

## Appendix I: Response to Joint Summary of Issues and Engagement

Comment ID	Topic/ Indigenous Group	Issues, Description or Comment	Skeena Resources Response	Relevant Section of Detailed Project Description
1	Tahltan Nation	Tahltan Nation will provide a decision on consent or lack of consent regarding the project's environmental assessment certificate based under the forthcoming Section 7 Agreement	Skeena Resources acknowledges that the Agreement under Section 7 is being developed and is the first of its kind under the new legislation. Skeena understands that Tahltan Nation will provide its consent decision on the EA based on incorporation of the elements of the Agreement into the rest of the EA process. A reference to the Section 7 Agreement has been added to the DPD and will be included in all regulatory context sections developed for assessment process deliverables. Skeena Resources will continue to work with the Tahltan Nation to understand its requirements through meetings and workshops in a transparent thoughtful manner. Skeena is committed to working collaboratively to incorporate Tahltan Knowledge into the Project, and consideration of Tahltan Values and interests.	Section 6.1 Section 7
2	Tahltan Nation	Impacts to Tahltan Nation and their Section 35 rights will be assessed by Tahltan through Tahltan Assessment principles, policy, methods, and process elements	Skeena Resources understands that the Tahltan Environmental Assessment Strategy Framework and Section 7 Consent Agreement will form the basis of consent and assessment of potential effects on Section 35 rights. References to the Tahltan Environmental Assessment Strategy Framework have been added to the DPD, as well as to related process elements such as the Tahltan draft Application Information Requirements (TdAIR) and Tahltan-defined criteria (e.g., Environmental and Social Design principles based on the 1987 Tahltan Resource Development Policy). The TdAIR requirements will also become part of the Hybrid AIR being developed to guide the Project assessment process. The Hybrid AIR will be finalized during the process planning phase.	Section 6.1 Section 6.2 Section 7
3	Tahltan Nation	Application of Tahltan Knowledge and Assessment Requirements on Tahltan Values is being scoped with the proponent and regulatory agencies	Skeena Resources is actively working with THREAT and regulatory agencies to understand information and assessment requirements, including substantial engagement and workshops/meetings to discuss methodology and approaches for developing assessments combining Tahltan Knowledge and Values with inputs from western science. Skeena Resources will continue to work with THREAT to ensure that Tahltan Nation information requirements, including those expressed in the T-dAIR in alignment with the Tahltan Environmental Assessment Strategy Framework, are addressed during the assessment process and reflected in the design of the Project.	Section 5 Section 6.1 Section 6.2.1 Section 7
4	Tahltan Nation	Importance of establishing the land and water to support existing and future uses by Tahltan people	Skeena Resources understands that land and water that supports existing and future uses by Tahltan people is an important Tahltan Value and will work with TCG to support a Tahltan assessment that adequately addresses these requirements. This will include assessing TdAIR requirements in the Hybrid AIR that will guide the EAC Application. Skeena Resources meets regularly with THREAT to discuss and share information on Tahltan Values, information requirements, and Tahltan Knowledge and how those are linked with reclamation/closure vision, land use planning, engineering design progress, water modelling and water management, and effects assessment planning. Skeena's knowledge of existing and future uses of the land and water will be informed by community engagement as well as input from THREAT.	Section 5 Section 6.1 Section 6.2.1 Section 7
5	Tahltan Nation	Jointly establishing the scope and requirements for project effects and cumulative effects	Skeena Resources understands that Tahltan Nation has requirements around scoping and assessment approaches for both Project-specific and cumulative effects that may differ from those required by provincial and federal regulators. Skeena Resources will continue to work with THREAT to understand the Tahltan EA Requirements and its application to scope and information requirements and Project documents throughout the assessment process.	Section 5 Section 6.1 Section 6.2.1 Section 7
6	Tahltan Nation	Ensuring the information generated by the environmental assessment captures the uncertainties and contingencies of the potential effects	Skeena Resources understands that Tahltan Nation has requirements relating to assessment of risks and project uncertainties that may differ from those required by provincial and federal regulators. Skeena Resources is committed to continue to work with THREAT to define and understand what the Tahltan Nation requirements are and approaches to effects assessment, including uncertainty and contingency planning.	Section 5 Section 6.1 Section 6.2.1 Section 7
7	Tahltan Nation	Impacts to food security and social, cultural, economic, and environmental traditional practices and uses	Skeena Resources understands that an assessment of Tahltan Nation values must include consideration of impacts to food security and social, cultural, economic, and environmental traditional practices and uses. Skeena has completed a Tahltan Social Baseline Survey in collaboration with Newcrest Mining and TCG. The results of the survey will inform the consideration of potential impacts of the Project on Tahltan communities and provide a more appropriate and Tahltan territory focused outcome compared to broadly aggregated data from StatsCan. Skeena Resources is committed to continue to work with TCG to understand and assess the Tahltan Nation requirements.	Section 5 Section 6.1 Section 6.2.1 Section 7
8	Tahltan Nation	Downstream concerns with salmon and hooligan [eulachon] fish populations	Skeena Resources acknowledges Tahltan Nation's concerns regarding impacts to salmon and hooligan/eulachon populations. Specific references to these species have been added to the DPD and will be included in the draft Hybrid AIR. The Hybrid AIR will be finalized during the process planning phase. Historical work between Tahltan fisheries and former operators Barrick regarding salmon inventories were part of an earlier EA Certificate. Follow-up with the Tahltan Fisheries Dept. and THREAT will help define the specific concerns, current status of information and approaches.	Section 5 Section 6.1 Section 6.2.1 Section 7

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9	Tahltan Nation	Avoidance of long-term treatment, and closure requirements	Skeena Resources understands that avoidance of long-term treatment, particularly post-closure, is a key concern for Tahltan Nation. Skeena Resources will work with the Tahltan Nation to define requirements around scoping and assessment approaches for both project-specific and cumulative effects that may differ from those required by provincial and federal regulators. Skeena Resources is committed to working with TCG to understand the Tahltan Nation concerns and how to address sustainability and risk requirements.	Section 5 Section 6.1 Section 6.2.1 Section 7
10	Nisga'a Nation	The Nisga'a Final Agreement requires that the Agency and the EAO assess the impacts of the proposed Eskay Creek Project on the Nisga'a Nation's treaty interests. Specifically, the proposed project must undergo the assessments in accordance with paragraphs 8(e) and 8(f) of Chapter 10 Environmental Protection and Assessment. As such, the Initial Project Description (IPD), the Engagement Plan and the Detailed Project Description must adequately describe (i) the Nisga'a Nation's Treaty rights and interests that may be impacted and (ii) how the proponent intends to engage with the Nisga'a Nation in a way that will ensure that the assessments required under the Nisga'a Treaty will be properly carried out in accordance with Nisga'a Chapter 10 guidance.	Skeena Resources has made several corrections to the DPD in order to address these comments. In addition, Skeena Resources understands that Nisga'a Nation does not need to identify as a Participating Indigenous Nation under the new EAO legislation to have an assessment under Chapter 10 of the Nisga'a Final Agreement. Skeena Resources will continue to engage with Nisga'a Nation on these requirements, potential effects and mitigations and related supporting information. Skeena Resources reached out to the Nisga'a Nation in a January 21, 2022 letter to set up a meeting to discuss the Nation's interests and concerns about potential impacts, and how assessments can be structured to address the identified concerns.	Section 6.1.3 Section 7.3 Section 10
11	Nisga'a Nation	Potential impacts of trucking concentrate and other materials within the Nass Area and Nass Wildlife Area via the proposed trucking route along highways 37 and 37A. Potential impacts include mortality of wildlife and impacts to freshwater and marine aquatic values by accidents and malfunctions along the trucking routes.	Skeena Resources has updated the DPD to reflect Nisga'a Nations' concerns relating to trucking and potential impacts from accidents and malfunctions to the described values. These concerns have been identified in the DPD as potential effects, primarily via the biophysical interactions, along with Skeena Resource's proposed approach to addressing them. A new row of potential effects for traffic and shipping has been added to Table 10-1, and the potential for effects on Nisga'a Nation Treaty rights has been added to Table 10-2. Skeena Resources reached out to the Nisga'a Nation in a January 21, 2022 letter to set up a meeting to discuss the Nation's interests and concerns, and will continue to engage as to how assessments can be structured to address the identified concerns.	Section 4.1.1 Section 7.3 Section 10
12	Nisga'a Nation	Shipping-related effects in Portland Canal and Portland Inlet – including potential impacts to freshwater and marine aquatic values due to accidents and malfunctions along the transport routes, and shipping effects	Skeena Resources has updated the DPD to reflect Nisga'a Nation's concerns about shipping-related effects on stated values (Tables 6.3-1 and 10-2). Skeena Resources reached out to the Nisga'a Nation in a January 21, 2022 letter to set up a meeting to discuss the Nation's interests and concerns, and will continue to engage as to how assessments can be structured to address the identified concerns.	Section 4.1.1 Section 7.3 Section 10
13	Nisga'a Nation	Shipping navigation including potential spill-response delays, compromised ship tracking, and communication limitations within Portland Canal	Skeena Resources has updated the DPD to reflect Nisga'a Nation's concerns about shipping-related effects within Portland Canal. These concerns have been identified in the DPD in Table 6.3-1, along with Skeena Resource's intention to engage directly to understand the concerns. Marine transportation, of an average of 200,000 tonnes per year of concentrate, will be the responsibility of concentrate purchasers using third parties for shipping. Skeena Resources reached out to the Nisga'a Nation in a January 21, 2022 letter to set up a meeting to discuss the Nation's interests and concerns, and insight to these identified challenges for shipping.	Section 4.1.1 Section 7.3 Section 10
14	Nisga'a Nation	A requirement that aquatic and wildlife effects be clearly stated in the IPD to include all project-related road and marine traffic within the Nass Area or Nass Wildlife Area	Skeena Resources has revised the text of the DPD to clearly state this requirement.	Section 9
15	Nisga'a Nation	Effects on the current and future social, cultural, and economic well-being of Nisga'a Citizens. The Nisga'a Final Agreement requires that the Agency and the EAO assess the impacts of the proposed Eskay Creek project on the Nisga'a Nation's treaty interests.	Skeena Resources acknowledges Nisga'a Nation's stated concerns for the well-being of Nisga'a Citizens. These concerns have been identified in Table 10-2 of the DPD, along with Skeena Resource's proposed approach addressing them. Skeena Resources reached out to the Nisga'a Nation in a January 21, 2022 letter to set up a meeting to discuss the concerns and ensure an approach to assessing potential impacts on their treaty interests.	Section 9
16	Gitanyow Nation	Gitanyow interest in EAO's recognition of Gitanyow's Wilp Sustainability Process (WSAP) and how the WSAP could be applied to the assessment of the Eskay Creek project.	Skeena Resources will continue to engage with Gitanyow Nation on the Wilp Sustainability Assessment Process. Skeena Resources reached out to the Gitanyow Nation on January 21, 2022 to set up a meeting in late February to discuss the Nation's interests and concerns.	Section 9
17	Accidents, Malfunctions, and Public Safety	Potential for adverse environmental effects from accidents and malfunctions (e.g., tailings dam breach, wastewater spill, water treatment system failure, propane release, fuel spill)	Skeena Resources has noted the potential for effects due to accidents and malfunctions related to project infrastructure, processes, and associated activities (e.g., trucking) as well as potential for spill incidents to land, water, and air, including releases of hazardous materials. Skeena Resources will include the requirement to assess potential effects of accidents and malfunctions in the draft Hybrid AIR, and will be scoped and assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 8.3.7

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18	Accidents, Malfunctions, and Public Safety	Concern that an accidental release or spill of contaminants could result in effects to air quality, water quality, wildlife, and wildlife habitat	Skeena Resources has noted the potential for spill incidents to land, water, and air, including releases of hazardous materials in the DPD. Skeena Resources will include the requirement to assess potential for accidental releases or spills of contaminants to affect the environment in the draft Hybrid AIR, to be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 8.3.7
19	Accidents, Malfunctions, and Public Safety	Accidents during mining operations may result in contamination of drinking/recreational water and traditional foods	Skeena Resources has added the potential for impacts to human health to the list of potential effects of accidents and malfunctions in the DPD. The requirement to assess the potential effects of accidents and malfunctions will be included in the draft Hybrid AIR and assessed in the EAC Application.	Section 8.3.7
20	Accidents, Malfunctions, and Public Safety	Request that impacts to public health are included in the assessment of accidents and malfunctions. Concern about increased risk of vehicle accidents on Highway 37, and effects to human health, wildlife (e.g., increased mortality), and freshwater and marine aquatic values. Support for an assessment of potential for accidents and malfunctions from increased traffic on Highway 37 and 37A	Skeena Resources has added the specific risk of vehicle accident on Highway 37 and 37A to the list of potential effects from accidents and malfunctions in the DPD. Skeena Resources will include the requirement to assess the potential effects of accidents and malfunctions, including impacts to human health, in the draft Hybrid AIR, to be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase. To understand potential changes in accident/incident frequency, Skeena Resources has updated the traffic study to reflect average concentrate hauling of 200,000 tonnes per year during operations. Results of the updated traffic study in the DPD found negligible change in incident frequency of less than 1%. This information was added to the DPD.	Section 4.2.1 Section 6.1.2 Section 8.3.7
21	Accidents, Malfunctions, and Public Safety	Concern about accidents and malfunctions (e.g., open pit flooding) caused by inaccurate water balance projections	Skeena Resources has noted the risk of accidents and malfunctions in the DPD. Skeena Resources will include a requirement to develop a set of potential accident and malfunction scenarios for the Project in the draft Hybrid AIR, with the effects of these scenarios to be assessed in the EAC Application along with characterization of the degree of uncertainty for all predictions. The Hybrid AIR will be finalized during the process planning phase.	Section 8.3.7
22	Accidents, Malfunctions, and Public Safety	Concern about tailings dam failure and the reliance on the structural integrity of three tailings dams	Skeena Resources acknowledges the concerns related to dam failure and geotechnical integrity of constructed infrastructure and is undertaking geotechnical design and investigative programs to support robust tailings dam design, including consideration of classification criteria and site specific features. Skeena Resources has added the potential for impacts due to accidents and malfunctions at the tailings dam to the list in the DPD. The potential effects of accidents and malfunctions will be included in the draft Hybrid AIR and assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 8.3.7
23	Accidents, Malfunctions, and Public Safety	Describe the geotechnical studies that will occur to evaluate stability of the TMSF, including any independent engineering reviews. Request for an evaluation of geotechnical stability of the tailings dams under static and seismic conditions, and a risk assessment for potential impacts of a tailings dam breach (e.g., breach assessment, inundation analysis)	Skeena Resources conducted a preliminary geotechnical program in 2020 for the PFS. A supplemental geotechnical field program has been completed and a laboratory program is underway for both foundation and construction materials to support the FS. Skeena Resources will use information from these programs to update geotechnical properties of both the foundation and dam materials, design, and evaluation of seepage and stability of this facility.  In addition, Skeena Resources has conducted a preliminary risk assessment, including a dam breach and inundation study on the PFS design to determine dam classification. This will be incorporated into the FS design underway in early 2022. Additional details generated for the PFS regarding geotechnical and design considerations are available in the NI43-101 Technical Report and Pre-feasibility Study (Ausenco 2021) posted on Skeena Resources website: <a href="https://skeenaresources.com/eskay-creek/technical-reports/">https://skeenaresources.com/eskay-creek/technical-reports/</a> . Skeena Resources will obtain an independent review for the permitting and final design phase. Consideration of accidents and malfunctions including a tailings dam breach will be part of the Hybrid AIR requirements and scoped during the process planning stage.	Section 3.5.2 Section 8.3.7
24	Accidents, Malfunctions, and Public Safety	Request for a notification strategy for the State of Alaska, Alaska Tribes, and the U.S. Federal Government in the event of a tailings dam incident	Skeena Resources has added the potential for impacts due to accidents and malfunctions at the tailings dam to the list of potential effects in the DPD. The potential effects of accidents and malfunctions will be included in the draft Hybrid AIR and assessed in the EAC Application. Skeena Resources will also include management plans, such as Spill Prevention and Emergency Response Plans, which will include notification strategies in the EAC Application.	Section 8.3.7

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25	Accidents, Malfunctions, and Public Safety	Concern that the Project may accumulate contaminated water throughout the mine life without implementation of water treatment solutions, resulting in potential for accidents and malfunctions, and increased financial liability	The potential for impacts due to accidents and malfunctions of water treatment has been added to the list in the DPD and will be included in the Hybrid AIR, and assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase. A Water Management Plan is in development and will include water quality modelling, contact/non-contact water conveyance design, water balance and where required, water treatment and mitigation measures. Capability exists at the Eskay Creek Mine presently for water treatment of underground mine effluent for certain metals, pH and TSS. As the Water Management Plan is developed for the Revitalization Project, use of those and other mitigation methods to achieve discharge quality and permit limits for operations to minimize potential impacts will be assessed. Skeena understands the concern related to accumulation of excess water and associated risks tied to discharge approvals, mitigation, and accidents/malfunctions. Once water modelling outputs are available in mid-2022 to help with mitigation planning, the Water Management Plan will be updated and considered during the EA process.	Section 4.1.5 Section 8.3.7
26	Accidents, Malfunctions, and Public Safety	The Reclamation Plan should include consideration of real progressive reclamation, including operating water treatment plants throughout the mine life, and treating/discharging water to reduce dam storage volume and the need for management post-closure	Progressive reclamation during mine operations is considered as part of the vision for mine closure. Closure will be considered in the Hybrid AIR and assessed in the EAC Application. Activities during post-closure phase are outlined in the DPD and are anticipated to be focused on monitoring and inspections and any actions resulting from monitoring. However, it's acknowledged this is performance based and subject to reporting under the BC <i>Mines Act</i> . Water management planning includes the need for contingencies, effects of the environment on the project and the accidents and malfunctions as outlined in the DPD.	Section 4.1.5 Section 4.2.2 Section 8.3.7 Section 9
27	Acoustic Environment	Include a noise assessment in accordance with Health Canada guidance to assess potential effects of noise on sensitive receptors, including the potential for sleep disturbance	Skeena Resources has included noise and vibration in the list of Valued Components provided with the DPD. Skeena Resources will include the potential effects of noise and vibration in the draft Hybrid AIR and will follow all applicable guidance, including Health Canada. The Hybrid AIR will be finalized during the process planning phase.	Section 10
28	Alternative Means of Carrying Out the Project	Include potential impacts of the alternative means of carrying out the Project on greenhouse gas (GHG) emissions, and consider GHG emissions as a criterion in the evaluation and selection of alternatives	Skeena Resources will consider any differentiating aspects of GHG emissions during the assessment of alternatives for the Project. Skeena Resources will include a requirement to carry out this assessment in the draft Hybrid AIR, which will be finalized during the process planning phase.	Section 4.8
29	Alternative Means of Carrying Out the Project	Consider possible environmental repercussions from dam failure, acid rock drainage, leaching, climate change, and catastrophic events as criteria in the evaluation and selection of alternatives	Skeena Resources will consider any differentiating aspects relating to accidents and malfunctions (i.e., the environment consequences of failure) during the assessment of alternatives for the Project as well as potential influences of climate change as a component of the Hybrid AIR. Skeena Resources will include a requirement to carry out this assessment in the draft Hybrid AIR. The Hybrid AIR will be finalized during the process planning phase.	Section 4.8
30	Alternative Means of Carrying Out the Project	Concern that the Project is an open-pit mine, rather than underground. Request for engagement of participants in the assessment of pit development and mining method alternatives, ways to decrease the surface disturbance of the Project, and the environmental benefits/drawbacks of each option	Skeena Resources will consider feedback from engagement on environmental values, cost, and mining methods during the assessment of alternatives for the Project. The draft Hybrid AIR will include a requirement to carry out this assessment and will be finalized during the process planning phase. Skeena Resources will continue to engage with stakeholders throughout the assessment of the Project and the design development will re-use existing disturbed areas as much as possible to maintain as compact a footprint as possible. Engagement with the TAC during Process Planning and Alternatives Assessment scoping will include updated information about engineering and geotechnical constraints which drive the open pit development and waste management approaches.	Section 4.8
31	Alternative Means of Carrying Out the Project	Concern about the lack of alternative waste management options to reduce risks of leakages and failures, and that the proposed method was chosen based on cost, rather than safety, current scientific, technological, and political standards, or the potential to reduce environmental harms, including cumulative effects to transboundary waters	Skeena Resources will include consideration of environmental, technical, Tahltan value and social and economic factors during the assessment of alternatives for the Project. The draft Hybrid AIR will include a requirement to carry out this assessment and will be finalized during the process planning phase. Skeena Resources will continue to engage with stakeholders throughout the assessment of the Project. Sub-aqueous disposal of PAG waste was the preferred option identified in the 2000 environmental review/assessment to prevent ARD and metal leaching, due to the absence of oxygen in a waterbody, and represents a proven technique for mitigation of ML/ARD from PAG waste rock and tailings.	Section 4.8
32	Alternative Means of Carrying Out the Project	Consider thickened/paste tailings and waste backfilling options to reduce the need for additional capacity at the tailings management storage facility. Other options to consider include a filtered tailings facility that is not sited on existing tailings facilities, and a reduced water tailings facility (paste or water pumped off) with a dry closure	Skeena Resources considered a range of waste/tailings disposal options during the PFS stage, which included thickened tailings, using mined out spaces for storing waste rock/tailings, long-term stability and geochemical performance in sub-aerial and sub-aqueous settings. Skeena Resources will include consideration of these options in the assessment of tailings management alternatives which will be required in the draft Hybrid AIR. The Hybrid AIR will be finalized during the Process Planning phase. Skeena Resources will continue to engage with stakeholders throughout the assessment of the Project.	Section 4.5.2 Section 4.8

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33	Alternative Means of Carrying Out the Project	Evaluate additional waste rock alternatives, especially for on-land or in-pit storage facilities, including: isolated and non-subaqueous waste rock disposal that includes a liner (if potentially acid generating (PAG) or metal leaching) and seepage control; backfilling waste rock into the existing underground workings and the new open pits; and scenarios in which additional capacity is required if there is more than expected PAG material	Skeena Resources will include consideration of the trade-off studies conducted in the PFS and FS stages for waste disposal in the assessment of alternatives for the Project. Skeena Resources has included updated information on the ongoing geochemical characterization program in the DPD. The liner system proposed for the TMSF is a composite liner on the upstream side of the embankment (i.e., geomembrane, low permeability, and transition zones) that is designed to prevent water ingress into the dam structure and associated seepage, compared to other sand/rock dam designs. Seepage quality to groundwater will be monitored by up to 5 monitoring wells around the infrastructure. Skeena Resources will include a requirement for the alternatives assessment to provide contingency storage capacity for NPAG and PAG materials in the draft Hybrid AIR, which will reflect that the TMSF can store between 3 and 4 Mt of waste per vertical meter of elevation increase in the final dam height. The Hybrid AIR will be finalized during the process planning phase.	Section 4.1.3 Section 4.8
34	Alternative Means of Carrying Out the Project	The alternatives assessment should be independently reviewed as per the Global Tailings Standards	An independent review per the BC <i>Mines Act</i> will be conducted during the permitting/final design phase of the Project. The alternatives assessment in the EAC Application will be at the feasibility level of permitting which does not require an independent review and sign-off from an independent tailings review board (as required by the Code). Skeena Resources anticipates establishing an independent tailings review board in the future. At present, the permitted TMSF is a natural depression in bedrock and is not presently a dammed impoundment.	This sheet
35	Alternative Means of Carrying Out the Project	Consider using non-degradation principles as goalposts when developing water quality objectives and required water treatment methods	Skeena Resources will consider water use protection and water management principles, as well as Tahltan sustainability criteria, when developing water quality management approaches, mitigations, and if required water treatment methods. Skeena Resources will consider this suggestion when developing the water management plan for the Project.	This sheet
36	Alternative Means of Carrying Out the Project	Recommend a thorough assessment and evaluation of design alternatives for the proposed construction of the three starter embankment dams to raise the water in the TMSF	Skeena Resources will consider alternative dam and tailings storage approaches during the assessment of alternatives for the Project. The Hybrid AIR will include a requirement to carry out this assessment and will be finalized during the process planning phase. Skeena Resources will continue to engage with stakeholders throughout the assessment of the Project.	This sheet
37	Alternative Means of Carrying Out the Project	Explain why the south pit could not be developed in the early mining phase to accommodate tailings and/or PAG waste rock disposal	Skeena Resources has assessed the mining schedule and there are two reasons why the south pit cannot be developed early in the mining schedule. The most effective way to access the south pit is to ramp up, off the WRSF that will be built during the operations phase. This requires significantly less road development and can be easily built into the Project later in the mine life. The south pit is also not a very high value mining area and contains very hard rock for processing. Skeena Resources could still use the south pit later in the mine schedule for PAG storage if that provides a technical advantage for ML/ARD management over other approaches.	This sheet
38	Atmospheric Environment	Potential for emissions of contaminants such as sulfur oxides (SO <sub>x</sub> ), nitrogen oxides (NO <sub>x</sub> ), volatile organic compounds (VOCs), and particulate matter (PM <sub>2.5</sub> , PM <sub>10</sub> , and PM) from mining operations, processing, and combustion, including from marine shipping, road, and rail traffic	Skeena Resources has noted the potential for impacts to air quality from Project-related activities in the DPD. Skeena Resources will include the potential effects to air quality caused by Project-related emissions and activities (including contaminants such as SO <sub>x</sub> , NO <sub>x</sub> , VOCs, and particulate matter), as well as a human health risk assessment in the draft Hybrid AIR. The Hybrid AIR will be finalized during the process planning phase.	Section 4.1.2 Section 10
39	Atmospheric Environment	Recommend the air quality assessment consider nitrogen dioxide (NO <sub>2</sub> ), sulphur dioxide (SO <sub>2</sub> ), carbon monoxide (CO), VOCs, polycyclic aromatic hydrocarbons (PAHs), particulate matter, metals, and diesel particulate matter (DPM)	Skeena Resources has noted the potential for impacts to air quality from Project-related activities in the DPD. Skeena Resources will include the potential effects to air quality caused by Project-related emissions and activities (including contaminants such as NO <sub>2</sub> , SO <sub>2</sub> , CO, VOCs, PAHs, DPM, and particulate matter) in the draft Hybrid AIR, to be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 4.1.2 Section 10
40	Atmospheric Environment	Potential for introduction of particulate matter to the atmosphere from activities causing physical disturbance to the land (e.g., blasting)	Skeena Resources has noted the potential for impacts to air quality from Project-related activities to land in the DPD. Skeena Resources will include the potential effects to air quality caused by Project-related emissions and activities (such as the introduction of particulate matter) in the draft Hybrid AIR, to be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 4.1.2 Section 10
41	Atmospheric Environment	Emission of air contaminants can result in local or regional degradation of ambient air quality, with potential impacts on human health and sensitive ecosystem receptors	Skeena Resources has noted the potential for impacts to air quality from Project-related activities, and links with human and ecological health in the DPD. Skeena Resources will include the potential effects to air quality caused by Project-related emissions and activities, as well as a human health risk assessment in the draft Hybrid AIR, to be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 4.1.2 Section 10

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42	Atmospheric Environment	Use of the most stringent Canadian Ambient Air Quality Standards to undertake an assessment of existing baseline, project-only, and future (baseline + project), and cumulative effects	Skeena Resources will include a requirement to carry out an assessment of impacts to air quality caused by Project-related emissions and activities in the draft Hybrid AIR for the Project. The draft Hybrid AIR will set out the approach for the assessment and will list the guidance and standards to be used, including Canadian Ambient Air Quality Standards. The Hybrid AIR will be finalized during the process planning phase. Scoping of the standards and methods and spatial issues will be done during the process planning phase with input from the Tahltan and TAC and public feedback.	Section 4.1.2 Section 10
43	Atmospheric Environment	Assess carcinogenic and non-carcinogenic health impacts of DPM, secondary pollutants (e.g., ground level ozone (O <sub>3</sub> ), secondary fine particulate matter (PM <sub>2.5</sub> )), chemicals associated with ore extraction (e.g., emissions from ammonium nitrate), and processing (e.g., ammonia). Clarify which chemicals will be used in processing	Skeena Resources has noted the potential for impacts to air quality from Project-related activities, and links with human health in the DPD. Skeena Resources will include the potential effects to air quality and human health caused by Project-related emissions and activities, including DPM, O <sub>3</sub> and particulate matter, as well as chemicals used in processing in the draft Hybrid AIR, to be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase. The list of anticipated chemicals used in processing was updated into the DPD.	Section 4.1.2 Section 10
44	Atmospheric Environment	Recommend the air quality assessment include waste incinerator emissions and all transportation-related activities that may be scoped into the assessment	Skeena Resources has noted the potential for impacts to air quality from Project-related activities in the DPD. Skeena Resources will include the potential effects to air quality caused by Project-related emissions and activities, including Project equipment and other emission sources, in the draft Hybrid AIR. The Hybrid AIR will be finalized during the process planning phase.	Section 4.1.2 Section 10
45	Atmospheric Environment	Request that metals be considered as a potential air contaminant of potential concern (COPC), including impacts on inhalation, ingestion, and other human health pathways	Skeena Resources has noted the potential for impacts to air quality from Project-related activities, and links with human health in the DPD. Skeena Resources will include the potential effects to air quality and human health caused by Project-related emissions and activities, including metals as a COPC, in the draft Hybrid AIR, to be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 4.1.2 Section 10
46	Atmospheric Environment	Request that a "likely conservative" (rather than an "overly conservative") model be used in the air quality assessment to ensure an accurate evaluation of potential impacts	Skeena Resources is still developing the models used in the assessment of the Project. Skeena Resources will continue to engage on this topic as the Project progresses and anticipates that the draft Model Plan will be developed and discussed during the process planning phase with the TAC and others.	Section 4.1.2 Section 10
47	Atmospheric Environment	Clarify if the overland conveyer will have a cover to mitigate dust	Skeena Resources currently plans to cover the stockpile feed conveyor and the mill feed conveyor, and has added this information to the DPD.	Section 4.1.3
48	Atmospheric Environment	Request mitigation measures for fugitive dust (e.g., wheel cleaning stations) to address effects to both water and air quality	Skeena Resources has included implementation of a Project-specific management plan to mitigate fugitive dust in the list of potential mitigations in the DPD and this suggestion will be considered as part of the list. Additional information about mitigation measures will be required by the Hybrid AIR and included in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 4.1.2 Section 10
49	Climate Change and Greenhouse Gas Emissions	Describe land areas expected to be impacted by the Project by ecosystem type, over the course of the Project lifetime, and including any areas of restored or reclaimed ecosystems. Quantify GHG emissions from land-use change and emissions associated with the post-closure phase as per the Strategic Assessment of Climate Change guidance	Skeena Resources has noted the potential for the Project to impact ecosystems through land disturbance/change and change in GHG emissions in the DPD. Skeena Resources will include requirements to quantify areas of disturbance caused by the Project by ecosystem type (including areas that will be restored or reclaimed). GHG emissions from Project-related activities, including impacts to carbon sinks will also be included in the Hybrid AIR, to be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase. Skeena Resources anticipates updating the calculation of the GHG emissions early in 2022 once the FS equipment list and fuel use becomes available. Land use change and impacts on carbon sinks will be considered in the Hybrid AIR and process planning in detail.	Section 4.5.1.2 Section 10
50	Climate Change and Greenhouse Gas Emissions	Consider best available technologies, best environmental practices, and mitigation and offset measures to reduce GHG emissions	Skeena Resources has noted the potential mitigation measures to reduce GHG emissions in the DPD, and BAT. Best environmental practices, and other mitigation and offset measures will be considered. More information about mitigation measures will be required by the Hybrid AIR and included in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 4.5.1.2 Section 4.6 Section 10
51	Climate Change and Greenhouse Gas Emissions	Changes in the Project area due to climate change may alter baseline conditions, with implications for climate sensitive aspects of Project design and associated effects on the environment; or cause impacts to the environment from accidents and malfunctions	Skeena Resources has noted the potential effects of the environment on the Project from a changing climate with updated information in the DPD about general trends, and the potential for accidents and malfunctions. Skeena Resources will include requirements to assess the impacts of the environment, including climate change, as well as the risk of accidents and malfunctions, in the draft Hybrid AIR. The Hybrid AIR will be finalized during the process planning phase.	Section 8 Section 10

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52	Climate Change and Greenhouse Gas Emissions	Describe activities that would result in impacts on carbon sinks	Skeena Resources has noted the potential impacts of the Project on carbon sinks, particularly around vegetation clearing for infrastructure, in Section 10 of the DPD, and provided some additional analysis on land use change carbon sources in Section 4.5.1.2. A description of the ecosystems and vegetation types occurring in the Project area is provided in Section 8.2.1. The Hybrid AIR will include requirements to assess impacts of the Project on carbon sinks and will be finalized during the process planning phase. Skeena Resources anticipates negligible impacts to downstream wetlands and little requirement for vegetation removal, beyond immediate footprint effects under proposed infrastructure including roads, WRSF, process plant, expanded TMSF and pits.	Section 4.5.1.2 Section 8.2.1 Section 10
53	Climate Change and Greenhouse Gas Emissions	Concern about impacts to Indigenous communities from localized climatic changes caused by potential emissions	Skeena Resources has noted the potential impacts of the Project on Indigenous community interests, including to health and well-being, in the DPD, and will include this as a requirement in the draft Hybrid AIR. The Hybrid AIR will be finalized during the process planning phase and consider spatial extent, scope and duration of potential effects related to emissions.	Section 10
54	Cultural	Concern about impacts to Indigenous communities from loss of food security, and impacts to sacred sites and other cultural and heritage-sensitive areas	Skeena Resources has noted the potential impacts to food security and to cultural, spiritual, and heritage sites in the DPD. The impacts of the Project on Indigenous community interests, including food security, sacred sites, and other cultural and heritage sensitive areas, will be included in the Hybrid AIR, to be assessed in the EAC Application. Feedback from Indigenous communities and members has been helpful to appreciate these concerns. The Hybrid AIR will be finalized during the process planning phase. Skeena Resources undertook a joint Tahltan Social and economic Baseline study in August/September 2021 to obtain specific information to understand community interests and concerns about food security, and opinions on the mining sectors influence on the local communities. The baseline study will inform the effects assessment and linkages to Tahltan Values and VC, particularly for heritage/culture. Additional information from the Social and economic baseline work has been included in the DPD.	Section 6.1.1 Section 10
55	Cumulative Effects	Concern about impacts to Indigenous communities from the cumulative effects of significant historic oil, gas, forestry, and mining development activities in the Project area	Skeena Resources has noted the potential for cumulative effects on environmental, economic, social, cultural and health values in the DPD. The impacts of the Project on Indigenous community interests, including effects in combination with historic development activities, will be a requirement in the Hybrid AIR, which will be finalized during the process planning phase. Skeena Resources undertook a joint Tahltan Social and economic Baseline study in August/September 2021 to obtain specific information to understand community interests and concerns about food security, potential effects and opinions on the mining sectors influence on the local communities. The baseline study will inform the effects assessment and linkages to Tahltan Values and VC, particularly for context of cumulative effects, health, and the Nation.	Section 6.2.1 Section 10.2
56	Cumulative Effects	Concern that the Project will add to cumulative effects in the region (particularly with other mining Projects including Brucejack and Kerr-Sulphurets Mitchell (KSM)) on communities, regional air and water quality, and fish and wildlife in the Unuk River watersheds	Skeena has noted the potential for cumulative effects on environmental, economic, social, cultural and health values in the DPD. The Hybrid AIR will include a requirement to assess the cumulative effects of the Project with other activities in the region, including the Brucejack Mine and KSM Mine. The Hybrid AIR will be finalized during the process planning phase. Figure 7.1-3 was added to the DPD to help appreciate the spatial extent of 2020 and 2021 sampling of VCs in the upper Unuk River Watershed and provide spatial context relative to other existing or proposed mining projects.	Section 8.1 Section 10.2
57	Cumulative Effects	The list of past, present, and reasonably foreseeable future activities in the Project area for the cumulative effects assessment should include the Eskay Creek Mine, Brucejack, KSM, Snip Mine, Rio Tinto BC Works, Vopak Pacific Canada, Coastal GasLink, and proposed projects in the Unuk River watershed; these activities should also be included on the regional study area maps	A list of past, present, and reasonably foreseeable future projects was updated to include the historic Eskay Creek Mine, Rio Tinto BC Works, Vopak Pacific Canada, future Snip Mine, and Coastal Gaslink; the Brucejack and KSM mines were already listed. The regional study area maps developed for the Project assessment will include these projects and the Process Planning phase and Hybrid AIR will refine the scope and projects to be included in the assessment.	Section 8.1 Section 10.2
58	Cumulative Effects	Cumulative activities may influence the water balance or water quality in the Unuk River. The conceptual model for water balance should include upstream and downstream sampling nodes (if they exist), and other land-based activities upstream of Ketchum Creek and downstream of Harrymel Creek	Upstream sampling nodes have been added to the conceptual water balance model depicted in the DPD and additional maps have been included in the DPD to show sampling locations and spatial distribution in the Unuk River watershed and near the mine site. The influence of other land use activities on water quality and quantity in the Unuk River will be captured Hybrid AIR and assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 4.1.5 Section 8.1
59	Cumulative Effects	Recommend the proponent continue the Bilateral Working Group water monitoring program with the Alaska Tribes, and use the previously collected data in the development of baseline conditions	Sampling locations for both historic monitoring and recent baseline studies are characterized in Figure 7.3-1 based upon professional advice to Skeena and consideration of near and far-field exposure and reference sites. The Bilateral Working Group program may not represent sampling sites best suited to the Project.	Section 8.1

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60	Cumulative Effects	Consider the cumulative effects of shipping out of the Port of Stewart on U.S./Alaska marine waters	Skeena Resources has noted the potential for cumulative effects on values in the DPD. The Hybrid AIR will be finalized during the process planning phase, and will include a requirement to assess the cumulative effects of the Project with other activities in the region, including the Brucejack Mine and KSM Mine. Concerns about marine shipping were raised in JSOIE Comments 11, 12, 13 and the outcomes of further engagement with Indigenous Peoples will inform the Hybrid AIR scoping for cumulative effects.	Section 6.1 Section 10.2
61	Differential Impacts on Diverse Persons and Groups	Use a Gender Based Analysis Plus (GBA Plus) approach throughout the assessment to understand the differential impacts and experiences of risks, benefits, and impacts of the Project on men, women, gender-diverse persons and people from a range of groups and communities	Skeena Resources has added the potential for impacts differentiated by gender and other factors in the DPD. The Hybrid AIR will include a requirement to consider the impacts to diverse populations differentiated by gender and other factors, and this will be assessed in the EAC Application using a GBA Plus approach. The Hybrid AIR will be finalized during the process planning phase.	Section 6 Section 10
62	Differential Impacts on Diverse Persons and Groups	Use disaggregated data (e.g., qualitative and quantitative data on positive and negative impacts on diverse people, disaggregated by sex, gender, age, etc.). If disaggregated data is limited, identify data gaps and how the needs of diverse people will be understood and reflected in Project design. Where available, include the views of diverse people, including those who are marginalized, and information on how their views will help shape the Project. Ensure inclusiveness in consultation and engagement	Skeena Resources has added a specific acknowledgement of the potential for impacts differentiated by gender and other factors to the DPD. Skeena Resources has noted its commitment to incorporating the principles of GBA Plus in its approach to engagement in the DPD. All site staff have completed the federal GBA Plus online course and all site staff in supervisory roles will be required to take "Be More than a Bystander" train-the-trainer program to enable them to train site staff on how to address and eliminate toxic workplace culture and foster an inclusive workplace. The Hybrid AIR will outline the approach used for the assessment of the Project, including potential data sources, and will be finalized during the process planning phase.	Section 6 Section 7.3 Section 10
63	Differential Impacts on Diverse Persons and Groups	Identify barriers to equality, including the position of various groups with respect to decision making, participation, access and control over resources, and norms, values, and rights	Skeena Resources has added a specific acknowledgement of the potential for impacts differentiated by gender and other factors to the DPD. The Hybrid AIR will set out the approach used for the assessment of the Project, including identification of barriers to equality, and will be finalized during the process planning phase.	Section 7.3 Section 10
64	Differential Impacts on Diverse Persons and Groups	Include information on what will be done to ensure the Project strengthens capacities and quality of life for diverse groups and individuals, how the Project seeks to address the identified needs of various people, and whether the Project outcomes include a broader commitment to improving equality and not perpetuating norms and structures that have contributed to inequality. Include an analysis of differential impacts to determine if diverse populations will get a fair share of Project benefits or will be disproportionately affected by negative consequences (e.g., gender based violence)	Skeena Resources has added a specific acknowledgement of the potential for impacts differentiated by gender and other factors to the DPD. The Hybrid AIR will set out the approach used for the assessment of the Project, including identification of specific mitigation strategies, and will be finalized during the process planning phase. Skeena Resources will develop programs and mitigation strategies for the social impacts of the project informed by the outcomes of the Tahltan Community Baseline survey and feedback received during community engagement sessions.	Section 7.3 Section 10
65	Differential Impacts on Diverse Persons and Groups	Include information about corporate policies on equality, anti-harassment, or other relevant policies; whether the current workforce is diverse, whether there's a history of abuses or infractions related to social justice issues, and whether training is provided on issues related to equality, diversity, and inclusion	Skeena Resources will set out the approach used for the assessment of the Project, including provision of descriptions of Skeena Resource policies relevant to equality, diversity, and inclusion in the Hybrid AIR. The Hybrid AIR will be finalized during the process planning phase. Skeena Resources will develop programs and mitigation strategies for the social impacts of the project informed by the outcomes of the Tahltan Community Baseline survey and feedback received during community engagement sessions.	Section 8.3
66	Economic Conditions	Prioritize hiring local residents, and consider collaborating with local Project stakeholders and Indigenous groups to support training and hiring of underrepresented groups; finding economic opportunities from local employment and training; and spending on local supplies, services, and transportation	Skeena Resources has ongoing discussions and engagement with local project stakeholders and Indigenous nations to discuss and support training and hiring. Skeena Resources and the Tahltan Nation (as represented by TCG) have had annual Communication Agreements in place since 2016 relative to other sites, and the Eskay Creek property was added to the 2018 Agreement when Skeena Resources optioned into the property. Skeena Resources also entered into an Opportunities Sharing Agreement in February of 2020 with the Tahltan Nation (as represented by TCG) to maximize contracting and employment opportunities for Tahltan members and businesses. Skeena Resources will include requirements to describe the potential benefits, including job opportunities for Indigenous groups and local residents, economic opportunities for local businesses and services, and training opportunities, in the draft Hybrid AIR, which will be finalized in the process planning phase.	Section 9 Section 10
67	Economic Conditions	Describe how training and employment opportunities would be provided to Indigenous peoples from potentially affected Indigenous groups, and clarify whether the Project will have Indigenous employment targets	Skeena Resources supports reconciliation and engagement with Indigenous communities and nations regarding workforce and community skills and capacities. Skeena Resources has ongoing engagement with potentially affected nations to scope capacity, interest, and status of work force. Specific workforce development plans have yet to be developed or formally set, though Skeena Resources will continue engagement with Indigenous communities to inform development of these plans.	This sheet



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68	Economic Conditions	Provide Project workforce projections for construction and operations, including median and maximum workforce numbers, and details of where workers will come from	Skeena Resources has provided Project workforce projections, including median and maximum workforce numbers, in Section 4.4 of the DPD. Skeena Resources expects that 50% of the Project positions will be filled by northern BC residents and is presently undertaking a labour market study to help inform the source of workers and the nature of specific roles and responsibilities to fill. The initial approaches to workforce composition and origin will be updated for the EA once the FS is completed.	Section 4.3
69	Economic Conditions	Provide more information on current social and economic conditions within potentially affected communities (e.g., regional unemployment/underemployment rates)	Skeena Resources has provided additional information on social and economic conditions, in the form of local community profiles, in the DPD. Additional research will be included in the Social and economic baseline studies of the local and regional study areas.	Section 8.3.5
70	Economic Conditions	Consider potential for increased risk of adverse social and economic impacts related to boom-bust cycles and negative economic effects (e.g., change in income equity)	Skeena Resources will include a requirement in the draft Hybrid AIR for an economic assessment of the Project that will include the potential effects at mine closure and consideration of boom/bust cycles, and will include mitigation measures for adverse effects. The Hybrid AIR will set out the approach used for assessing the potential for the Project to have differentiated impacts/benefits on distinct populations (GBA Plus), and will be finalized during the process planning phase.	Section 10
71	Economic Conditions	Consider financial planning supports, support for traditional economies, and investments into the local economy as mitigation measures	Skeena Resources will consider these mitigation measures as part of its ongoing Project planning and will include a requirement to describe mitigation measures for economic effects of the Project in the Hybrid AIR, which will be finalized during the process planning phase.	Section 10
72	Ecosystems	Concern about impacts to Indigenous communities from loss of lands with native habitats and associated wildlife, and impacts to soils, waters, and fish habitat	Skeena Resources has noted the potential to affect Indigenous interests, including through the potential impacts of the Project on the biophysical environment, in the DPD. Skeena Resources will include the impacts of the Project on Indigenous community interests, including loss of lands with native habitats and associated wildlife as well as impacts to soils, waters, and fish habitat in the Hybrid AIR, which will be finalized during the process planning phase. These examples of concerns have been added to the potential impacts listed in Table 10-2 of the DPD.	Section 10
73	Ecosystems	Settling of air contaminants from mining activities (e.g., metals, polycyclic aromatic compounds) into the surrounding environment may cause adverse impacts to terrestrial and aquatic ecosystems, including water, soil, flora, and fauna	Skeena Resources will include a requirement to assess impacts to terrestrial and aquatic ecosystems, including water, soil, wildlife, and vegetation to the Hybrid AIR. This will be linked to the assessment of the Project's effects on air quality, and will be included in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 8.2.1 Section 10
74	Ecosystems	Emissions of NO <sub>x</sub> and SO <sub>2</sub> may lead to acidification and potential exceedance of critical load, and may affect plants, wildlife, and fish and fish habitat	Skeena Resources will include a requirement to assess impacts to terrestrial and aquatic ecosystems, including water, soil, wildlife, and vegetation in the Hybrid AIR. This will be linked to the assessment of the Project effects on air quality, emissions and HHRA, and will be included in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 8.2.1 Section 10
75	Ecosystems	Concern about further habitat fragmentation, cumulative effects, and reduction in biodiversity and healthy habitat for many species at risk in the region, including grizzlies, wolverines, western toads, and northern goshawks	Skeena Resources has noted the potential Project effects on wildlife and wildlife habitat, including fragmentation via land clearing and mine construction in the DPD. Skeena Resources will include requirements in the Hybrid AIR to assess potential Project-specific and cumulative effects to wildlife, including species at risk, and to provide a summary of the Project's effects on the biophysical factors that support ecosystem function. The Hybrid AIR will be finalized during the process planning phase.	Section 10
76	Effects of the Environment on the Project	Changes to the Project caused by climate change (e.g., from extreme weather events) may cause issues, such as equipment failures, that can threaten the environment, impact human health and safety, interrupt essential services, disrupt economic activity, and incur high costs for recovery and replacement	Skeena Resources has noted the potential effects of the environment on the Project in the DPD. The Hybrid AIR will include requirements to assess the impacts of the environment (including climate change and extreme weather events), as well as assess the risk of accidents and malfunctions associated with climate change on the Project, and will be finalized during the process planning phase. Additional information on effects of climate change have been included in the DPD.	Section 9
77	Effects of the Environment on the Project	Include a discussion of reasonably foreseeable effects that climate change may have on the Project and surrounding area, including long-term stability of infrastructure (e.g., tailings/water treatment facilities)	Skeena Resources has noted the potential effects of the environment on the Project in Section 8 of the DPD. The Hybrid AIR will be finalized during the process planning phase and will include requirements to assess the impacts of the environment (including climate change and extreme weather events), as well as assess the risk of accidents and malfunctions associated with climate change on the Project. The potential effects of extreme events, such as precipitation and stream flows, on long-term stability of infrastructure will be factored into the consideration and will form part of the engineering design.	Section 9
78	Effects of the Environment on the Project	Consider impacts of climate change to any modeling associated with risk analysis of tailings storage facility dam failure	Skeena Resources has noted the potential effects of the environment on the Project in the DPD. The Hybrid AIR will be finalized during the process planning phase and will include requirements to assess the impacts of the environment (including climate change), as well as assess the risk of accidents and malfunctions associated with climate change on the Project.	Section 9

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79	Environmental and Impact Assessment Processes	Include all transportation routes into and out of the mine site, all proposed ancillary infrastructure which the Project cannot proceed without (e.g., construction of the electric transmission line), and the entire TMSF (not just the expansion) in the assessment	Skeena Resources understands that the scope of the assessment, including the components of the Project that will be included in the assessment, as well as the Hybrid AIR and process order, will be discussed and determined during the process planning phase. Skeena Resources has updated information, in the DPD, on the traffic routes considered and site infrastructure anticipated to exist just prior to the construction phase of the Project.	Section 4.2
80	Environmental and Impact Assessment Processes	Concern that one year of baseline studies is not adequate (should be minimum 3-5 years), and is not enough time for rights holders and stakeholders to review the data and analysis. Baseline studies for the existing mine are dated and irrelevant to creating a current baseline	To characterize conditions immediately prior to the Project, Skeena Resources is undertaking environmental, social, economic, heritage, and health studies in 2020, 2021 and 2022. These studies are being undertaken to meet current standards, address refinement of the Project design, and reflect current regulatory requirements in support of provincial and federal assessments. The early baseline studies and extensive monitoring data from 1990-2020 will provide additional data richness and longer-term information to be considered in the EA.	Section 8
81	Environmental and Impact Assessment Processes	Recommend that only pre-mining (early 1990s) environmental conditions be used to characterize the effects of the Project on the environment	Skeena Resources will summarize pre 2020 environmental information in the environmental assessment. The temporal scope of the Project assessment will be determined during the process planning phase.	Section 8
82	Environmental and Impact Assessment Processes	Include all future site activities, regardless of whether they are captured under existing permits, in the assessment to ensure the public, stakeholders, and regulators fully understand the scale of the Project and its potential impacts	Skeena Resources understands that the scope of the assessment, including the Project activities that will be included in the assessment, will be discussed and determined during the process planning phase. The Eskay Creek Mine (underground) has two Environmental Certificates in effect at present.	Section 3 Section 4
83	Environmental and Impact Assessment Processes	Request for identification of Alaska Tribes that have traditional, cultural, and subsistence uses of the Unuk River, and a description of those uses and potential impacts from the Project	Skeena Resources has received the request and will review it in context of the Hybrid AIR and process planning for the EA. Skeena Resources has included additional characterization of the effects of the environment on the Project in Section 8 and has received input from the TAC and EAO for characterization of information.	Section 8
84	Environmental and Impact Assessment Processes	Regional study areas should include Alaska and salmon populations of the Unuk River, and the assessment of downstream impacts should be developed and executed with significant input from Alaska Tribes, communities, and their scientific representatives	Skeena Resources understands that the scope of the assessment, including spatial boundaries (local and regional) will be discussed and determined during the process planning phase with key input from the TAC, including the representatives from these organizations.	Section 4 Section 6
85	Fish and Fish Habitat	Effects on fish mortality and productivity through harmful alteration, disruption, and destruction during construction and operation	Skeena Resources has noted the potential for the Project to affect fish through changes to fish habitat in the DPD. No fish populations exist at the mine site, only in downstream waterbodies including the Unuk River and Iskut River. Potential effects from accidents and malfunctions and interaction with fish and fish habitat will be considered.	Section 10
86	Fish and Fish Habitat	Concerns about impacts to fish, including salmon health and fish passage, due to sediment from road dust along highways 37 and 37A	Skeena Resources has noted in the DPD, the potential for the Project to affect fish through dust deposition to waterbodies. Mitigation measures will be considered and since much of the transportation route along highways 37 and 37A is paved, additional details will be scoped for the Hybrid AIR in the Process Planning phase.	Section 10
87	Fish and Fish Habitat	Clarify if and where there are fish in Ketchum Creek (including between the D7 discharge point and the confluence of the Unuk River) and the locations of existing fish barriers	Skeena Resources has updated the figure in the DPD and has included a figure showing fish bearing stream reaches and barriers to clarify this point. No fish were found in Ketchum Creek despite numerous sampling events over multiple decades. A major fish passage barrier was observed on Ketchum Creek approximately 30 m upstream of the Unuk River confluence; fish cannot ascend this barrier. Upstream of this barrier, the creek flows through a canyon which is characterized mainly by cascades and chutes for approximately 2 km. Within this section of Ketchum Creek, limited velocity refugia for fish were identified, and therefore this section poses a velocity barrier for fish passage upstream.	Section 8.2.3
88	Fish and Fish Habitat	Provide additional information on planned downstream water and fish monitoring efforts in the Unuk River during operations and post-closure	Skeena Resources will include a requirement in the Hybrid AIR to describe the proposed monitoring plans for VCs during all Project phases, and this information will be provided in the EAC Application. The Hybrid AIR will be finalized in the process planning phase. Skeena Resources will continue to undertake an Aquatic Effects Monitoring Program at a frequency that will be determined during the permitting process. Skeena Resources anticipates that a Monitoring Program will be developed during the EA process.	Section 8.1.1 Section 8.2.3
89	Fish and Fish Habitat	Recommend the proponent study both historical and present hooligan (eulachon) fish populations in the lower Unuk River with Alaska Tribes	Skeena Resources conducted fish tissue sampling of Dolly Varden in 2020 at two sites in the Unuk River, a reference site 6 km upstream of the confluence of Ketchum Creek, and an exposure site several kilometers downstream of the confluence of Ketchum Creek. The two locations provide current conditions data close to the mine site, compared to the lower Unuk River, to inform monitoring and effects assessments that are not potentially affected by other mining operations (e.g., Brucejack Mine discharge into Sulphurets Creek and eventually the lower Unuk River). No fish sampling is currently planned in the lower Unuk River for tissue metals as other entities conduct monitoring programs in those areas.	Section 8.2.3

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90	Fish and Fish Habitat	Request for mitigation measures in the Unuk River that directly relate to Alaska salmon legislation	Skeena Resources will include a requirement to describe the proposed mitigation measures for Project-specific and cumulative residual effects, along with the regulatory frameworks, legislation, and guidance that those mitigation measures will follow in the Hybrid AIR. The Hybrid AIR will be finalized in the process planning phase and this information will be provided in the EAC Application.	Section 6
91	Fish and Fish Habitat	Concern about relying on previous assessments and monitoring (that were not based on thorough and robust scientific research methods) that concluded the Unuk River and its salmon were not impacted by mining activities in the area	Skeena Resources will include a requirement to describe the data sources that were relied upon for the assessment, including those used to characterize existing conditions to support the EA assessment and process planning, in the draft Hybrid AIR. The Hybrid AIR will be finalized in the process planning phase.	Section 10
92	Geology, Geochemistry, and Geological Hazards	Provide additional details about the existing underground mine, including: whether past tailings were used as backfill for the underground workings, the mine's groundwater monitoring program, the design of the existing TMSF (i.e., whether it is lined and how water is managed), and any water quality or geotechnical compliance issues	Tailings between 1994 and 2008 were deposited to either Albino Storage Facility or TMSF (post 2001). Significant volumes of backfill were used in the underground mine to create safe working conditions when underground mining was active. The hydraulic backfill was typically composed of run of river gravels imported to the mine site and mixtures of either 6% cement (for mining activities located below fill stopes) and 4% (for mining activities located above fill stopes). Some inert solid waste/construction materials were disposed underground per authorizations. Groundwater monitoring wells were installed through the mine life with reduced monitoring prior to 2017; additional groundwater wells were installed by Skeena Resources in 2020 and 2021 to increase data monitoring and collection to model and monitor the site conditions. Skeena Resources proposes to fully describe the groundwater characterization program in the EA Application to meet current standards and regulatory expectations. The existing TMSF was a non-fish bearing and permitted natural lake waterbody into which tailings were deposited between 2001 and 2008, typically below 25 m water depth in a deeper bowl in middle. Approximately 400,000 m <sup>3</sup> of tailings were placed subaqueously in the middle of the facility. No tailings were placed underground. There are no dams or impoundments on the TMSF, only a small temporary weir for water level monitoring at the outlet (Site TM-1). The discharge from the TMSF is not held by permanent water retention structures, and reflects the natural hydrograph of the water body and does not have any geotechnical compliance issues. Skeena Resources routinely monitors water quality per permit conditions which has always been below discharge permit levels for monitored parameters. Average flows from the facility range over the year from 0.07 m <sup>3</sup> /s to 1 m <sup>3</sup> /s. There are no compliance issues with the TMSF.	Section 4.1
93	Geology, Geochemistry, and Geological Hazards	Provide a conceptual design of the proposed expanded TMSF, including dam heights, dam construction techniques and whether the facility is proposed to be lined	Skeena Resources has included additional information on the TMSF in the DPD. The current TMSF was a non-fish bearing alpine waterbody that was designated as a tailings impoundment area (TIA) under federal legislation in 2002. The conceptual design is being updated in the FS stage and has been increased in size and water elevation from the IPD version as shown on Figure 4.1-5. A cross section and plan view of the TMSF dams is shown on Figure 4.1-5. The dams of the TMSF will have liners to improve water holding capacity and reduce seepage since tailings beaches are not planned up against the dams.	Section 4.1.3
94	Geology, Geochemistry, and Geological Hazards	Request that liners and/or seepage collection and treatment be utilized for facilities that hold acid generating/metal leaching wastes and tailings	The liner system proposed for the TMSF is the composite liner system on the upstream side of the TMSF embankment (i.e., geomembrane, low permeability, and transition zones). Four to five monitoring wells will be installed downslope of the TMSF dams to monitor seepage water quality. The WRSF is unlined; seepage will be collected and routed to holding ponds where water quality monitoring will occur to determine if treatment or discharge to the environment or TMSF will be required. If water quality does not meet water quality standards for direct release to the environment it could be diverted to a water treatment plant or the TMSF, depending on what modelling results indicate. Skeena Resources will provide additional details as design and the Water Management Plan progresses. Liners may be used for facilities or components which may contain metal leaching by-products.	Section 4
95	Geology, Geochemistry, and Geological Hazards	Ensure the waste rock segregation program used to identify PAG rock is adequately described, including: the criteria or thresholds that are proposed to be used to distinguish non-PAG rock from PAG; whether the geochemical characterization scope includes evaluation of the potential for neutral metals leaching for parameters such as arsenic, antimony, mercury, and selenium; geochemical characterization of historic and future subaqueous stored mine wastes and neutral metal leaching in both subaerial and subaqueous conditions; and the timing for completion of geochemical characterization	Skeena Resources conducted a preliminary geotechnical program in 2020 for the PFS. A supplemental geotechnical field program has been completed and a laboratory program is underway for foundation and construction materials, as well as waste rock, tailings, and overburden. Skeena Resources will use information from these programs to update geotechnical properties of both the foundation and dam materials, design, and evaluation of seepage and stability of this facility. The timing of reporting and waste characterization criteria for distinguishing non-PAG and PAG rock is being informed by the geochemistry program described in Section 3.5.2 of the DPD and will be described in the EAC Application. Source term reports for static and kinetic work, ML/ARD baseline data and waste management reports will be generated in 2022 as laboratory programs are completed and interim results are being used to guide engineering design. The consideration of neutral metal leaching is a part of the scope of work for a range of constituents historically associated with the Eskay Creek Mine. Humidity cell testing, saturated columns and field leach barrels are being used to inform characterization work and criteria as well as the extensive historical data set.	Section 3

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96	Geology, Geochemistry, and Geological Hazards	Ensure the metal leaching and acid rock drainage management plan, source term model, and site wide water balance and quality model include sediment quality	Skeena Resources intends to run the water balance and water quality model for the various constituents to understand concentration changes over time, and then use those results to qualitatively assess if there is potential for surface water quality changes to affect sediment quality.	This sheet
97	Geology, Geochemistry, and Geological Hazards	Explain why column tests are not planned for submergence of PAG rock	Skeena Resources initiated two column tests on rock types that will be mined by open pit operations. Subaqueous column tests were performed by Barrick on eight samples of the rock types located closest to the ore zone. Data from a total of ten column test samples will be available for the Project.	This sheet
98	Geology, Geochemistry, and Geological Hazards	Provide additional information on best practices for advancing open-pit mining operations through existing underground voids	Skeena Resources included information about working around voids in the PFS 43-101. Best practice for advancing open pit mining operations through existing underground voids is to fill them with either waste or mill feed, which removes the void and supports the wall rock around the void. Although working around known voids will present some challenges that a management technique will be developed to address, there is potential to encounter some unmapped voids. Skeena Resources anticipates that the RC grade control drilling program will provide additional information regarding the location of the voids in advance of mining equipment being present. Additional time will be required working around and preparing the old mine workings during open pit mining. Skeena Resources expects the issue will be drifts as opposed to stopes, as the stopes were backfilled with cemented material for stability.	Section 4.1.2 This sheet
99	Geology, Geochemistry, and Geological Hazards	Describe how the TMSF and waste rock pile would be rehabilitated, and on whether engineered covers or backfill would be used	Skeena Resources will develop a conceptual Closure and Reclamation Plan for inclusion in the EAC Application. Maintenance of the long-term water cover over the submerged PAG tails/waste rock in the TMSF is the primary option, while a variety of options will be investigated for the waste rock piles, eventually leading to a vegetative cover. Some material may also be backfilled.	Section 4.1.2 Section 4.2.2
100	Geology, Geochemistry, and Geological Hazards	Provide the occurrence rate of historical seismicity in the Project region, and include natural and induced or mining-related earthquakes in the potential effects of the Project Human Health and Well-Being	Skeena Resources has incorporated additional information about natural and induced seismicity in the DPD and additional info will be characterized for the EA.	Section 8.3.7 Section 10
101	Human Health and Well-being	Effects to human health from exposure to COPC through air, consumption of local foods or water, dermal contact with contaminated surface/groundwater, and working in a highly mineralized area	Skeena Resources will include a Human Health Risk Assessment in the EAC Application, which will present a problem formulation identifying types and sources of COPCs, transport pathways, exposure pathways, and potential human receptors groups including Indigenous and non-Indigenous land users and off-duty workers. Skeena Resources added an air quality and dust control plan and site water management plan to the potential mitigations listed in the DPD.	Section 4
102	Human Health and Well-being	Include the locations of all potential permanent/temporary/seasonal human receptors (e.g., residences, sensitive locations), waterbodies used for recreational or ceremonial purposes, sites used for drinking water, and the distance between them and the Project components that may affect them	Skeena Resources will include a Human Health Risk Assessment in the EAC Application, which will include the locations of potential human receptors as well as transport and exposure pathways between Project components and activities and human receptors.	Section 4
103	Human Health and Well-being	Include a detailed Health Impact Assessment to capture positive and adverse effects on social, economic, and health conditions. Consider community concerns (e.g., employment) and use GBA Plus to assess effects on sub-populations	Skeena Resources will include a Human Health Risk Assessment prepared by a qualified professional in the EAC Application and will continue engagement to understand community concerns. Skeena Resources will include requirements for the assessment approach (including use of GBA Plus) in the draft Hybrid AIR, which will be finalized during the process planning phase.	Section 4
104	Human Health and Well-being	Include a multi-media Human Health Risk Assessment when elevated levels of COPC are identified in the environment and there are possible exposure pathways to humans. The assessment should include a screening-level assessment before eliminating any pathways or parameters, and in the full assessment, consider problem formulation, a toxicity (or hazard) assessment, an exposure assessment, and a risk characterization for all receptor locations (e.g., worker accommodations, recreational areas, drinking water sources)	Skeena Resources will include a Human Health Risk Assessment prepared by a qualified professional in the EAC Application and will continue engagement to understand community concerns. Skeena Resources will include requirements for the assessment approach (including use of GBA Plus) in the draft Hybrid AIR, which will be finalized during the process planning phase.	Section 4
105	Human Health and Well-being	Provide distance from nearest healthcare facilities and service centres, including those located in Iskut, Terrace, and Stewart	Skeena Resources has added additional information on services to community profiles in the DPD. Skeena Resources will include a requirement to provide detailed information on infrastructure and services in regional communities in the Hybrid AIR and will be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 8.3.5

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106	Human Health and Well-being	Ensure that the appropriate regulations are referenced in the Detailed Project Description for sewage, drinking water, and industrial camps, and include current health permits/approvals in the summary of existing permits/approvals	Skeena Resources has added a summary of current health permits and approvals to the DPD. Skeena Resources will include a list of guidance documents and regulations for human health in the draft Hybrid AIR, to include the documents listed by this reviewer. The Hybrid AIR will be finalized during the process planning phase.	Section 5.3 Section 5.4
107	Indigenous Peoples' Rights	Concern that the Project lacks the Free, Prior, and Informed Consent of all impacted Indigenous peoples, including downstream Alaska Tribes represented by SEITC	Skeena Resources works to provide information to support and fulfill approaches to FPIC as part of the EA process and corporate approach to the Project. Additional engagement by Skeena Resources through the TAC, which is anticipated to include Alaskan representatives, and other venues and sharing of information, including draft versions of process documents like this DPD, will help broaden the understanding of both the Project and Indigenous concerns and interests touched by it.	Section 6 Section 7.1 Section 10
108	Infrastructure and Services	Concern about impacts of traffic on Highway 37 North, especially at the Bob Quinn intersection	Skeena Resources has added the specific risk of traffic accidents on Highway 37/37A to the list of potential effects from accidents and malfunctions in the DPD. Skeena Resources has completed a traffic study that will inform the assessment of these impacts in the EAC Application. An updated assessment of project traffic and expected incident rates was included in the DPD, although no meaningful change in incident rates was noted as a key outcome due to Project traffic.	Section 8.3.7
109	Land and Resource Use	Refer to the Bob Quinn Rural Land Use Bylaw for the design of the transmission line to the Bob Quinn substation	The DPD has affirmed that the transmission line is not planned to connect to the Bob Quinn substation, as such the Bob Quinn Rural Land Use Bylaw is not application to the transmission line. However, project components in the area covered by the bylaw e.g., KM2 laydown on the Eskay Creek Mine Access Road will be developed in consideration of bylaws.	Section 6.2.2
110	Marine Shipping	Potential effects to air quality from emissions due to marine shipping, resulting in degradation of local or regional ambient air quality, contamination of land and waterbodies, and effects to plants, wildlife, and fish and fish habitat	Skeena Resources considered these potential effects to air quality from emissions due to marine shipping in the DPD and will include a requirement to consider potential effects to VCs during all Project phases in the draft Hybrid AIR. The requirements in the Hybrid AIR will be finalized in the process planning phase to inform the Process Order and the EAC Application.	Section 10
111	Marine Shipping	Provide updated information on existing and future marine traffic volumes	Skeena Resources provided these details in the DPD. Skeena anticipates concentrate tonnage for shipping to be 200,000 tonnes per year, an increase of 40,000 tonnes compared to the IPD. The specific number of vessels, if fully loaded would be two more at 20,000 tonnes per vessel compared to the IPD. Typically shipping of bulk mining products is split among multiple vessels in lots of 6,000 to 8,000 tonne compartments so multiple customers products are handled per ship load. Skeena Resources will provide additional information in the EAC Application based upon FS study outcomes and additional investigation of shipping logistics, typically arranged by third parties on behalf of customers (i.e., smelters) who purchase the product at dockside. The Hybrid AIR will be finalized in the process planning phase to reflect this.	Section 4.1.1
112	Marine Shipping	Concern about shipping-related effects in Portland Canal and Portland Inlet, including effects to marine aquatic values and potential impacts on Nisga'a Nation interests	Skeena Resources has included potential shipping-related effects in Portland Canal and Portland Inlet and related impacts to wildlife and freshwater/marine aquatic values, as well as the proposed approach to addressing these potential effects in the DPD, and subsequent Hybrid AIR during process planning.	Section 8 Section 10
113	Migratory Birds	Effects of noise, vibration, artificial lighting, and contaminant exposure on migratory birds and their habitat	Skeena Resources will include a requirement in the draft Hybrid AIR to identify the potential pathway of effects for selected Valued Components, including migratory birds, which may comprise the effects of noise, vibration, artificial lighting, and contaminant exposure. This will be reflected in the EAC Application. The Hybrid AIR will be finalized in the process planning phase. Skeena Resources has added this to Section 10 of the DPD.	Section 10
114	Migratory Birds	Clarify which species of migratory birds could be affected by the Project, and propose mitigation measures for habitat loss, alteration, and disturbance	Skeena Resources will include a requirement in the draft Hybrid AIR to list the wildlife species to be included in the assessment of the Project, including migratory birds, along with mitigation measures to address any residual Project-specific or cumulative effects. This will be reflected in the EAC Application. The Hybrid AIR will be finalized in the process planning phase. Migratory bird inventories were completed in 2020/21 to inform the occurrence within the Project area.	Section 10
115	Navigation	Provide information on impacts on navigation from the proposed water control structures in the TMSF	Skeena Resources confirms that TMSF has not been classified as a navigable waterbody since the early 2000s when the waterbody was designated as a TIA federally and subsequently excluded from consideration as a navigable waterbody under federal navigable waters legislation.	This sheet
116	Other	Include details on the post-closure phase, including length, activities, and potential impacts	Skeena Resources has included the estimated length of the post-closure phase. Activities during the post-closure phase are outlined in the DPD and are anticipated to be focused on monitoring and inspections and any actions resulting from monitoring. However, it's acknowledged this is performance based and subject to reporting under the BC <i>Mines Act</i> . Skeena Resources will include a requirement in the draft Hybrid AIR for a more fulsome description of post-closure phase activities and a detailed assessment of the potential impacts of those activities, which will be presented in the EAC Application. The Hybrid AIR will be finalized in the process planning phase.	Section 4.2 Section 4.3 Section 10

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117	Other	Include additional information on reclamation and closure concepts, and end land-use objectives	Skeena Resources added additional details related to the Closure and Reclamation Plan in the DPD. Closure activities are anticipated to include the demolition and remove of processing and mine support facilities, deactivation of linear features, application of any cover, recontouring and scarifying and ongoing monitoring and maintenance. The closure phase is estimated to take 3 years after operations cease, and a Closure and Reclamation Plan will be included the EAC Application.	Section 4.2.2
118	Other	Include additional information on the timing, and other details as and when available, of pit development phases	Skeena Resources has provided additional detail regarding the timing and sequencing of pit development in the DPD. Information on the pit development considered for the PFS 43-101 is available via the publicly posted (Skeena Resources website) technical report. The North pit will be developed progressively through the mine life, from the south end (uphill) during the 2 years of construction adjacent to the Technical Sample quarries to north end (deepest) at end of mine life.	Section 4.1.2
119	Other	Suggest adding a description of the Project Coordinated Authorizations Process Charter	Skeena Resources has added a brief description of the Eskay Revitalization Project Coordinated Authorizations Process Charter to the DPD.	Section 5.1
120	Other	Include dam monitoring and/or removal cost estimates and responsibility	Skeena Resources will include a requirement for information about dam monitoring in the draft Hybrid AIR, which will be reflected in the EAC Application. The Hybrid AIR will be finalized during the process planning phase. Removal cost estimates for the TMSF dams likely do not apply.	This sheet
121	Other	Request for a description of the likely monitoring plans to be developed and implemented under the Environmental Management System	Skeena Resources has provided a list of management plans in Section 4.6 of the DPD. Skeena Resources will include a requirement to describe these monitoring plans in the draft Hybrid AIR and these management plans will be presented in the EAC Application along with any requirements for follow-up monitoring. Monitoring will include measures to evaluate the effects assessment predictions contained in the EAC Application against the effectiveness of mitigation measures proposed by Skeena Resources, and protocols to follow (including additional mitigation measures) in case the predictions prove inaccurate or the proposed mitigation measures are not as effective as anticipated.	Section 4.6 Section 10
122	Other	Include details on re-opening risks and environmental impacts (e.g., from de-flooding underground workings)	Skeena Resources will include evaluation of the risks and potential impacts of development of the pit overtop of the underground workings in the EA, particularly from a safety and environmental hazard perspective. Skeena Resources will update procedures and considerations regarding re-opening and collect information to update the current understanding. Skeena Resources will include this in the draft Hybrid AIR, along with mitigation measures (e.g., if water treatment is needed for dewatering) based on the timing and type of development around the existing underground needed. Generally, the risk of impacts from dewatering are mainly around managing water quantity and quality, and if any mitigations are needed to comply with permit requirements and will be factored into the Water Management Plan.	Section 10
123	Other	Include a schedule for completing the engineering and technical studies, and key Project plans (draft Water Management, Waste Management, Reclamation and Closure)	Engineering for the FS and technical studies to inform the EA are ongoing into Q3 2022 to support concurrent permitting and EA work, while the anticipated timelines have been added to Table 5.2-2.	Section 5.2.2
124	Other	Include the dimensions of the Main and South Pits at maximum buildout	Skeena Resources has added approximate pit dimensions, based on current design to the DPD.	Section 4.1.2
125	Public and Stakeholder Engagement	Engage health and social service providers, Kitimat-Stikine Electoral Area Directors (from Area A, D, and F), and Alaska Tribes in future public and stakeholder opportunities	Skeena Resources will advertise and reach out to ensure providers, regional/local governments, public and stakeholders are aware of timing and format for future events.	This sheet
126	Public and Stakeholder Engagement	Ensure that the Engagement Plan is designed for participants living in a rural area with limited access to virtual engagement opportunities	Skeena Resources has conducted mail drops for community engagement sessions to all residents in Stewart, Dease Lake, Iskut and Telegraph Creek. Skeena Resources also used Zoom and MS Teams platforms for previous virtual engagements, which allows participants to call in if they do not have access to internet, and will continue to provide opportunities for rural residents. Skeena Resources will work to engage with in-person opportunities for those more comfortable with that format, where safe to do so under Covid-19 and public health safety measures, through our team based in Tahltan territory, Smithers, Lower Mainland, and other communities in northwest BC.	This sheet
127	Social Conditions	Concern about impacts to Indigenous communities' social well-being and economic prosperity	Skeena Resources has noted in the DPD, the potential for the Project to impact social and economic conditions. Skeena Resources will include requirements in the draft Hybrid AIR to assess the Project's potential to impact Indigenous communities' social well-being and economic prosperity, and this requirement will be reflected in the EAC Application. The Hybrid AIR will be finalized during the process planning phase. Skeena Resources will continue to engage with Indigenous communities on this topic and additional effort will be focused with Indigenous peoples and their representatives.	Section 10

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128	Social Conditions	Consider housing, education levels, equity, cost of living, racism/ discrimination, community cohesion, realities of rural living, access to services, colonization, GBA Plus, social conditions for different sub-populations, increases in traffic, and monitoring for negative impacts in the socioeconomic assessment	Skeena Resources will factor in these suggestions for assessment of potential effects and set out the scope of the assessment of the Project, including potential impacts on social, economic, and health values, in the draft Hybrid AIR, which will be finalized during the process planning phase and reflected in the EAC Application.	Section 10
129	Species at Risk, Wildlife and their Habitat	Effects to wildlife, migratory birds, species at risk, and their habitat in the Project area resulting from habitat loss, alteration or fragmentation, habitat avoidance, direct and indirect mortality, changes in predator/prey relationships, changes to migration or movement patterns, destruction or disturbance of residences, exposure to contaminants, and sensory disturbance (e.g., noise, vibration, artificial lighting)	Skeena Resources will consider these potential effects in the scope of the assessment of the Project. The draft Hybrid AIR will set out the approach to assessing potential impacts on wildlife and identifying pathways for those impacts, and will be reflected in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 10
130	Species at Risk, Wildlife and their Habitat	Direct and indirect mortality and population impacts on mountain goats, ungulates, and bears from disturbance caused by helicopter use and Project-related road improvements	Skeena Resources will include the requirement to assess potential impacts on wildlife and identification of pathways for those impacts from Project activities, in the draft Hybrid AIR, to be reflected in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 10
131	Species at Risk, Wildlife and their Habitat	Consider climate projections and scenarios that could affect the operation of the mine and cause greater impacts to wildlife and their habitat	Skeena Resources will include a requirement to assess the effects of climate change on the Project itself and to account for climate change effects in the context of impact predictions in the draft Hybrid AIR, to be assessed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	Section 9 Section 10
132	Species at Risk, Wildlife and their Habitat	Request that aquatic and wildlife effects include all Project-related road and marine traffic within the Nass Area or Nass Wildlife Area	Skeena Resources has revised the text of the DPD to clearly state this requirement.	Section 7
133	Transboundary	Concerns about adverse direct and cumulative transboundary effects to U.S. waters, aquatic resources, and use by Alaska Tribes from changes in water quality and water flows, sedimentation, dust deposition, and potential accidents or malfunctions of the TMSF	Skeena Resources has noted the potential for direct and cumulative effects on values in the DPD. Skeena Resources will include consideration of potential effects to aquatic resources, water quality, hydrology, sediment quality, air quality, fish, Indigenous interest and potential accidents/malfunctions, in the draft Hybrid AIR, which will be finalized in the process planning phase. The consideration of those potential direct and cumulative effects and scope within BC will provide guidance if potential transboundary issues may arise.	Section 10
134	Transboundary	Assess effects of the Project during all phases on the Unuk River extending into the U.S., including impacts on people, water quality, and aquatic resources. Develop monitoring plans and a monitoring location to evaluate changes to Unuk River water quality and aquatic resources	Skeena Resources will include the requirement to assess potential effects to people, water quality, and aquatic resources in the draft Hybrid AIR, which will be finalized in the process planning phase with input from the TAC including Alaskan representatives. This will include definition of study areas in consideration of administrative boundaries. An aquatic effects monitoring plan will be included in the EAC Application informed by the effects assessment.	Section 10
135	Water Quality and Processes	Effects to surface and groundwater quality could result from increased erosion and sediment generation, transport, and deposition; dissolution of nitrates, deposition of particulate matter; discharges, spills, or seepage of other contaminants from mine and waste management infrastructure (e.g., metal leaching, acid rock drainage); reduced groundwater availability to recharge surface waterbodies; and increased contaminant concentrations	Skeena Resources has noted the potential effects to surface and groundwater quality that could result from these issues in the DPD. Skeena Resources will include the requirement to assess potential Project-specific and cumulative effects to surface and groundwater quality in the draft Hybrid AIR, which will be finalized during the process planning phase.	Section 4.2.2 Section 8.1 Section 10
136	Water Quality and Processes	Alteration of surface water flows and quantities, including from construction of the open pit, could impact water quality in the receiving environment (e.g., Unuk and Iskut rivers/watersheds)	Skeena Resources has noted potential effects of the Project to surface water flows and quantities in the DPD. Skeena Resources will include requirements to assess potential Project-specific and cumulative effects to surface water in the draft Hybrid AIR, which will be finalized during the process planning phase.	Section 8.1 Section 10
137	Water Quality and Processes	Impacts to water quantity from drawdown of the water table due to construction of the open pits or use in water-intensive operational processes	Skeena Resources has noted potential effects to groundwater quantity, resulting from the construction of Project components or through Project activities in the DPD. Skeena Resources will include requirements to assess potential Project-specific and cumulative effects to groundwater in the draft Hybrid AIR, which will be finalized during the process planning phase.	Section 8.1 Section 10

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138	Water Quality and Processes	Identify all drinking water sources and waterbodies used for traditional purposes, and confirm whether Indigenous users consume treated or untreated water from the Project	Skeena Resources is not aware of other licensed points of diversion for drinking water users situated along the Unuk River immediately downstream of Eskay Creek mine site in BC. However, consumption of surface water from the Unuk River for drinking water may occur from unregistered users. A Land Use and Occupancy Study has been completed by the Tahltan Nation which may further inform the assessment of water quality and potential effects. Skeena Resources will continue to engage with Indigenous groups and stakeholders and will consider any identified drinking water sources or waterbodies used for traditional purposes in the EA.	Section 8.1.1
139	Water Quality and Processes	Concern that monitoring conducted for the Eskay Creek mine at current monitoring sites, including those on the Unuk River, do not give the full picture of potential effects from the proposed expansion due to methods, locations, and sampling frequency. Request for a robust environmental effects monitoring program for baseline and ongoing monitoring that addresses these issues	Skeena Resources included additional information on the baseline/current conditions monitoring locations in Section 7 of the DPD, including the Aquatic Effects Monitoring Program which completed its 17th monitoring event since the late 1990's. Skeena Resources will include the requirement to consider the data collection program, scope and extent in the draft Hybrid AIR, which will be finalized during process planning. It is anticipated the EAC Application will include an Aquatic Effects Monitoring Plan informed by the outcome of the effects assessment.	Section 8
140	Water Quality and Processes	Describe the current water treatment process being used at the site, and the discharge rate of treated water	Skeena Resources has provided a summary of the water management approach for the Project in Section 4.2 of the DPD and additional work is ongoing during the FS in 2022.	Section 4.1
141	Water Quality and Processes	Clarify whether long-term water treatment will be needed, and if so, provide details to assess its effectiveness for treating parameters of concern, the expected by-products, and how they will be managed	Skeena Resources has provided a summary of the water management approach for the Project in Section 4.2 of the DPD. Detailed modelling of future water quality is ongoing to support engineering design and discharge planning and will be part of the inputs to the Water Management Plan for the Project, including mitigations. Skeena Resources has not yet completed detailed design of water treatment as outputs of detailed water quality modelling are pending. Skeena Resources will include this as a requirement in the draft Hybrid AIR, which will be finalized during process planning, and will provide updates to Indigenous Nations and TAC during that process.	Section 4.1
142	Water Quality and Processes	Provide water balance modeling, hydrological modeling, and water quality modeling to predict loading and concentrations of contaminants for all Project phases	Skeena Resources has provided a summary of the water management approach for the Project in Section 4.2 of the DPD. Detailed modelling of future water quality is ongoing and will be part of the inputs to the Water Management Plan for the Project, including discharge planning and mitigations. Skeena Resources has not yet completed detailed design of water treatment as outputs of detailed water quality modelling are pending. Skeena Resources will include this in the draft Hybrid AIR, which will be finalized during process planning, and will provide updates to Indigenous Nations and TAC during that process.	Section 4.1
143	Water Quality and Processes	Provide geochemical testing of representative pit wall material, waste rock, and tailings to characterize the potential for acid rock drainage and metal leaching	Skeena Resources has included a more detailed overview of the geochemical characterization program in the DPD. Baseline reports will provide extensive detail and analysis related to geochemistry, source term development and ML/ARD mitigation and planning and these will be available as part of the EA Application.	Section 3.5
144	Water Quality and Processes	Baseline conditions for water quality should include pre-Eskay Creek Mine and current baseline conditions	The temporal scope of the Project assessment will be determined during the process planning phase. Skeena Resources has information on pre-Eskay Creek Mine conditions, mine operations and post-operations monitoring data that is being considered for the characterization of environmental conditions, as well as detailed sampling data since 2020. Baseline and summaries of historic data reports will be included as part of the EAC Application to help characterize monitoring data extending back to the early 1990s.	Section 8
145	Water Quality and Processes	Explain why there are exceedances of freshwater British Columbia Water Quality Guidelines, whether exceedances are predicted to continue, and the steps taken to address them. Identify whether selenium is an element of concern	A summary of water quality conditions will be included in the baselines and factored into any effects assessment scope. Upstream (i.e., non-mine related) exceedances in streams near the mine site are thought to be a result of the naturally turbid water with high TSS coinciding with elevated total metals concentrations; this is not unusual for streams with glacial inputs in mineral enriched areas such as in the Unuk River and Ketchum Creek.  Zinc concentrations are seasonally elevated above end of pipe criteria in the existing D7 discharge from closed upper mine workings and are also seasonally above freshwater aquatic life guidelines upstream of the existing mine (not due to mine influence). Environmental effects monitoring has shown effects as a result of the seasonal exceedances. A mine water management for the existing mine and advanced exploration will be developed unrelated to the Project to address existing end of pipe exceedances.  The Hybrid AIR will include a list of Contaminants of Potential Concern either based on naturally elevated concentrations or those potentially affected by Project activities. Selenium maybe included in the list of COPCs given geochemical analysis conducted to date.	Section 3.4



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146	Water Quality and Processes	Consider using State of Alaska water quality guidelines and science-based thresholds for chronic effects to aquatic life when determining impacts to water quality, discharge quality, and receiving environment water quality objectives	Skeena Resources will include a requirement in the draft Hybrid AIR to describe relevant guidelines and science-based thresholds to be used in assessment of the Project. This requirement will be addressed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase with input from the TAC and representatives.	This sheet
147	Water Quality and Processes	Include tables showing constituents and range/maximum concentrations of all effluents and seepages currently being discharged from the site. Include this information for each of the sampling locations as compared to appropriate criteria, guidelines, and limits, including Unuk River data collected by the U.S. Geological Survey	Skeena Resources will present the information on discharges and receiving environment monitoring of the site, including data back to the early 1990s, in the comprehensive water quality baseline report (to be included with the EAC Application), rather than the DPD. Skeena Resources will include detailed water quality information in the draft Hybrid AIR, which will be finalized during the process planning stage.	Section 8
148	Water Quality and Processes	Request that the Environmental Management System consider implementing monitoring plans and activities during construction, operation, closure, and post-closure to evaluate effectiveness of mitigation strategies and detect potential changes in water quantity, water quality, and aquatic resources	Skeena Resources has updated Section 4.6 with a list of likely management plans that will be included as part of the EA process and likely reflect the suggestions presented. Skeena Resources will include a requirement in the draft Hybrid AIR to describe monitoring plans and other follow-up actions to mitigate any residual effects identified, and this requirement will be addressed in the EAC Application.	Section 4.6 Section 10
149	Water Quality and Processes	Work directly with the downstream Alaska Tribes to monitor water and sediment chemistry, benthic organism diversity and populations, and phytoplankton to assure waters are being protected and to detect changes in time for effective remediation	Skeena Resources will include a requirement in the draft Hybrid AIR to describe monitoring plans and other follow-up actions to mitigate any residual effects identified, and this requirement will be addressed in the EAC Application. The Hybrid AIR will be finalized during the process planning phase.	This sheet
150	Water Quality and Processes	Request that a long-term water balance model be developed to span the range of climate change predicted drought and flood conditions, and an analysis of how the open pits and subsequent dewatering may affect water levels in the nearby streams	Skeena Resources will develop a water balance model that takes climate change into consideration during the process planning phase, and reflected in requirements of the draft Hybrid AIR to inform the EAC Application and monitoring plans.	Section 4.1.5
151	Water Quality and Processes	Conduct dye studies to map potential groundwater connectedness between waste facilities and nearby surface waters	Skeena Resources will include the scope of groundwater studies as a component of the draft Hybrid AIR and addressed during process planning. The six MW17 wells installed through the groundwater baseline characterization program capture the potential for influence from existing mine groundwater infiltration, while surface water sampling does not. The detailed groundwater model for the project will consider interactions of proposed infrastructure and existing infrastructure, and develop approaches for establishing linkages to surface water systems. Skeena Resources established additional groundwater wells across the mine site in 2020 which are subject to quarterly quantity and quality monitoring, and augmented the monitoring well network in 2021 with vibrating wire piezometers (VWP).	This sheet
152	Wetlands	Effects to wetlands and their ecological functions, including alteration of hydrological regimes, which could affect the quality or availability of habitat for migratory birds, species at risk, and other wildlife, including areas used for breeding, foraging, resting, and migration	Skeena Resources has noted the potential effects of the Project on wetlands and their ecological functions and associated wildlife linkages in the DPD. Skeena Resources will include requirements in the draft Hybrid AIR to assess potential Project-specific and cumulative effects to wetlands, including potential habitat for wildlife and to provide a summary of the Project's effects on the biophysical factors that support ecosystem function. The Hybrid AIR will be finalized during the process planning phase.	Section 8.2.1 Section 10