

November 22, 2021

via email

Impact Assessment Agency of Canada
210A-757 West Hastings Street
Vancouver, British Columbia, V6C 3M2

Attention: Christal Nieman, Project Manager, Pacific and Yukon Region

Dear Ms. Nieman:

Re: Skeena Resources Limited (Proponent) Request to Suspend the Federal Time Limit for the Eskay Creek Revitalization Project

Skeena Resources Limited (Skeena) is proposing the Eskay Creek Revitalization Project (the "Project") to develop an open pit gold-silver mine at the former underground Eskay Creek Mine within Tahltan Nation territory. Skeena has been working as the Proponent with regulators and the Tahltan Nation representatives through the Planning Phase to describe the Project, understand Indigenous interests and issues, inclusion of Tahltan knowledge and interests, as well as consider feedback on the Initial Project Description from the public, Tahltan Nation, Indigenous Nations and regulators.

Skeena as the Proponent of the Project requests that the Impact Assessment Agency of Canada (the "Agency") immediately suspend the timeline for the Planning Phase under the *Impact Assessment Act* (the "Federal Act") to allow for the alignment of timelines of the federal and provincial processes. In order to achieve alignment, Skeena requests that the timeline for the federal process resume when the Agency accepts the Detailed Project Description (the "DPD"), concurrent with the BC Environmental Assessment Office (the "BC EAO") issuing an EA Readiness Decision under the BC Environmental Assessment Act (EAA 2018). Skeena anticipates that a federal 'Substitution Decision' by the federal Minister will follow shortly after determination of the need for a federal Impact Assessment by IAAC, and decision to proceed with the EA in the Readiness Decision by the provincial Minister.

This request follows up from discussions during weekly meetings in October and November 2021 with the Agency, the BC EAO, Tahltan Nation representatives and Skeena in which the Agency and the BC EAO acknowledged the importance of aligning and coordinating the federal and provincial assessment processes. Representatives of the Agency and BC EAO confirmed their intention to coordinate the timelines required to review the project.

With the planning phase of the Federal Act underway and having just completed the Early Engagement phase of the EAA (2018), Skeena is developing a DPD that will meet the

requirements of both assessment processes and summarize engagement work to date and acknowledge the ways in which Indigenous interests and information will be addressed in the assessment process. Skeena anticipates that producing a single DPD will support both the provincial, federal and Tahltan Nation review processes, in particular the federal agency's *Notice of Impact Assessment Decision with Reasons* and the provincial EA Readiness Decision by the BC EAO.

The DPD and other supporting documents (Application Information Requirements, Tahltan Application Information Requirements, Valued Component Selection, Regulatory Coordination Plan) are in development to enable IAAC, BC EAO, the public, Indigenous Nations and the Tahltan Nation to understand and decide on the next steps for the Revitalization Project.

Please confirm receipt of this request for immediate suspension of the federal timeline and advise when the timeline suspension is in effect.

Respectfully submitted,

Steve Jennings
Environmental Assessment Manager
Skeena Resources Limited

cc:

Nalaine Morin, Lands Director, Tahltan Central Government
David Grace, Project Director, BC EAO
Justin Himmelright, VP Sustainability, Skeena Resources Limited