



Impact Assessment
Agency of Canada

Agence d'évaluation
d'impact du Canada



Environmental
Assessment Office

Pacific and Yukon Region
757 West Hastings Street
Suite 201A
Vancouver BC V6C 3M2

Région du Pacifique et du Yukon
757 rue Hastings Ouest
bureau 210 A
Vancouver (C-B) V6C 3M2

PO Box 9426 Stn Prov Govt
Victoria BC V8W 9V1

June 23, 2022

Sent by Email

Doug Ramsey
Director, Sustainability and Indigenous Affairs
Spanish Mountain Gold Ltd.
Doug.Ramsey@spanishmountaingold.com

Agency File No: 005827
EAO File No: [30200-20/SPMG-06]

Dear Doug Ramsey,

Subject: Joint Summary of Issues and Engagement for the Spanish Mountain Gold Project

The Impact Assessment Agency of Canada (the Agency) and British Columbia's Environmental Assessment Office (EAO) conducted a comment period on the Spanish Mountain Gold Project (the Project) from April 25 to May 25, 2022. Participants were invited to review the summary of the Initial Project Description and to provide feedback related to the Project.

The enclosed Joint Summary of Issues and Engagement (Joint Summary) reflects the issues raised through comments received from the public, Indigenous groups and technical advisors (federal authorities, provincial ministries, and local governments). As a next step, the Agency and the EAO expect Spanish Mountain Gold Ltd. (the proponent) to produce a single Detailed Project Description that will meet both federal and provincial requirements.

The federal Planning phase under the *Impact Assessment Act* is to engage with Indigenous groups, provinces and other jurisdictions, the public and stakeholders to identify and discuss issues early, to inform a robust assessment process and better project design. Descriptions of all the phases of the federal process can be found in the [Impact Assessment Process Overview](#).

...2

Canada



Pursuant to subsection 15(1) of the federal *Impact Assessment Act*, the proponent must provide the Agency with a Detailed Project Description that sets out how it intends to address the issues in the Joint Summary and includes the information described in the *Information and Management of Time Limits Regulations* (the Regulations). The requirements for the Detailed Project Description are set out in Section 4 and Schedule 2 of the Regulations. Please consult the Agency's [Guide to Preparing an Initial Project Description and a Detailed Project Description](#) for further information.

Early Engagement is the start of the provincial regulatory process that provides an opportunity for all participants to better understand the Project, identify key issues and interests, and establish a foundation for the remainder of the process. An overview of the provincial process is included in the [EAO User Guide](#). The guidelines for completing a Detailed Project Description for the EAO are included in the [Early Engagement Policy](#). Under Section 39(a) of British Columbia's *Environmental Assessment Act* (2018), the proponent has up to one year to submit its Detailed Project Description from the issuance of the Joint Summary, or the Chief Executive Assessment Officer may terminate the assessment of the Project.

The EAO strongly encourages the proponent to submit additional documents along with the Detailed Project Description, including the proponent's proposed Application Information Requirements, based on the EAO's [Application Information Requirements Guidelines](#).

The EAO expects the proponent to engage with Indigenous nations and technical advisors during the development of the Detailed Project Description to ensure their interests are considered. This engagement will help avoid uncertainty and potential time delays later in the process. This engagement includes sharing drafts of the Detailed Project Description with these participants. The Detailed Project Description should include information provided in the Initial Project Description and updates, revisions and further details following engagement with Indigenous nations, technical advisors and other stakeholders. It is important that the Detailed Project Description describe how engagement activities and the Joint Summary were considered, and how they may have contributed to changes in the Project.

The proponent is asked to provide meaningful responses in the Detailed Project Description to the issues included in the Joint Summary. The Joint Summary and the proponent's responses will be used to inform the Agency's decision on whether an impact assessment is required for the Project, and the EAO's decision on whether the Project should proceed to an environmental assessment under the *Environmental Assessment Act*.

In preparing the responses, there may be some issues that, in the view of the proponent, are outside of its care and control. In this situation, the proponent may choose to identify the party or parties with the potential to address the issue(s).

For ease of reference, the Agency and the EAO request that the response to the Joint Summary be provided in a table with reference to other parts of the Detailed Project Description as warranted.

As part of the public comment period, the Agency also invited comments from the public and Indigenous groups on the request from the Government of British Columbia that the conduct of the federal impact assessment, should one be required, be substituted to the province. Comments received in relation to the substitution request will be considered by the federal Minister of Environment and Climate Change in making the substitution decision; they are not reflected in the Joint Summary and the proponent is not expected to provide a response to those comments.

In consideration of efforts being made to coordinate the federal Planning phase steps under the *Impact Assessment Act* and the provincial Early Engagement phase steps under the *Environmental Assessment Act*, the Agency recognizes that the proponent may require additional time to produce the Detailed Project Description. You are encouraged to contact the Agency and the EAO in the next few days to discuss how much time may be required.

All records produced, collected, or received in relation to the assessment of the Project—unless prohibited under the federal *Access to Information Act* or the provincial *Freedom of Information and Protection of Privacy Act*—will be considered public and posted on the [Canadian Impact Assessment Registry](#) Internet site and/or the [EAO's Project Information Centre](#).

If you have any questions or if the Agency or the EAO can assist in facilitating engagement with Indigenous groups and technical advisors during the development of the proponent's Detailed Project Description, please do not hesitate to contact Julie Lowry from the Agency at Julie.Lowry@jaac-aeic.gc.ca or Katherine St. James from the EAO at Katherine.StJames@gov.bc.ca.

Sincerely,

<Original signed by>

Regina Wright
Regional Director, Pacific and Yukon
Impact Assessment Agency of Canada

<Original signed by>

Elenore Arend
Chief Executive Assessment Officer and
Associate Deputy Minister
British Columbia Environmental Assessment Office

Enclosure: Spanish Mountain Gold – Joint Summary of Issues and Engagement

c.c. : Rob Hajdú, Team Lead, Impact Assessment Agency of Canada
Michael Shepard, A/Assistant Deputy Minister, Environmental Assessment
Office
Tracy James, Executive Project Director, Environmental Assessment Office
Katherine St. James, Project Assessment Director,
Environmental Assessment Office

Joint Summary of Issues and Engagement

1.0 Introduction

Spanish Mountain Gold Ltd. (the proponent) is proposing the construction, operation and decommissioning of the Spanish Mountain Gold Project (the Project), an open-pit gold mine located in the Cariboo region of central British Columbia, approximately 70 kilometres northeast of Williams Lake. The Project would produce 20,000 tonnes of ore per day and operate for 14 years. The Project would include an open mine pit, waste rock storage facilities, a rock processing plant, an overland conveyor, water treatment facilities, and an electrical transmission line.

The Impact Assessment Agency of Canada (the Agency) and the Environmental Assessment Office (EAO) are working cooperatively in a coordinated process for the initial phase of the Project's review in accordance with the [Impact Assessment Cooperation Agreement between Canada and British Columbia \(2019\) \(the Cooperation Agreement\)](#), and in support of the principle of “one project, one assessment.”

The Agency and the EAO have both accepted an Initial Project Description for the Project, submitted under the federal *Impact Assessment Act* and the provincial *Environmental Assessment Act*.

This Joint Summary of Issues and Engagement (Joint Summary) document is prepared and issued by the Agency and the EAO as part of the federal Planning and provincial Early Engagement phases in the assessment of projects that are captured by both the federal *Impact Assessment Act* and the provincial *Environmental Assessment Act*. In accordance with the Cooperation Agreement, this Joint Summary is issued to the proponent in place of separate federal Summary of Issues and provincial Summary of Engagement documents.

As required by subsection 14(1) of the federal *Impact Assessment Act* and paragraph 13(5)(a) of the provincial *Environmental Assessment Act*, this document summarizes:

- the issues raised to the Agency or the EAO by the public during the joint public comment period;
- comments from Indigenous groups related to their interests in the Project area;
- key issues or concerns identified by Indigenous groups regarding the Project, and
- comments provided by technical advisors¹ after reviewing the proponent's Initial Project Description.

Note that the Joint Summary provides a summary of comments received; it does not evaluate those concerns, nor does it define what is to be addressed in the impact assessment. The Joint Summary also identifies participating Indigenous nations as per paragraph 13(5)(b) of the provincial *Environmental Assessment Act*.

The proponent is required to consider the issues raised in the Joint Summary and respond to them in its Detailed Project Description and accompanying response to the Joint Summary. This Joint Summary, the proponent's response to the Joint Summary, and the proponent's Detailed Project Description will be used, in addition to other information, by the Agency to determine whether a federal impact assessment is required, and by the EAO to determine if the Project is ready to proceed to a provincial environmental assessment.

¹ Federal authorities, provincial ministries, local governments and health authorities.

Further details on the Project can be accessed in the Initial Project Description, Engagement Plan, and other documents on the Agency's [Canadian Impact Assessment Registry](#) or the [EAO Project Information Centre \(EPIC\)](#).

2.0 Early Engagement Overview

During the coordinated process, the Agency and the EAO sought to understand how the public, Indigenous groups and technical advisors want to be engaged, and gathered information on their initial interests, concerns, questions, feedback and knowledge regarding the Project. The Agency and the EAO hosted two virtual information sessions and held meetings and teleconferences with technical advisors and potentially affected Indigenous groups.

2.1 Joint Public Comment Period

The Agency and the EAO held a 30-day joint public comment period from April 25 to May 25, 2022. Due to the COVID-19 pandemic and the associated physical distancing measures, virtual information sessions were held via Zoom on May 11 and May 12, 2022. The virtual information sessions included presentations on the federal and provincial assessment processes, a presentation by the proponent on the Project, and an opportunity to ask questions.

The Agency and the EAO received 14 public comments during the joint public comment period. Comments were from individuals and one non-governmental organization. Comments are summarized below in section 4.0.

3.0 Indigenous Groups

The Agency and/or the EAO notified and requested input from the following Indigenous groups and organizations, whose interests could reasonably be expected to be affected by the Project:

- Xat'sull First Nation*
- Williams Lake First Nation*
- Lhtako Dené Nation*
- Tsilhqot'in National Government
- Métis Nation British Columbia

* indicates confirmed participating Indigenous nation under the *Environmental Assessment Act*

The Agency and the EAO made funding available to support participation by Indigenous groups in this phase of the assessment.

Under the provincial *Environmental Assessment Act*, Indigenous nations can self-identify as a participating Indigenous nation for the assessment of a project. Participating Indigenous nations are afforded specific procedural rights under the *Environmental Assessment Act*, including capacity funding, consensus seeking processes, a procedure to communicate consent or withhold consent at key decision points, and access to facilitated dispute resolution.

Participating Indigenous nations under the *Environmental Assessment Act* who commented on the Initial Project Description are identified in Table 1. Table 1 describes the Agency and the EAO's preliminary

understanding of Indigenous groups’ interests in the Project area. During the comment period, Xatśūll First Nation conducted an initial environmental and socio-cultural review of the Initial Project Description and provided the comments below for inclusion in this document. Lhtako Dené Nation informed the Agency and the EAO that it did not have comments at this time but was interested in learning more about the potential impacts on water quality and post-Project reclamation. The Agency and the EAO will continue to engage the Indigenous groups, and should additional information be provided, it will be considered during the process.

Table 1: Preliminary Understanding of Indigenous Issues Raised by Indigenous groups

Indigenous Group	Summarized Understanding of issues raised
Xatśūll First Nation*	<ul style="list-style-type: none"> • Xatśūll First Nation’s review focused on examining the cumulative effects of any large-scale project and how these projects interact with each other. The review focused on the central goal of well-being for all relevant living species and ecosystems. • Xatśūll First Nation noted the importance of the connections between cultural values and livelihood, the biophysical environment, and human health and wellbeing. <p>Interests and Potential Impacts of the Project</p> <p><i>General</i></p> <ul style="list-style-type: none"> • Importance of shared decision-making and consent which are key to the assessment process • Need for compensation measures when permanent effects are anticipated • Consideration of cumulative effects of the Project, including historic and existing development and mining operations on ecosystem services, including impacts on the surrounding region and communities • Need for adaptive management approaches that include long-term monitoring and trigger response and action plans when predictions differ from observations <p><i>Biophysical effects</i></p> <ul style="list-style-type: none"> • Consideration of climate change and related events on Project impacts and design • Impacts on water quality, quantity and associated rain runoff diversions to limit mine contact water, including consideration of historic and existing mining activity impacts on aquifers and waterbodies downstream • Effects on fish and fish habitat, including from changes to water flows that may or may not trigger a harmful alteration, disruption and destruction of fish and fish habitat • Effectiveness of fish habitat offsetting • Impacts on vegetation, including culturally significant plants • Mitigation measures to conserve and protect rare ecological plant communities and old growth forests • Effects on species at risk • Mitigation measures to conserve and protect species at risk and their habitat • Concerns about uncertainty and subjectivity of habitat suitability modelling

- Introduction and effects of invasive species from Project activities and related mitigation measures, including an iterative management plan;
- Effects of noise and impacts on visual quality on the human and wildlife population
- Cumulative effects on greenhouse gas emissions and air quality

Cultural impacts

- Impacts on Indigenous cultural heritage features or values
- Impacts on hunting and trap lines
- Consideration of social, cultural and environmental values of sites when identifying preferred options for the location of the Tailings Storage Facility
- Impacts on access to Xatśúll First Nation territory and lands, including consideration of impacts on sense of belonging and safety with possible increases in interactions with enforcement and increased pressures on the environment from increased access to territory and land by non-community members through trails and roads

Socio-economic impacts

- Potential benefits to Xatśúll First Nation community members through employment and training opportunities
- Economic, social, and environmental impacts of informal housing and work camps on infrastructure and services such as policing, healthcare and wildlife conservation services, including:
 - potential creation of informal economies, both legal and illegal;
 - additional stressors on the environment through legal and illegal harvesting;
 - housing availability prices, and associated affordability of life for Xatśúll First Nation members; and
 - potential additional stressors on local healthcare and mental health resources, quality of services.
- Mitigation measures to address economic, social and environmental impacts of workforce accommodations on local infrastructure and services, and the environment
- Consideration of gender inequalities that may be exacerbated through male-dominated labour options
- Consideration of vulnerabilities that the Project may introduce or exacerbate such as employment issues, substance use, education access and ability, marginalization of community members, systemic racism, confidence and access to the environment
- Potential Project contributions and improvements to potential community strengths such as existing businesses, a strong youth council, and institutional experience with the natural resource sector such as through education funding and training
- Impacts of the Project on sense of belonging and community building, in particular the importance of building a collaborative relationship with the proponent that supports existing community networks and decision-making processes

	<p>Requests</p> <ul style="list-style-type: none"> • Indigenous legislation, laws, and context should be considered, including references to the <i>Declaration of the Rights of Indigenous Peoples Act</i> and Section 35 of the <i>Constitution Act</i>; • Request further discussion and understanding of baseline studies and new information collected since 2010 including: <ul style="list-style-type: none"> ○ baseline studies on fisheries and other aquatic-based activities, and ○ details on the terrain, including slope, aspect, elevation, etc.; • Request further information on decommissioning, closure, and reclamation plans including: <ul style="list-style-type: none"> ○ how and when the temporary camp areas be restored to a pre-disturbance state; ○ how passive water treatment efficiency will be assessed; ○ long-term monitoring of water quality, revegetation, invasive species, erosion, etc.; and ○ consideration of re-vegetation, in particular of culturally significant plants; • Request additional details on the Emergency Response Plan and consideration of lessons learned from the Mount Polley Mine tailings dam failure; and • Suggest a Community-Based Monitoring Program over the life and after-life of the Project to monitor the health and traditional use of the land after decommissioning and reclamation.
Lhtako Dené Nation*	<ul style="list-style-type: none"> • Impacts on water quality and quantity, including downstream effects; and • Concerns about adequate decommissioning and reclamation of the Project site.

4.0 Summary of Issues

This section provides a high-level summary of comments received by the Agency and the EAO from the public, Indigenous groups and technical advisors on the proponent’s Initial Project Description (see Table 2). The proponent is directed to review the original submissions posted on the Agency’s [Canadian Impact Assessment Registry](#) and the EAO’s [website](#).

The Joint Summary does not include comments received on British Columbia’s request to substitute the conduct of the federal impact assessment, should one be required, to the province. Should a federal impact assessment be required, the federal Minister of Environment and Climate Change will consider any comments received in deciding whether to approve the request for substitution. The Agency will post a notice of the Minister's decision with respect to the request for substitution along with the reasons for the decision on the Agency’s [Canadian Impact Assessment Registry](#).

Table 2: Summary of Issues Raised

<p>Accidents, Malfunctions, and Public Safety</p> <ul style="list-style-type: none"> • Consideration of the potential for adverse environmental and human-health effects from accidents and malfunctions such as leaks or spills, during the construction and operation of the Project • Need for information on proposed prevention, mitigation, and response measures that will be implemented for accidents or malfunctions • Consideration of environmental impacts such as extreme winds, heat, flood and wildfire events that could negatively impact storage facilities, dams, or cause overland flow of mine affected runoff water should be included in emergency response planning • Concerns about the potential failure of the proposed tailings storage facility and references to the Mount Polley Mine tailings dam failure
<p>Acoustic Environment (Terrestrial)</p> <ul style="list-style-type: none"> • Inclusion of a noise assessment in accordance with Health Canada's guidance which includes sensitive receptors
<p>Alternative Means of Carrying Out the Project</p> <ul style="list-style-type: none"> • Inclusion of timelines for the tailings management alternatives assessment • Consideration of the feasibility of electrifying part of the mining fleet, and the positive Project effects that may result for human health and the environment • Inclusion of a proper assessment of alternatives for mine waste management
<p>Atmospheric Environment</p> <ul style="list-style-type: none"> • Potential air quality impacts and fugitive dust mitigation, including impacts on tourism and recreation, country foods, and Indigenous harvesting of plants for food and medicinal and ceremonial purposes • Need for local air quality data and assessment, including additional meteorological stations and other appropriate sampling methods and locations for establishing baseline air quality conditions • List air pollutants by emissions source and by Project phase, including identification of sources that are considered point source, area sources, and/or fugitive sources of emissions
<p>Archaeological Sites</p> <ul style="list-style-type: none"> • Concerns about the potential impacts to Indigenous sacred sites and other cultural and heritage-sensitive areas
<p>Climate Change and Greenhouse Gas Emissions</p> <ul style="list-style-type: none"> • Contribution of the Project's emissions on Canada's environmental commitments and climate change, and how this could impact provincial and federal targets • Concerns about climate changes impacts due to potential emissions during construction, operation, and decommissioning • Consideration of how climate changes in the Project area, such as possible changes in mean and extreme precipitation and temperature and related environmental conditions, may alter baseline conditions, with implications for climate sensitive aspects of Project design and associated effects on the environment
<p>Cultural</p> <ul style="list-style-type: none"> • Concerns about the impacts to the ability of Indigenous peoples to conduct cultural practices • Consideration of the impacts to Indigenous Peoples from loss of food security (traditional foods) • Concerns regarding Project interactions with the Likely-Xat'sùll Community Forest • Potential effects on Indigenous Protected and Conserved Areas within the Project area

Cumulative Effects

- Concerns about cumulative effects to Indigenous communities due to significant oil, gas, forestry and mining development activities over the past several decades

Differential Impacts upon Diverse Persons and Groups

- Inclusion of a Gender-based Analysis Plus approach throughout the assessment to understand the differential impacts and experiences of risk, benefits and impacts of the Project on men, women, gender diverse persons and people from a range of groups and communities, including groups identified by age, place of residence, ethnicity, socio-economic status, employment status or disability for example, in a variety of ways including:
 - employment opportunities;
 - access to revenues;
 - access to safe and affordable housing;
 - compensation or benefits and expanded investment in the local community;
 - decision making roles for new innovation and technologies; and
 - access to services and programs that account for the perspective, knowledge and experiences of individuals and communities.
- Use of disaggregated baseline information (at a minimum, by sex, gender, age and ethnicity, and where possible, by other factors such as Indigeneity or education and income levels) and inclusion of descriptions of data gaps, where applicable.
- Identification of the specific systemically marginalized groups among women (e.g., Indigenous, younger women, youth), that are often disproportionately affected by health and safety risks, including intimidation and discrimination, in scoping, assessment and mitigation measures
- Inclusion of information about mitigation measures, corporate policies and other measures on equality, anti-harassment, or other relevant policies; whether the current workforce is diverse, whether there is a history of abuses or infractions related to social justice issues, and whether training is provided on issues related to equality, diversity, and inclusion

Economic Conditions

- Description of economic benefits and opportunities for local communities (e.g., who from the communities will benefit) and the potential for differential economic benefits, including opportunities for women, persons with disabilities or Indigenous peoples in the Project workforce
- Consideration of how the Project can promote an efficient and inclusive labour market
- Describe how training and employment opportunities would be provided, including when (e.g. Project phases) training and skills development will take place, as well as the types of skills/training development that will be offered
- More information on current socio-economic conditions within potentially affected commercial activities from outdoor recreation
- Consideration of the historical contribution of the mining industry to the regional economy, a detailed projection of potential mining activity in the region, and a projection of economic activity in the region across industries to allow for the analysis of potential positive and negative economic and socioeconomic effects in the context of the industry's overall economic contributions to the region
- Costs and benefits of the Project to the economy

Ecosystems

- Effects on forest vegetation and biodiversity, changes in land use, recovery of forested land, and the forest industry in the region
- Effects on soil quality, loss, compaction, and erosion that could result in reduced soil productivity, including descriptions of the methods used for tree clearing and potential impacts on biodiversity and species with cultural values

<ul style="list-style-type: none"> • Potential for the introduction of cyanide, mercury and sulfuric acid into the surrounding environment • Consideration of the impacts of forested lands, including identification of appropriate mitigation measures and future reclamation activities
<p>Fish and Fish Habitat</p> <ul style="list-style-type: none"> • Effects on fish mortality and productivity through harmful alteration, disruption, and destruction of fish habitat from Project construction and operation • Potential for the issuance of a <i>Fisheries Act</i> authorization or letter of advice, which would include conditions to avoid, mitigate, and offset effects to fish and fish habitat
<p>General – Project Description</p> <ul style="list-style-type: none"> • High quality detailed maps needed of the Project site, including maps with labelled roads, project features, and clearly defined project footprint
<p>Geology, Geochemistry, and Geological Hazards</p> <ul style="list-style-type: none"> • Consideration of both natural and induced seismicity (if applicable), information on mapped faults within the local study area or region, and an assessment of the potential and expected shaking from local and distant earthquake sources, including volcanic hazards • Identification of terrain hazards, both naturally occurring events and events that may arise as a result of Project activities • Consideration of the effects of the environment on the Project (e.g., terrain hazards, seismic effects) and the effects of the Project on the environment and public safety (e.g., physical infrastructure) • Consideration of potential for Project activities to effect debris flow/flood risks along Cedar Creek
<p>Human Health and Well-Being</p> <ul style="list-style-type: none"> • Identification of potential permanent/temporary/seasonal human receptors (e.g., residences, sensitive locations), waterbodies used for recreational or ceremonial purposes, sites used for drinking water and country foods, and the distances to key Project components that maybe have potential impacts on these receptors • Assessment of effects needed to human health from exposure to contaminants of potential concern from multiple pathways of exposure (e.g., through consumption of local foods or water, air (inhalation/deposition), dermal contact with contaminated surface/groundwater) in a highly mineralized area to understand the potential uptake by local residents, off-duty workers, and recreationalists in the Project area • Potential changes to the quality of water sources used by residents in the area and the need to confirm adherence to applicable water quality standards or guidelines (e.g., Guidelines for Canadian Drinking Water Quality)
<p>Indigenous Peoples’ Rights and Interests</p> <ul style="list-style-type: none"> • Impacts on Aboriginal rights of Indigenous peoples and their traditional land uses, including fishing, hunting, gathering, and trapping • Consideration of Indigenous legislation, laws, and context, including references to the <i>Declaration of the Rights of Indigenous Peoples Act</i> and Section 35 of the <i>Constitution Act</i> • Opportunities and benefits for Indigenous peoples through job creation and training opportunities • Focus on shared decision-making and consent which are key to the process, including the importance of building a collaborative relationship with the Proponent • Impacts on Indigenous cultural heritage features or values • Impacts on access to territory, lands, and resources, including sense of belonging and safety • Economic, social, and environmental impacts of informal housing and work camps on infrastructure and services

<ul style="list-style-type: none"> • Impacts on water quality and quantity, including consideration of historic and existing mining activity impacts and downstream impacts on aquifers and waterbodies • Identification of all drinking water sources and water bodies used for traditional purposes, and confirm whether Indigenous users consume treated or untreated water from the Project • Impacts of accidents and malfunctions, effects of the environment on the Project and resulting effects on Indigenous rights and interests • Effects on valued components identified by Indigenous groups
<p>Infrastructure and Services</p> <ul style="list-style-type: none"> • Clarification of the potability of the water supply for domestic use in the process plant, plant site, buildings, and work camp • Clarification and further information are required on the planned helicopter operations, including whether an existing airstrip or newly constructed helipad, will be used for doré transport • Description of the transportation of doré once it leaves the mine site (end location, general routes, etc.) to sufficient detail to determine whether transportation components are within the mandate of Transport Canada
<p>Migratory Birds</p> <ul style="list-style-type: none"> • Description of the effects pathways to migratory birds • Identification of individual mortality and the destruction of nests and eggs of migratory birds • Potential effects of noise, vibration, and artificial lighting on migratory birds and their habitats
<p>Navigation</p> <ul style="list-style-type: none"> • Information needed to determine potential impacts to navigation, including description of construction methodology for both the proposed work and any associated temporary works • Information needed on the potential cumulative impacts to navigation in conjunction with surrounding works (e.g. water intakes, bridges, diversions, transmission lines, pipelines) in the regional study area • Clarification on the location (which waterways) and type of bridges or crossings proposed, if any, or whether there are existing structures that the proponent intends to alter, and whether these activities may have implications under the Canadian Navigable Waters Act • Solicitation of navigation related comments and concerns, from the public and Indigenous users
<p>Other</p> <ul style="list-style-type: none"> • Clarification and development of the relevant authorizations, licenses and permits that will be required
<p>Public and Stakeholder Engagement</p> <ul style="list-style-type: none"> • Concern about the level of community engagement • Concern for people without internet access to participate in online engagement, such as the virtual information sessions • Ensure inclusiveness in consultation by engaging diverse subgroups to identify different needs, providing language and information materials that are accessible to all, considering the decision-making abilities of individuals or groups, and mitigating barriers to participation and demonstrate how outcomes of this engagement are included throughout the assessment
<p>Project Design</p> <ul style="list-style-type: none"> • Information on the potential for acid rock drainage and metal leaching from mine waste (i.e. tailings, rock material, overburden) and pit walls is required to identify mitigation measures to limit impacts from these potential sources • Metal leaching characteristics under neutral pH conditions should also be considered in determining suitability of construction material, including dam embankments. Include additional information on how metal leaching will be considered in identifying suitable construction materials

- Consideration of the *Metal and Diamond Mining Effluent Regulations*' parameters and any other elements (including selenium and chromium) for neutral metal leaching in the characterization of mine waste
- Proposed passive treatment technologies (iron terrace, biochemical reactor, polishing wetland, and in-pit treatment) may be considered emerging technologies which would require additional detail
- Inclusion of details on the location of the existing and proposed work camps and airstrip
- Details needed on the transmission line clearing, construction and maintenance
- Inclusion of a description and discussion of the geochemical characteristics of the subgrade ore proposed to be stockpiled
- Consideration of a mine waste (i.e., tailings, waste rock and overburden) and pit walls management plan to provide commitments and compliance measures
- Description confirming the safe and secure manufacturing and storage of explosives

Social Conditions

- Details needed on the recreational opportunities lost to the public, including use, recreation and enjoyment of the public reserves in the Project area
- Consideration of the potential impacts on BC Forest Service Recreation Sites, including Spanish Lake, Boswell Lake and Quesnel Lake
- Consideration of the potential impacts of alterations to Spanish Lake Road and Likely Road to local road users

Species at Risk, Wildlife and their Habitat

- Consideration of the effects to wildlife, migratory birds, species at risk (e.g., amphibians, arthropods, birds, lichens, terrestrial mammals, mosses, reptiles, and vascular plants) listed on the *Species at Risk Act*, their habitat (e.g., wetlands) 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)
- Potential increase in wildlife injury, mortality, and the introduction of invasive species (e.g., Common Reed (*Phragmites australis*)) and hunters/poachers from increase in road traffic volumes
- Detailed reports needed on the baseline wildlife and vegetation assessments
- Inclusion of habitat suitability or cumulative effects models for Project footprint, transmission line and a reasonable buffer
- Potential impacts to mule deer, caribou, moose, grizzly bear, and fish along the transmission corridor and Project site

Water Quality and Processes

- Detailed water quality monitoring data for baseline conditions, including hardness, pH, temperature, and dissolved organic carbon needed
- Concerns about the alteration of surface flows and drawdown of the water table as a result of mining activities
- Impacts from acid rock drainage and metal leaching caused by mining activity
- Information on groundwater hydrogeology needed, including point and non-point source discharges, and a request for the inclusion of a numerical groundwater model for baseline conditions and specific to project phases
- Information needed on surface water hydrology, including a short description of the proposed water balance and water quality modelling methodology
- Recommendation to include hydrometric monitoring stations lower in the relevant watersheds to aid with water balance/water quality model validation in the receiving environment

- Expanded description of waste discharges and management, including the active water treatment plant
- Impacts of water diversion to local residents

Wetlands

- Concerns that effects to wetlands and their ecological functions, including alteration of hydrological regimes, 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
- Information needed on Tailings Storage Facility pre-disturbance baseline and closure plan as it relates to water and wetlands

5.0 Next Steps

The next steps in this initial phase of the assessment include:

- the Proponent is required to submit a Detailed Project Description to the Agency and the EAO that includes responses to the issues raised in the Joint Summary;
- the Proponent is expected to engage with technical advisors and each of the Indigenous groups listed in section 3.0 above to ensure their interests and issues are reflected in the Detailed Project Description; and
- the Proponent is encouraged to submit additional documents along with the Detailed Project Description, including the proponent's proposed Application Information Requirements that is consistent and/or captures Agency and EAO requirements.

The Agency will use the Detailed Project Description, in addition to other information, to determine whether a federal impact assessment is required and the EAO will use it to determine if the Project is ready to proceed to a provincial environmental assessment.