

# RED MOUNTAIN UNDERGROUND GOLD PROJECT

## VOLUME 4 | CHAPTER 28

### PUBLIC CONSULTATION

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## 28 PUBLIC CONSULTATION

### 28.1 Introduction

The purpose of this chapter is to summarize IDM Mining Ltd.'s (IDM's) consultation efforts on the proposed Red Mountain Underground Gold Project (the Project) with local community members, stakeholders, and the public to date. It is guided by the Red Mountain Underground Gold Project Public Consultation Plan, which is discussed in more detail below.

IDM proactively engages with community members, stakeholders, and the public, in the spirit of respect and integrity, to build and maintain constructive and mutually beneficial relationships. IDM will continue to develop these relationships through the transparent sharing of Project-related information and timely, honest, and accountable responses to questions and concerns raised. IDM will also continue to work to establish open dialogue with community members, stakeholders, and the public to better understand and integrate their priorities, feedback, and concerns into Project planning, decision-making, and operations.

In compliance with paragraph 16.1 of the order under section 11 of the *BC Environmental Assessment Act* (the Section 11 Order), dated February 10, 2016, a full Public Consultation Report has been prepared and is attached to this document in Appendix 28-A.

The Project is within the Nass Area and the Nass Wildlife Area, as set out in the Nisga'a Final Agreement (NFA). Pursuant to the NFA, Nisga'a Nation, as represented by Nisga'a Lisims Government (NLG) has Treaty rights to the management and harvesting of fish, wildlife, and migratory birds within the Nass Wildlife Area and the larger Nass Area. The Project is also within the asserted traditional territory of Tsetsaut Skii km Lax Ha (TSKLH) and is within an area where Métis Nation BC (MNBC) claims Aboriginal rights.

Some of the stakeholders addressed in this section have tenured or licensed rights within the Bitter Creek valley. A specific assessment of the potential effects on the Project on their interests is included in Chapter 19 (Economic Effects Assessment) under the Contemporary Land and Resource Use valued component (VC).

Public consultation activities may be inclusive of Aboriginal Groups or individuals; however, it is considered outside of the formal Aboriginal consultation conducted by IDM. A summary of IDM's Aboriginal consultation efforts is provided in Part C and in Appendix 27-A (Aboriginal Consultation Report).

## 28.2 Regulatory and Policy Setting

### 28.2.1 BC Environmental Assessment Act

Section 11(2)(f) of the *BC Environmental Assessment Act* (BCEAA) states that the “executive director's discretion under subsection (1) [of BCEAA] includes but is not limited to the discretion to specify by order ... the persons and organizations, including but not limited to the public, first nations, government agencies and, if warranted in the executive director's opinion, neighbouring jurisdictions, to be consulted by the proponent or the Environmental Assessment Office during the assessment, and the means by which the persons and organizations are to be provided with notice of the assessment, access to information during the assessment and opportunities to be consulted,” (Government of BC, 2002). Pursuant to this, the BC Environmental Assessment Office (EAO) issued a Section 11 Order for the Project in February 2016.

Section 25 of BCEAA also outlines the structure and purpose of EAO's electronic Project Information and Collaboration website (EPIC), stating that it is “for the purpose of facilitating public access to information and records relating to assessments conducted under [BCEAA],” (Government of BC, 2002). EAO has made the Project's relevant environmental assessment (EA) documents available on EPIC, including:

- The Project Description;
- EAO-generated documents, such as the Section 11 Order;
- The approved Application Information Requirements for the Project (AIR);
- IDM's approved Aboriginal and Public Consultation Plans; and
- IDM's Aboriginal and Public Consultation Reports.

The Public Consultation Policy Regulation under BCEAA has also been considered in the development and implementation of IDM's public consultation activities.

### 28.2.2 Section 11 Order

Part H of the Project's Section 11 Order outlines the public consultation activities to be conducted by EAO and IDM during the Pre-Application and Application Review phases of the Project's environmental assessment. Key public consultation activities required under the Section 11 Order include:

- The development of a Public Consultation Plan;
- EAO-led public comment periods and open houses during the Pre-Application and Application Review phases;
- The accessibility of key environmental assessment documents, such as the draft AIR and the Application for an Environmental Assessment Certificate/Environmental Impact Statement (Application/EIS) itself, to the public during the public comment periods; and
- Public consultation reports to be prepared by the proponent.

### 28.2.3 Red Mountain Underground Gold Project Public Consultation Plan

As required under paragraph 14.1 of the Section 11 Order, IDM prepared and submitted a Public Consultation Plan to EAO, and, as per paragraph 14.2 of the Section 11 Order, EAO assessed the Public Consultation Plan to determine if the proposed activities were adequate. EAO posted the approved Public Consultation Plan to EPIC in April 2016. The Public Consultation Plan can be viewed at:

<https://projects.eao.gov.bc.ca/p/red-mountain-underground-gold/docs>

The purpose of the Public Consultation Plan is to outline and guide the public consultation activities that IDM has carried out when consulting with local community members, stakeholders, and the public during the Pre-Application and Application Review phases of the provincial EA process.

To date, there have been no formal changes made to the Project's Public Consultation Plan as a result of feedback from local governments, stakeholders, or individuals or experience from consultation to date.

### 28.2.4 Canadian Environmental Assessment Act, 2012

The Project is reviewable under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012). The Canadian Environmental Assessment Agency (the Agency) issued the EIS Guidelines for the Project in January 2016.

One of the purposes identified in CEAA 2012 is to ensure opportunities for meaningful public participation during the EA. CEAA 2012 requires that the Agency provide the public with an opportunity to participate in the EA and an opportunity to comment on the draft EA Report. Meaningful public participation is best achieved when all parties have a clear understanding of the proposed Project as early as possible in the review process. The proponent is required to provide current information about the Project to the public and especially to the communities likely to be most affected by the Project.

The Agency has led two public comment periods to date. The first public comment period, from September 28 to October 19, 2015, sought public comments on the Project and its potential effects based on the Project Description and informed whether the Project would require a federal environmental assessment. The second public comment period, from November 12, 2015, to January 11, 2016, sought public comments on the draft EIS Guidelines. IDM anticipates the Agency will hold additional public comment periods on the Application/EIS, on the Agency's draft Environmental Assessment report, and on potential conditions of approval during the Application Review phase.

## 28.3 Identified Local Communities and Stakeholders

IDM has identified the following communities and stakeholders as potentially affected by the proposed Project. These communities and stakeholders were selected due to the

potential for the Project to affect their interests: they are either proximate to the Project or hold tenured interests in the Bitter Creek valley.

In addition to this list of communities and stakeholders, IDM will continue to share information regarding the Project and opportunities to participate in the EA process with the general public.

### 28.3.1 Communities and Governments

Further socio-economic information about the District of Stewart and RDKS can be found in Chapter 19 (Economic Effects Assessment), Chapter 20 (Social Effects Assessment), and Appendix 20-A (Socio-Economic Baseline). More details regarding the history of Stewart can be found in Chapter 21 (Heritage Effects Assessment).

#### 28.3.1.1 District of Stewart

The District of Stewart (Stewart), founded in 1905 (District of Stewart, ND), is a small and isolated community of approximately 500 individuals (Statistics Canada, 2011). It consists of approximately 550 km<sup>2</sup> of land (Statistics Canada, 2011), across from Alaska's Misty Fiords National Park, and at the end of the Portland Canal (District of Stewart, ND); see Figure 28.2-1.

A large proportion of Stewart residents seem to be seasonal, escaping the cold and wet winters of the northern coastal town, as evidenced by the proportion of total private dwellings (379) compared to the number of private dwellings that are usually occupied (217): 162 private residences, or 43% of all private dwellings, are not usually occupied (Statistics Canada, 2011). The private lands and residences located within the District of Stewart are the nearest ones to the Project.

Stewart's demographics are summarized in Table 28.3-1 and are compared to the same statistics for the Regional District of Kitimat-Stikine (RDKS) for context.

**Table 28.3-1: Demographics of Stewart and RDKS**

Characteristic	Stewart # of Individuals (% of Population)	RDKS # of Individuals (% of Population)
Total Population	494 (100%)	37,361 (100%)
<b>Age Groups</b>		
0 to 17 years	115 (23%)	8,883 (24%)
18 to 24 years	25 (5%)	3,280 (9%)
25 to 39 years	90 (18%)	6,265 (17%)
40 to 64 years	195 (39%)	14,185 (38%)
65 to 84 years	60 (12%)	4,315 (11%)

Characteristic	Stewart # of Individuals (% of Population)	RDKS # of Individuals (% of Population)
85 years and over	5 (1%)	360 (1%)
Median Age	43	40.3
<b>Marital Status and Families</b>		
Total population 15 years and over by marital status	405 (81%)	30,150 (81%)
Married or living with a common-law partner	250 (50%)	17,600 (47%)
Not married and not living with a common-law partner	155 (31%)	12,550 (34%)
Average number of persons per census family	2.7	2.9
Average number of children at home per census family	0.9	1.1
<b>Language Spoken Most Often at Home</b>		
English	485 (98%)	34,960 (94%)
French	5 (1%)	290 (1%)
Non-Official and Non-Aboriginal Languages	5 (1%)	1,400 (4%)

(Statistics Canada, 2011)

Stewart was eventually connected to the rest of the province by road in the early 1970s: Highway 37A, which connects Stewart to Highway 37, was completed in 1971 and the Nass River Bridge was completed a year later (McLeod & McNeil, 2004).

The primary economic activities in Stewart include the two ports (Stewart Bulk Terminals and Stewart World Port), forestry, and tourism.

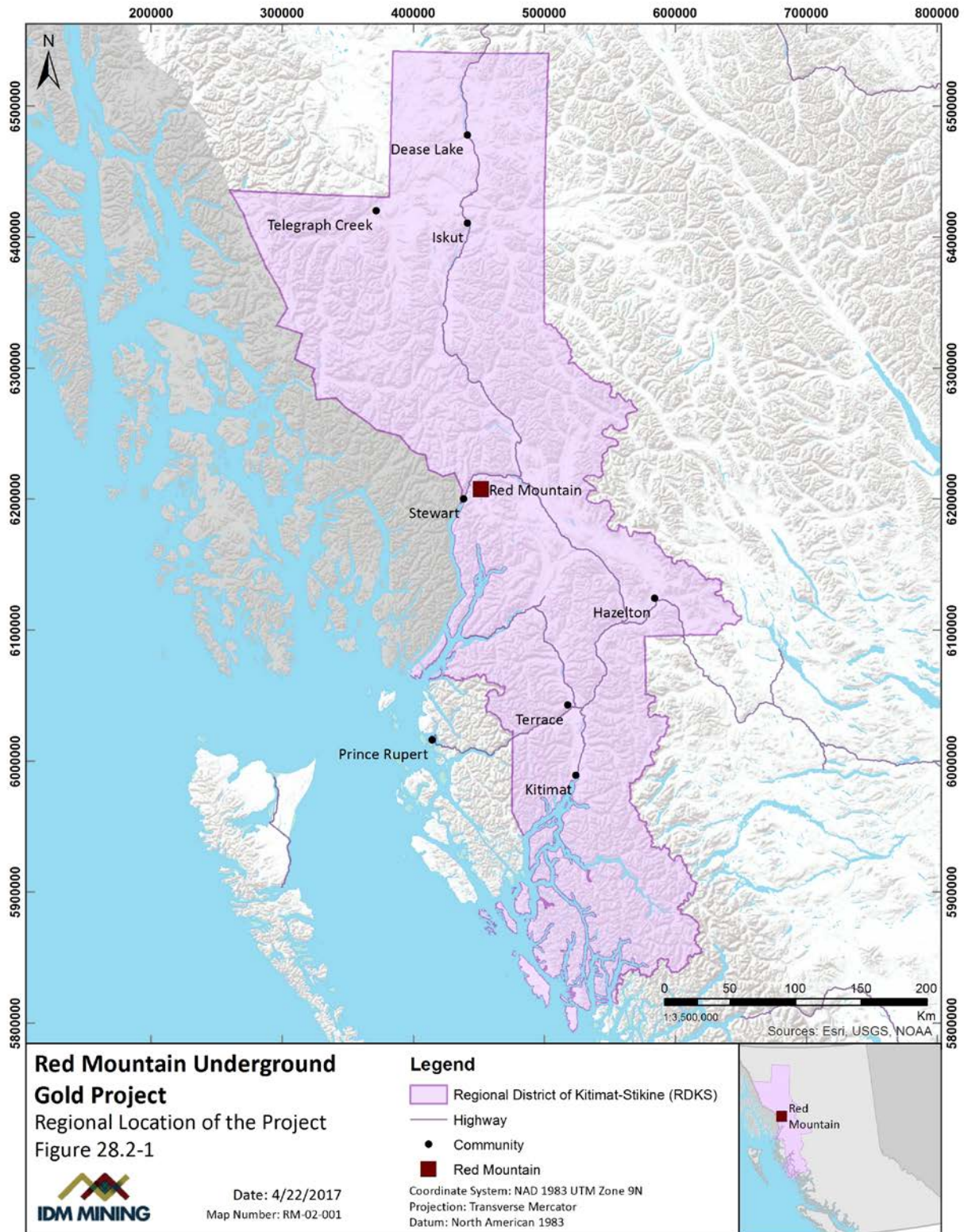
Stewart is administered by a district council consisting of Mayor Galina Durant, Councillor Bernie Elliott, Councillor Sylvia Goulet, Councillor Patricia Lynn, Councillor Gina McKay, Councillor Eike Riemann, and Councillor Neal Rowe. Elections are held every four years; the last election was in 2014, and the next one will be in 2018.

The top three stated priorities of the Stewart District Council are:

- Economic development, specifically marketing gravel and green energy;
- Community safety, including upgrading the community evacuation plan, developing and implementing flood protection and avalanche plans, and fire department training; and
- Tourism, including a marketing program and tourism investment profile (District of Stewart, 2015).



**Figure 28.2-1: Regional Location of the Project**



### 28.3.1.2 Regional District of Kitimat-Stikine

The Project is within the RDKS, which provides local government services to an area of 107,000 km<sup>2</sup> in northwest BC, including Stewart, Kitimat, Terrace, and the Hazeltons. RDKS administers over 40 functions or services, including: rural land-use planning, community water systems, fire protection, transportation systems, and library services (Regional District of Kitimat-Stikine, ND).

Demographic information for RDKS is listed in Table 28.3-1.

RDKS is administered by an elected Board of Directors, as summarized in Table 28.3-2. The RDKS Board of Directors is comprised of 6 municipal councillors or mayors, appointed annually from their respective municipal councils, and 6 Directors, elected from the rural "Electoral Areas" for four-year terms (Regional District of Kitimat-Stikine, ND).

**Table 28.3-2: RDKS Board of Directors**

Name	Representative Area
Harry Nyce, Interim Chair (2017)	Electoral Area A (Nass Valley, Meziadin)
Linda Pierre	Electoral Area B (Hazeltons rural areas, Kispiox Valley, Moricetown through Cedarvale)
Jessica McCallum-Miller	Electoral Area C (Rural Terrace area, south coast)
Mary Murphy	Councillor, District of Kitimat
Alice Maitland	Mayor, Village of Hazelton
Dave Brocklebank	Electoral Area D (Telegraph Creek, Iskut, Bob Quinn)
Gail Lowry	Mayor, District of New Hazelton
Ted Ramsey	Electoral Area E (Thornhill)
Galina Durant	Mayor, District of Stewart
Tina Etzerza	Electoral Area F (Dease Lake)
Lynne Christiansen	Councillor, City of Terrace
Sean Bujtas	Councillor, City of Terrace

(Regional District of Kitimat-Stikine, ND)

### 28.3.1.3 Provincially and Federally Elected Officials

The provincially and federally elected officials in the Project area are:

- Doug Donaldson, Member of BC Legislative Assembly for Stikine; and
- Nathan Cullen, Member of Parliament for Skeena-Bulkley Valley.

## 28.3.2 Overlapping Tenure Holders

Overlapping tenure are shown in Figure 28.3-1.

### 28.3.2.1 Nisga'a Guide Outfitting

Guide outfitting license no. 601084 overlaps with the Project area. This license supports the harvesting of black bear (*Ursus americanus*), grizzly bear (*Ursus arctos*), and mountain goat (*Oreamnos americanus*) (GOABC, 2017). Until recently, the guide outfitting license was held by Bob Milligan of Coast Mountain Outfitters. In September 2015, Mr. Milligan sold the license to Nisga'a Guide Outfitters LP (NGO). Nisga'a Nation, through Nisga'a Pacific Ventures Limited Partnership, owns and operates NGO. NGO has retained Mr. Milligan as an advisor to support NGO through its development and first years of operation. NGO's stated goal is to generate employment for Nisga'a citizens by training 6 to 12 individuals as guide outfitters (Personal Communication with Nisga'a Guide Outfitters, 2016). Eventually, NGO may make more intensive use of the license area than occurred under the previous, single-proprietor ownership.

The Bitter Creek valley is known for its mountain goat population, which in the past has been underutilized for guide outfitting due to poor access. The herd may become a more important resource for NGO in the future (Personal Communication with Nisga'a Guide Outfitters, 2016).

### 28.3.2.2 Trapline Holder

Trapline no. TR0614T101 overlaps with the Project area. The trapline is held by Freddie Banerd, and is frequently leased to fellow Stewart resident Dave Green. According to Front Counter BC, 630 individual animals were trapped on this trapline between 1985 and 2015. Figure 28.3-1 shows locations of trapline and guide outfitter licence overlaps in the Project Area.

### 28.3.2.3 Heliski Operator

Last Frontier Heliskiing Ltd. (LFH) operates under a recreational license of occupation (no. 6406316) in the Project area. The license has an operating area of approximately 8,900 km<sup>2</sup> (Last Frontier Heliskiing, 2015). LFH was established in 1997 and annually operates from mid-December to the end of April. LFH was granted a 20-year license agreement in 1999 and was granted additional terrain near Stewart in 2007 (Last Frontier Heliskiing, 2015).

The company uses two lodges: Bell 2 Lodge and the Ripley Creek Inn in Stewart (Personal Communication with Cliff Umpleby, 2016). More than 600 runs have been established, and the company can accommodate 35 guests with three A-Star helicopters (Last Frontier Heliskiing, 2015). LFH has an international clientele and an annual volume target of almost 4,000 skier days per season (Last Frontier Heliskiing, 2015). Most clients are European, and approximately 25 to 30% of clients are repeat customers (Personal Communication with Cliff Umpleby, 2016).

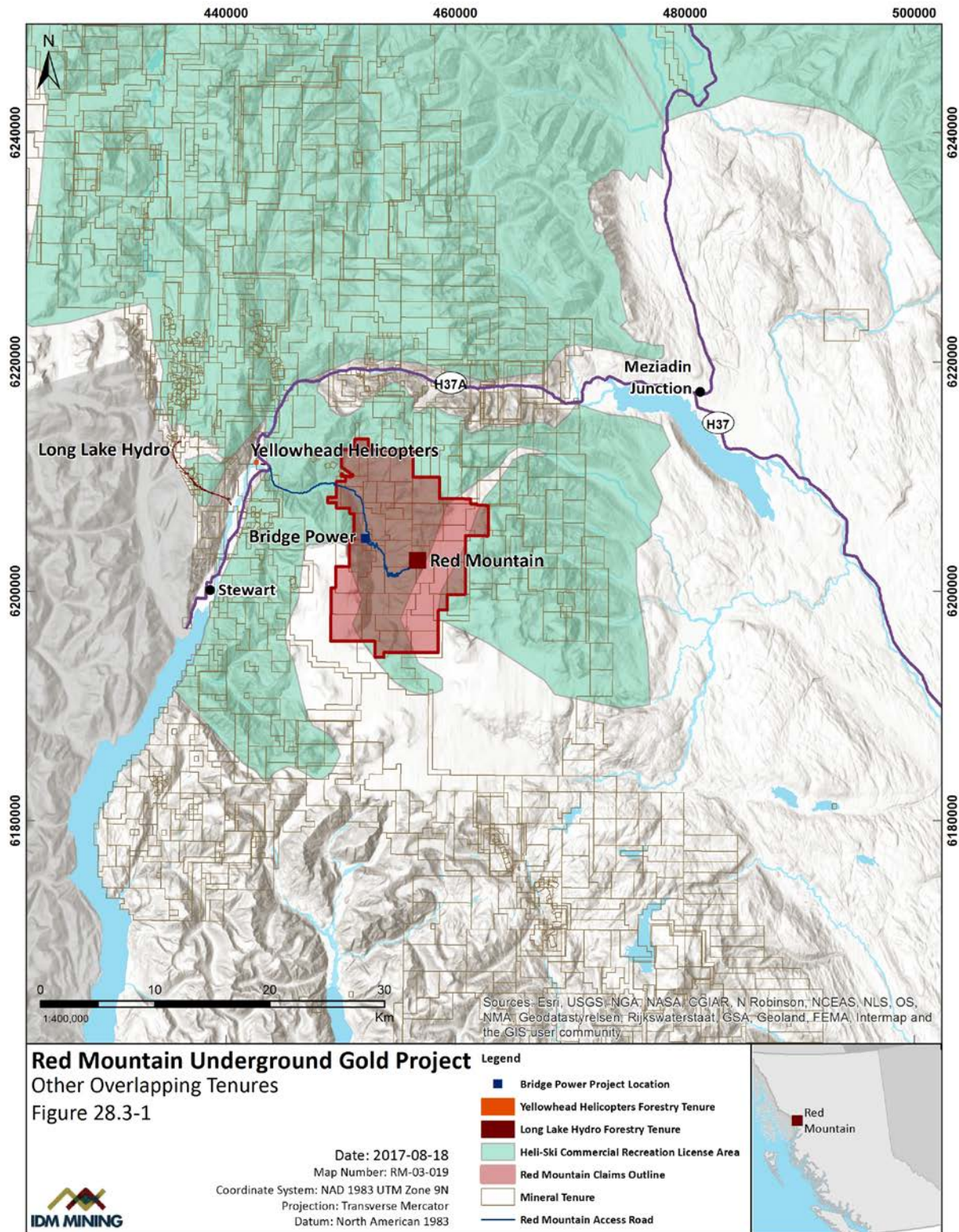
LFH operates in the Bitter Creek valley during spells of bad weather when other valleys are not accessible. LFH referred to a ski run in the Bitter Creek valley, called *Vitamin Ski*, as a 'bread-and-butter run' because it is reliable in bad weather (Personnal Communication with Cliff Umpleby, 2016).

#### 28.3.2.4 Other Businesses and Infrastructure

Other businesses and infrastructure operating in the Project area include:

- Bridge Power Hydro Developments, which is developing a run-of-river hydroelectric project in the Bitter Creek valley. The Bitter Creek Hydro Project has significant spatial overlap with the proposed Red Mountain Project, and has been included in the cumulative effects assessments of relevant VCs and ICs in Volume 3 of this Application/EIS. IDM and Bridge Power have engaged regarding sharing environmental baseline data and the potential to share infrastructure in the Bitter Creek valley, such as road and powerline rights-of-way.
- Two active forestry tenures held by Long Lake Hydro Inc. and Yellowhead Helicopters Ltd.:
  - IDM understands that Yellowhead Helicopters utilizes the cleared area near Highway 37A as a helicopter landing pad to support its work in the Stewart area.
  - IDM understands that Long Lake Hydro Inc. is building and maintaining its transmission line right-of-way from the Project site to the Long Lake substation near Stewart, along Highway 37A. The Long Lake Hydroelectric Project has been included in the cumulative effects assessments of relevant VCs and ICs in Volume 3 of this Application/EIS.
- Mineral tenures held by Ian Alastair Logie, Teuton Resources Corp., Randy John Marko, Mountain Boy Minerals, and Skeena Resources Corp. IDM understands that exploration on these mineral tenures is in the early stages of development.

Figure 28.3-2: Overlapping Tenures



## 28.4 Summary of Public Consultation

### 28.4.1 Phases of Public Consultation

The Project's Public Consultation Plan divides public consultation into four phases, consistent with the phases and milestones of the provincial EA process. These phases are summarized in Table 28.4-1.

**Table 28.4-1: Phases of Public Consultation**

Phase	Description of Activities	Dates
Early Engagement	<p>Consultation activities conducted during the exploration phase of Project development, up to and including the submission of the Project Description to EAO and EAO's issuance of the Section 10 Order.</p> <p>The goals of early consultation are to build awareness of the proposed Project and seek input from community members, stakeholders, and the public regarding the Project, current environmental and socio-economic conditions in the Project area, potential Project effects, and proposed mitigation measures.</p> <p>This phase includes consultation with government officials and identified stakeholders through introductory meetings, discussions, and letters.</p>	May 2014 – Oct 2015 Complete
Pre-Application	<p>Consultation activities conducted subsequent to the issuance of the Section 10 Order and prior to IDM's submission of the Application/EIS.</p> <p>The goals of Pre-Application phase consultation are to communicate clear and concise Project information, to share information regarding opportunities for participation in the EA process, and to gain insight from community members, stakeholders, and the public regarding their interests in the Project area and concerns of the potential effects of the Project on those interests.</p> <p>Consultation activities during this phase include a 30-day public comment period on the AIR, an EAO-led open house, ongoing meetings and discussions with government officials, community members, and identified stakeholders, and making information regarding the proposed Project readily accessible.</p>	Nov 2015 – Sep 2017 Complete

Phase	Description of Activities	Dates
Application Review	<p>Consultation activities conducted subsequent to the submission of the Application/EIS, during the Application Review phase of the provincial EA process.</p> <p>The goals of Application Review phase consultation activities are to build and strengthen existing relationships with community members, stakeholders, and the public through meetings and information sharing. The Proponent's focus during this phase is on responding to public comments on the Application/EIS.</p> <p>Consultation activities during this phase include a 30-day public comment period on the Application/EIS, an EAO-led open house, ongoing meetings and discussions with government officials, community members, and identified stakeholders, and making information regarding the proposed Project readily accessible.</p>	Oct 2017 – Mar 2018 Pending

## 28.4.2 Summary of Past and Planned Consultation Activities

IDM has summarized its public consultation activities in two Public Consultation Reports. The first report summarizes IDM's public consultation efforts from commencement to November 25, 2016, and is available on EAO's EPIC website. The second report summarizes IDM's consultation efforts from November 26, 2016, to September 15, 2017, the date of submission of the Application/EIS to EAO and the Agency, and is available in Appendix 28-A.

### 28.4.2.1 Early Engagement

IDM initiated early engagement with local community members, stakeholders, and the public shortly after acquiring the Project in May 2014. Activities during this phase of consultation included early meetings and discussions with the District of Stewart and letters of introduction to overlapping tenure holders.

### 28.4.2.2 Pre-Application

During the Pre-Application phase, IDM developed a community website ([redmountainproject.com](http://redmountainproject.com)), a community email address ([community@idmmining.com](mailto:community@idmmining.com)), and several community newsletters to provide Project information to and receive feedback from community members, stakeholders, and the public. Copies of the newsletters were mailed to popular community locations in Stewart so that local community members could easily access them. Such locations include: the Stewart Museum, Northern Lights Grocery Store, Brand New Video, the King Edward Hotel, and Granmac Services. Digital copies of the newsletter were posted on the District of Stewart and Project websites and were distributed directly to the District of Stewart Mayor and Councillors.

During the AIR public comment period (from October 5 to November 4, 2016), EAO hosted a community open house in Stewart to provide Project information to local community members and to advertise the opportunity to submit comments, questions, or concerns about the Project to EAO. IDM supported the open house and public comment period by

distributing EAO's notice of the open house and public comment period in regional newspapers, including the Terrace Standard, Prince Rupert Northern View, Smithers Interior News, Ketchikan Daily News, and The Northern Connector. IDM also distributed the notice through social media and in hardcopy to each mailbox in Stewart. IDM made a hardcopy of the AIR available in the lobby of the King Edward Hotel in Stewart and electronically on a USB stick at the Stewart Public Library.

#### 28.4.2.2.1 Consultation with Local Government Officials

IDM began consulting with the District of Stewart shortly after acquiring the Project. Early meetings include discussions held on January 26 and July 27, 2016. Both Mayor Durant and Councillor Lynn attended the EAO-led open house in Stewart on October 12, 2016.

In November 2016, IDM and District of Stewart representatives met to discuss the existing socio-economic conditions in the community and the potential effects of the Project. Topics discussed included the community's experience with construction camps both inside and outside of the town, housing, and infrastructure. Follow-up emails and conversations were held to ensure that IDM has a clear understanding of the socio-economic conditions in Stewart. The information the District of Stewart provided has been integral to the Economic and Social Effects Assessments conducted in this Application/EIS (Chapters 19 and 20, respectively).

In January 2017, Mayor Galina Durant met with representatives of mining companies who operate in and around Stewart, including IDM, to discuss the lack of emergency services in Stewart. IDM looks forward to continuing to work with the District of Stewart to ensure that the Project's effects on emergency services in Stewart are minimized.

On September 9, 2017, IDM hosted a site visit for District of Stewart representatives, including the Mayor, two councillors, and the Chief Financial Officer who had recently joined in the EAO-led Working Group for the Project.

It is IDM's understanding that the District of Stewart's primary issues, interests, or concerns about the Project are:

- The lack of emergency services in Stewart, including ambulance, search and rescue, fire response, and primary medical care;
- Social benefits and community revitalization resulting from increased population due to the Project; and
- Economic benefits resulting from the Project.

IDM provides regular update to District of Stewart representatives.

#### 28.4.2.2.2 Consultation with Regional Government Officials

IDM continues to engage with RDKS representatives through the EAO-led Working Group for the Project, as well as separately to discuss the potential effects of the Project on RDKS services and community members. This has included meetings and discussions with RDKS



representatives on January 26 and February 23, 2016, and a presentation to the RDKS Board of Directors on October 21, 2016.

An RDKS representative attended the EAO Working Group site tour of the Project on July 27, 2016, and the second Working Group meeting in Terrace on July 28, 2016.

In December 2016, IDM and RDKS representatives met to discuss the existing socio-economic conditions in Stewart and within the RDKS and the potential effects of the Project. RDKS provided information about housing, infrastructure, waste services, emergency services, tourism, economic development, and the RDKS Heritage Resource Registry. Follow-up emails and conversations were held to ensure that IDM has a clear understanding of the socio-economic conditions in the RDKS. The information RDKS provided was integral to the Economic, Social, and Heritage Effects Assessments conducted in this Application/EIS (Chapters 19, 20, and 21, respectively).

In January 2017, IDM provided a letter in support of RDKS's Northwest BC Resource Benefits Alliance.

It is IDM's understanding that RDKS's primary issues, interests, or concerns about the Project are:

- Planning for appropriate waste disposal during the Project's construction and operation; and
- Economic benefits for community members within RDKS.

#### 28.4.2.2.3 Consultation with Provincial and Federal Government Officials

Discussions with senior officials from both the Province and the Government of Canada occur regularly with respect to the Project. This includes both elected officials and representatives from appropriate ministries.

IDM will continue to consult with provincial and federal government officials during the upcoming Application Review phase.

#### 28.4.2.2.4 Consultation with Identified Stakeholders

IDM has engaged with identified stakeholders on a proactive basis, but also respects the level of engagement each one has preferred. IDM will continue to be available for open dialogue with all stakeholders throughout the upcoming Application Review phase and for the life of the Project.

##### *Guide Outfitting License*

In October 2015, IDM sent an introductory letter to Milligan Outfitting Ltd., then the holder of the guide outfitting license that overlaps the Bitter Creek valley. Bob Milligan, owner of Milligan Outfitting, responded to say that he would like continued access along the overgrown Access Road past Ore Mountain and that he looked forward to working with IDM and supporting the proposed Project.

As stated above, in the fall of 2015, Mr. Milligan sold the license to NGO.

IDM representatives met with NGO on December 1, 2016, to discuss NGO's interests in the Project area and potential effects of the Project on those interests. NGO stated that they use the Bitter Creek valley to hunt mountain goats and are primarily concerned about any potential adverse effects to mountain goats, which would in turn adversely affect NGO's potential revenue in leading guided mountain goat hunts. NGO provided some details on the areas and locations where mountain goats are most often hunted.

#### Trapline Holder

In October 2015, IDM sent an introductory letter to Freddie Banerd, the holder of the overlapping trapline, to introduce IDM and the proposed Project. IDM did not receive a response.

IDM representatives met with David Green, acting on behalf of Mr. Banerd, on November 29, 2016, to discuss their use of the trapline in the Bitter Creek valley and potential effects of the Project on that use. Mr. Green stated that he often leases the trapline from Mr. Banerd, and that he has Mr. Banerd's permission to speak on his behalf.

Mr. Green stated that, due to the lack of an access road, they do not trap much in the Bitter Creek valley; any trapping done must be by all-terrain vehicle or skidoo. Mr. Green's primary concern was that they would be allowed to continue trapping in the Bitter Creek valley, even if they became employees of IDM and were subject to the proposed "no hunting, no fishing" policy.

#### Last Frontier Heliskiing

In October 2015, IDM sent an introductory letter to LFH to introduce IDM and the proposed Project. LFH responded by thanking IDM for the information and the opportunity to voice concerns regarding the potential effects of the Project on LFH's interests. LFH stated that, due to the relatively small size of the Project, LFH anticipated a very small effect on their operations. LFH stated that they may lose one or two runs in the Bitter Creek valley, but that was manageable. LFH asked that IDM keep them informed of Project developments. IDM has communicated regularly with LFH regarding Project updates.

IDM representatives met with Cliff Umpleby, Director of Operations for LFH, on December 1, 2016, to discuss LFH's interests in the Bitter Creek valley and potential effects of the Project on those interests. Mr. Umpleby gave an overview of LFH's use of the Bitter Creek valley. LFH guides and clients do not ski to the bottom of the valley; they stay within the tree-less alpine area. Therefore, LFH does not anticipate much interaction between their use of the valley and proposed Project components.

It is IDM's understanding that LFH's primary issues, interests, or concerns about the Project are:

- The elevation level of the Powerline, which might prevent LFH from being able to access certain runs with a helicopter;

- Communication regarding helicopter use in the valley, should LFH be operating at the same time as IDM;
- Communication regarding avalanche control to ensure that LFH guides and clients are well away from avalanche control areas; and
- Cumulative visual and noise effects of industrial development in the region that reduce the “wilderness” atmosphere LFH’s clients are seeking.

In response to LFH’s request for communication regarding avalanche control and helicopter use in the Bitter Creek valley during the 2017 exploration season, IDM has been in regular communication with LFH regarding activities in the valley.

#### Bridge Power Hydro Developments

IDM has been working closely with Bridge Power Hydro Developments, as there may be many opportunities to share infrastructure and operational costs should both projects proceed.

#### 28.4.2.3 Upcoming Consultation

IDM anticipates that EAO will lead a public comment period on the Project’s Application/EIS and host a second open house in Stewart during the upcoming Application Review phase. IDM will support these consultation efforts using similar means as before: distributing notices of the open house and opportunity to comment, making hardcopies of the Application/EIS available at relevant locations, and providing Project information to local community members, stakeholders, and the public.

IDM understands that the Agency will also hold public comment periods on the Application/EIS and on the Agency’s draft Environmental Assessment report and potential conditions of approval. IDM will support these consultation efforts as requested by the Agency.

During the Application Review phase, IDM will to continue to engage with community members, stakeholders, and the public by:

- Continuing to share honest and timely Project information through the Project website, new editions of Project newsletters, and social media;
- Responding to emails received through the community email address;
- Responding to written comments received during the public comment period on the Application/EIS, in accordance with paragraph 15.5 of the Section 11 Order;
- Engaging in formal and informal discussions with local community members, stakeholders, and the public as requested;
- Continuing to meet and share information with local, regional, provincial, and federal government representatives;

- Advertising and participating in EAO-led community open houses during the public comment period on the Application/EIS, in accordance with paragraph 15.2 of the Section 11 Order;
- Making the Application/EIS available on the Red Mountain Project website, on EAO's EPIC website, and at the locations described in the Project's Public Consultation Plan, in accordance with paragraph 15.3 of the Section 11 Order; and
- Incorporating feedback into the proposed Project's design, when appropriate.

## 28.5 Key Issues Summary Table

A summary of the key issues brought forward by local community members, stakeholders, and members of the public as well as IDM's response and/or proposed mitigation is provided in Table 28.5-1. This table does not include IDM's responses to comments received from members of the public during the AIR public comment period (October 5 to November 4, 2016), which are included in the Project's first Public Consultation Report.

**Table 28.5-1: Community, Stakeholder, and Public Key Issues Summary Table**

Stakeholder	Topic	Issue, Interest, or Concern Raised	Proponent Response or Proposed Mitigation	Status of Resolution
District of Stewart	Social and Health Services	Lack of emergency services in Stewart, including ambulance, search and rescue, fire response, and primary medical care.	<p>IDM recognizes that social and health services in Stewart are limited and at or near capacity.</p> <p>IDM has included Social and Health Services as a VC under the Social Pillar. The assessment of potential Project effects on Social and Health Services is included in Chapter 20.</p> <p>IDM has provided a framework for a Health and Social Services Plan in presented Chapter 29 (Management Plans and Monitoring).</p> <p>IDM will work with the District of Stewart and other regulatory agencies to develop and implement a Medical and Health Services Plan prior to the construction of the Project.</p> <p>Throughout the life of the Project, IDM will maintain consistent and open dialogue with the District of Stewart and other regulatory agencies and will support the monitoring of health care demands and occurrences of medical escalations and traumas requiring support from local services.</p> <p>IDM will also initiate an operational group to share information and address issues as they arise and before they lead to chronic effects on services.</p>	Ongoing
District of Stewart	Social Benefits	Social benefits and community revitalization resulting from increased population due to the Project.	IDM looks forward to working with the District of Stewart to maximize social and economic benefits of the Project for the community.	Ongoing
District of Stewart	Economic Benefits	Economic benefits resulting from the Project.	IDM looks forward to working with the District of Stewart to maximize social and economic benefits of the Project for the community.	Ongoing

Stakeholder	Topic	Issue, Interest, or Concern Raised	Proponent Response or Proposed Mitigation	Status of Resolution
RDKS	Housing	Inquiry about the quality and quantity of housing currently available in Stewart.	<p>Housing has been included as a VC under the Social pillar. An assessment of the potential Project effects on Housing is included in Chapter 20.</p> <p>IDM will work closely with the District of Stewart to develop a housing plan with a comprehensive description of housing availability, quality, and affordability.</p> <p>A range of housing options may be implemented including construction of apartments, houses, and neighbourhoods, restoration of row-houses and apartment buildings, and use of modular units, RVs, barges, or floatels. While the operation workforce will gradually increase, the construction work camp will also be available during the transition period to reduce adverse pressure on housing.</p> <p>IDM and the District of Stewart will consult with other jurisdictions in northwest BC that have completed Housing Action Plans to solicit advice on good practices for housing policies and measures to ensure housing remains affordable in Stewart.</p> <p>IDM is committed to ensuring that the Project maximizes positive effects for community health and well-being through population growth. Housing options that maintain housing availability and affordability while allowing for permanent in-migration and population growth will be implemented with negligible adverse effects anticipated on Housing and the Housing VC assessment endpoint.</p>	Ongoing
RDKS	Waste Management	Planning for appropriate waste disposal during the Project's construction and operation.	IDM will continue to communicate with RDKS regarding waste disposal plans for the Project's construction and operation.	Ongoing
RDKS	Economic Benefits	Economic benefits for community members within RDKS.	IDM looks forward to working with RDKS to maximize social and economic benefits of the Project for the region.	Ongoing

Stakeholder	Topic	Issue, Interest, or Concern Raised	Proponent Response or Proposed Mitigation	Status of Resolution
NGO (formerly Coast Mountain Outfitters)	Access	Request for continued access to a decommissioned road near Ore Mountain and offer of support for the Project.	IDM is appreciative of the support of local businesses such as Coast Mountain Outfitters and looks forward to working with them to ensure that appropriate access is maintained.	Ongoing
NGO	Mountain Goats	Potential adverse effects on mountain goats in the Bitter Creek valley could adversely affect NGO's potential revenues.	Based on the Wildlife and Wildlife Habitat Effects Assessment (Chapter 16), the Project will not have significant adverse effects on mountain goats in the Bitter Creek valley, therefore IDM does not anticipate an adverse effect on NGO's revenue based on effects to mountain goats.	Resolved
Trapline Holder	Right to Continue Trapping	Concern that Project activities in the Bitter Creek valley would prohibit access to the trapline holder.	IDM will work with all relevant parties to ensure that the Project's Access Management Plan has minimal effect on stakeholders' access to the valley.	Ongoing
Trapline Holder	Right to Continue Trapping	Concern that, as employees of IDM, they would be subject to the proposed "no hunting, no fishing" policy.	IDM will communicate with the relevant individuals regarding this potential conflict.	Ongoing
LFH	Communication	Comment that the Project may result in the loss of one or two ski runs but that the impact to LFH would be small. Request for information updates as the Project progressed.	IDM is appreciative of the support of local businesses such as LFH and has continued to communicate with LFH in order to organize an in-person meeting and provide Project updates.	Ongoing

Stakeholder	Topic	Issue, Interest, or Concern Raised	Proponent Response or Proposed Mitigation	Status of Resolution
LFH	Access to Ski Runs	Concern that, depending on its elevation, the Powerline might prevent helicopter access to certain runs.	IDM will continue to communicate with LFH regarding the design and location of the Powerline right of way. Based on the relative size of LFH's commercial recreation tenure, changes to access due to the location of the Powerline right of way are unlikely to result in significant effects to LFH's revenues.	Ongoing
LFH	Communication	Request to ensure that helicopters are on the same radio channel to ensure they are aware of each other's presence in the Bitter Creek valley.	IDM will continue to communicate with LFH regarding helicopter use in the Bitter Creek valley. This will include discussion regarding the Access Management Plan for the Project's Construction and Operation Phases.	Ongoing
LFH	Communication	Request that IDM communicate regarding planned avalanche control to ensure guides and clients are not in the valley at the same time.	IDM will continue to communicate with LFH regarding its activities in the valley to minimize or avoid any potential conflicts with their use.	Ongoing
LFH	Cumulative Visual and Noise Effects	Cumulative Noise and Visual Quality effects from industrial development in the region reduce the "wilderness" atmosphere LFH's clients are seeking.	Some visual and noise effects on LFH's clients in the Bitter Creek valley are unavoidable. Based on the relative size of LFH's commercial recreation tenure, Project changes to Visual Quality and Noise are unlikely to result in significant effects to LFH's revenues. Measures to reduce the effects of changes to Visual Quality on Contemporary Land and Resource Use in the Bitter Creek valley will include attempts to retain existing vegetation, where possible, to screen Project components from view. Embankments disturbed for road construction are expected to green-up naturally over time as will the right of way for the Powerline. Measures to avoid, minimize, or mitigate Noise effects will also be implemented.	Resolved



## 28.6 References

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