterbodies by acid rock drainage.	AIR/EIS Guidelines Comments Consultation	<p>KAM has conducted a thorough geochemical characterization of waste rock (Appendix 3-A), which has been used to guide blending requirements that are described in the Metal Leaching/ Acid Rock Drainage Management Plan (Section 11.4).</p> <p>Predicted geochemical source terms from the various mine components (MRSFs, the ore stockpile, the TSF and the pit walls) are used as input into the project-scale water quality model to predict water quality at various locations across the Project and in the downstream environment. Potential effects of the Project on surface water quality are assessed in Sections 6.3 of the Application/EIS.</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
	Potential effects on Cherry Creek watershed as a result of dust and/or seepage from the Mine Site.	AIR/EIS Guidelines Comments Consultation	<p>Based on the current Project infrastructure layout, no direct effects on water quality in the Cherry Creek watershed are anticipated.</p> <p>The air quality model (Appendix 10.1-A) does not predict a significant increase of dustfall deposition concentrations in waterways distal to the site such as Cherry Creek.</p> <p>Based on numerical groundwater flow and particle tracking simulations, groundwater is not predicted to migrate across the boundary between the Cherry Creek and Peterson Creek watersheds (Appendix 6.6-D).</p> <p>Results of the assessment of potential effects on surface and groundwater quality are presented in Sections 6.3 and 6.5 of the Application/EIS.</p>
	Potential connectivity between Jacko Lake and the open pit that could result in seepage from Jacko Lake into the pit.	AIR/EIS Guidelines Comments Consultation	<p>KAM has completed a hydrotechnical study of the connectivity between Jacko Lake and the open pit (Appendix 6.6-A). The results of this study have been incorporated into the numerical groundwater flow model (Appendix 6.6-D), and subsequent analysis.</p> <p>The results of the hydrotechnical study also contributed to the assessment of accidents and malfunctions (Section 17.6). A failure mode of pit wall failure was assessed as a low probability, but high consequence event. KAM recognizes the many environmental, social and cultural values associated with Jacko Lake, and is committed to on-going risk management to ensure the Project can be developed, operated, and closed in a manner that retains these values.</p>
	Changes to water quantity in Kamloops Lake and the Thompson River and importance of wastewater reuse.	AIR/EIS Guidelines Comments Consultation BC EAO Working Group Meeting	<p>The Project is being designed to minimize water use, with water recycled on-site to its greatest extent (see Section 11.7). At peak Operation, water use will be less than 0.5% of Kamloops Lake's lowest inflows (see Section 6.4). It is not expected this would result in downstream effects in the Thompson River.</p> <p>Detailed results of the assessment of potential effects on surface water and groundwater quantity are presented in Sections 6.4 and 6.6 of the Application /EIS.</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
	Potential effects on groundwater quantity at Jacko Lake.	BCEAO Working Group Meeting	<p>Detailed results of the assessment of potential effects on surface water and groundwater quantity are presented in Sections 6.4 and 6.6 of the Application/EIS.</p> <p>The Project is being designed to minimize water use, with water recycled on-site to its greatest extent. The water balance of the lake will be maintained due to high inflow. KAM will implement a Water Management and Hydrometric Monitoring Plan.</p>
Fish populations and fish habitat	Potential effects from blasting vibrations on fish and fish habitat in Jacko Lake.	Consultation	<p>Potential effects on fish populations and fish habitat, including potential effects from vibration on the fish in Jacko Lake, are assessed in Section 6.7 of the Application/EIS.</p> <p>The blast charge weights will be reduced and smaller diameter holes will be used as the edge of the Open Pit approaches the eastern shore of Jacko Lake.</p> <p>KAM will implement a Fisheries and Aquatic Life Monitoring Plan (Section 11.25) and a Noise Management Plan (Section 11.22) so that controls are in place to minimize adverse effects on fish during all phases of the Project.</p> <p>KAM understands the importance of Jacko Lake to the SSN and other groups, therefore potential effects on Jacko Lake are summarized as supporting topic in Section 8.7. This describes potential effects in relation to changes in land and resource use, fish populations and fish habitat, and other valued components, as appropriate.</p>
	Changes in availability of rainbow trout in Jacko Lake.	Cultural Heritage Study	<p>Potential effects on fish populations and fish habitat are assessed in Section 6.7 of the Application/EIS. The assessment considers potential effects on rainbow trout population abundance and fish habitat utilization in Jacko Lake and Peterson Creek. While some loss of habitat will occur in Jacko Lake, the population of trout in Jacko Lake is currently maintained through a stocking program. The Project will not change the stocking program.</p> <p>The Application/EIS identifies measures to avoid or minimize adverse effects on fish and fish habitat, including an offsetting plan to ensure no net loss of productive fish habitat. In addition, KAM will implement a Fisheries And Aquatic Life Monitoring Plan so that measures and controls are in place to minimize potential adverse effects on fish during all phases of the Project.</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
	Potential effects to migrating and resident fish species in Kamloops Lake.	Consultation	Potential effects on fish populations and fish habitat, including potential changes in habitat in Kamloops lake as a result of water intake upgrades and adequate mitigation are discussed in Section 6.7 of the Application/EIS. KAM is intending to maximize use of existing intake infrastructure at Kamloops Lake.
	Potential effects on the fishery and aquatic ecosystem in the in the Thompson River as a result of the Project and related cumulative effects.	Mitigation Report	Potential effects on fish populations and fish habitat, including potential cumulative effects when appropriate, are assessed in Section 6.7 of the Application/EIS. Potential effects of the Project are expected to remain within the Peterson Creek watershed, and are not expected to extend to the Thompson River. KAM will implement a Fisheries And Aquatic Life Monitoring Plan (Section 11.25) so that measures and controls are in place to minimize potential adverse effects on fish during all phases of the Project.
	Effects to the Aboriginal trout fishery such as habitat destruction and the loss of a food source.	BC EAO Working Group Meeting	No effects are anticipated on the Aboriginal trout fishery in Jacko Lake. Potential effects on fish populations and fish habitat, including potential cumulative effects when appropriate, are assessed in Section 6.7 of the Application/EIS. KAM will implement a Fisheries And Aquatic Life Monitoring Plan so that measures and controls are in place to minimize potential adverse effects on fish during all phases of the Project.
	Consideration of alternatives that would not remove Peterson Creek, NE arm of Jacko Lake, and the Hunting Blind Complex.	BC EAO Working Group Meeting	Information regarding Jacko Lake is provided in Section 8.7 of the Application/EIS. The history of the decision making will be as clear as possible in the application. Peterson Creek Diversion Channel Alternatives Assessment looks at variations including the potential for an open, or partially open, channel. The channel would still need to be altered however. This option was not chosen due to environmental and safety considerations.

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
Wildlife and wildlife habitat	Potential effects from noise and artificial light on wildlife.	BC EAO Working Group Meeting Mitigation Report Consultation	Potential effects of the Project on wildlife, including habitat alteration and loss, disturbance and displacement and mortality-, and measures to mitigate potential adverse effects are described in Sections 6.11 to 6.17 of the Application/EIS. Effects on wildlife will be monitored through the implementation of the Wildlife and Vegetation Monitoring Plan (Section 11.27).
	Effects on non-migratory game birds habitat, in particular, Blue and Red-listed species such as the sharp-tailed grouse.	Cultural Heritage Study Mitigation Report Consultation AIR/EIS Guidelines Comments BCEAO Working Group Meeting	Potential effects of the Project on non-migratory birds are assessed in Sections 6.16 of the Application/EIS. Based on consideration of SSN and other stakeholders input and baseline observations, reported historical presence or suitability of habitat, the sharp-tailed grouse and ruffled grouse were selected as focal species for the assessment. Effects on wildlife will be monitored through the implementation of the Wildlife/Vegetation Monitoring Plan (Section 11.27).
	Displacement of ungulates (from disruption in movement or migration patterns) and changes to wildlife habitat.	Mitigation Report Consultation	Potential effects on mammals, including habitat alteration and loss, disturbance and displacement, and mortality, are assessed in Section 6.17 of the Application/EIS. Moose and mule deer are part of the focal species for the analysis. KAM will implement a Wildlife and Vegetation Monitoring Plan (Section 11.27) to ensure that measures and controls are in place to minimize potential adverse effects during all phases of the Project.
	Potential effects on the American badger and other small mammals in the Project vicinity such as porcupine and skunk, including effects on the habitats these species depend on.	Mitigation Report BCEAO Working Group Meeting	Potential effects on mammals, including habitat alteration and loss, disturbance and displacement, and mortality, are assessed in Section 6.17 of the Application/EIS. Badger are a part of the focal species for the analysis.
	Concern expressed with the bioaccumulation of metals in raptors.	BCEAO Working Group Meeting	Potential effects of the Project on raptors are assessed in Sections 6.15 of the Application/EIS. Effects on wildlife will be monitored through the implementation of the Wildlife/Vegetation Monitoring Plan. This will include a metals monitoring plan for vegetation which will help understand the metals uptake to animals feeding on it (i.e., rodents).

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
Vegetation	Destruction of grasslands which supports biodiversity.	Mitigation Report Consultation BC EAO Working Group Meeting	<p>KAM acknowledges the importance of grasslands as sensitive ecosystems that support large number of species. Potential effects of the Project on grasslands and measures to mitigate adverse effects are described in Section 6.10 of the Application/EIS.</p> <p>Grasslands link to numerous other valued components, including most vegetation and wildlife species listed as value components, recreation, and land use. The interrelationships between grasslands and these valued components are discussed in each VC. Invasive species were noted during ground surveys but they were not inventoried. KGHM has a noxious weed control program currently operating on site. The areas where weeds occur have been mapped and to some extent the species of invasive or noxious weed has been mapped. KGHM would welcome any opportunity to discuss reclamation opportunities with the SSN.</p> <p>End land-use objectives outlined in the Reclamation and Closure Plan (Section 3.17) include re-establishing grassland habitat. Revegetation efforts will incorporate targeted native and traditional use species.</p> <p>KAM is interested to work with SSN to develop further details related to Closure planning. Some potential opportunities for closure research are provided in the Landscape Design and Restoration Plan (Section 11.26).</p>
	Concern about cumulative effects on - traditional plants and medicinal plants since some of these plants cannot be collected elsewhere and other plants collected here are being impacted elsewhere by other projects	BC EAO Working Group Meeting	<p>Potential effects of the Project on rare plants and measures to mitigate adverse effects are described in Section 6.8 of the Application/EIS. Rose and snowberry were intended as examples; all species in the CHS are considered. Section 6.8 of the Application/EIS identifies past, present and reasonable foreseeable future projects and activities considered to have the potential to interact with the residual effects of the Project and assesses cumulative effects when appropriate. This assessment is based on federal and provincial guidance documents.</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
Traditional Land Use	Change in access and use of preferred animal harvesting locations (e.g., Jacko Lake, Goose Lake, Peterson Creek).	Mitigation Report	<p>Potential effects on traditional harvesting activities, including access to harvesting areas, are assessed in Section 8.5 Current Use of Land and Resources for Traditional Purposes and Section 13 Aboriginal Interests (Rights and Title) of the Application/EIS.</p> <p>The assessment of potential effects on harvesting activities considers results of other relevant environmental, social, health, and heritage valued components assessed in Part B of the Application/EIS.</p> <p>TK/TLU information provided by SSN in the Cultural Heritage Study has been considered and integrated in the assessment and in the definition of mitigation strategies.</p> <p>KAM will implement an Access Management Plan, which will include provision for safe access to Jacko Lake during the Project life cycle. Wetland and habitat values associated with other waterbodies and watercourses are assessed in Section 6.9. The assessment identifies mitigation measures, including wetland compensation.</p>
	Potential effects on berry, wild root vegetable, and other medicinal and food plant gathering sites (in the vicinity of the Project and around Jacko Lake).	Cultural Heritage Study Consultation	<p>Potential effects of the Project on gathering activities, -including access to gathering sites, availability and quality of resources, and sensory disturbances-, and measures to mitigate potential adverse effects are described in Section 8.5 Current Use of Land and Resources for Traditional Purposes and Section 13 Aboriginal Interests (Rights and Title) of the Application/EIS. These sections consider results of the assessments of rare plants (Section 6.8), rare and sensitive ecological communities (Section 6.9) and grasslands (Section 6.10) to identify how changes to terrestrial ecosystems would impact gathering activities.</p>
	Effects on plants used for technological and ceremonial purposes (in the vicinity of the Project and especially around Jacko Lake).	Cultural Heritage Study Mitigation Report BCEAO Work Group Meeting	<p>Potential effects on country foods, including metal concentrations in plant and animal tissue are assessed in Section 10.3 of the Application/EIS.</p> <p>Effects on plants (including invasive plant management and metal uptake by plants) will be monitored throughout the life of the Project through the implementation of the Wildlife and Vegetation Monitoring Plan (Section 11.27).</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
Aboriginal rights and title	Loss of part of SSN traditional territory, including the loss of land to support cultural activities and community members, and resulting indirect economic losses.	Mitigation Report Consultation BCEAO Work Group Meeting	KAM is committed to developing sustainable long-term relationships with SSN. KAM will work with the SSN to implement long-term economic, social, and environmentally sustainable opportunities while avoiding, minimizing, and mitigating adverse Project effects. KAM is actively engaged in on-going dialogue with SSN to achieve a meaningful and mutually beneficial Project agreement. Potential effects of the Project on Aboriginal Interests are assessed in Section 13 Aboriginal Interests (Rights and Title) and Section 14 Other Potential Effects on Aboriginal Interests of the Application/EIS.
	Changes to rights and title in relation to Jacko Lake, Goose Lake and Kamloops Lake.	AIR/EIS Guidelines comments Consultation	Potential effects on Aboriginal Interests (Rights and Title) are assessed in Section 13 of the Application/EIS. The assessment includes effects to rights and title concerning Jacko Lake, Goose Lake and Kamloops Lake.
Cultural resources/uses	Effects to potential burial sites and burial cairns located in the Project footprint.	AIR/EIS Guidelines Comments Consultation	KAM has completed numerous archaeological/heritage studies to support Project development. SSN representatives have supported the fieldwork associated with these studies. Heritage sites are assessed in Section 9.2 of the Application/EIS. TK/TLU information provided by SSN has been considered and integrated in the assessment and in the definition of mitigation strategies. Discussions between the Archaeology Branch, SSN and KAM will be on-going to determine the specific mitigation requirements for each known archaeological site. Potential effects of the Project on other Aboriginal Interests including heritage values are assessed in Section 14 of the Application/EIS.
	Destruction of the Hunting Blind Complex and the historical, cultural and instructional values associated with it.	Cultural Heritage Report Mitigation Report AIR/EIS Guidelines Comments Consultation BCEAO Work Group Meeting	KAM has been and will continue to invite SSN to discuss any mitigation strategies that can continue the historical, cultural and instructional values associated with Hunting Blinds. Section 13 (Aboriginal Interests) describes potential effects on the Hunting Blind Complex based on KAM's current understanding.

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
	<p>Potential effects on (including changes to the integrity of) the Jacko Lake area (“Pipsell”) which is considered an important cultural landscape and place with spiritual value.</p> <p>The destruction of Jacko Lake and 8 hectares of spawning habitat is a significant impact to sustainable fisheries and culture.</p>	<p>AIR/EIS Guidelines Comments Consultation</p> <p>BCEAO Work Group Meeting</p>	<p>KAM’s understanding is that Pipsell (the area surrounding Jacko Lake is considered an important cultural landscape and place with spiritual and cultural value (SSN, pers. comm., 2014). The SSN assert that Jacko Lake is a storied site chronicling the many traditional activities that occurred there: root gathering, fishing and hunting in and around the lake (SSN, pers. comm., 2014). There is also a spiritual significance at Pipsell that forms the basis for a foundational story for the Stkemlupsemc people illustrating the connection between Secwepemc spiritual beliefs and practices in the current world, the world below (water), and the world above (atmosphere) (SSN, pers. comm., 2014). According to the story, “water people” or xqelmucwetke are said to reside in Jacko Lake.</p> <p>In summary, the SSN believe that Jacko Lake connects the livelihood of Secwepemc people to the caretaker above (atmosphere, which also supports the notion of protecting air quality). As part of this, the SSN notes that the Secwepemc people continue to carry out various cultural and spiritual ceremonies and communicate with the water people at Jacko Lake to prevent any future disturbances from the water people (SSN, pers. comm., 2014).</p> <p>Potential effects on Aboriginal Interests (Rights and Title), including potential effects on ceremonial or cultural uses of the land are assessed in Section 13 of the Application/EIS.</p>
	<p>Potential effects on Goose Lake which has cultural value.</p>	<p>AIR/EIS Guidelines Comments Consultation</p>	<p>Goose Lake was noted as an area where members of SSN hunt moose annually. Potential effects on Aboriginal Interests (Rights and Title), including potential effects on ceremonial or cultural uses of the land are assessed in Section 13 of the Application/EIS.</p>
	<p>Potential effects on sacred sites at Mount Lolo.</p>	<p>Community Meetings</p>	<p>Mount Lolo is located approximately 20 km north east of the Mine Site. No effects on sacred sites at Mount Lolo are anticipated.</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
Human health	Potential effects on human health from consumption of contaminated country foods (including as a result of dust deposition).	Mitigation Report BCEAO Working Group Meeting	<p>Human Health and Country Foods have been added as valued components in the Application/EIS based on responses received during review of the draft AIR/EIS Guidelines, which included comments from SSN, the larger technical working group, and the public.</p> <p>Potential effects on country foods, including metal concentrations in plant and animal tissue are assessed in Section 10.3 of the Application/EIS. The results of this analysis are carried forward to the assessment of Human Health (Section 10.4). The assessment of human health is based on a Human Health and Ecological Risk Assessment (HHERA) that considers: multiple potential exposure pathways (including, air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines); and multiple types of human receptors (e.g., Aboriginal and non-Aboriginal people for all age groups and sensitive members of the population – young children, the elderly, pregnant women, etc.).</p> <p>Mitigation measures specific to potential human health effects were not been recommended. Mitigation measures to control air and dust emissions outlined in the air quality effects assessment (Section 10.1) and mitigation measures to control surface water and groundwater discharges outlined in the water quality effects assessment (Section 6.3) will reduce Project emissions to levels that are protective of human health.</p>
	Effects on human health from noise and vibration (in particular, blasting).	Mitigation Report Social Sub-working Group Meeting	<p>Section 10.5 of the Application/EIS identifies and evaluates potential effects of the Project on noise and vibration levels and proposes mitigation measures for all phases of the Project to minimize the identified effects. Key mitigation measures will include: when operations start, test blasts or smaller blasts will be used to incrementally “scale up” the blast until vibration effects are fully understood; trained blasting technicians, and standard QA/QC procedures will be implemented; a process will be established to address vibration complaints in a timely manner. With the implementation of these measures, potential effects are considered to be minor.</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
	Potential negative effects on human health as a result of air quality changes and dust (i.e., potential effects on respiratory tissue).	Mitigation Report Consultation	Potential effects of the Project on dustfall and changes in air quality have been modelled in accordance with a detailed Dispersion Modelling Plan approved by the BC Ministry of Environment. Modelling results and potential effects are presented in Section 10.1.
	Potential effects to domestic drinking water	Consultation	<p>Potential effects associated with drinking water are considered in Section 10.2. Results of the numerical groundwater model are used to evaluate groundwater flow paths from Project infrastructure toward the nearest potential drinking water source.</p> <p>Results of the air quality modelling and the drinking water analysis are carried forward as inputs to the assessment of potential effects on human health, which are assessed in Section 10.4 of the Application/EIS. The assessment considers multiple potential exposure pathways (including air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines); and multiple types of human receptors (e.g., Aboriginal and non-Aboriginal people for all age groups and sensitive members of the population – young children, the elderly, pregnant women, etc.).</p> <p>KAM will implement an Air Quality Monitoring and Dust Control Plan (Section 11.6), including measures to mitigate fugitive dust, and surface water and groundwater quality monitoring programs (Sections 11.23 and 11.24).</p> <p>Mitigation measures specific to potential human health effects were not been recommended. Mitigation measures to control air and dust emissions outlined in the air quality effects assessment (Section 10.1) and mitigation measures to control surface water and groundwater discharges outlined in the water quality effects assessment (Section 6.3) will reduce Project emissions to levels that are protective of human health.</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
Economic opportunities	Interest expressed in training and skills development for members.	Consultation	KAM is committed to building a strong and lasting partnership with the SSN and its members. KAM's goal is to create long-term careers for SSN members. KAM will endeavor to work closely with the SSN to develop and implement a SSN Human Resources development plan for all project phases, which may include gap analysis, member assessment and development programs, high school mentorship programs, etc. KAM will endeavor to create SSN bursary programs.
	Interest expressed in employment and contracting opportunities.	Consultation	As stated above KAM will endeavor to work closely with SSN to develop and implement a SSN Human Resources development plan for all project phases giving all SSN members every opportunity to be successfully employed by the Project. KAM has been working with the SSN developing a procurement management plan. This plan allows SSN companies to successfully compete for contracting opportunities.
Social effects	Potential effects as a result of population increases that could reduce accessibility to health care, and other community services (some of which already have capacity issues).	AIR/EIS Guidelines Comments Social Sub-working Group Meeting	Potential effects on health services and other community services are addressed within Section 8.1 (Infrastructure, Public Facilities and Services) of the Application/EIS. The analysis considers the concerns on the perceived shortage of health professionals in the region and identify adequate mitigation when required.
	Concern that proximity to mine will encourage outmigration of physicians.	Consultation	KAM will implement a Socio-economic Monitoring Plan (Section 11.29) to enable the implementation of adaptive follow-up programs as needed.
	Concern that increases in disposable income could bring additional social problems (e.g., crime, drugs, gambling).	Consultation	Potential effects associated with Income are evaluated in Section 7.3, and potential effects on Community Health and Well-being are assessed in Section 10.7 of the Application/EIS. KAM is committed to maximizing positive effects associated with the Project, and identifying practical ways to minimize potential adverse effects that may be felt by a portion of the population.
	Concern expressed that Jacko Lake title claim may result in confrontations towards certain groups in the community.	BCEAO Working Group Meeting	Potential effects of Community Health and Well-being are assessed in Section 10.7 of the Application/EIS. It is difficult to predict how all of the political bodies in each community would interact; difficult to quantify.

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
Accidents and malfunctions	Concern regarding potential malfunctions and accidents (i.e., Kinder Morgan pipeline), preference for a dry stack, and potential failure of the TSF.	AIR/EIS Guidelines Comments Consultation BC EAO Working Group Meeting	<p>Accidents and Malfunctions are assessed in Section 17.6 of the Application/EIS. The assessment considers a wide range of potential failure modes, including potential effects to the Kinder Morgan pipeline, and potential failure of the TSF. KAM is committed to proactive risk management throughout all phases of the Project, with continued efforts to identify means of reducing the likelihood and/or consequence of failure modes.</p> <p>The TSF embankment design will be in accordance with the Canadian Dam Association Dam Safety Guidelines. Use of Mine Rock Storage Facilities (MRSFs) to buttress the embankments is a key aspect of the design that increases the Factor of Safety, and reduces the likelihood and consequence of potential failure modes. Other key aspects of the design include minimizing the volume of standing water stored behind the embankments and maintaining a large tailings beach between the embankment and the supernatant pond.</p> <p>Preliminary TSF design, and the supporting geotechnical studies are included in the Application (Appendix 3-D).</p>
Reclamation	Concern about potential contamination occurring during the Post-closure phase. Importance of ensuring the Ajax property is properly reclaimed and restored.	Consultation	<p>KAM will implement a Mine Closure and Reclamation Plan (Section 3.17).</p> <p>This plan is supported by the entire Environmental Management System, which is described in Section 11 of the Application/EIS, and will be implemented for all phases of the Project.</p> <p>KAM understands the importance of Closure planning, and will continue to advance further details of the Closure plan to support permitting efforts, and has proposed some opportunities for reclamation research that could be implemented during Operation. KAM is interested to identify means of working with SSN to advance these (or other) research opportunities.</p>
Cumulative Effects	Potential cumulative effects of the Project and other industries and developments in the Project area overlapping SSN's Territory.	Mitigation Report Consultation	Sections 6 to 10 of the Application/EIS identifies past, present and reasonable foreseeable future projects and activities considered to have the potential to interact with the residual effects of the Project and assesses cumulative effects when appropriate. This assessment is based on federal and provincial guidance documents.

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
Consultation	Inadequate information sharing and consultation on the updated General Arrangement.	Consultation	<p>Based on feedback received from Aboriginal Groups and the public during the consultation process, KAM conducted additional engineering studies and changed the General Arrangement (GA) of the Project, as announced on May 29, 2014. The updated GA was presented by KAM to SSN on June 3, 2014, February 24, 2015 and April 28, 2015.</p> <p>The updated GA brings key facilities closer together reducing air emissions. This change responds to health concerns related to dust and noise generation. The TSF is also proposed at a new location, which avoids Inks lake and prevents the TSF from being visible from the Coquihalla Highway.</p> <p>In immediate follow-up to the announcement of the updated GA, KAM met with the SSN to review the full GA (May 29, 2014). A follow-up meeting occurred with the Working Group (including SSN) on June 23, 2014.</p> <p>KAM has and will continue to consult SSN regarding areas of concern, mitigation, and accommodation opportunities on all portions of the Project footprint.</p>
	Concern that the Application/EIS may contain inaccuracies regarding consultation activities with the SSN.	AIR/EIS Guidelines Comments	KAM has provided SSN the opportunity to review and comment on the outputs of the consultation activities undertaken with them during the Pre-Application phase as part of their review of the First Nations Consultation Report, and as part of review of draft sections of Part C of the Application/EIS. These reports include a detailed log of communication with the SSN and an Issues Tracking Table.
	Concern raised about lack of capacity and technical assistance to properly participate in the environmental assessment process.	AIR/EIS Guidelines Comments BC EAO Working Group Meeting	<p>KAM recognizes the capacity challenges associated with reviewing large documents associated with environmental assessments. KAM is committed to preparing high quality submissions to facilitate a clear and consistent review of the Project, and to working with government agencies and First Nation groups to find ways of supporting an efficient yet effective review process.</p> <p>KAM has provided SSN funding to facilitate their involvement in a range of Pre-Application consultations and will continue to offer funding to support SSN participation in the environmental assessment process.</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
	<p>SSN is concerned that they have been insufficiently consulted regarding identification and selection of Valued Components and temporal and spatial boundaries for the environmental assessment.</p>	<p>AIR/EIS Guidelines Comments</p>	<p>The Proponent has engaged and consulted SSN for approximately 6 years and provided funding to SSN to conduct a Cultural Heritage Study (CHS) to gather information about SSN cultural uses of the Project area, including perceptions of effects, and proposed mitigation. Information provided by SSN has been carefully considered and, where appropriate, incorporated into baseline studies, effects assessments, and mitigation and monitoring strategies.</p> <p>Discussions and identification of relevant Valued Components underwent considerable review. BC EAO provided SSN with opportunities to review and comment on drafts of the AIR/EIS Guidelines. Through the Working Group, SSN provided written comments on the draft AIR/Guidelines on May 28, 2012. As a result of SSN comments, the AIR/EIS Guidelines was revised to include additional baseline information on cultural resources, consideration of effects on culturally-significant resources (e.g. include indicators for the assessment of traditional use plants), assessment of health and well-being, assessment of country foods, and approach to water management. A final AIR/EIS Guidelines was generated on June 3, 2013.</p> <p>The Working Group met on June 23, 2014 following the announcement by KAM of a new GA for the Project. The final AIR/EIS Guidelines was further updated and distributed to the Working Group on June 30, 2014. SSN submitted comments on August 29, 2014. After addressing SSN comments, the AIR/EIS Guidelines was then re-issued on November 7, 2014, for which the SSN submitted comments on December 18, 2014. Through subsequent meetings and discussions with SSN, BC EAO and CEA Agency, additional VCs were added to the AIR/EIS Guidelines specifically to address the SSN's concerns (e.g., Current Use of Lands and Resources for Traditional Purposes), and additional clarifications and requirements were added to existing sections of the AIR/EIS Guidelines leading up to the re-finalization in July 2015.</p>

Topic	SSN Issue/Concern/Comment	Manner Raised	KAM Response
	Interest expressed in additional consultation with KAM (could include site tours, community meetings consultation on the relocation of the Kinder Morgan pipeline and information sharing on Project changes).	Consultation	<p>KAM has facilitated six site tours for SSN members (representatives, elders, including one site tour for members of the Working Group in June 2014). Invitation for additional site tours remains in place.</p> <p>KAM held a total of 4 community meetings with the SSN in 2015.</p> <p>The scope of the CHS was expanded to cover changes to the updated Project GA; in particular the research area was extended to include the areas in the south footprint.</p> <p>KAM will continue to consult the SSN to understand potential Project effects and respond to information requests through all phase of the Project.</p>
	Concern that the updated Cultural Heritage Study (produced as a result of changes to the GA) may not be considered in the Application/EIS.	Consultation	<p>The updated Cultural Heritage Study for the updated GA was due in February 2015. To date, KAM has yet to receive the expanded Cultural Heritage Study. Once the report is made available, where possible it will be incorporated into the review of the Application/EIS and considered in the assessments.</p> <p>KAM continues to consult the SSN to obtain an understanding of SSN's past, current and future uses of lands to be impacted by the Project. Consultation will continue during the Application Review period.</p>

Table 2: Key Issues Expressed by AIB and KAM Responses

Topic	AIB Issues	Manner Raised	KAM Response
Water quantity and quality	General concerns about changes to water quantity and quality.	Consultation	<p>Potential effects of the Project on surface water and groundwater quality are assessed in Sections 6.3 and 6.5 of the Application/EIS. The assessment identifies mitigation strategies required to maintain water quality and discuss the effectiveness of proposed mitigation measures. Key measures include ML/ARD management (see Section 11.4), maximizing collection and re-use of site contact water (see Section 11.7), and establishing the Peterson Creek Diversion System. Potential effects are identified for Peterson Creek, but are considered negligible by the time the creek reaches the Thompson River.</p> <p>Potential effects on surface water and groundwater quantity are assessed in Sections 6.4 and 6.6 of the Application /EIS. The Project is being designed to minimize water use, with water recycled on site to its greatest extent. At peak operation, water use will be less than 0.5% of Kamloops Lake lowest flows. KAM will monitor water quantity and quality on an ongoing basis throughout the life of the Project and will implement Surface Water and Groundwater Quality Management and Monitoring Plans (Sections 11.23 and 11.24).</p>
	Potential effects on Thompson River.	BC EAO Working Group Meeting	<p>Potential effects of the Project on surface water quality and quantity are assessed in Sections 6.3 and 6.4 of the Application /EIS.</p> <p>Key measures include ML/ARD management (see Section 11.4), maximizing collection and re-use of site contact water (see Section 11.7), and establishing the Peterson Creek Diversion System. Potential effects are identified for Peterson Creek, but are considered negligible by the time the creek reaches the Thompson River.</p> <p>KAM will monitor water quantity and quality on an ongoing basis throughout the life of the Project and will implement Surface Water and Groundwater Quality Management and Monitoring Plans through all phases of the Project (Sections 11.23 and 11.24).</p>
Cumulative effects	Concern about cumulative effects (including the Kinder Morgan pipeline).	Consultation	Sections 6 to 10 of the Application/EIS identifies past, present and reasonably foreseeable future projects and activities considered to have the potential to interact with the residual effects of the Project and assesses cumulative effects as appropriate. This assessment is based on federal and provincial guidance documents.

Topic	AIB Issues	Manner Raised	KAM Response
Land and resource use	Potential effects on cattle from metals in the Sugarloaf Property.	Consultation	<p>Potential effects on land and resource use are assessed in Section 8.4 of the Application/EIS. This includes the assessment of potential effects on agricultural land use and ranching.</p> <p>The Human Health Risk Assessment (Section 10.4, and Appendix 10.4-A) also assesses potential effects on cattle from exposure to metals, and the potential for accumulation through the food chain.</p>
Economic	Interest expressed in contracting, employment, training and procurement opportunities.	Consultation	KAM is committed to building strong and lasting partnerships in the community, to hiring employees locally, and to identifying partnerships with education and training organizations and institutions to support development of the expertise required.
	Concern about the potential use of temporary foreign workers as employees for the Project.	Consultation	<p>KAM is committed to building strong and lasting partnerships in the community, to hiring employees locally, and to identifying partnerships with education and training organizations and institutions to support development of the expertise required.</p> <p>Potential effects of the Project on local and regional employment are assessed in Section 7.2 Labour Force, Employment and Training.</p>
Consultation	Interest expressed in developing a Cultural Heritage Assessment for the Project.	AIR/EIS Guidelines Comments Consultation	<p>KAM is committed to working with Aboriginal Groups to develop capacity and gather information on traditional uses.</p> <p>Prior to the updated General Arrangement (GA), AIB expressed an interest in completing a TK/TLU study for the Project. However, following the announcement of the updated GA and signing of the Consultation and Benefits Agreement, AIB has not pursued a TK/TLU study further.</p>
	Concern about lack of resources to meaningfully participate in the environmental assessment process.	Consultation	<p>KAM recognizes the capacity challenges associated with reviewing large documents associated with environmental assessments. KAM is committed to preparing high quality submissions to facilitate a clear and consistent review of the Project, and to working with government agencies and Aboriginal Groups to find ways of supporting an efficient yet effective review process.</p> <p>The Proponent provided AIB funding through a Consultation and Benefit Agreement to facilitate their involvement in the environmental assessment process.</p>

Table 3: Key Issues Expressed by LNIB and KAM Responses

Topic	LNIB Issue/Concern/Comment	Manner Raised	KAM Response
Traditional Land Use	Potential effects on the ability of LNIB to engage in fishing, hunting, and gathering.	Consultation	Potential effects on traditional harvesting activities (including fishing, hunting and gathering) are assessed in Section 8.5 Current Use of Land and Resources for Traditional Purposes and Section 13 Aboriginal Interests (Rights and Title). The assessment considers potential changes to access to harvesting locations, availability and quality of resources, and sensory disturbances that may affect the ability to exercise harvesting rights, as well as measures to mitigate potential adverse effects. Potential effects on ceremonial or cultural uses of the land are assessed in Section 8.5 Current Use of Land and Resources for Traditional Purposes and Section 13 Aboriginal Interests (Rights and Title).
	Potential effects from dust on cattle grazing and wildlife harvested in the area (near Lac Le Jeune).	Consultation	
	Potential effects from dust on food and medicinal plants harvesting in the area (near Lac Le Jeune).	Consultation	
	Concern regarding mine's proximity to lands that are of cultural importance to LNIB.	Consultation	
Water quantity and water quality	Potential downstream effects from changes in water quantity and quality.	Consultation	<p>Potential effects of the Project on surface water and groundwater quality are assessed in Sections 6.3 and 6.5 of the Application/EIS. The assessment identifies mitigation strategies to maintain water quality and discuss the effectiveness of proposed mitigation measures. Key measures include ML/ARD management (Section 11.5), maximizing collection and re-use of site contact water (Section 11.7), and establishing the Peterson Creek Diversion System. Potential effects are identified for Peterson Creek, but are considered negligible by the time the creek reaches the Thompson River.</p> <p>Potential effects to surface water and groundwater quantity are assessed in Sections 6.4 and 6.6 of the Application /EIS. The Project is being designed to minimize water use, with water recycled on site to its greatest extent. At peak operation, water use will be less than 0.5% of Kamloops Lake lowest inflows.</p> <p>KAM will monitor water quality on an on-going basis throughout the life of the Project and will implement Surface Water and Groundwater Quality Management and Monitoring Plans (Sections 11.23 and 11.24).</p>

Topic	LNIB Issue/Concern/Comment	Manner Raised	KAM Response
Accidents and malfunctions	Potential failure of the TSF, including potential effects on the Kinder Morgan pipeline, which is located under the proposed mine rock and TSF.	Consultation	<p>Accidents and Malfunctions are assessed in Section 17.6 of the Application/EIS. The assessment considers a wide range of potential failure modes, including potential effects to the Kinder Morgan pipeline, and potential failure of the TSF. KAM is committed to proactive risk management throughout all phases of the Project, with continued efforts to identify means of reducing the likelihood and/or consequence of failure modes</p> <p>The TSF embankment design will be in accordance with the Canadian Dam Association Dam Safety Guidelines. . Use of Mine Rock Storage Facilities (MRSFs) to buttress the embankments is a key aspect of the design that increases the Factor of Safety, and reduces the likelihood and consequence of potential failure modes. Other key aspects of the design include minimizing the volume of standing water stored behind the embankments and maintaining a large tailings beach between the embankment and the supernatant pond. Preliminary TSF design, and the supporting geotechnical studies are included in the Application (Appendix 3-D)</p> <p>The Kinder Morgan pipeline currently runs through the Project area. KAM has engaged Kinder Morgan to prepare and submit a Section 58 and Section 74 permit to the NEB, proposing to reroute the Pipeline further to the West of the Project footprint.</p>
Economic	Interest in potential education, training, and employment opportunities.	Consultation	<p>KAM is committed to building strong and lasting partnerships in the community, to hiring employees locally, and to identifying partnerships with education and training organizations and institutions to develop the expertise required.</p> <p>Potential effects of the Project on local and regional employment are assessed in Section 7.2 Labour Force, Employment and Training.</p>
	Interest in developing economic and business opportunities.	Consultation	Potential business opportunities are discussed in Section 7.4 of the Application/EIS.
	Interest in creation of economic diversification.	Consultation	Potential effects of the Project to economic diversification are assessed in Section 7.6 of the Application/EIS.

Topic	LNIB Issue/Concern/Comment	Manner Raised	KAM Response
Human Health	Concern about potential effect of noise on human health.	Social Sub-working Group Meeting	<p>Section 10.5 of the Application/EIS identifies and evaluates potential effects of the Project on noise and vibration levels and proposes mitigation measures for all phases of the Project to minimize the identified effects.</p> <p>Due to the proximity of the Project to the City of Kamloops and to rural residences, noise and vibration effects have been identified as a concern. The noise and vibration assessment for potential human health effects covers a broad area with a wide array of residential receptors ranging from urban and suburban to rural and quiet rural locations. KAM will implement a Noise Management Plan.</p>

Table 4: Key Issues Expressed by WP/CIB and KAM Responses

Topic	WP/CIB Issue/Concern/Comment	Manner Raised	KAM Response
Water quantity and water quality	Effects on water quality from acid rock drainage and other potential contamination during and after production.	Consultation	<p>KAM has conducted a detailed and thorough geochemical characterization to evaluate the potential for metal leaching and acid rock drainage. This report is provided in Appendix 3-A of the Application/EIS.</p> <p>The results of the geochemical characterization provide inputs to the water quality prediction model, which directly informs the assessment of potential effects of the Project on surface water and groundwater quality (Sections 6.3 and 6.5 of the Application/EIS). The Application/EIS identifies mitigation strategies to maintain water quality and discuss the effectiveness of proposed mitigation measures. Key measures include ML/ARD management (see Section 11.5), maximizing collection and re-use of site contact water (see Section 11.7), and establishing the Peterson Creek Diversion System. Potential effects are identified for Peterson Creek, but are considered negligible by the time the creek reaches the Thompson River.</p> <p>KAM will monitor water quality on an on-going basis throughout the life of the Project and will implement Surface Water and Groundwater Quality Management and Monitoring Plans (Sections 11.23 and 11.24) to ensure protection of human and environmental health is accounted for through all phases of the Project development</p>
	Concern about the significant amount of water that will be used by the Project from Kamloops Lake and the Thompson River, which could deplete water resources available for the community and other uses including cattle and hay ranching.	Consultation	<p>The Project is being designed to minimize water use, with water recycled on-site to its greatest extent (see Section 11.7, Water Management and Hydrometric Monitoring Plan). At peak operation, water use will be less than 0.5% of Kamloops Lake lowest inflows.</p> <p>Details results of the assessment of potential effects on surface water and groundwater quantity are presented in Sections 6.4 and 6.6 of the Application/EIS.</p>

Topic	WP/CIB Issue/Concern/Comment	Manner Raised	KAM Response
	Potential effects on water quality due to dust deposition on nearby waterbodies.	Consultation AIR/EIS Guidelines Comments	Potential effects of the Project on dustfall and changes in air quality have been modelled in accordance with a detailed Dispersion Modelling Plan approved by the BC Ministry of Environment (Section 10.1). Predictions of dust deposition take into account wind speeds and direction and are used as input to water quality prediction modelling (Section 6.3). To protect air quality, KAM will implement an Air Quality Monitoring and Dust Control Plan (Section 11.6), including measures to mitigate fugitive dust, which are known to be effective.
Fish populations and fish habitat	Potential effects on fish and fish habitat as a result of contamination of waterbodies (e.g. dust deposition)	Consultation	Potential effects on fish populations and fish habitat are assessed in Section 6.7 of the Application/EIS. This includes consideration of predicted water quality, which incorporates air modelling of dust deposition. Metals uptake by fish is also considered in the Human Health and Ecological Risk Assessment (Section 10.4 and Appendix 10.4-A). The Application/EIS identifies measures to avoid or minimize adverse effects on fish including an offsetting plan to ensure no net loss of productive fish habitat and the implementation of a Fisheries and Aquatic Life Monitoring Plan (Section 11.25).
	Potential impacts of leaks, seepages or catastrophic tailings pond breaches on fish-bearing waterways and therefore on fish and human health	AIR/EIS Guidelines Comments	Accidents and Malfunctions are assessed in Section 17.6 of the Application/EIS and include scenarios for contamination of water due to spill and leaks, TSF failure, leakage from TSF, seepage collection and runoff ponds, etc. KAM is committed to proactive risk management throughout all phases of the Project, with continued efforts to identify means of reducing the likelihood and/or consequence of failure modes.
Wildlife and wildlife habitat	Effects on migratory birds which may use Goose Lake.	AIR/EIS Guidelines Comments	Potential effects of the Project on migratory birds, including habitat loss are assessed in Sections 6.14 of the Application/EIS. Loss of Goose Lake is unavoidable. However, the function of Jacko Lake for migratory birds will be maintained and this site is the primary water body in the LSA providing migratory stop-over habitat and waterfowl breeding habitat. Habitat compensation at Inks Lake will also provide additional suitable breeding and stop-over habitat.

Topic	WP/CIB Issue/Concern/Comment	Manner Raised	KAM Response
Country foods	Potential contamination of plants, wildlife, and country foods.	Consultation	<p>Potential effects on country foods, including metal concentrations in plant and animal tissue are assessed in Section 10.3 of the Application/EIS. The results of this analysis are carried forward to the assessment of Human Health (Section 10.4). The assessment of human health is based on a Human Health and Ecological Risk Assessment (HHERA) that considers: multiple potential exposure pathways (including, air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines); and multiple types of human receptors (e.g., Aboriginal and non-Aboriginal people for all age groups and sensitive members of the population – young children, the elderly, pregnant women, etc.).</p> <p>Mitigation measures specific to potential human health effects were not been recommended. Mitigation measures to control air and dust emissions outlined in the air quality effects assessment (Section 10.1) and mitigation measures to control surface water and groundwater discharges outlined in the water quality effects assessment (Section 6.3) will reduce Project emissions to levels that are protective of human health.</p>
Aboriginal Rights and title	Potential effects of noise and vibration on the ability to exercise fishing and hunting rights.	Consultation	<p>Potential effects of the Project on the ability to exercise Aboriginal Rights (including fishing, hunting, and gathering) are described in Section 13-Aboriginal Interests (Rights and Title) of the Application/EIS. The assessment considers potential changes in the experience of harvesting (sensory disturbances), changes in access to harvesting locations, availability and quality of resources that may affect the ability to exercise harvesting rights, as well as measures to mitigate potential adverse effects.</p>
Land and resource use	Potential effects on ranching activity from fugitive dust emissions.	Consultation	<p>Potential effects to non-traditional land and resource use are assessed in Section 8.4 of the Application/EIS. This includes the assessment of potential effects on agricultural land use and ranching.</p>
	Potential sensory disturbances (noise and vibration effects) for those residing on the WP/CIB Indian Reserves.	Consultation	<p>Potential disturbance from noise and vibration on the WP/CIB reserves is evaluated in Section 14 based on the results of the noise and vibration assessment presented in Section 10.5</p>

Topic	WP/CIB Issue/Concern/Comment	Manner Raised	KAM Response
Decommissioning and Closure	Potential for contamination during the Post-closure phase.	Consultation	KAM understands the importance of planning for Decommissioning and Closure from the start of the Project, and this has been built into the Project design, including a Mine Closure and Reclamation Plan (Section 3.17) that seeks opportunities for progressive reclamation. Section 11 of the Application/EIS outlines the Environmental Management System that will be implemented throughout all phases of the Project.
	Potential use of contaminated soil in reclamation programs.	Consultation	Section 6.2 Geology, Landforms and Soils includes baseline soils information, which has been incorporated into the Closure and Reclamation Plan (Section 3.17). A Soil Salvage and Handling Plan (Section 11.3) will be implemented to ensure appropriate stripping and stockpiling of the soil horizons for use in reclamation and restoration programs.
Vegetation	Potential soil contamination from fugitive dust emissions, which in turn affect plants, rare plants and sensitive and ecological communities.	Consultation AIR/EIS Guidelines Comments	The Human Health and Ecological Risk Assessment (HHERA), which is described in Sections 10.3 and 10.4, evaluates ecological receptor exposures to Project-related chemicals from multiple sources (air, soil, water, etc.), including the cumulative contaminant loads into soils and the effect that this has on chemical levels in local forage over the full predicted operating life of the Project. Fugitive dust emissions will be minimized through implementation of an Air Quality and Dust Control Plan (Section 11.6), which will utilize mitigation measures that are known to be effective. This will be verified through air quality monitoring, as well as through monitoring of wildlife and vegetation (Section 11.27).

Topic	WP/CIB Issue/Concern/Comment	Manner Raised	KAM Response
Human health	<p>Potential effects of air pollution on human health including:</p> <ul style="list-style-type: none"> • effects from chemicals in blast emissions (including uranium) • effects from transportation-related emissions (large diesel generators, heavy equipment) on nearby Indian Reserves and traditional use areas • effects from chemicals in fugitive dust on nearby on traditional use areas • potential for dust to be distributed at considerable distance from the Mine Site including to WP/CIB Reserve No 4 	<p>Consultation AIR/EIS Guidelines Comments</p>	<p>Potential effects of the Project on dustfall and changes in air quality have been modelled in accordance with a detailed Dispersion Modelling Plan approved by the BC Ministry of Environment. Modelling results and potential effects are presented in Section 10.1. Results of the air quality modelling are carried forward as inputs to the assessment of potential effects on human health, which are assessed in Section 10.4 of the Application/EIS. The assessment considers multiple potential exposure pathways (including air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines); and multiple types of human receptors (e.g., Aboriginal and non-Aboriginal people for all age groups and sensitive members of the population – young children, the elderly, pregnant women, etc.).</p> <p>KAM will implement an Air Quality Monitoring and Dust Control Plan (Section 11.6), including measures to mitigate fugitive dust, and surface water and groundwater quality monitoring programs (Section 11.23 and 11.24).</p> <p>Mitigation measures specific to potential human health effects were not been recommended. Mitigation measures to control air and dust emissions outlined in the air quality effects assessment (Section 10.1) and mitigation measures to control surface water and groundwater discharges outlined in the water quality effects assessment (Section 6.3) will reduce Project emissions to levels that are protective of human health.</p> <p>Potential effects on other Aboriginal Interests including economic, social, health and heritage values are assessed in Section 14 of the Application/EIS.</p> <p>Potential effects on Aboriginal Rights including title are assessed in Section 13 of the Application/EIS.</p>

Topic	WP/CIB Issue/Concern/Comment	Manner Raised	KAM Response
Accidents and malfunctions	Potential effects on traditional resources from a spill or accident along the transportation corridor.	AIR/EIS Guidelines Comments	Accidents and Malfunctions are assessed in Section 17.6 of the Application/EIS and include scenarios for contamination of water due to spill and leaks, TSF failure, leakage from TSF, seepage collection and runoff ponds, etc. KAM is committed to proactive risk management throughout all phases of the Project, with continued efforts to identify means of reducing the likelihood and/or consequence of failure modes.
	Potential failure of mine facilities (in particular the TSF and the NWRSF, as well as potential accidents/malfunctions associated with the Kinder Morgan pipeline.	AIR/EIS Guidelines Comments Consultation	<p>Accidents and Malfunctions are assessed in Section 17.6 of the Application/EIS. The assessment considers a wide range of potential failure modes, including potential effects to the Kinder Morgan pipeline, and potential failure of the TSF. KAM is committed to proactive risk management throughout all phases of the Project, with continued efforts to identify means of reducing the likelihood and/or consequence of failure modes.</p> <p>The TSF embankment design will be in accordance with the Canadian Dam Association Dam Safety Guidelines. Use of Mine Rock Storage Facilities (MRSFs) to buttress the embankments is a key aspect of the design that increases the Factor of Safety, and reduces the likelihood and consequence of potential failure modes. Other key aspects of the design include minimizing the volume of standing water stored behind the embankments and maintaining a large tailings beach between the embankment and the supernatant pond.</p> <p>Preliminary TSF design, and the supporting geotechnical studies are included in the Application (Appendix 3-D)</p>
Economic	Potential effects on tourism opportunities from sensory disturbances such as effects to aesthetic and visual resources and noise.	Consultation	Potential effects of the Project on economic diversification, including interaction with other industries are assessed in Section 7.6 Economic Diversification.
	Economic cost of environmental degradation or depletion of natural resources.	AIR/EIS Guidelines Comments	<p>Potential effects on outdoor recreation are assessed in Section 8.5 of the Application/EIS.</p> <p>Potential effects of the Project on local and regional employment are assessed in Section 7.2 Labour Force, Employment and Training.</p>

Topic	WP/CIB Issue/Concern/Comment	Manner Raised	KAM Response
	Potential increase of unemployment and poverty due to mine activities.	AIR/EIS Guidelines Comments	The assessment considers indirect and induced effects as well as population changes.
	Potential effects of boom and bust periods on employment, including spillover effects.	AIR/EIS Guidelines Comments	KAM will implement a Socio-economic Monitoring Plan (Section 11.29) to enable the implementation of adaptive management as needed.
Social	Potential effects on access to health care facilities and medical practitioners (i.e., loss of physicians and health personnel) due to mine operations.	AIR/EIS Guidelines Comments	<p>Potential effects on health services and other community services are addressed in Section 8.1 Infrastructure, Public Facilities and Services. The analysis considers the concerns raised on the perceived shortage of health professionals in the region and identifies adequate mitigation when required.</p> <p>KAM will implement a Socio-economic Monitoring Plan (Section 11.29) to enable the implementation of adaptive management as needed.</p>
Cumulative effects	Potential cumulative effects of various mining operations on traditional land use.	Consultation AIR/EIS Guidelines Comments	<p>Sections 6 to 10 of the Application/EIS identifies past, present and reasonable foreseeable future projects and activities considered to have the potential to interact with the residual effects of the Project and assesses cumulative effects when appropriate. This assessment is based on federal and provincial guidance documents.</p> <p>Potential effects, including cumulative effects, on the ability to exercise Aboriginal rights are assessed in Section 13 of the Application/EIS.</p>
Consultation	Inadequate capacity to properly engage in the environmental assessment process and the Project.	AIR/EIS Guidelines Comments	WP/CIB requested funding from KAM to support their participation in the environmental assessment process. KAM and the WP/CIB signed a Capacity Funding Agreement on May 15, 2015. KAM and WP/CIB continue to work towards a Project Benefits Agreement.
	Interest expressed in undertaking a traditional use study to understand the potential effects of the Project.	Consultation	KAM is committed to working with Aboriginal Groups to develop capacity and gather information on traditional uses. As part of the Capacity Funding Agreement, WP/CIB will develop a TLU/TK study. Preparations for the study was underway at the time of writing.

Table 5: Key Issues Expressed by MNBC and KAM Responses

Topic	MNBC Issue/Concern/Comment	Manner Raised	KAM Response
Fish populations and fish habitat	Potential effects of blasting and vibration on fish and fish habitat in Jacko Lake.	Ajax Mine Initial Project Report Consultation	<p>Potential effects on fish populations and fish habitat, including potential effects from vibration on the fish in Jacko Lake, are assessed in Section 6.7 of the Application/EIS.</p> <p>Potential effects from vibration and noise from daily blasting activities are assessed in Section 10.5 of the Application/EIS.</p> <p>The blast charge weights will be reduced and smaller diameter holes will be used as the edge of the Open Pit approaches the eastern shore of Jacko Lake..</p> <p>KAM will implement a Fisheries And Aquatic Life Monitoring Plan (Section 11.25) to ensure that controls are in place to minimize adverse effects on fish during all phases of the Project.</p> <p>KAM understands the importance of Jacko Lake, therefore potential effects on the current use of land and resources associated with Jacko Lake are assessed in Section 8.5 of the Application/EIS. This describes potential effects in relation to changes in land and resource use, fish populations and fish habitat, and other valued components, as appropriate.</p>
Wildlife and wildlife habitat	Potential effects of light and heat on wildlife movement (including potential for increased predation).	Consultation	<p>Potential effects of the Project on wildlife, -including habitat alteration and loss, disturbance and displacement and mortality-, and measures to mitigate potential adverse effects are described in Sections 6.11 to 6.17 of the Application/EIS. Effects on wildlife will be monitored through the implementation of the Wildlife and Vegetation Monitoring Plan (Section 11.27).</p>
	Potential effects of increased access on wildlife habitats.	Ajax Mine Initial Project Report	
	Potential effects on endangered species with habitat in the Mine Site, such as the badger.	Ajax Mine Initial Project Report Consultation	<p>Potential effects on mammals, including habitat alteration and loss, disturbance and displacement, and mortality, are assessed in Section 6.17 of the Application/EIS. The badger is part of the focal species for the analysis.</p> <p>KAM will implement a Wildlife and Vegetation Monitoring Plan (Section 11.27) so that measures and controls are in place to minimize potential adverse effects during all phases of the Project.</p>
	Potential effects on wildlife that may access the TSF such as ducks (e.g., consumption of poly liner as it degrades).	Consultation	<p>Potential effects of the Project on migratory birds, including effects on birds landing on the TSF, are assessed in Sections 6.16 of the Application/EIS. KAM will implement a Wildlife and Vegetation Monitoring Plan (Section 11.27) so that measures and controls are in place to minimize potential adverse effects during all phases of the Project.</p>

Topic	MNBC Issue/Concern/Comment	Manner Raised	KAM Response
Traditional land use	Potential effects to harvesting and other land uses, including changes in access.	Ajax Mine Initial Project Report Consultation	<p>Potential effects to traditional land use activities, including access to harvesting areas, are assessed in Section 8.5 Current Use of Land and Resources for Traditional Purposes and Section 13 Aboriginal Interests (Rights and Title) of the Application/EIS.</p> <p>The assessment of potential effects on harvesting activities considers results of other relevant environmental, social, health and heritage valued components assessed in Part B of the Application/EIS. KAM will implement an Access Management Plan (Section 11.21) to ensure continued access to Jacko Lake.</p>
	Potential loss of Goose Lake.	Ajax Mine Initial Project Report Consultation	Potential effects on Aboriginal Interests (Rights and Title) are assessed in Section 13 of the Application/EIS. The assessment includes potential effects to traditional land use around Goose Lake.
Water quantity and water quality	Potential effects on water quality in Jacko Lake as well as other waterbodies (such as the Thompson River).	Consultation	<p>Potential effects of the Project on surface water quality are assessed in Sections 6.3 of the Application/EIS.</p> <p>The Application/EIS identifies mitigation strategies required to maintain water quality and discusses the effectiveness of proposed mitigation measures. Key measures include ML/ARD management (see Section 11.4), maximizing collection and re-use of site contact water (see Section 11.7), and establishing the Peterson Creek Diversion System. Potential effects are identified for Peterson Creek, but are considered negligible by the time the creek reaches the Thompson River</p> <p>KAM will monitor water quality on an ongoing basis through the implementation of the Water and Groundwater Quality Management and Monitoring Plans (Sections 11.23 and 11.24).</p>
	Changes in water quantity to nearby waterbodies	Ajax Mine Initial Project Report Consultation	The Project is being designed to minimize water use, with water recycled on site to its greatest extent (Section 11.7). The Peterson Creek Diversion System will maintain flow to Peterson Creek downstream of the Project. At peak operation, water use will be less than 0.5% of Kamloops Lake's lowest inflows (Section 6.4).
Economic	Interest expressed in potential employment and economic opportunities.	Ajax Mine Initial Project Report Consultation	KAM is committed to building strong and lasting partnerships in the community, to hiring employees locally, and to identifying partnerships with education and training organizations and institutions to develop the expertise required.
	Interest expressed in training and skills development.	Ajax Mine Initial Project Report	Potential effects of the Project on local and regional employment and business are assessed in Section 7.2 Labour Force, Employment and Training and Section 7.4 Business.

Topic	MNBC Issue/Concern/Comment	Manner Raised	KAM Response
	Concern about the use of foreign labour force.	Consultation	KAM is committed to building strong and lasting partnerships in the community, to hiring employees locally, and to identifying partnerships with education and training organizations and institutions to develop the expertise required.
Property Values	Potential effects on property values such as increases in housing costs.	Ajax Mine Initial Project Report Consultation	Potential effects on property values are assessed in Section 7.5 of the Application/EIS.
Transportation and traffic	Potential effects from transportation of ore and increased truck traffic.	Consultation	Potential effects on transportation and traffic are assessed in Section 8.1 Infrastructure, Public Facilities and Services.
Noise	Potential noise effects from blasting and crushing activities on local residents.	Ajax Mine Initial Project Report Consultation	<p>Due to the proximity of the Project to the City of Kamloops and to rural residences, noise and vibration effects have been identified as a concern. The noise and vibration assessment covers a broad area with a wide array of residential receptors ranging from urban and suburban to rural and quiet rural locations.</p> <p>Section 10.5 of the Application/EIS evaluates potential effects of the Project on noise and vibration levels and proposes mitigation measures to minimize negative effects. To reduce noise effects KAM will implement a Noise Management Plan (Section 11.22).</p>
Accidents and malfunctions	TSF safety and potential malfunctions.	Ajax Mine Initial Project Report Consultation	<p>Accidents and Malfunctions are assessed in Section 17.6 of the Application/EIS. The assessment considers a wide range of potential failure modes, including potential effects to the Kinder Morgan pipeline, and potential failure of the TSF. KAM is committed to proactive risk management throughout all phases of the Project, with continued efforts to identify means of reducing the likelihood and/or consequence of failure modes.</p> <p>The TSF embankment design will be in accordance with the Canadian Dam Association Dam Safety Guidelines. Use of Mine Rock Storage Facilities (MRSFs) to buttress the embankments is a key aspect of the design that increases the Factor of Safety, and reduces the likelihood and consequence of potential failure modes. Other key aspects of the design include minimizing the volume of standing water stored behind the embankments and maintaining a large tailings beach between the embankment and the supernatant pond. Preliminary TSF design, and the supporting geotechnical studies are included in the Application (Appendix 3-D).</p>

Topic	MNBC Issue/Concern/Comment	Manner Raised	KAM Response
Consultation	Interest in additional consultation throughout the environmental assessment process and into the construction, operation, and Decommissioning and Closure phases of the Project.	Ajax Mine Initial Project Report Consultation	KAM will continue to work with Aboriginal Groups to understand potential Project effects and respond to information requests through all phase of the Project.
	Interest in developing detailed traditional land use studies to understand how Metis may be affected.	Ajax Mine Initial Project Report Consultation	TBD. No further discussions have been held.