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3 ASSESSMENT PROCESS

This section of the Application for an Environmental Assessment Certificate/Environmental Impact Statement (Application) presents a description of the provincial and federal Environmental Assessment (EA) processes; a review of the proposed Blackwater Gold Project (Project) regulatory history and milestones; and a summary of the information distribution and consultations undertaken by New Gold Inc. (Proponent) with Aboriginal groups, the public and key stakeholders, local governments, and federal and provincial government agencies during the Pre-Application stage of the EA process. The section also describes consultation planned with government agencies, Aboriginal groups, local government and the public, and key stakeholders during the Application review stage.

The Project requires an EA Certificate (EAC) under the British Columbia *Environmental Assessment Act* (BC *EAA*) (Government of BC, 2002a). Additionally, the Project is subject to the *Canadian Environmental Assessment Act, 2012 (CEAA, 2012)* (Government of Canada, 2012a). The Canadian Environmental Assessment Agency (Agency) and the British Columbia Environmental Assessment Office (BC EAO) have agreed to coordinate the federal and provincial EAs to the extent possible pursuant to the Canada-British Columbia Agreement for Environmental Assessment Cooperation (2004).

Under the coordinated federal and provincial EA process, the Proponent prepares a single Application containing the information necessary to fulfill both provincial and federal requirements. The provincial and federal EA processes are conducted concurrently (**Figure 3-1**). The provincial and federal agencies will review and comment on the Application and each jurisdiction will render its own decision on the Project.

Pursuant to the federal EA, federal departments enter into an agreement committing the signatories to work together to facilitate an effective, accountable, transparent, timely, and predictable federal review in relation to a proposed project and to contribute to fulfilling the Crown's duty to consult Aboriginal groups. On 6 May 2013, an agreement relating to the Project was signed by the Agency, Natural Resources Canada (NRCan), Environmental Canada, Transport Canada, Fisheries and Oceans Canada (DFO), Infrastructure Canada, Canadian Transportation Agency (CTA), and Aboriginal Affairs and Northern Development Canada (AANDC), which was published on the website of the Major Projects Management Office (MPMO) (2014).

The BC EAO and the Agency process include a Pre-Application and an Application review stage. The Pre-Application stage involves: 1) preparing the terms of reference for the EA in consultation with federal and provincial government agencies, local governments, Aboriginal groups, and the public (i.e., Application Information Requirements [AIR] and Environmental Impact Statement Guidelines [EIS Guidelines]; and 2) submitting the Application for evaluation against the AIR and the EIS Guidelines issued by the BC EAO and the Agency, respectively. The Application stage involves: 1) formal filing of the Application by the Proponent for review by federal and provincial government agencies, local governments, Aboriginal groups, and the public; 2) preparation of the EA report, which summarizes the results of the assessment; and 3) referral to ministers and respective decisions from the federal Minister of the Environment, and the provincial ministers of Energy and Mines and Environment.





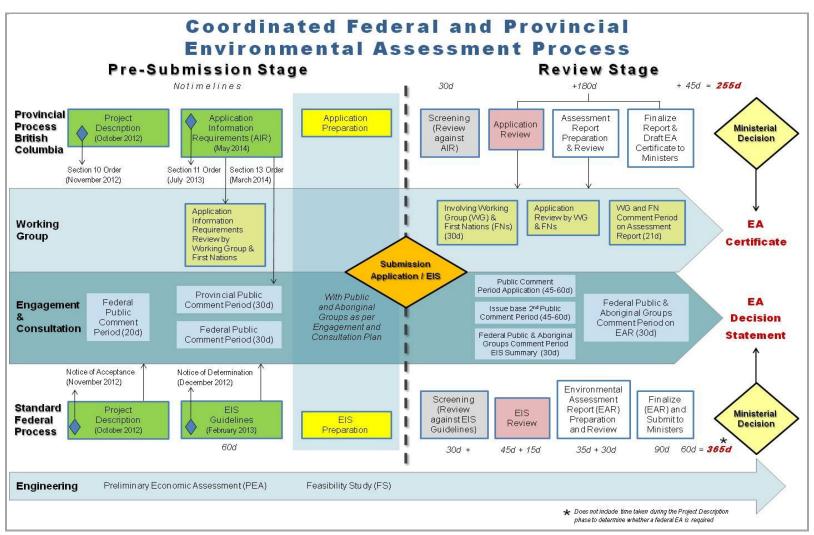


Figure 3-1: Coordinated Federal and Provincial Environmental Assessment Process



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3.1 <u>Provincial EA Process</u>

The BC *EAA* governs the provincial EA process. The Act requires that large-scale proposals that meet or exceed the thresholds in the *Reviewable Project Regulation* undergo an EA and obtain an EAC before the project may proceed. An EAC is required before permits for development can be issued such as a permit under the *Mines Act* (Government of BC, 1996).

The BC *EAA* requires the assessment of potential significant adverse environmental, economic, social, health, and heritage effects of a project, while taking into account practical means of preventing or reducing these effects to an acceptable level. EAs include the following elements:

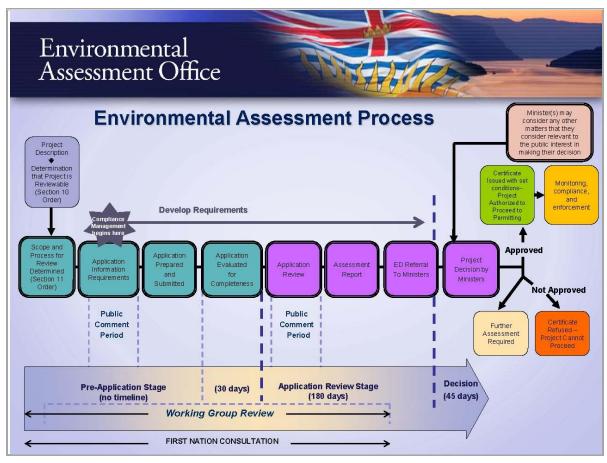
- Providing opportunities for interested parties to identify issues and provide input;
- Consulting with Aboriginal groups, which includes opportunities to identify issues and provide input;
- Developing technical studies of relevant environmental, social, economic, heritage, and/or health effects of the Project;
- Identifying ways to prevent or reduce negative effects and enhance positive effects;
- Considering the input of all interested parties in compiling assessment findings and making decisions about the project's acceptability; and
- Identifying the potential effects of the project on community values and information on the nature of public and Aboriginal support for the project.

Figure 3.1-1 shows the provincial EA process. At the end of the Application review stage, the provincial ministers decide whether to issue an EAC for the Project and allow the Project to proceed to the permitting stage.



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Source: http://www.eao.gov.bc.ca/ea_process.html

Figure 3.1-1: Provincial Environmental Assessment Process

The Proponent submitted a Project Description for the Project to the BC EAO on 24 October 2012. After reviewing the Project Description, the BC EAO issued an Order under section 10 of the BC EAA on 5 November 2012, which indicated the Project requires an EAC and may not proceed without an EA. On 9 July 2013, the BC EAO issued an order pursuant to section 11 of the BC EAA, which prescribed the scope, procedures, and methods for the provincial EA including requirements for public, government agency, and Aboriginal group consultation. On 13 March 2014, BC EAO issued a section 13 Order stating that an off-site transload facility and rail spur lines that were originally part of the scope in the section 11 Order are no longer considered as project components.

Pursuant to the *Public Consultation Policy Regulation* under the BC *EAA*, proponents must undertake a public consultation program related to the EA process. These requirements are described in detail in **Section 3.4** of the Application—Public and Agency Information Distribution and Consultation.



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3.1.1 Blackwater Project Working Group

The BC EAO established a Working Group for the Project consisting of provincial and federal regulatory agencies, local governments, and Aboriginal groups in April 2013 (**Table** 3.1-1). The role of the Working Group is to provide direction to the Proponent relating to baseline studies, as well as potential mitigation measures based on the effects assessment. The Proponent is not a member of the Working Group and has attended Working Group meetings to provide information on the Project, including results of baseline studies and mitigation measures, and to respond to questions. The Working Group's involvement during the Pre-Application stage has focused primarily on reviewing the draft AIR.

The Working Group first met on 30 April 2013. A sub-working on caribou was established for the Project in July 2013.

Table 3.1-1: Working Group Members

Working Group Member Type	Working Group Member Name
	Lhoosk'uz Dene Nation
	Nadleh Whut'en First Nation
Aboriginal Groups	Saik'uz First Nation
	Stellat'en First Nation
	Ulkatcho First Nation
	BC Environmental Assessment Office (chair of the Working Group)
	Ministry of Aboriginal Relations and Reconciliation
	Northern Health
	Ministry of Energy and Mines
Provincial Ministries	Ministry of Environment
	Ministry of Environment - South Coast Region
	Ministry of Forests, Lands, and Natural Resource Operations
	Ministry of Jobs, Tourism and Skills Training
	Ministry of Transportation and Infrastructure
	Cariboo Regional District
	District of Fort St. James
Local Governments	District of Vanderhoof
	Regional District of Bulkley–Nechako
	Village of Fraser Lake
	Canadian Environmental Assessment Agency
	Environment Canada
Fodoral Departments	Fisheries and Oceans Canada
Federal Departments	Health Canada
	Natural Resources Canada
	Transport Canada



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3.1.2 Application Information Requirements

The Proponent prepared the draft AIR outlining the information to be included in the Application. Drafts were distributed to the Working Group for review and comment on 30 April 2013 and 12 July 2013. The draft AIR was also made available to the public on 27 September 2013 via the BC EAO electronic Project Information Centre (e-PIC). During the 30-day public comment period, the Proponent solicited input on the draft AIR by holding open houses. The Proponent documented the comments and questions raised during the public comment period in tracking tables (**Appendix 3.1.3A**). The AIR tracking tables also describe how the issues and comments were responded to. The tables are included in the Application as follows:

- Public and local government agencies AIR tracking table that document issues and concerns raised by public and local government agencies on the draft AIR are presented in Appendix 3.1.3A.
- Aboriginal groups AIR tracking table that documents issues and concerns raised by Aboriginal groups on the draft AIR are presented in **Appendix 3.1.3A**.
- Provincial agencies AIR tracking table that documents issues and concerns raised by provincial agencies on the draft AIR are presented in **Appendix 3.1.3A**.
- Federal agencies AIR tracking table that documents issues and concerns raised by federal departments on the draft AIR are presented in **Appendix 3.1.3A**.

Sections 3.2.1 and **3.4** describe in detail how comments provided by Working Group members and the public were taken into account to finalize the AIR. The AIR was approved by BC EAO on 15 May 2014.

3.1.3 Provincial Milestones

The Project has accomplished the following milestones in the provincial EA process:

- **24 October 2012**. Project Description provided to BC EAO with a request to initiate an EA.
- **5 November 2012**. BC EAO issued a section 10 Order which determined the Project is reviewable under Part 3 of the *Reviewable Project Regulation* because the Project would have a production capacity of greater than or equal to 75,000 tonnes per year of mineral ore. The Order indicates: 1) the Project requires an EAC; and 2) the Proponent may not proceed with the Project without an assessment.
- **20 December 2012**. Version A of the draft AIR sent to BC EAO and Agency, which identified federal and provincial requirements for the Application.
- **28 February 2014.** Version B of the draft AIR issued by the Proponent according to an updated template provided by BC EAO, which took into account the requirements of *CEAA*, *2012*. The main change made to Version B of the draft AIR was the removal of



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federal information requirements since these requirements were provided in the EIS Guidelines.

- **12 April 2013**. Proponent sent Version C of the draft AIR to BC EAO and the Agency. Version C addressed the BC EAO's and the Agency's comments on Version B.
- 30 April 2013. Working Group meeting held at the Prince George, BC's Civic Centre.
 The Proponent provided an overview of the Project, described their approach to the EA including studies and field programs, and reviewed the draft AIR and proposed Valued Components (VCs) for the assessment. The Working Group's initial comments on the Project and EA plans were also discussed. As a follow-up to this meeting, the BC EAO established a sub-working group to discuss the assessment of potential effects on caribou.
- **9 July 2013**. Section 11 Order issued by BC EAO, which identifies the scope, procedures, and methods for the EA.
- 12 July 2013. Version D of draft AIR sent to BC EAO and Agency for distribution to the Working Group. This version addressed comments provided by the Working Group to Version C of the draft AIR.
- 17 July 2013. Caribou Sub-working Group meeting.
- **28 August 2013**. Version E of draft AIR submitted to BC EAO and the Agency. Version E addressed Working Group comments on Version D.
- **20 September 2013**. Version F of draft AIR submitted to BC EAO for review. It addressed comments from BC EAO on Version E.
- 27 September 2013. Notice of public open house and public comment period on the draft AIR posted to BC EAO website. The Proponent's Public and Stakeholder Consultation Plan for the Project posted to BC EAO website.
- 9 October to 8 November 2013. Public comment period for the draft AIR.
- 15 October 2013. BC EAO open house in Fraser Lake.
- 16 October 2013. BC EAO open house in Vanderhoof.
- 4 November 2013. Caribou Sub-working Group meeting.
- 5 November 2013. Caribou Sub-working Group meeting.
- **12 December 2013.** BC EAO provided additional direction to the Proponent regarding engaging with the Nazko First Nation (NFN) during the EA process including:
 - Providing the NFN with information on the Proponent's assessment of the potential effects related to the use and potential upgrades of the Kluskus and Ootsa Forest-Service Roads (FSRs), including potential accidents and malfunctions along the FSRs:
 - Making reasonable effort to respond to questions and comments that the NFN has during the Application review stage as early as possible, in order to support the NFN



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- in submitting comments to the BC EAO with respect to potential effects on NFN Aboriginal interests; and
- In response, the Proponent confirmed it will make efforts to meaningfully inform the NFN about the results of studies undertaken and respond to any questions and comments raised by the NFN during the subsequent Application review phase.
- 5 February 2014. Version G of the draft AIR addressing comments received during the
 public comment period provided to BC EAO and the Agency was distributed to the
 Working Group. A stand-alone AIR companion document, presenting the rationale for the
 selection of VCs and draft AIR comment tracking tables, provided to the Working Group
 together with draft AIR Version G.
- 13 March 2014. Section 13 Order issued by BC EAO amending the section 11 Order by removing references to building and operating a new transload facility and related rail spur line from the list of project components.
- **25 April 2014**. Version H of draft AIR provided to BC EAO and the Agency together with updated AIR comment tracking tables. This draft AIR version addressed comments from members of the Working Group and Aboriginal groups.
- 15 May 2014. Final AIR issued by BC EAO.

3.1.4 Issues Tracking Tables

The issues tracking tables document issues, comments, and concerns raised by stakeholders and the public as well as Aboriginal groups during preparation of the Application. The tables also include the Proponent's responses, where applicable. The following Issues Tracking Tables are included in the Application:

- Public and local governments: Issues tracking tables presented in Appendix 3.1.3B. A summary table of these issues is also provided in Table 3.4-5;
- Aboriginal groups: Issues tracking tables presented in Appendix 3.1.3B. A summary table of these issues is also provided in Table 3.3-4;
- **Provincial ministries**: Issues tracking tables presented in **Appendix 3.1.3B**. A summary table of these issues is also presented in **Section 3.4.1.2.2**; and
- Federal departments: Issues tracking tables presented in Appendix 3.1.3B. A summary table of these issues is also presented in Section 3.4.1.2.2.

A summary of consultations completed up to April 2014 is provided in **Appendix 3.1.3C**.



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3.2 Federal Assessment

CEAA, 2012 governs the federal EA process. One of the guiding principles of the federal process is to use the EA as a planning tool to ensure that projects are considered in a careful and precautionary manner in order to avoid or mitigate the possible adverse effects of projects on the environment and to encourage decision makers to take actions that promote sustainable development.

The purposes of *CEAA*, 2012 include ensuring opportunities for meaningful public participation during an EA, and promote communication and cooperation with Aboriginal peoples, including First Nations, Inuit and Métis. The Act requires that the Agency provide the public with an opportunity to participate in the EA and an opportunity to comment on the draft EA report. Proponents are required to engage with Aboriginal people and groups that may be affected by the project, or that have potential or established Aboriginal and Treaty rights and related interests in the project area, as early as possible in the project planning process.

Information gathered through the EA process and associated engagement by the Proponent and consultation by government with Aboriginal peoples is used to inform decisions under *CEAA*, *2012*. This information also informs the Crown's understanding of the potential adverse impacts of the Project on potential or established Aboriginal or Treaty rights and related interests, and the effectiveness of measures proposed to avoid or minimize those impacts.

CEAA, 2012 provides statutory timelines for completion of an assessment. **Figure 3.2-1** illustrates the steps and timelines that apply to the Project under the standard EA process. The process stipulates a maximum of 365 days for the different steps required by the Agency during the EA process. The Minister may extend the EA timelines for up to three months to enable cooperation with another jurisdiction or because of circumstances that are specific to the Project. The federal Cabinet can extend timelines beyond the three months.

With respect to the Project, the Agency determined an EA is required for the Project on 20 December 2012 (Agency, 2013a). The federal departments involved in the EA review are listed in **Table 3.2-1**.

Federal policies and other initiatives were considered in the EA. The federal *Fisheries Act* requires that projects avoid causing serious harm to fish unless authorized by the Minister of DFO. Guidance relating to the *Fisheries Act* is provided by the Fisheries Protection Policy Statement (Government of Canada, 2013). The Aquatic Resources Management Plan (ARMP) (**Section 12.2.1.18.4.2**) is consistent with the objectives of this policy and requirements of the *Fisheries Act*.

The Federal Policy on Wetland Conservation (Government of Canada, 1991) has been considered for the preparation of a conceptual wetlands mitigation and compensation plan.

The Southern Mountain caribou population is protected under the *Species at Risk Act* (*SARA*) (Government of Canada, 2002), and a Caribou Recovery Strategy for the Woodland Caribou, Southern Mountain Population (*Rangifer tarandus caribou*) in Canada was finalized in 2014



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(Environment Canada, 2014), which has been considered in the effects assessment for caribou (Section 5.4.11).

Table 3.2-1: Federal Departments involved in the Environmental Assessment

Federal Department/Agency	Role
Transport Canada	In possession of specialist or expert information or knowledge with respect to the Project; regulatory and statutory duties in relation to the Project
Fisheries and Oceans Canada	In possession of specialist or expert information or knowledge with respect to the Project; may have regulatory and statutory duties in relation to the Project
Health Canada	In possession of specialist or expert information or knowledge with respect to the Project
Canadian Environmental Assessment Agency	Responsible for administering the federal EA process and promoting policies and practices
Environment Canada	In possession of specialist or expert information or knowledge with respect to the Project; has regulatory and statutory duties in relation to the Project
Major Projects Management Office	Provides oversight and advice throughout the federal EA to ensure adherence to service standards and roles and responsibilities of all parties
Natural Resources Canada	In possession of specialist or expert information or knowledge with respect to the Project; has regulatory and statutory duties in relation to the Project
Aboriginal Affairs and Northern Development Canada	Has advisory responsibilities with regard to approach to Aboriginal consultation



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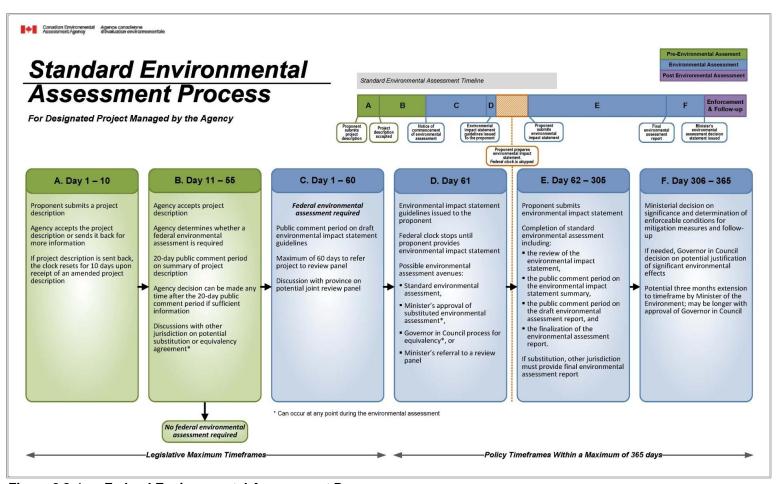


Figure 3.2-1: Federal Environmental Assessment Process



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3.2.1 EIS Guidelines

The terms of reference for the EIS are prepared by the Agency and issued to a proponent as EIS Guidelines, following a public comment period. The purpose of the guidelines is to identify the information requirements for preparing the EIS for a designated project. The EIS Guidelines for the Project were issued by the Agency on 19 February 2013 (Agency, 2013b).

3.2.2 Federal Milestones

The Project has accomplished the following milestones in the federal process:

- **24 October 2012**. Proponent submitted the Project Description and a Summary Project Description to the Agency.
- **5 November 2012**. The Agency issued a letter (i.e., File No. 005361) notifying the Proponent that the Project meets the definition of a designated project under *CEAA*, 2012 and the submitted Project Description meets the requirements of the *Prescribed Information for a Description of a Designated Project Regulations* under *CEAA*, 2012.
- **4 November 2012**. The Agency invited public comments on the Project Description and the summary Project Description.
- 20 December 2012. The Agency determined a federal EA is required and issued a
 Notice of Environmental Assessment Determination. At the same time, draft EIS
 Guidelines were issued for public comment.
- 19 February 2013. The Agency released the final EIS Guidelines (Agency, 2013b) for the Project and, in its letter of transmittal, confirmed that the Project would not be referred to a review panel and the Agency would conduct the assessment.
- **20 February 2013**. The Agency announced that participant funding was available for the Project review.
- **16 May 2013**. The Agency announced an allocation of \$198,637 in federal participant funding to eight Aboriginal groups.

3.3 Aboriginal Groups Information Distribution and Consultation

This section identifies Aboriginal groups consulted, summarizes information dissemination and consultation activities undertaken, and presents key issues raised during the Pre-Application stage. This section also proposes a plan for consulting with Aboriginal groups during the Application review stage.

A more detailed discussion of consultation activities undertaken with Aboriginal groups is provided in **Part C** of the Application. **Section 15** presents the information obtained through consultation on Aboriginal rights and interests for each Aboriginal group and describes the measures proposed to avoid or mitigate potential and/or adverse effects on Aboriginal rights and interests. **Section 16** presents information obtained from consultation on other Aboriginal interests and the measures



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proposed by the Proponent to avoid, mitigate (or enhance where applicable) related effects on these interests. **Section 17** presents a detailed description of consultation activities undertaken with each Aboriginal group while **Section 18** summarizes the potential effects of the Project on Aboriginal rights and interests and proposes commitments to address these effects.

In April 2011, following acquisition of the Project, the Proponent began communications with potentially affected Aboriginal groups. Pre-Application consultation focused on having early discussions with Aboriginal groups and ensuring that each group is engaged in the Project in a way that is respectful and meaningful. Pre-Application consultation focused on obtaining information related to Aboriginal use of the Project area, interests of Aboriginal groups that may be affected by the Project, as well as any concerns or comments about the Project. An overview of each Aboriginal group within the scope of the Proponent's consultation activities is provided in **Part C** of the Application, which includes a background section describing each Aboriginal group.

Although the duty to consult with Aboriginal groups lies with Crown agencies responsible for regulatory approvals, the BC EAO delegates certain procedural aspects of consultation to proponents. The section 11 Order issued on 9 July 2013 identifies Aboriginal consultation requirements. Schedule B of the Order directs the Proponent to consult with the following Aboriginal groups:

- Lhoosk'uz Dene Nation (LDN);
- Nadleh Whut'en First Nation (NWFN);
- Saik'uz First Nation (SFN);
- Stellat'en First Nation (StFN); and
- Ulkatcho First Nation (UFN).

The EIS Guidelines require the Proponent to engage with Aboriginal groups whose potential or established Aboriginal rights and Treaty rights and related interests may be affected by the Project, which include at a minimum the groups listed above and the Métis Nation British Columbia (MNBC). The EIS Guidelines require a summary of available information on the potential or established Aboriginal and Treaty rights and related interests of all the named Aboriginal groups that have the potential to be adversely impacted by the Project.

Schedule C of the Order identifies Aboriginal groups that are to be provided with notification of, and relevant information pertaining to, key Project milestones. These groups include:

- Nazko First Nation (NFN);
- Skin Tyee Nation (STN); and
- Tsilhqot'in National Government (TNG).

In addition to engaging with the Aboriginal groups identified above, the Proponent has provided information on the Project to the:



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- Burns Lake Band;
- Cheslatta Carrier Nation;
- Esdilagh, Tsi Del, Xeni Gwet'in and Toosey First Nations; and
- Yunesit'in Government.

The Proponent also engaged in discussions with the Carrier Chilcotin Tribal Council (CCTC) and the Carrier Sekani Tribal Council (CSTC). The CSTC provides political and technical support to eight First Nations belonging to the CSTC, including the NWFN, SFN, and StFN. The CCTC provides support services to four communities, including the LDN and UFN.

3.3.1 Pre-Application Consultation

This section describes Aboriginal consultation undertaken during the Pre-Application stage. The objectives of the Proponent's Aboriginal Consultation Program are to:

- Identify and understand Aboriginal groups' rights and interests the Project could potentially affect;
- Identify how Aboriginal groups wish to be consulted on an ongoing basis;
- Provide Aboriginal groups with timely and credible information on the Project and ensure meaningful discussion occurs;
- Fulfill section 11 Order directives and the AIR;
- Seek Aboriginal groups' input into Project design and environmental studies;
- Seek Aboriginal groups' input into culturally appropriate approaches to mitigation or avoidance measures; and
- Discuss ways to avoid, reduce, or mitigate potential adverse effects of the Project on Aboriginal rights and interests and to identify ways to optimize potential benefits.

These objectives aim to ensure meaningful input from Aboriginal groups included in the design of mitigation and avoidance measures and to identify ways to optimize benefits for Aboriginal groups.

3.3.1.1 Aboriginal Groups Consultation Plan

The Aboriginal Groups Consultation Plan (AGCP) is required by Part G, subsection 11.1.2 of the section 11 Order issued by the BC EAO in July 2013. A copy of the AGCP is presented in **Appendix 3.3.1A**. A draft AGCP was provided to each of the Schedule B Aboriginal groups on 25 October 2013 for review and comment, along with a request for a meeting to discuss the AGCP. For those groups that did not respond to the letter, follow-up letters were sent two weeks later requesting a meeting to discuss the plan. **Table 3.3-1** summarizes feedback provided by the Aboriginal groups.



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Table 3.3-1: Summary of Feedback Received from Aboriginal Groups on the AGCP

Aboriginal Group	Feedback Received
LDN	Comments were received electronically from LDN representatives. One change was made regarding the role of the CCTC.
NWFN	Two letters were sent to NWFN requesting a meeting to discuss the AGCP. No responses were provided by the time of writing and no comments were received on the AGCP.
SFN	Two letters were sent to SFN requesting a meeting to discuss the AGCP. No responses were provided by the time of writing and no comments were received on the AGCP.
StFN*	Comments were received electronically from StFN representatives and related primarily to the lack of a capacity agreement and overall effect on participation in the EA process. Changes were made to the AGCP, as appropriate.
UFN	Teleconference was held between the Proponent and UFN Chief and Council representative. During the meeting, one change to the AGCP was requested regarding the role of CCTC. Change was made to the AGCP.

Note: *StFN was provided with a draft AGCP for review in 22 October 2013.

A final version of the AGCP was provided to the BC EAO on 20 January 2014. In addition, the Proponent provided BC EAO with a summary of the efforts made to obtain comments on the AGCP (including those groups that had yet to provide feedback), comments received, and changes made to the AGCP based on the comments. The AGCP was finalized and approved by BC EAO in May 2014.

The Proponent provided the BC EAO with a summary of the efforts undertaken to consult with NWFN on 6 May 2014. The Proponent emailed the BC EAO on 16 June 2013 to advise that the parties were making progress with respect to their discussions on the Project. In October 2013, the Proponent provided NWFN with a draft AGCP and a Consultation Report outlining the project-related concerns raised to date by NWFN.

Detailed information related to the AGCP and efforts made to obtain input from Aboriginal groups are presented in **Appendix 3.3.1A** including:

- Annex 1: Approved AGCP (May 2014) addressing comments from Aboriginal Groups and BC EAO; and
- Annex 3: Draft AGCP (January 2014), including "Appendix A" comments received on the AGCP from Aboriginal groups (and Consultation Reports) and how comments were incorporated into the documents.

A summary of the Proponent's communications with Aboriginal groups is included in **Section 17**, **Appendix 17A**.



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The following sections present an overview of how the requirements defined by the AGCP were executed during the Pre-Application stage. Further detail with regards to consultation for each Aboriginal group is provided in **Section 17**.

3.3.1.2 Aboriginal Consultation Reports

Pursuant to Part G, subsections 11.1.5 and 11.1.6 of the section 11 Order, the Proponent prepared draft "summary of consultation activities" (consultation reports) summarizing the consultation activities undertaken with each Schedule B Aboriginal group. The consultation reports outlined consultation activities conducted with each Aboriginal group and described the key Aboriginal interests, concerns, and issues raised by each group. The reports also identified how the Proponent would respond to issues raised by Aboriginal groups and proposed a consultation process for the Application review stage. On 25 October 2013, the draft consultation reports were provided to each Schedule B Aboriginal group for review and comment along with a request to meet and discuss the report. For those groups that did not respond, follow-up letters were sent two weeks later requesting a meeting to discuss the report. **Table 3.3-2** summarizes input provided by the Aboriginal groups.

Table 3.3-2: Summary of Feedback Received from Aboriginal Groups on the Consultation Reports

Aboriginal Group	Feedback Received
LDN	Comments were received electronically from LDN representatives. As requested, one editorial change was made regarding the name listed for the New Gold Project engineer and it was noted that the description of consultation activities were consistent with LDN's recollection.
NWFN	Two letters were sent to NWFN requesting a meeting to discuss the consultation report. No responses were provided and no comments were received on the report.
SFN	Two letters were sent to SFN requesting a meeting to discuss the consultation report. No responses were provided and no comments were received on the report.
StFN*	Comments were received electronically from StFN representatives and related primarily to the lack of progress made on a capacity funding agreement and relationship development. Changes were made, as appropriate.
UFN	Teleconference was held between the Proponent and UFN Chief and Council representative. During the meeting, changes were made to the UFN interests/concerns table including the addition/clarification of medicinal plants and potential effects to cabins and artifacts.

Note: *StFN was provided with a draft AGCP for review in 22 October 2013.

Consultation reports, including documentation that explains how comments received from Aboriginal groups were addressed, were provided to BC EAO on 20 January 2014. The feedback received from Aboriginal groups was incorporated into the consultation reports (and subsequently the Application) and final reports were distributed to Schedule B First Nations (**Appendix 3.3.1A**).



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Consultation reports were provided to Schedule B Aboriginal Groups again in April and May 2014 including a description of consultation activities to be executed prior to the submission of the Application. At that time, no new concerns or interests were identified.

On 12 November 2014 the Proponent provided Aboriginal group-specific consultation reports summarizing consultations undertaken by the Proponent between May and November 2014 with LDN, NWFN, SFN, StFN, and UFN to each group (**Appendix 3.3.1B**). These reports built on the letters the Proponent sent on 16 September 2014, which outlined consultation activities to date and proposed further consultation. NWFN provided comments on the NWFN report to the BC EAO on 8 December 2014. In their comments, the NWFN requested a revision to the description of the 4 July 2014 and 27 October 2014 meetings in the report, and indicated there were insufficient resources to conduct a Traditional Knowledge/Traditional Land Use (TK/TLU) study, and a lack of resources and consultation to determine potential adverse effects and proposed mitigation measures including accommodation.

3.3.1.3 Information Distribution and Consultation Methods

The Proponent is committed to open and transparent communication with Aboriginal groups. The following methods have been employed during the Pre-Application stage:

- Project Website. The Project website
 (www.newgold.com/properties/projects/blackwater) was launched in 2012 to keep people
 informed about the Project and provide timely Project information. It provided a range of
 information to the public including comprehensive Project information, contact
 information, consultation opportunities, and newsletters, a description of the EA process,
 and any related updates, Frequently Asked Questions (FAQs) and answers, as well as
 copies of technical studies such as environmental baseline reports.
- Direct Communication. The Proponent directly engaged with Aboriginal groups by way
 of meetings (see description below), telephone calls, conference calls, e-mails, and
 letters. Meetings often included visual aids such as PowerPoint presentations, maps, and
 other related documentation. The meetings provided opportunities for both parties to
 share information and provide updates related to the Project, as well as discuss
 proposed agreements, employment and contracting opportunities, and TLU.
- **Site Tours**. The Proponent conducted several different types of site tours (e.g., proposed mine site, transmission line helicopter tours, operating open pit mine site, operating New Gold mine site) attended by Aboriginal groups involved in the Project.
- Community Meetings and Open Houses. The Proponent hosted community meetings and open houses to provide Aboriginal groups with information about the Project, to answer questions, and to discuss issues of importance to them.
- Meetings. The Proponent participated in a number of meetings with Aboriginal representatives since 2011, and implemented an information management system to address any comments or concerns raised during meetings. The meetings provided opportunities for both parties to share information and provide updates related to the



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Project, as well as discuss proposed agreements, employment and contracting opportunities, and TLU.

- Project Office. The Proponent opened a community office in Vanderhoof in May 2012, which is staffed with a Community Relations Manager, a First Nations Coordinator, and an Office Administrator.
- TK/TLU Studies. The Proponent actively engaged Aboriginal groups in the collection and documentation of TLU. As part of this, the Proponent provided capacity funding to the LDN, SFN, STN, StFN, and UFN to complete TLU studies,
- Working Group. The Proponent and Aboriginal groups also participated in the BC EAOled Working Group process.

3.3.1.4 Consultation Activities Conducted

This subsection provides information on consultation conducted with Aboriginal groups pursuant to the BC EAO-approved AGCP. Additional consultation conducted with Aboriginal groups from May 2014 to November 2014 is summarized in **Appendix 17A** (Summary of Communications with Aboriginal Groups) and additional comments raised are included in **Appendix 3.3.1B** Aboriginal Groups Consultation Reports (November 2014). The Issues Tracking Table presented in **Appendix 3.1.3B** was updated to reflect issues presented in **Appendix 3.3.1B** Aboriginal Groups Consultation Reports.

The Proponent began engaging Aboriginal groups in April 2011, following the acquisition of the Project. The Proponent contacted all Aboriginal groups listed in **Section 3.1.1.** In June 2011, an outreach program was established to raise the level of awareness and understanding of the Project within the Aboriginal communities that may be potentially affected by the Project. This outreach program included presentations to Aboriginal leadership, production and distribution of newsletters, open house events, site tours, and individual and community meetings. The following list presents the consultation conducted with Aboriginal groups during the Pre-Application stage:

- Project Presentations to Aboriginal Leadership. The Proponent delivered regular Project presentations to Aboriginal leadership. To date, over 45 presentations have been given. Presentations have focused on:
 - Discussing potential Project effects on Aboriginal rights and interests and proposed mitigation and management measures to address those effects;
 - o Gathering information on Aboriginal interests, including any concerns;
 - Providing information about the Project, including updates or changes;
 - o Providing information on employment, training, and contracting opportunities;
 - o Providing information on the provincial and federal EA processes; and
 - o Furthering development of relationships with Aboriginal leadership.
- **Meetings**. The Proponent met with Aboriginal groups and individuals to provide Project updates and to address any comments or concerns about the Project. To date, over 150 in-person meetings have been held with Aboriginal representatives, leadership,



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registered trapline holders, and Elders. These meetings included discussions regarding TLU, proposed agreements, and employment opportunities. Some meetings were also attended by community knowledge holders whom provided TK/TLU information.

- Joint Implementation Committees. The Proponent has implemented two separate
 Joint Implementation Committees (JICs) with LDN and UFN to provide Aboriginal
 representatives with a collaborative forum for open and frank dialogue relating to
 implementing agreements the Proponent has with Aboriginal groups. Meetings occur
 quarterly. To end of the first quarter of 2014, eight JIC meetings have been held, four
 with LDN and four with UFN.
- Community Meetings/Open Houses. The Proponent hosted and/or attended community meetings and open houses to provide Aboriginal groups with information about the Project, answer questions, and discuss issues of importance.
- Effects Assessment Meetings. The Proponent met with Aboriginal groups and representatives to review the results of the effects assessments and obtain input into proposed mitigation. These meetings also provided Aboriginal groups with an explanation of:
 - How information they provided through the consultation process had been addressed, and
 - Proposed commitments and design-related decisions that have been made as a result of their input into EA process.

Table 3.3-3 shows the effects assessment meetings held:

Table 3.3-3: Effects Assessment Meetings

Aboriginal Group	Meeting Date
Lhoosk'uz Dene Nation	21 March 2014
Saik'uz First Nation	18 March 2014
	17 June 2014
Stellat'en First Nation	17 March 2014
	26 June 2014
Ulkatcho First Nation	6 March 2014
	27 March 2014

The Proponent invited the NWFN to discuss the results of the effects assessments and obtain input into the proposed mitigation. In addition, the Proponent requested participation and input from NWFN with respect to the socio-economic study. As of the first quarter of 2014, requests for such meetings were unsuccessful. Since that time, the Proponent has provided initial capacity funding to NWFN which enabled it to secure technical advisors for the Project and the associated documentation. The Proponent continues to engage the NWFN regarding further capacity funding for the EA process.



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Additional details about effects assessment meetings with Aboriginal groups are provided in **Section 17**.

Feedback and input into project design and environmental studies. The Proponent incorporated Aboriginal groups' input into the EA and Project design, where possible and practical, and addressed any issues, interests and concerns through avoidance, mitigation, or management, as appropriate. In response to concerns raised by Aboriginal groups and other stakeholders, the following changes were made:

- Designing the Project, including on-site and off-site infrastructure, to avoid the
 Blackwater River drainage. The Blackwater River is a tributary of the Fraser River and is
 of importance to Aboriginal groups in the area. Historically, the Carrier and Tshilqot'in
 peoples used the area to transport goods for trade along the historic Grease Trails.
 Specifically, all Project components were moved outside of the Blackwater River
 drainage. This included the addition of saddle dams on the western edge of the Tailings
 Storage Facility (TSF) to contain this facility entirely within the Davidson Creek
 catchment and prevent effects on the Ungulate Winter Range (UWR).
- Designing the Project and its infrastructure to avoid the UWR which is the winter habitat for the Tweedsmuir-Entiako Caribou herd. UFN and other First Nations expressed concern about the potential for the Project to affect the caribou herds. Based on discussions, the Proponent designed the Project to avoid the UWR. Specifically, the TSF was designed to have the western tailings dams placed outside of the UWR to prevent any drainage of the TSF into the UWR. The Proponent will discontinue the use of the existing exploration road, which passes through UWR; a new access to the mine site is proposed. Access to the mine site will not be from the west but from the north starting at KM 124.5 of the Kluskus FSR.
- Designing the Project to avoid the lower reaches of Davidson Creek. Based on research
 and input from Aboriginal groups, the Proponent understood that fisheries values were
 higher in the lower reaches of Davidson Creek where Kokanee salmon spawning occurs.
 Specifically, seepage collection systems (cut-off ditch and recovery wells) as well as
 other contingencies were built into the design to specifically avoid impacts to the lower
 reaches of Davidson Creek.
- Designing the Project to avoid historic trails and culturally important areas. Existing
 historic areas were identified in proximity to the Project, including the Alexander
 Mackenzie Heritage Trail, Messue Wagon Trail, and Messue Horse Trail/Kluskus
 Bypass. Culturally important areas such as a fish camp were also identified nearby.
 Aboriginal groups in the area noted these are of historic and cultural importance and are
 still used by members today (particularly LDN people). Specifically, the access road and
 water pipeline from Tatelkuz Lake were moved to avoid sensitive areas.
- The Proponent engaged with the UFN and supplied capacity funding for completion of caribou studies including the completion of A Caribou Habitat Supply Report by UFN's consultant that was considered for the effects assessment for caribou.



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- The draft Wildlife Management Plan (WLMP) was provided to Schedule B First Nations for input on 15 May 2014 (see consultation in Appendix 17A). Consultation with UFN and LDN informed aspects of the proposed WLMP. Community members identified concerns about declining numbers of caribou, the impact of wolves, and the impacts on caribou movement, which occurs seasonally between Moose Lake and Tweedsmuir Park, west of the mine site. In determining potential Project effects, habitat suitability modelling was conducted with input from provincial and federal agencies and Aboriginal groups.
- In order to prepare the Fisheries Mitigation and Offsetting Plan (FMOP, Appendix 5.1.2.6C), interviews with Aboriginal groups and traditional use studies were initiated to define the location and extent of Aboriginal fisheries near the Project area. In September 2013, offsetting measure options were discussed with the SFN. Discussion included possible projects that are of interest in the SFN.
- Comments from Aboriginal groups have been considered with respect to the assessment
 of alternatives for the TSF presented in Appendix 2.5A of the Application and the
 assessment of alternatives for mine waste disposal.
- As described in the Assessment Methodology (Section 4) and in the Identification for Selection of Valued Component Sections (Section 5.2.1, 5.3.1, 5.4.1, 6.2.1, 7.2.1, 8.2.1, and 9.2.1) the selection of VCs for the EA includes an issues scoping process through which available information is compiled and analyzed in consultation with Aboriginal groups to identify an initial list of issues. In part, candidate VCs were identified through Aboriginal groups and were further refined throughout the AIR process; for example beaver was added as an indicator for furbearers as a response to feedback from LDN on the draft AIR.
- Site Tours. To the first quarter of 2014, the Proponent hosted over 12 site tours with
 members from the LDN, UFN, SFN, NWFN, and individual trapline holders. Collectively,
 over 35 people from these communities have participated in these site tours, conducted
 both on the ground and by helicopter. Invitations to participate in site tours have been
 extended to other Aboriginal groups. In addition, site tours were conducted with
 representatives of NFN (31 July 2014) and TNG (1 August 2014).
- Minerals and Mining Education. The Proponent supported delivery of educational courses to SFN and NFN. The training (i.e., Mine Training 101) was delivered by the British Columbia Institute of Technology and funded by the Proponent. The course was delivered on reserves. It provided community members with a detailed introduction to the mining process, from exploration through EA, construction, operations, and reclamation. The purpose of the course was to ensure that community members were informed of the mining process, thereby improving informed decision making in the communities.
- **TK/TLU Studies**. The Proponent has actively engaged with Aboriginal groups in collecting and documenting TLU. The Proponent has implemented the following approaches to consider TK/TLU information:



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- Funding TK/TLU-related studies for Aboriginal groups and collecting associated TK/TLU information directly where possible;
- Literature reviews;
- o Focus groups and one-on-one interviews with knowledge holders;
- Interviews with Aboriginal trapline holders;
- Site tours with key community representatives including knowledge holders;
- Community meetings; and
- o Informal discussions.
- The collection and integration of TK/TLU information into the Project design, Environmental Management Plans (EMPs), Project permitting, and ongoing monitoring during construction, operations, and closure is considered integral to Project development by the Proponent.
- TK/TLU information provided input into culturally sensitive approaches to mitigation or avoidance measures and assisted in the assessment process by identifying relevant potential effects, and provided insight as to how potential effects can be avoided, mitigated or managed, and, if necessary, accommodated. While the Proponent has endeavoured to gather TK/TLU information from all potentially affected Aboriginal groups, negotiations on sharing this information are at different stages. The Proponent has provided funding to the LDN, SFN, StFN, UFN, and STN to complete TK/TLU studies. Information from ongoing TK/TLU studies when completed will be integrated into the Project design, execution, management plan development, Project permitting and monitoring in subsequent stages of the Project development including the Application review stage, the permitting phase, and the Project construction, operations, closure, and post-closure phases. TK/TLU studies from UFN and LDN have been made available to the Proponent and were used for the effects assessment of the Project. Further information on integration of TK/TLU information is provided in Section 17.

Where available, traditional ecological or community knowledge has been described in the baseline section under each VC.

Project Updates and Correspondence. The Proponent has provided Aboriginal groups with information and updates about the Project on a regular basis and/or when important Project milestones occurred (as appropriate), using various means including newsletters, e-mails, and meetings. The Proponent developed and is maintaining a website that includes information on topics such as a Project overview, the EA process, the environment, which includes status of and access to baseline studies, community initiatives (including its work with Aboriginal groups), sustainability, the mine plan as well as a media section. Within the main links there are sub-links that allow users to sign up to receive Project updates, and to review baseline reports and press releases. There is also a link to documents such as the section 11 Order and EIS Guidelines. When requested, the Proponent also provides copies of materials such as baseline studies directly to the requesting Aboriginal group. Contact information, including e-mail and phone options, are provided as a FAQ section that provides information on many topics important to Aboriginal groups.



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Socio-economic Initiatives and Economic Opportunities. The Proponent continues to work closely with Aboriginal groups to identify economic, contracting and employment opportunities, and to develop a robust approach to provide socio-economic benefits to Aboriginal groups potentially affected by the Project. A major focus is on providing employment and economic opportunities to Aboriginal communities. For example, the Proponent is working with local Aboriginal groups to increase the participation of Aboriginal-owned businesses in the provision of goods and services for the Project, and the provision of training and employment opportunities. During exploration, between 20% and 25% of the total workforce was Aboriginal. This has been achieved through close cooperation with Aboriginal communities.

In addition, the Proponent has:

- Provided funding for Drill Core Technician/Field Exploration programs;
- Hosted NFN youth from the BladeRunners employment program;
- Provided a number of contracting opportunities to Aboriginal businesses;
- Organized meetings between key Aboriginal representatives and the Proponent's Human Resources Manager and Project Engineer Manager to ensure communities were informed regarding upcoming employment and contracting opportunities; and
- Opened a Project Office in Vanderhoof where applicants are encouraged to drop off applications.

Training. Training to prepare Aboriginal staff for employment during Project construction and operations was explored with regional Aboriginal training institutions and local Aboriginal groups. In addition, the Proponent encouraged Aboriginal groups to participate in the socio-economic studies through interviews and focus groups.

Participation in the Blackwater Project EA Working Group. In April 2013, the BC EAO established the Blackwater Project Working Group to meet during the Pre-Application stage of the EA process to provide technical advice to BC EAO with respect to concerns and information requirements related to the EA. Schedule B Aboriginal Groups were invited to participate in the Working Group, including LDN, NWFN, SFN, StFN, and UFN.

The AIR Issues Tracking Tables presented in **Appendix 3.1.3A** identify comments provided by Working Group members during the review of the draft AIR, and how comments were addressed.

In addition, representatives of Aboriginal groups attended meetings with government stakeholders and agencies about specific topics of the EA such as the following:

- On 3 September 2013, the Proponent discussed the FMOP with SFN.
- On 31 October 2013, the Proponent presented preliminary results of the water quality effects assessment to government stakeholders and the LDN.



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- On 12 December 2013, the Proponent met with regulators, resource managers, and the LDN to discuss the fish habitat evaluation and instream flow.
- On 14 February 2014, the Proponent met with government stakeholders and the UFN to discuss the caribou recovery strategy. A strategy overview, current caribou count data, habitat mapping, work concluded to date and future plans were discussed. Several action items were noted and tasked to specific stakeholders. This included a determination of the information that would be required for the EA.
- On 4 March 2014, a presentation on the groundwater effects assessment was provided to government stakeholders and the LDN. Site characterization, groundwater quality, groundwater flow, and effects predictions were discussed.

Archaeological Assessment. The Proponent actively worked with Aboriginal groups to gain their participation in the Archaeological Impact Assessment (AIA) and its report to ensure appropriate cultural engagement throughout the AIA process. Aboriginal group members have been employed in the fieldwork required to complete the AIA.

3.3.1.5 Summary of Issues and Concerns by Aboriginal Groups

The Aboriginal Issues Tracking Table included in **Appendix 3.1.3B** presents a list of comments and concerns raised by Aboriginal groups as well as responses to the comments and status of resolution. Issues raised by Aboriginal groups as members of the Working Group and in relation to the draft AIR are presented in **Appendix 3.1.3A**.

Table 3.3-4 provides an overview of the key comments, issues, interests, and concerns raised by Aboriginal groups. Commitments and/or responses resolution are also described. Effects of the Project on the Aboriginal activities and specific commitments to address these effects are provided in **Part C**.

Primary concerns and comments raised by Aboriginal groups related to potential effects on:

- Archaeology and heritage;
- Business and contracting opportunities;
- Employment;
- Human health;
- Increased access;
- Increased traffic;
- Mine closure;
- Mine design;
- Aboriginal rights and title;
- Socio-economic conditions;



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- Training;
- Transmission line;
- Vegetation;
- Water resources and aquatics; and
- Wildlife.

Socio-economic benefits were also raised primarily regarding employment and contracting opportunities.





Table 3.3-4: Key Comments and Concerns Expressed by Aboriginal Groups and Responses

Category	Issues/Concerns/Interests	Proponent Response
	Effects on trapline holders	The Proponent met with holders of provincially registered traplines in the mine site area.
		The Proponent has proposed the following measures to mitigate potential effects on registered traplines: • Project designed to minimize the total footprint area.
		• Establish an Access Management Working Group with Aboriginal representatives and key stakeholders to discuss access management for the transmission line corridor and the mine site.
		Compensate affected registered trapline holders in accordance with industry and provincial protocols with associated proof of lost revenue.
		Communicate information to affected trapline holders about project activities, including timing.
		Locate and maintain breaks in the rollback to facilitate access to trapping trails during clearing activities.
		Dispose of wastes generated on site to limit the attraction of wildlife to the mine site (Industrial and Domestic Waste Management Plan).
		Implement design and operational procedures to limit risks associated with malfunctions and accidents.
		Prohibit mine employees from trapping, hunting or fishing on mine site property.
		 Implement the respective Environmental Management Plans, addressing air quality and emissions management; transportation and access management; landscape, soils, and vegetation management and restoration; and wildlife management.
		Engage First Nations, where appropriate in on-going environmental monitoring of exploration activities.
		• Implement a TK/TLU Committee with participation of Aboriginal groups potentially affected by the Project to monitor that commitments made by the Proponent in regards to TK/TLU are being complied with.
		Effects on wildlife, including species that are trapped, have been assessed and the results as well as mitigation measures are presented in Section 5.4.7 to 5.4.15 . The Environmental Management Plans in Section 12.2 address wildlife management. A Reclamation and Closure Plan will be implemented as described in Section 2.6 . Section 7.2.6 presents the effects assessment that considers the interaction of the Project footprint and activities with Non-Traditional Land and Resource Uses, including registered traplines. Section 7.2.7 presents the effects assessment on Current Land and Resource Use for Traditional Purposes and describes potential effects on hunting and trapping activities including restrictions on access. Effects on Aboriginal rights are assessed in Section 15 and effects on other Aboriginal interests are assessed in Section 16 .
		Meetings were held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, input provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.
	Effects on caribou herds and the UWR	Tailing Storage Facility and access road to mine redesigned to avoid UWR.
Wildlife		The Caribou Sub-working Group met to review baseline and assessment methods.
		Develop mitigation and avoidance strategies through ongoing discussions with the Caribou Sub-working Group. Participate in regional wildlife and recovered properties the form of the control of th
		 Participate in regional wildlife and resource management initiatives (specifically for ungulates). Setting reclamation goals to re-establish later winter habitat.
		 Minimize ground disturbance and damage to vegetation in areas adjacent to footprints by flagging or fencing of sensitive habitats.
		Modify the timing of clearing trees in lichen conifer forest habitat where caribou may feed.
		Implement progressive reclamation using local native vegetation wherever possible.
		Restore disturbed habitats at mine closure or development of habitats capable of supporting caribou.
		Implement caribou awareness and protocols in regular safety and environmental orientations performed by the Project.
		Implement invasive plant management techniques as defined in the Invasive Species Management Plan.
		Implement dust control measures as defined in the Air Quality and Emissions Management Plan.
		Enforce speed limits along mine access roads and implement best management practices for road maintenance to reduce potential wildlife collisions. Partition of the collision of the collis
		 Prohibit mine employees from hunting on mine site property. Implementation of the Environmental Management Plans addressing wildlife management; transportation and access management; and landscape, soils, and vegetation management and
		restoration. Implement a TK/TLU Committee with participation of the Aboriginal Groups on which territories the Project is located to monitor that commitments made by the Proponent in regards to TK/TLU are being complied with
		 are being complied with. Establish an Access Management Working Group with key stakeholders and potentially affected Aboriginal representatives to discuss access management for the transmission line corridor and the mine site.
		The Proponent also provided funding to UFN to conduct caribou calf surveys. Effects on caribou will be managed according to provincial standards and best practices in accordance with the environmental management plans presented in Section 12.2 (Caribou management is discussed in a subsection of the Wildlife Management Plan Section 12.2.1.18.4.6.17 – Group Specific Management, Caribou Conservation). Environmental management plans also address issues such as the potential for road kill, displacement, and increased mortality due to enhanced predator, and hunting restrictions to employees.
		In addition to wildlife management, including caribou management, the environmental management plans also address: transportation and access management; landscape, soils, and vegetation management and restoration; and invasive species management (Section 12.2).
		The detailed effects assessment on caribou is presented in Section 5.4.11 and potential Project effects on Aboriginal rights are presented in Section 15 .



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Category	Issues/Concerns/Interests	Proponent Response
		The Wildlife Management Plan, in draft, was provided to First Nations to encourage feedback into the mitigation proposed. Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.
	Effects on bear populations	Section 12.2 presents environmental management plans that address wildlife management, industrial and domestic waste management, and transportation and access management. A Reclamation and Closure Plan is presented in Section 2.6 that describes how wildlife habitat will be reclaimed. Effects on Aboriginal rights including hunting and trapping are described in Section 15. The wildlife management plan was provided to Schedule B First Nations on 15 May 2014 for input and discussion. A number of measures will be implemented to minimize or avoid effects on bear populations: Prohibit mine employees from hunting on mine site property. Redesign the TSF and mine access road to avoid UWR. Set reclamation goals to re-establish later winter habitat. Dispose of wastes generated to limit the attraction of wildlife. Participate in regional wildlife and resource management initiatives. Implement the respective Environmental Management Plans addressing Wildlife Management; Landscape, Soils, and Vegetation Management and Restoration; industrial and domestic waste management, and Transportation and Access Management. Implement a TK/TLU Committee with participation of the Aboriginal Groups on which territories the Project is located to monitor that commitments made by the Proponent in regards to TK/TLU are being complied with. Establish an Access Management Working Group with key stakeholders and potentially affected Aboriginal representatives to discuss access management for the transmission line corridor and the mine site. Section 2.2.1.18.4.14 Transportation and Access Management Plan Subsection 12.2.1.18.4.14.7 also describes additional consultation to take place with respect to design and implementation of the final plan. The Wildlife Management Plan, in draft, was provided to First Nations to encourage feedback into the mitigation proposed. Meetings were also held with First Nations to discuss the results of
		effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.
	Consideration of wildlife movement, effects and mortality as t moose population is decreasing	The effects assessment on moose is presented in Section 5.4.10 . This assessment considers barriers to wildlife including the roads developed as part of the mine and their potential effects on wildlife movements. The effects assessment also takes into account disturbance of daily or seasonal wildlife movements (e.g., migration and home ranges), which would include potential hazards and conflicts associated with mine access and travel corridors of moose.
		 The Proponent has implemented a number of measures within Project design aimed at avoiding and/or mitigating loss and degradation effects to wildlife and wildlife habitat including: Participate in regional wildlife and resource management initiatives (specifically for ungulates). Prohibit mine employees from hunting on mine site property. Implement the respective Environmental Management Plans, addressing wildlife management; landscape, soils, and vegetation management and restoration; and transportation and access management. Issues such as road kill, displacement, and an increase in mortality due to increased predator access will be addressed in these Management Plans. Implement a TK/TLU Committee with participation of the Aboriginal Groups on which territories the Project is located to monitor that commitments made by the Proponent in regards to TK/TLU are being complied with.
		 Establish an Access Management Working Group with key stakeholders and potentially affected Aboriginal representatives to discuss access management for the transmission line corridor and the mine site. Minimize the Project footprint. Develop mitigation and avoidance strategies through ongoing discussions with the Caribou Sub-working Group. Participate in regional wildlife and resource management initiatives (specifically for ungulates). Set reclamation goals to re-establish later winter habitat. Minimize ground disturbance and damage to vegetation in areas adjacent to footprints by flagging or fencing of sensitive habitats. Redesign the TSF and mine access road to avoid UWR. Set reclamation goals to re-establish later winter habitat.
		The Proponent will implement environmental management plans (Section 12.2), addressing: wildlife management; landscape, soils, and vegetation management and restoration; industrial and domestic waste management; and transportation and access management. Issues such as road kill, displacement, and an increase in mortality due to increased predator access will be addressed in these management plans.
		The Wildlife Management Plan, in draft, was provided to First Nations to encourage feedback into the mitigation proposed. Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.



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	Effects on Tatelkuz Lake water quality and quantity and related	The effects assessment on fish is presented in Section 5.3.8 and on fish habitat in Section 5.3.9.
	effects on fish and fish habitat	Variations in Tatelkuz Lake levels caused by the Project are anticipated to fall within the range of natural and historic lake level fluctuations. Therefore, Tatelkuz Lake will experience negligible effects. It is anticipated that water withdrawal from Tatelkuz Lake will not cause significant adverse effects on lake habitat or aquatic life.
		A Health Effects Assessment, including a risk assessment, has been conducted (Section 9.2) – see also Human Health below. The Proponent will implement a Country Foods Monitoring Plan around the mine site to monitor species that represent potential pathways for metals concentrations in country foods. Metal concentrations in a set of indicator fish will be analyzed to assess levels against existing baseline levels. If metal concentrations increase to levels of concern, further consultation and planning to address necessary mitigation measures will be undertaken with regulators and First Nations.
Water Resources and Aquatics		Water Quality monitoring is ongoing and water quality results are posted as they become available. The effects assessment on surface water quality and sediment quality is presented in Sections 5.3.3 and 5.3.4 . Surface water and sediment quality will meet applicable provincial and federal standards to prevent effects on fish, furbearers, or animals that use those waters. Surface water will also be monitored on an ongoing basis throughout the life of the Project and after closure. The Project will aim to operate as a zero discharge facility during operations and closure phases. Seepage from the main dam will be captured by an ECD and pumped back to the TSF. Section 13 provides details on follow-up monitoring and compliance reporting. Section 5.3.2 provides the effects assessment on surface water flow.
Trator Hoodarood and Aquation		The Proponent has committed to maintain in stream flows requirements for fish in affected streams. Additional mitigation will include:
		 Results of all water quality sampling will continue to be posted for Aboriginal groups' review;
		 Erosion and sediment control measures, including control matting, rip-rap, and hydro-seeding will be implemented to protect erodible soils from entering waterbodies; and Establish a group including affected Aboriginal group representatives to discuss access management for the transmission line corridor and the mine site.
		Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.
	Effects on the Nechako Reservoir including water quality and fish	The drainage from the proposed mine site to the Nechako reservoir is approximately 50 km long and receives contributions from a large number of streams. The aquatic environment effects assessment is presented in Section 5.3 and shows that no effects will occur in the Nechako Reservoir as a consequence of the Project. This issue is considered resolved.
	Effects and contamination of the water system— Blackwater Drainage system and Tascha Lakes	As a result of consultation, on-site and off-site infrastructure was designed to avoid the Blackwater River drainage system which includes Tascha Lake. The Proponent understands the importance of the Blackwater Drainage system to Aboriginal groups and thus designed all infrastructures to avoid this system. This issue is consider resolved.
	Potential contamination of berry picking sites Effects on medicinal plants that may be downstream of the	The Proponent used available TK/TLU from UFN and LDN to avoid berry site areas however this TK/TLU information is confidential. The Proponent is also funding other Aboriginal groups to complete traditional land use studies. Locations of berry sites where collection takes place will be identified to determine if impacts will occur and appropriate avoidance and mitigation measures will then be developed.
	Project	TLU studies were completed by UFN and LDN. These studies identified locations of berry collection sites and this information was considered in the EA. Potential effects and mitigation and avoidance methods have been identified and will be implemented. Section 7.2.7 presents the effects assessment of Current Land and Resources Use for Traditional Purposes, which addresses changes in plant gathering activities. Section 5.4.5 presents effects on ecosystem composition and includes traditional use plant habitat as an indicator. Section 12.2 presents environmental management plans that address vegetation and invasive species management. The Proponent will work with potentially affected Aboriginal groups to avoid and/or mitigate potential effects on traditional gathering activities.
		The Proponent will also implement mitigation measures aimed at minimizing impacts to berry picking and medicinal plant gathering sites by minimizing the Project footprint and by implementing the environmental management plans to reduce dust deposition, gaseous contaminants, and invasive species proliferation. Post-closure disturbed areas will be reclaimed as described in the Reclamation and Closure Plan in Section 2.6 .
		The following measures will be implemented to minimize or avoid effects on plants and plants gathering for traditional purposes:
Vegetation		Establish a group including affected Aboriginal group representatives to discuss access management for the transmission line corridor and the mine site;
		 Minimize the Project footprint; Implement environmental management plans to reduce dust deposition, nitrogen deposition, and invasive species proliferation (Air Quality and Emissions Management Plan; Transportation and Access Management Plan; Landscape, Soils, and Vegetation Management and Restoration Plan; Invasive Species Management Plan);
		Include traditional use plant species habitat in reclamation prescriptions;
		 Implement design and operational procedures to limit risks associated with malfunctions and accidents; and Implement a no plant harvesting policy for all workers while resident at the Project site.
		The country foods monitoring plan, will engage First Nations to the degree possible
		The assessment of potential Project effects on Aboriginal rights and other interests are presented in Sections 15 and Section 16 . Section 9.2 presents the results of the Health Effects Assessment. Appendix 9.2.2B includes a Country Foods Monitoring Plan. The effects assessment on Ecosystem Composition in Section 5.4.5 includes traditional use plant habitat as an indicator. Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each



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		Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.
	Potential exacerbation of arsenic levels, which are noted to be high in some waterbodies in the area	Results from studies related to concentration of arsenic in the water downstream of the Project were provided to Aboriginal groups. Background arsenic levels are low. The Backwater mine site is designed to operate as a zero discharge facility during operations and closure, and thus will not exacerbate natural arsenic levels. During construction, sediment ponds will be used to contain and treat site run-off to reduce concentration of suspended solids. Surface water and sediment quality will meet applicable provincial and federal standards so as not to affect fish, furbearers, or other wildlife populations. The effects assessment for human health is presented in Section 9 . Appendix 9.2.2B includes a Country Foods Monitoring Plan. The effects assessment on surface water quality and sediment
Human Health		quality is presented in Section 3. Appendix 3.2.28 includes a Country 1 cous Monitoring Flat. The effects assessment of surface water quality and sediment quality is presented in Section 13 provides details on follow-up monitoring and compliance reporting.
		Additional mitigation measures are presented in Section 12.2 Environmental Management Plans, addressing mine water management, water quality and liquid discharges management, emergency and spill preparedness and response, aquatic resources management, and cyanide management. Section 10 Accidents and Malfunctions provides additional information.
		Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.
	Potential disturbances to grave sites in the area from drilling	No grave sites have been identified within the mine site.
Archaeology and Heritage		Additional details are provided in Section 8.2.2 , which addresses potential effects on archaeological sites. Section 12.2 presents environmental management plans that address archaeology and heritage resources management. Burial sites will be managed according to the standards set by the Archaeology Branch and in accordance with the preference of the local community. Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.
	Effects from cyanide	The Proponent provided a fact sheet on cyanide and cyanide management. The Project will not treat waste rock with cyanide. Waste rock from the open pit will be disposed of at the waste rock dumps located adjacent to the open pit. Only the ore will be subject of treatment using a whole ore leach process. The tailings residue of this process will be deposited in the TSF after a cyanide destruction process has been applied.
		Mitigation measures for storage of cyanide include:
		 Use of ISOtainers (i.e., containers that are dedicated to cyanide transport) that are designed for controlled dissolution upon delivery to the site; Storage at the transload facility is designed to minimize contact of solid cyanide with water (e.g., under a roof, off the ground, in specially designed containers);
		Adequate ventilation in the storage facility; Outside and the storage facility and the storage facility.
		 Containment systems in place should there be spilled cyanide materials; and Warning signs to alert workers that cyanide is present.
		Mitigation measures for the safe transport of cyanide include:
		 Cyanide off-loading and storage facilities will be located away from surface waters and within fenced and access-controlled boundaries with locked security fencing; Gas detectors in the off-loading and storage area; and Signage for workers.
Mine Design		The Proponent is a member of the International Cyanide Management Institute, adhering to the International Cyanide Management Code. The Proponent commits to have its mining operations audited by an independent third party from the Institute.
		A Health Effects Assessment has been conducted and is presented in Section 9.2 . The Proponent will implement a Country Foods Monitoring Plan around the mine site to monitor species that represent potential pathways for metals concentrations in country foods. Metal concentrations in a set of indicator plants, mammals, and fish will be analyzed to assess levels against existing baseline levels. If metal concentrations increase to levels of concern, further consultation and planning to address necessary mitigation measures will be undertaken with regulators and First Nations.
		Section 10 Accidents and Malfunctions addresses potential risks and effect associated with the use and transport of cyanide to the site. A cyanide management plan is presented in Section 12.2. Results of the assessment will be shared and discussed with interested Aboriginal groups.
		Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.



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	Effects due to acid rock drainage from exposed highwall during operations and post-closure	There is risk of ARD. Tatelkuz Lake water will continue to be pumped after closure to fill the pit as quickly as possible within the limits of allowed water withdrawal to prevent harm to fish. The accelerated flooding of the open pit will reduce the risk of generation of ARD. The flooding of the open pit is a process that will take approximately 18 years following completion of the operations phase. Once the open pit is flooded, during the post-closure phase, the mine site will discharge water back to Davidson Creek, and the water quality downstream of the mine site is expected to meet water quality objectives for the protection of aquatic life. Section 5.3.3 presents the results of the water quality effects assessment conducted for the Project. Section 12.2 presents environmental management plans that will address water quality and liquid discharges management to ensure all water leaving the mine site will meet applicable regulatory requirements.
Mine Closure		A Health Effects Assessment has also been conducted (Section 9.2). The Proponent will implement a Country Foods Monitoring Plan around the mine site to monitor species that represent potential pathways for metals concentrations in country foods. Metal concentrations in a set of indicator plants, mammals, and fish will be analyzed to assess levels against existing baseline levels. If metal concentrations increase to levels of concern, further consultation and planning to address necessary mitigation measures will be undertaken with regulators and First Nations.
		Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.
	Concern about the likelihood the tailings facility may leak	The TSF will be designed, built and managed to minimize impacts to the environment. The effects assessment on surface water quality and sediment quality is presented in Sections 5.3.3 and 5.3.4 . Surface water and sediment quality will meet applicable provincial and federal standards downstream of the proposed mine site to prevent effects on water users, and fish (Section 5.3.8), furbearers (Section 5.4.13), or other wildlife populations (Sections 5.4.7 to 5.4.15) that use those waters. The mine site will aim to operate as a zero discharge facility during operations and closure phases. During construction, sediment ponds will be used to contain and treat site run-off to reduce concentration of suspended solids. Section 12.2 Environmental Management Plans address mine water, mine waste management, and emergency and spill preparedness management. Section 13 provides details on monitoring and follow-up programs.
	Effects on the Nechako and Stellako Rivers from the transmission line crossings	Section 2.5 Alternative Means of Undertaking the Project addresses the assessment of transmission line alternatives. To minimize environmental impacts, the transmission line is proposed to follow existing roads and trails whenever possible and steps will be taken to maintain vegetation to the extent possible along the route.
	atanomico di coonigo	Section 12.2 Environmental Management Plans address transportation and access management.
		Additional surface and groundwater monitoring stations were established as part of the baseline program;
		Results of all water quality sampling will continue to be posted for working group and Aboriginal groups review; Water will be presidented as an experience beside throughout the life of the Resident and part elegants.
		 Water will be monitored on an ongoing basis throughout the life of the Project and post-closure; Surface water and sediment quality will meet applicable provincial and federal standards to avoid effects on fish, furbearers, or animals that use those waters;
		The mine site will aim to operate as a zero discharge facility during operations and closure phases;
		• Erosion and sediment control measures, including erosion control matting, rip-rap, and hydro-seeding, will be implemented to protect erodible soils from entering waterbodies;
		Design and operational procedures to limit risks associated with malfunctions and accidents will be implemented;
Transmission Line		 Establish a group including affected Aboriginal group representatives to discuss access management for the transmission line corridor and the mine site; and Implementation of environmental management plans, addressing mine water management; water quality and liquid discharges management; transportation and access management; emergency and spill preparedness and response; landscape, soils, and vegetation management and restoration; erosion and sediment control; aquatic resources management; and wetlands management.
		The detail effects assessments on water quality and sediment quality are presented in Section 5.3.4 . Potential Project effects on Aboriginal rights are assessed in Section 15 and potential effects on other Aboriginal interests, including water quality, are presented in Section 16 .
		Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address this issue. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved until each Aboriginal group can review the Application in detail. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application.



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Category	Issues/Concerns/Interests	Proponent Response
Increased Access	Increased access to hunting areas for non-Aboriginal hunters	The Proponent is establishing an Access Management Working Group with Aboriginal groups to discuss access management for the mine site and the transmission line. Access management strategies being considered by the Proponent include limiting access by non-Aboriginal proups for ceremonial or traditional purposes; in the case that these areas are deemed safe. Constraining access along the transmission line ROW is being considered including limiting use during the construction phase). Strategies might also include constraining non-Aboriginal people from using the area along the transmission line ROW by establishing barriers (e.g. gates or other type of obstacles). Aboriginal groups could play a role in managing the barriers to ensure they can access portions of the road that goes along the transmission line ROW. Other mitigation is described below. • The Proponent is working with First Nations to avoid/minimize effects on traditional hunting locations. • Prohibit mine employees from hunting on mine site property. • Redesign the TSF and mine access road to avoid UWR. • Set reclamation goals to re-establish later winter habitat. • Participate in regional wildlife and resource management initiatives (specifically for ungulates). • Dispose of wastes generated on site to limit the attraction of wildlife to the mine site. • Implement Environmental Management Plans, addressing Wildlife Management; Landscape, Soils, and Vegetation Management and Restoration; Industrial and Domestic Waste Management Plans and Transportation and Access Management. Issues such as road kill, displacement, and an increase in mortality due to increased predator access will be addressed in these Management Plans and Transportation and Access Management. Issues such as road kill, displacement, and an increase in mortality due to increased predator access will be addressed in these Management Plans and Transportation and Access Management. Issues such as road kill, displacement, and an increase in mortality due to increased predator access
	Effects of increased traffic and related safety effects	Meetings were also held with First Nations to discuss the results of effects assessments and the mitigation proposed by the Proponent to address issues related to access. As appropriate, feedback provided by Aboriginal groups has been incorporated into mitigation. It is expected that dialogue with First Nations will continue throughout the life of the Project. This matter is considered resolved for the purposes of the Application. As appropriate, the Proponent will meet with interested First Nations to further address any concerns about the assessment and mitigation proposed in the Application. The Proponent has carried out research regarding existing traffic volumes as well as potential effects from foreseeable projects to determine the potential impacts on traffic in the area. Section 7.2
Increased Traffic		presents the social effects assessment including regional and community infrastructure. The residual effects of Project-related incremental traffic are expected to be minor and not significant. The Proponent has a road safety policy that employees are expected to adhere to. Transportation and access management is addressed in the environmental management plans. This issue is considered resolved.
Employment	Interest in employment opportunities	The Proponent is committed to increasing the percentage of Aboriginal employees by working closely with the employment and training officers in Aboriginal communities as well as with Band Councils to establish conditions at the Project that support a multicultural workforce. The Proponent recognizes that proactive measures are needed to enhance employment of Aboriginal workers, and proposes various strategies to facilitate training, recruitment, and retention, presented in Section 12.2 , The Proponent is also committed to hiring locally whenever possible. The Proponent encourages Aboriginal employees (self-declared).
		 Some measures to enhance Aboriginal employment and contracting include: Work with local Aboriginal employment organizations and regional training institutions to encourage local recruitment and contracting; Preferential hiring of local businesses including Aboriginal-owned business that meet employment and contracting requirements; Provide information on contracting opportunities and related required qualifications to local Aboriginal communities and advertise them in local Aboriginal newsletters; Encourage major contractors during the construction and operations phases to sub-contract with local suppliers; and Develop a database of local and Aboriginal suppliers and developing communication protocols to ensure suppliers are made aware of opportunities.
		The effects assessment on regional and local employment and businesses is presented in Section 6.2.3 . Additional information on Aboriginal interest in economic development is discussed in Section 16 . The Business, Contracting Opportunities and Training Plans are being developed with most Schedule B First Nations and generally, subject to Confidentiality Agreements. General strategies for business, contracting and training plans for Aboriginal groups are addressed in Section 12.2.1.18.4.16 Recruitment, Training and Employment Management Plan. This issue is considered resolved for the purposes of the Application but discussions about opportunities to enhance benefits to First Nations will be ongoing throughout the Project.



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Category	Issues/Concerns/Interests	Proponent Response
Training	Interest expressed in training with the Project	The Proponent will work closely with regional training institutions to implement a training strategy for local residents including Aboriginal groups. This may include partnering with the BC Aboriginal Mine Training Association to provide training programs; collaborating with local contractors to provide apprenticeship programs; sourcing and training under-represented groups; and offering scholarships to encourage high school graduation. The Business, Contracting opportunity and Training Plans are being developed with most Schedule B First Nations and generally, subject to Confidentiality Agreements.
		General strategies for business, contracting and training plans for Aboriginal groups are addressed in Section 12.2.1.18.4.16 Recruitment, Training and Employment Management Plan.
		Additional details on Project effects on regional and local employment and businesses are presented in Section 6.2.5.
		Section 12.2 presents environmental management plans that address recruitment, training, and employment.
		This issue is considered resolved for the purposes of the Application but discussions about opportunities to enhance benefits to First Nations will be ongoing throughout the Project.
	Interest expressed in contracting and business opportunities	The Proponent is committed to providing Aboriginal groups with the opportunity to provide contracting services to the Project. The Proponent will work with communities and the provincial and federal governments to discuss business capacity and opportunities for Aboriginal peoples to prepare for the mine during construction and operations.
		Additional details on Project effects on regional and local employment and businesses are presented in Section 6.2.5.
		Section 12.2 present environmental management plans that address recruitment, training, and employment.
		Some measures to enhance Aboriginal employment and contracting include:
		Work with local Aboriginal employment organizations and regional training institutions to encourage local recruitment and contracting;
Business and Contracting Opportunities		Preferential hiring of local businesses including Aboriginal-owned business that meet employment and contracting requirements;
		Provide information on contracting opportunities and related required qualifications to local Aboriginal communities and advertise them in local Aboriginal newsletters; The contraction of the con
		 Encourage major contractors during the construction and operations phases to sub-contract with local suppliers; and Develop a database of local and Aboriginal suppliers and developing communication protocols to ensure suppliers are made aware of opportunities.
		Develop a database of local and Aboriginal suppliers and developing communication protocols to ensure suppliers are made aware of opportunities.
		The effects assessment on regional and local employment and businesses is presented in Section 6.2.3 . Section 16 Other Aboriginal Rights also discusses Aboriginal interest in economic development.
		This issue is considered resolved for the purposes of the Application but discussions about opportunities to enhance benefits to First Nations will be ongoing throughout the Project.
	Potential for the Project to exacerbate social problems (e.g., domestic violence, prostitution, substance abuse)	This concern has been addressed in Section 7.2.5 Family and Community Well-Being and Section 16 Other Aboriginal Interests. The Proponent will continue to identify and address issues associated with local socioeconomic effects.
		The following measures will be implemented to avoid or minimize potential social problems:
		Deliver cultural and sensitivity awareness training to employees and mine supervisory staff, which will aim to prevent harassment and promote respect;
		 Provide construction and operations camps for workers; Drug and alcohol testing for all employees;
		 Provide recreational facilities and activities for workers at the Project site:
		Provide access to money management training;
		Offer counselling services to employees;
		Deposit workers' salaries directly to their bank accounts;
Socioeconomic Effects		Work with local agencies to assist in monitoring community well-being and cooperate in taking corrective actions where appropriate.
Socioeconomic Enects		Additional details are provided in Section 7.2. Social Effects Assessment and Section 16 Other Aboriginal Interests.
		This issue is considered resolved for the purposes of the Application but discussions about opportunities to enhance benefits to First Nations and limit socio-economic disturbances will be ongoing throughout the Project.
	Concerns raised regarding "boom and bust" cycle (including employment followed by unemployment), inequitable distribution of employment within Aboriginal communities as well as with non-Aboriginal communities	The Proponent actively supports community-building and promotes opportunities for economic diversification. Although an adverse economic effect is predicted at closure, some employment and procurement opportunities associated with long-term environmental engineering, monitoring, and management are expected. Skills gained at the mine will likely be transferable, enabling workers to apply them at other mines, similar resource developments or heavy industrial projects in the region. This concern has been addressed in Section 7.2.5 Family and Community Well-Being and in Section 16 Other Aboriginal Interests. The Proponent will work with local agencies to assist in monitoring community well-being and to take corrective actions where appropriate.
		The Proponent is committed to working with educational partners to provide training programs to develop a skilled pool of employees, providing long-term sustainable benefits to the community and its members. The Project will provide opportunities for on-the-job training through a variety of mandatory and elective training initiatives. This training and accumulated experience will provide residents with opportunities for increased workforce mobility and transferability of skills and experience.
		The effects assessment on regional and local employment and businesses is presented in Section 6.2.3.



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Category	Issues/Concerns/Interests	Proponent Response
Rights and Title	Concern about the impact on Aboriginal rights and title	The Proponent is committed to meaningful consideration of the rights and interests of the potentially affected Aboriginal groups and will seek ways to address (i.e., avoid, reduce, and/or mitigate) any potential adverse effects identified during the EA process. The Proponent will continue to consider information on rights and other interests as it becomes available and will incorporate it in Project design, execution, management plans, permitting, and monitoring to the extent practical.
	Concern expressed about the cumulative effect of development on ability to exercise Aboriginal rights	The assessment of potential Project effects on Aboriginal rights is described in Section 7.2.7 presents the effects assessment (including a cumulative effects assessment) on current land and resource use for traditional purposes that address potential changes to traditional use, including: • Hunting and trapping activities; • Fishing activities; • Plant gathering activities; • Other cultural and traditional uses of the land (e.g., cultural and spiritual places, trails, navigation).

Note: ARD = Acid Rock Drainage; BC EAO = British Columbia Environmental Assessment Office; EA = Environmental Assessment; ECD = Environmental Control Dam; FSR = Forest Service Road; LDN = Lhoosk'uz Dene Nation; TK/TLU = Traditional Knowledge/Traditional Land Use; TSF = Tailings Storage Facility; UFN = Ulkatcho First Nation; UWR = Ungulate Winter Range



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3.3.2 Consultation Planned During Application Review

This section provides a description of the consultation planned during the Application review stage, and a description of the methods and process that will be used to resolve outstanding issues.

Consultation with Aboriginal groups during the Application review stage is intended to meet the requirements of the BC EAO section 11 Order and *CEAA*, *2012*. The goals of Application review stage consultation are to:

- Continue to engage Aboriginal groups in the Project;
- Seek comments from Aboriginal groups on the results of the effects assessments, and proposed mitigation measures;
- Seek comments from Aboriginal groups on culturally appropriate approaches to avoid, reduce, mitigate, or otherwise accommodate potential adverse effects to Aboriginal traditional and current use; and
- Identify opportunities for longer-term participation in economic, employment, training, and other capacity-building interests.

3.3.2.1 Proposed Consultation Activities with Aboriginal Groups

Table 3.3-5 shows a proposed schedule for consultation and information activities during the Application review stage. Some activities have been identified as consultation activities and others as information activities. Information and consultation activities will be undertaken with Aboriginal groups listed in Schedule B of the section 11 Order, while information activities will be implemented with Aboriginal groups listed in Schedule C of the section 11 Order and the MNBC.

3.3.2.2 Proposed Methods and Processes to Resolve Outstanding Issues with Aboriginal Groups

During the Application review stage, the Proponent will continue to work with Aboriginal groups to understand potential Project effects and respond to information requests. The Proponent will endeavour to resolve any outstanding issues through continued dialogue with Aboriginal groups including the consultation activities identified above and the implementation of a TK/TLU Committee to monitor the Project development. The Proponent also proposes establishment of a group including affected Aboriginal group representatives to discuss access management for the transmission line corridor and mine site. In some cases, outstanding issues and concerns may be addressed in agreement negotiations. Outstanding issues for Aboriginal groups are also addressed in **Section 17** of the Application. The Proponent will attempt to resolve outstanding issues by:

 Obtaining additional details regarding the issue as necessary (from the Aboriginal group and/or from technical experts with expertise on the issue);



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- Responding to the Aboriginal group about the issue that is still outstanding, and checking
 with the group to determine whether the issue has been sufficiently addressed;
- Meeting with the Aboriginal group as needed to discuss and resolve the issue; and
- Reporting back to the Aboriginal group on the status of the issue.

The Proponent is committed to transparency and integrity in all of its business operations, and understands that the Project may affect nearby Aboriginal groups. Implementing its Design for Closure approach, the Proponent will work with these communities to develop and implement long-term economic, social, and environmentally sustainable opportunities while avoiding, minimizing, and mitigating negative Project effects.



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Table 3.3-5: Schedule of Consultation Activities

Key Activities	Description	Type of Activity
Submission of the Application	After submission of the Application, the Proponent will distribute copies of the Application for information	Information
Provide copies of Application to Aboriginal groups	and consultation purposes.	
Provide information on Public Comment Events	The Proponent will inform Aboriginal groups of the public comment period including the dates, times, and locations of regulator-led open houses.	Information
	When requested, provide overview presentations on the Application to facilitate Aboriginal groups review and answers questions.	
Working Group Meetings	When requested, the Proponent will attend working group meetings organized by BC EAO and the Agency.	Consultation
Discuss results of effects assessment	The Proponent will communicate results from the effects assessments to Aboriginal groups, leadership, and communities through community events and meetings, and obtain input. The Proponent will provide Aboriginal groups with an explanation of how information they provided through the consultation process has been or will be addressed and with an explanation of all proposed commitments and design-related decisions that have been or will be made as a result of their input in the planning and assessment process.	
	The Proponent will respond to information and meeting requests regarding specific concerns from Aboriginal groups. Follow-up meetings will be held to communicate the effects assessments including planned mitigation	
	measures and management planning results.	
Mitigation meetings	The Proponent intends to meet with Aboriginal groups to discuss mitigation and accommodation strategies. This may include meetings with community knowledge holders to gain additional input into the proposed mitigation measures.	Consultation
Community events	Continue, as necessary, to host events and inform Aboriginal communities about the Project.	Information/ Consultation
Project site tours	The Proponent will continue to offer the opportunity for site tours to interested parties.	Information/ Consultation
Project updates	Provide timely updates to Aboriginal groups on progress, milestones, findings, and actions taken during the review of the Application.	Information/ Consultation
Issues tracking tables	The Proponent will maintain an issues tracking tables to document issues raised by Aboriginal groups on the Application including a response to those issues (Appendix 3.1.3B).	Information/ Consultation
Consultation reports	Provide written reports to Aboriginal groups summarizing the results of consultation with each group (subsection 12.1.4 of section 11 Order).	Consultation



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3.4 <u>Public and Government Agency Information Distribution and Consultation</u>

This section describes consultation undertaken with the public, key stakeholders, local governments and government agencies during the Pre-Application stage and planned consultation with the public, key stakeholders, and government agencies during the Application review stage.

3.4.1 Pre-Application Consultation

This subsection describes the Project's information distribution and consultation program plan with the public, key stakeholders, and local governments. It provides a list of key stakeholders that were consulted, and summarizes information distribution methods, consultation activities undertaken with the public, and key issues and concerns raised.

3.4.1.1 Summary of Consultation with the Public and Local Governments

The section 11 Order issued by the BC EAO on 9 July 2013 identifies public consultation requirements. The Proponent's public consultation program was undertaken in accordance with Schedule A - Part H as well as the relevant sections (**Sections 2.3**, **3.3**, **3.4**, **9.2**, **10.1**, and **10.2**) of the EIS Guidelines for the Project, which the Agency distributed on 19 February 2013.

'Public' includes local governments, communities, stakeholders, property owners, and the general public. 'Stakeholders' are individuals and groups with a direct interest in the Project. The Public Consultation Plan (**Appendix 3.4.1A**) is focused on private land owners, and tenure holders (e.g., range and forest tenure holders, and trappers and guide outfitters) in the Project area. These are described as follows:

- Communities. The Proponent focused community consultation efforts in Vanderhoof, Fort St. James, Burns Lake, and Fraser Lake. In addition, some consultation activities were held in Quesnel and Prince George. As the Project progresses, neighbouring communities (e.g., Williams Lake, Houston, Anahim Lake, and Smithers) will be considered if there is sufficient public interest. The Proponent hosted a Citizens Forum with citizens from Fort St. James, Fraser Lake, Vanderhoof, and Burns Lake attending. Participants identified their future vision for their communities and discussed the role of industry in minimizing adverse effects and maximizing community development opportunities (June 2013). The Proponent hosted two focus groups with Community Liaison Committee (CLC) group members to receive community input on its proposed human resource strategy, including local hiring shift schedules, recruitment to the region and employment terms and conditions (July, August 2013).
- Local and Regional Governments. The Proponent consulted government representatives from each of the communities identified above as well as the Cariboo Regional District Area 1, Cariboo Regional District Joint Planning Committee, the Regional District of Bulkley-Nechako, and the Regional District of Fraser-Fort George.



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- Tenure Holders and Private Landowners. The Proponent consulted private landowners and tenure holders. Table 3.4-1 summarizes these consultations and the issues raised in a general manner. A detailed record of Proponent consultations with tenure holders and landowners is presented in Appendix 3.1.3C. Specific issues and concerns raised by landowners and tenure holders are included in Appendix 3.1.3B, Issues Tracking Tables (Public, Aboriginal Groups, and Local, Provincial and Federal Government Agencies).
- Appendix 7.1.2A includes maps depicting tenures and licenses held within the Non-Traditional Land Use Regional Study Area (RSA) and/or Project area as follows:
 Figures 3.4-2 and 3.4-3 for mineral tenures, Figures 3.5-2 and 3.5-3 for forest tenures,
 Figure 3.6-1 for guide outfitting areas, Figure 3.6-2 for traplines, Figure 3.8-1 for
 agricultural land use and range tenures, Figures 3.9-1 and 3.9-2 for private land, Figures
 3.9-3 and 3.9-4 for permits, licenses, land tenures and charges, and Figure 3.9-5 for
 water licenses.
- Business Organizations. The Proponent met with the Chamber of Commerce for each
 of the key communities: Vanderhoof, Fort St. James, Fraser Lake, Burns Lake, and
 Prince George.
- Community and Environmental Organizations. Organizations consulted include Nechako Environment & Water Stewardship Society, BC Wildlife Federation, Nechako Valley Regional Cattlemen's Association, Nechako Valley Sporting Association Fish and Wildlife Division, and the Upper Nechako Wilderness Council.
- Economic Development Organizations. Meetings have been held with 16/97
 Economic Alliance, Community Futures Development Corporation of Stuart Nechako,
 Initiatives Prince George, Northern Development Initiative Trust, Vanderhoof & District
 Co-operative Association, and Quesnel Community and Economic Development
 Corporation. The Proponent also met with Economic Development Officers from Fort St.
 James, Fraser Lake, Vanderhoof, Burns Lake, Quesnel, and the Bulkley-Nechako
 Regional District.
- Education and Training Organizations. Meetings and consultation activities have been held with the College of New Caledonia, Nechako Valley Post-Secondary Education Committee, Progressive Employment Services Limited and the School District 91 – Nechako Lakes, and University of Northern British Columbia.
- Health and Safety Organizations. Consultation was conducted with key Royal Canadian Mounted Police (RCMP) officers in the communities as well as the Nechako Valley Community Services Society, Burns Lake Community Health Centre, and the Northern Health Authority. As part of the public outreach, the Proponent with Dr. Janis Shandro from the University of Victoria/University of British Columbia, hosted a Regional Health Forum with 33 front-line health and social service practitioners from across the region; focus was on identifying action to sustain healthy communities, particularly as it relates to resource projects in the region.



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The Public Consultation Plan is presented in **Appendix 3.4.1A**. Based on the results of a comprehensive stakeholder mapping program and an early consultation program, the following strategic goals have been identified and outlined in this plan:

- Consult with stakeholders and the public to ensure key issues of concern and potential adverse effects are assessed and addressed in the Application and identify mitigation and/or avoidance measures;
- Consult with elected officials, community leaders and citizens to ensure they understand the Project and have shared their local and regional knowledge about consequences, challenges, and potential benefits;
- Work closely with local government staff and elected officials to align the Project with regional aspirations and priorities;
- Work to resolve emerging environmental, community, land use and other issues in timely, face-to-face meetings that actively respect and respond to stakeholder concerns;
- Partner to achieve mutual benefits early in the cycle of the Project and continue building partnerships and benefits throughout the life of the Project; and
- Provide accessible, transparent and timely information about Project phases, the mining process, the EA process, Project-related opportunities and challenges.

A detailed summary of communication with the public up to the first quarter 2014 is provided in **Appendix 3.1.3C**.



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Table 3.4-1: Summary of Consultations with Tenure Holders and Private Landowners

Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
Commercial Lodges and Gui	de Outfitters			
Batnuni Lake Guides & Outfitters Ltd. (Guide Outfitter Cert. No. 601039; 500948)	 Project introduction, updates, and information sharing Discussion of tenure and potential effects to tenure activities Provision of map of Project area and guiding territories Provision of link to the Project Description 2013/ 14/ 15 Exploration Program Proposed transmission line 	Meeting Telephone Mail E-mail	 Adequacy of consultation Potential effects of increased access Potential effects to wildlife – moose, caribou and grizzly bear Land Use – Overlapping tenure resulting in the potential for disruption to land used by trappers, guides, ranchers, and lodge owners 	 Potential effects of increased access and effects to wildlife, including moose, caribou and grizzly bear, will be mitigated through the Wildlife Management Plan. The Proponent has addressed issues related to the Exploration Program including adjusting the program and implementing Access Management programs. The Proponent has committed to implement an access management plan along the rights-of-ways, including the transmission line, and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan). The Proponent has also committed to continue to support regional management initiatives for ongoing research and monitoring of the Tweedsmuir-Entiako Northern Caribou subpopulation and their habitat use near the mine



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
Crystal Lake Resort (Guide Outfitter Cert. No. 701156; 701161)	 Project introduction, updates, and information sharing Proposed transmission line (transmission line route altered to address tenure holder's concerns) Discussion of tenure and potential effects to tenure activities 	MeetingTelephoneE-mail	Potential effects from the transmission line due to increased access/hunting	Potential effects of increased access and effects to wildlife, including caribou and grizzly bear, will be mitigated through the Wildlife Management Plan. The Proponent has committed to implement an access management plan along the rights-of-ways, including the transmission line, and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan).
Euchiniko Lakes Ranch (Guide Outfitter Cert. No. 500929)	 Project introduction 2013 exploration program Discussion of tenure and potential effects to tenure activities Notification of drilling activity Requested permission to conduct reclamation work within the guiding territory and offered to work around scheduled guided trips 	MeetingTelephoneE-mailLetter	Potential effects to wildlife (moose) from increased access along new right of ways	 Potential effects of increased Potential effects of access and effects to wildlife, including moose, will be mitigated through the Wildlife Management Plan. The Proponent has committed to implement an access management plan along the rights-of-ways, including the transmission line, and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan).
Finger Lake Resort	Project introductionProposed transmission line	E-mail	No issues raised to date	• n/a



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
Hallett Lake Outfitters Ltd. (Guide Outfitter Cert. No. 700298; 701166)	 Project introduction, updates, and information Proposed transmission line Discussion of tenure and potential effects to tenure activities 	MeetingTelephoneE-mailLetter	Potential effects from the transmission line (increased access to hunters, and impacts on trapping and guiding trails, and on local cabin)	Potential effects of increased access and effects to wildlife, including moose, will be mitigated through the Wildlife Management Plan. The Proponent has committed to implement an access management plan along the rights-of-ways, including the transmission line, and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan).
HSP Ranch (PID 004282353)	Project introduction Proposed transmission line	E-mail	No issues raised to date	• n/a
Laidman Lake Ecolodge (PID 015493032)	 Information update Provision of Project maps Visit to the property to sample water quality 	 Meeting Telephone Email Mail 	Effects on long-term viability of the business and potential compensation Sensory disturbances from noise	Potential visual impacts will be mitigated by the Visual Resources Management Plan. Potential noise effects will be mitigated by the Occupational Health and Safety Management Plan Potential water quality effects will be mitigated by the Mine Water Management Plan, Water Quality and Liquid Discharges Management Plan and Cyanide Management Plan. Implement wildlife management plan. Implement the transportation and access management plan
Moose Lake Lodge (& Fawnie Mountain Outfitters;	Project introduction, updates, and information sharing	Meeting E-mail Letter	 Potential effects on water quality Potential effects to fish and fish habitat 	Potential effects on water resources, fish and fish habitat, and wildlife will be mitigated by the Mine Water Management Plan, Water Quality,



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
Guide Outfitter Cert. No. 600384)	 Provision of link to Project Description Proposed transmission line 2013 exploration program Invitation to open houses 		Potential effects to caribou from over- predation	Liquid Discharges Management Plan, Sediment and Erosion Control Management Plan, Wetlands Management Plan and Wildlife Management Plan. The Proponent will implement a Fisheries Management Offsetting Plan to mitigate effects on fish and fish habitat.
Nechako Lodge & Aviation (PID 017335311)	 Project introduction, updates, and information sharing Proposed transmission line Land and resource use data collection: use of local, navigable waters. 	• E-mail	 Accidents or malfunctions (potential tailings failure) Potential effects of cyanide Potential effects on drinking water 	The Proponent has committed to implement an Emergency and Spill Preparedness and Response Plan. Potential effects on water resources will be mitigated by the Mine Water Management Plan, Water Quality, Liquid Discharges Management Plan, and Sediment and Erosion Control Management Plan.
Nechako Retreat (PID 004281365)	 Project introduction, updates, and information sharing Proposed transmission line Letter to BC EAO Discussion and project open house meetings 	 Meetings Telephone E-mail Letter 	Potential effects from the transmission line Access management along the right of way Loss of wilderness area and impacts to tourism/culture Impacts to ungulates as a result of increased hunting pressure and mortality	The Proponent has committed to implement an access management plan along the rights-of-ways, including the transmission line, and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan). The Project is consistent with the Vanderhoof Land and Resource Management Plan, including management direction related to tourism and culture. Potential effects on visual quality, and wildlife will be mitigated by the Visual



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
				Resources Management Plan, and Wildlife Management Plan.
Pitka Mountain Outfitters Ltd. (Guide Outfitter Cert. No. 701137)	 Project introduction, updates, and information Discussion of tenure and potential effects to tenure activities Provision of link to the Project Description Proposed transmission line 	MeetingsTelephoneE-mailLetter	Mine closure and the decommissioning of the transmission line Potential effects on wildlife due to noise Potential effects from the transmission line resulting in increased access and hunting pressures	 The Proponent has committed to implement a Reclamation and Closure Plan (Section 2.6). Potential noise effects will be mitigated by the Occupational Health and Safety Management Plan. The Proponent has committed to implement an access management plan along the rights-of-ways, including the transmission line, and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan).
Sumanik's Sanctuary	 Project introduction, updates, and information Proposed transmission line 	• E-mail	No issues raised to date	• n/a
Tachick Lake Resort (PID 011699361)	Project introductionProposed transmission line	E-mail	No issues raised to date	• n/a
Tatelkuz Lake Ranch Resort (also referred to as the Mills Ranch in this Application) (PID 023387769)	 Project introduction, updates, and information Discussion of tenure and potential effects to tenure activities Proposed transmission line Land and resource use data collection: navigable 	 Meetings Helicopter Site Tour Telephone E-mail 	 Potential contamination of drinking water Increased predation from grizzly bears Potential effects from increased access Potential effects to fish and fish habitat Potential effects to infrastructure and service 	Potential effects on water resources, fish and fish habitat and wildlife will be mitigated by the Mine Water Management Plan, Water Quality, Liquid Discharges Management Plan, and Sediment and Erosion Control Management Plan, Wetlands Management Plan, and Wildlife Management Plan.



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
	waters near and on landowner's property		Potential negative effects to livestock and cattle in the area	The Proponent has committed to implement a Fisheries Management Offsetting Plan to offset effects to fish and fish habitat. The Proponent has committed to implement an access management plan along the rights-of-ways, including the transmission line, and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan)(e.g., livestock movement.
Tatuk Lake Outfitters Wilderness Resort (PID 012437042)	Project introduction Proposed transmission line	• E-mail	No issues raised to date	• n/a
Uncha Mountain Outfitters (Guide Outfitter Cert. No. 601048)	Project introduction	 Requests for meeting Telephone E-mail Letter 	No issues raised to date	• n/a
PID 017957079 and PID 017957061 (Same owner)	 Requested access to properties for wildlife survey field work at the potential power line corridor (access granted) Information indicating power line does not pass through the properties Various project newsletters 	Telephone Email Email	No issues raised to date	• n/a



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
	Invitation to comment on draft EIS guidelines posted on the Agency's website (2013)			
Guyishton Woodlot Ltd (PID 015274365)	Requested access to cross woodlot for wildlife survey filed work at potential power line corridor (access granted).	Telephone	No issues raised to date	• n/a
Forestry Tenure Holders				
Canadian Forest Products (CANFOR)	Project introduction, updates, and information sharing Proposed transmission line Roads and site access Visit to CANFOR rail loadout Exploration programs Land and resource use data collection Kluskus FSR	MeetingsE-mailLetter	Potential effects to infrastructure and service (concern that Kluskus FSR would be become a highway status road)	The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan). The Kluskus FSR is managed by BC MFLNRO with CANFOR as the primary licence holder. New Gold has a road user agreement with the tenure holder.
L&M Lumber & Nechako Lumber	 Project introduction, updates, and information Proposed transmission line Discussion of tenure and potential effects to tenure activities Exploration programs Land and resource use data collection Kluskus FSR 	Meeting E-mail Letter	Potential effects from increased access (concern about maintaining access to existing roads)	The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan). New Gold has a road user agreement with the tenure holder.



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
Nultac Logging Company	Project introduction	Meeting	Potential effects from increased access (concern about traffic and speed past Stoney Creek home)	 The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan). The Project is not proposing to access the site through Stoney Creek and includes a partial realignment of the Kluskus FSR to improve safety.
Selkin Logging Ltd.	Land and resource use and socio-economic data collection	Meeting	No issues raised to date	• n/a
West Fraser Mills Ltd.	 Project introduction, updates, and information Proposed transmission line 	Meeting E-mail	Potential effects from the transmission line (concern about height of transmission line over haul roads)	 The designed clearance height for the transmission line is determined by the Canadian Standards Association and is being developed with MFLNRO. The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan).
Mineral Tenure Holders				
Amarc Resources Ltd.	Requested authorization to conduct geotechnical work on the stakeholder's mineral tenures	Letter	No issues raised to date	• n/a



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
BW Mineral Tenure Holder	Requested authorization to conduct geotechnical work on the stakeholder's mineral tenures Proposed transmission line	Meeting Letter	No issues raised to date	• n/a
Copper Creek GoldCorp	Requested authorization to conduct geotechnical work on the stakeholder's mineral tenures	• Letter	No issues raised to date	• n/a
Mountain Boy Minerals	Request for permission to conduct geotechnical work on the stakeholder's mineral tenures	Letter	No issues raised to date	• n/a
RJK Exploration	 Project introduction, updates, and information Requested authorization for the proposed transmission line site investigation program 	MeetingsE-mailLetter	No issues raised to date	• n/a
RNR Resources	Accepted a meeting request to discuss the proposed project	Meeting and project updateSite tour	 Maintain agriculture land in the project area Environmental protection 	 The Project is consistent with the Vanderhoof Land and Resource Management Plan, including management direction related to tourism and culture. The Proponent has committed to a number of environmental management plans to protect the environment, and has committed to monitoring and reporting.
TTM Resources Ltd.	Requested authorization for the proposed	• Letter	No issues raised to date	• n/a



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
	transmission line site investigation program			
Range Tenure Holders				
CTN Ranching (Range Tenure No. RAN077117)	 Project introduction, updates, and information Proposed transmission line Discussion of tenure and potential effects to tenure activities Provision of map of Project area 	MeetingLetterTelephone	Potential effects from the transmission line (concern about hunters accessing tenure with quads)	The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan) (e.g., livestock control).
Dykam Ranch and Woodlot Ltd. (Range Tenure No. RAN077118)	 Project introduction, updates, and information Road safety, employment opportunities, baseline studies Proposed transmission line Discussion of tenure and potential effects to tenure activities 	Meeting Telephone E-mail Letter	Potential effects from increased access (road safety) Potential effects on water resources (water quality and molybdenum) Potential negative effects to livestock and cattle in the area (keeping cattle off of Kluskus FSR) Visual (visibility of Project lights)	 The Proponent will implement a road safety policy that employees are expected to adhere to. The transportation and access management plan will also have a "Road Use Handout," which will outline the rules that are to be followed by all traffic travelling on the existing access roads, as well as a road map, radio frequency map, and signage map. The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan) (e.g., livestock control). Further the Proponent has already posted signs on the Kluskus FSR to slow down for



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				cattle as well as supporting resource road users information sign at 18.5 km in July 2012. The Proponent has committed to implement a several plans to mitigate effects on water resources (Mine Water Management Plan, Sediment and Erosion Control Plan, Water Quality and Liquid Discharges Management Plan) and wildlife (Wildlife Management Plan). Potential effects on visual quality will be mitigated by the Proponent's commitment to implement a Visual Resources Quality Management Plan
Matthew Creek Ranch (purchased by New Gold in September 2013 for habitat enhancement opportunities)	 Project introduction, updates, and information Discussion of tenure and potential effects to tenure activities Access road Exploration program 	MeetingsTelephoneE-mailLetter	Potential effects from increased access Potential effects on water resources	Issues resolved with the purchase of the property by the Proponent.
Range Tenure Holder RAN075154	(see Tatelkuz Lake Ranch Resort)	• n/a	No issues raised to date	• n/a
Rim Rock Ranch (Range Tenure No. RAN077666)	 Project introduction, updates, and information Discussion of tenure and potential effects to tenure activities Proposed transmission line 	MeetingsTelephoneLetter	 Potential effects to invasive plant species (interest in seed mix and concern about Canadian thistle) Land Use - Potential negative effects to livestock and cattle in the 	 The Proponent has committed to implement an Invasive Species Management Plan to mitigate effects due to invasive plant species. The Proponent will carry out ongoing consultation with ranchers and livestock owners to resolve issues (where applicable), and will notify



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
			area (suggested fencing or cattleguards)	owners of the construction schedule and related Project activities The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan) (e.g., livestock control).
Steiner Ranch (Range tenure RAN077238-1)	 Project introduction, updates, and information sharing Proposed transmission line Provision of map of Project area and range tenure Discussion of tenure and potential effects to tenure activities 	MeetingsLetterTelephone	 Potential effects from increased access (overall access control) Potential effects from the transmission line (concern that existing fencing will be destroyed, opening up access to ATVs) Potential effects to invasive plant species (weed control) Land Use - Potential negative effects to livestock and cattle in the area (containment of cattle) 	 The Proponent altered the transmission line route to address the tenure holder's concerns. The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan) (e.g., livestock control). The Proponent has committed to implement an Invasive Species Management Plan to mitigate effects due to invasive plant species. The Proponent will carry out ongoing consultation with ranchers and livestock owners to resolve issues (where applicable), and will notify owners of the construction schedule and related Project activities



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
Trapline Tenure Holders	·			
TR0512T014	 Project introduction, updates, and information sharing 2013 exploration program Discussion of tenure and potential effects to tenure activities Traditional land use and traditional knowledge 	MeetingTelephoneE-mail	Effects on tenure including ground disturbance and loss of income from reduced ability to trap Employment opportunities	The Proponent has committed to compensate impacts to trapline holders based on industry and industry protocols with associated proof of lost revenue. The Proponent has committed to implement a Recruitment, Training and Employment Plan. To mitigate wildlife effects, the Proponent has committed to implement a Wildlife Management Plan.
TR0512T027	 Project introduction, updates, and information 2013 exploration program Proposed transmission line Discussion of tenure and potential effects to tenure activities Employment opportunities 	 Meeting Telephone Letter Registered letter (returned undeliverable) Email 	No issues raised to date	• n/a
TR0601T003	 Project introduction, updates, and information Discussion of tenure and potential effects to tenure activities Proposed transmission line Provided link to the Project Description 	MeetingsPhone CallE-mail	Potential effects from increased access Potential effects on water resources Potential effects to wildlife - moose	The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan). The Proponent has committed to implement a several plans to mitigate effects on water resources (Mine Water Management Plan, Sediment



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
				and Erosion Control Plan, Water Quality and Liquid Discharges Management Plan) and wildlife (Wildlife Management Plan). To mitigate wildlife effects, the Proponent has committed to implement a Wildlife Management Plan.
TR0601T006	 Project introduction, updates, and information Preliminary results of the assessment of effects on transmission line on furbearers Proposed transmission line Provided link to the Project Description 	 Meetings Telephone E-mail Letter Registered letter (returned undeliverable) 	Potential effects from the transmission line (impacts to trapline) Potential effects to wildlife – furbearers	The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan). Effects to wildlife will be mitigated by the Proponent's commitment to implement a Wildlife Management Plan.
TR0604T053	 Project introduction, updates, and information sharing Potential transmission line Discussion of tenure and potential effects to tenure activities 	 Request for Meeting (declined) Telephone Letter 	Land Use - Potential negative effects to livestock and cattle in the area	The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan).
TR0711T007	 Project introduction, updates, and information sharing Traditional land use in the Kluskus area Potential transmission line 	Site visit Meetings and interview Telephone	 Potential environmental effects from the project Effects of Project traffic in the area of the trapline Cumulative effects on wildlife due to increased access from transmission 	The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan).



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
	Discussion of tenure and potential effects to tenure activities Socio-economic data gathering		line and alignment cutting the trapping area into three pieces Effects of the mine site (tailings pond, chemicals) on water for 50–60 years Effects of power line on wildlife Employment opportunities	The Proponent has committed to implement a several plans to mitigate effects on water quality (Mine Water Management Plan, Sediment and Erosion Control Plan, Water Quality and Liquid Discharges Management Plan) and wildlife (Wildlife Management Plan). The Proponent has committed to monitoring and reporting on monitoring results.
TR0712T009	 Project introduction and information sharing Socio-economic interview Discussion of tenure and potential effects to tenure activities 	Interview	No issues raised to date	• n/a
TR0712T029	 Project introduction, updates, and information Proposed transmission line 	Letter Meeting	Potential effects from the transmission line	The Proponent has committed to implement an access management plan along the rights-of-ways and establish a group to discuss access issues with Aboriginal groups and tenure holders (Transportation and Access Management Plan).
TR0712T035	Attempts to identify representatives Project introduction	TelephoneLetterRegistered letter (returned undeliverable)	No issues raised to date	• n/a



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Tenure Holder	Communications	Methods	Issues (General)	Issue Status (for more detailed responses see Appendix 3.1.3B)
TR0712T036	 Project introduction Discussion of tenure and potential effects to tenure activities 	Registered letter (returned undeliverable) Request for meeting Telephone E-mail	No issues raised to date	• n/a
TR0712T039	 Project introduction, updates, and information Potential transmission line Discussion of tenure and potential effects to tenure activities 	Meeting Telephone	No issues raised to date	• n/a
TR0712T040	 Project introduction, updates, and information sharing Potential transmission line Discussion of tenure and potential effects to tenure activities 	TelephoneFax	No issues raised to date	• n/a
TR0712T043	 Project introduction, updates, and information sharing Potential transmission line Discussion of tenure and potential effects to tenure activities 	MeetingsTelephoneE-mail	No issues raised to date	• n/a
TR0713T017	 Project introduction, updates, and information Proposed transmission line 	Telephone Letter	No issues raised to date	• n/a



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3.4.1.1.1 Information Distribution and Consultation Methods

The objectives of information distribution and consultation activities are to:

- Share information about the Project;
- Engage in open and transparent communications;
- Solicit feedback from the public about the Project and any associated environmental or social issues and concerns;
- Document issues and concerns raised by the public;
- Address issues raised by the public and where practical, make changes to the Project;
 and
- Comply with provincial and federal requirements related to public consultation including the section 11 Order issued by BC EAO and the EIS Guidelines issued by the Agency.

The Proponent utilized a broad range of tools and methods to disseminate information about the Project. A description of these methods is provided below:

- Project Website: The Project website
 (www.newgold.com/properties/projects/blackwater) was launched in 2012 to keep people
 informed about the Project and provide timely Project information. The website presents
 a range of information to the public such as pictures of the Project site, contact
 information, consultation opportunities, newsletters, FAQs and answers, as well as
 copies of technical studies such as baseline reports and mineralization studies.
- Project Office: The Proponent opened a community office in Vanderhoof in May 2012, which is staffed with a Community Relations Manager, a First Nations Coordinator, and an Office Administrator. The office is open to the public and interested parties are encouraged to visit the office where they can connect with a Project team representative. Since the office opened in 2012, more than 1,000 interested parties have signed up to receive e-mail updates and more than 190 have signed the guest book. The office accepts resumes from job seekers and encourages businesses to register in the Blackwater Business Directory.
- Open Houses: A range of materials was developed to support information distribution at Open Houses. The following materials were used:
 - Informational Panels. Posters presenting a variety of information such as Project Facilities, Transmission Line and Access Road, Environmental Assessment Process, Assessment Methodology, Pillars and Valued Components, Environment, Economic, Social, Heritage, Health, Surface Water and Sediment Quality, Fish and Fish Habitat, Moose, Economic: Regional and Local Employment and Business, and Regional and Local Services:
 - Electronic and hard copies of related documents (draft AIR/Project Description, Public and Stakeholder Consultation Plan);



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- Feedback forms;
- Blackwater Project animation video;
- Media fact sheet (for media only);
- Association of Mineral Exploration BC Career in Mining booklets;
- Open house advertisements, meeting notices, and newspaper articles. The advertisements were intended to ensure that local communities had up-to-date Project information and upcoming meetings; and
- Media Notices. The Proponent issued several media notices to local and regional media related to their open houses.
- Project Newsletters and Stakeholder E-mails. The Proponent maintained communication with stakeholders and the public through quarterly newsletters and stakeholder emails. For example, newsletters were distributed in October 2012, April 2013, May 2013, and January 2014 by mail to more than 6,500 homes and handed out at Project events. More than 1,000 stakeholders receive regular e-mails updating them on key project updates and milestones. Over 1,000 people are listed in the e-mail distribution list and are provided with regular updates and milestones on the Project.
- Direct Communication. The Proponent directly engaged with interested parties by way
 of meetings, telephone calls, e-mails, and letters. Meetings often included visual aids
 such as PowerPoint presentations, maps, and other related documentation. The
 meetings provide opportunities for both parties to share information and provide updates
 related to the Project.
- Advertising. The Proponent placed a number of advertisements related to public
 consultation events, including open houses. A list of these advertisements is provided in
 Appendix 3.4.1C. In addition to advertising public consultation events, the Proponent
 placed a social responsibility advertisement in the Vancouver Sun on 20 August 2012
 Corporate Social Responsibility Report.
- Interviews on Local Radio and Television. The Proponent distributed information about the Project by providing media notices to all television and radio stations in the Project area and participating in interviews with local broadcast outlets including Vista Radio 94x and the Valley Wolf, the Peak Radio Smithers, CIRX-FM, and CKPG-TV.
- Media Notices, Releases and Articles. The Proponent issued a number of media notices with Project information, and regularly participated in media interviews. A list of the media notices is provided in Table 3.4-2. The media notices typically announce Project details including announcements of public participation events as well as project updates. The interviews have enabled the Proponent to respond to questions and concerns. New Gold Corporate issued a media release on 12 December 2013 announcing Project details including land acquisitions and Project updates. A media release specific to the Project was provided on 12 December 2013 on Sedar's homepage to announce the Blackwater Feasibility Study results. While the Proponent remains committed to the Project, the timeframe for development has been extended. To ensure the Project is in a position to take advantage of a recovery in gold prices, the



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Proponent will continue to move the project through the EA and permitting process in 2015. Throughout 2015, the Proponent will also continue to work collaboratively with community partners to help prepare local workers for employment and contracting opportunities. The extended timeframe will provide additional time to establish local training programs and partnerships. A list of media articles is provided in **Appendix 3.4.1B**.

Table 3.4-2: Project Media Notices

Date	Title
14 May 2013	Nearly 250 People Attend New Gold Open Houses
26 April 2013	Blackwater Project Hosts Six Open Houses
10 January 2013	Blackwater Project Media Notice Award
21 December 2012	Draft EIS Guidelines Public Comment Period
2 November 2012	New Gold Connects with Local Communities
15-22 October 2012	New Gold 's Blackwater Gold Project Hosts Four Open House
14 June 2012	Blackwater Gold Project Site Tour

3.4.1.1.2 Consultation Activities Conducted

Public engagement and consultation is guided by the Agency and the BC EAO. These agencies oversee the public consultation program that is specific to the Project, ensuring that potentially affected stakeholders are engaged. Stakeholders such as the provincial and federal governments, local government and community organizations, landowners, and other stakeholders have been consulted. This section provides an overview of the consultation activities conducted with the public and government agencies. A summary of communications between the public and the Proponent is included in **Appendix 3.1.3C**.

3.4.1.1.2.1 Proponent's Open Houses

In October 2012, the Proponent held open houses in Fort St. James, Vanderhoof, Burns Lake, and Fraser Lake to introduce the Project to local communities and seek feedback about potential Project effects and how the Project could work with local communities and the region (**Table** 3.4-3). Ten informational panels were available for participants to view. More than 180 people attended.



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Table 3.4-3: Open Houses

Date	Community	Approximate Number of Attendees
Round 1 (Project Description)		
22 October 2012	Fort St. James	24
23 October 2012	Vanderhoof	79
24 October 2012	Burns Lake	41
25 October 2012	Fraser Lake	27
Round 2 (Baseline Results)	·	
6 May 2013	Vanderhoof	85
7 May 2013	Fraser Lake	15
8 May 2013	Burns Lake	33
9 May 2013	Quesnel	25
13 May 2013	Fort St. James	18
14 May 2013	Prince George	42

The second round of open houses featured an animated Project video and an electronic picture frame that ran a series of slides featuring the Proponent's Project team, the site, the preparation laboratory, and the community of Vanderhoof. In addition, core samples from the preparation laboratory were set up in a geology display. Open house attendees were asked to provide their input on community visioning, land use, and other additional data via feedback forms. Members from the Project team were also available to answer questions and collect feedback. These open houses helped demonstrate the Proponent's commitment to the long-term economic, social, and environmental sustainability of the communities and region and provided an opportunity to answer questions and receive comments related to potential environmental effects and local hiring and procurement. Twenty-three baseline study panels were available for review and comment and environmental consultants were present to answer questions. Nearly 250 people attended the open houses.

The Proponent management, staff, and Project consultants were available at each open house to share information and seek feedback about how the Project could work with the community. Notification of open houses was through e-mail, mass mail-outs, website updates, posters placed in high traffic locations, radio, and through notifications in local newspapers. **Appendix 3.4.1C** presents the advertisements placed. The open house report is provided in **Appendix 3.4.1D**.

3.4.1.1.2.2 BC EAO Open House and Public Reviews of the Draft AIR

The public had an opportunity to review and comment on the draft AIR at open houses organized by the BC EAO, and during the formal comment period from 9 October 2013 to 8 November 2013.

During the public comment period, copies of the draft AIR were provided at the following locations:



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- Burns Lake Public Library 585 Government Street, Burns Lake, BC;
- Cariboo Regional District Library Quesnel Branch 101-410 Kinchant Street, Quesnel, BC:
- Fraser Lake Public Library 228 Endako Avenue, Fraser Lake, BC;
- Fort St. James Public Library 425 Manson Street, Fort St. James, BC;
- Prince George Public Library 887 Dominion Street, Prince George, BC; and
- Vanderhoof Public Library 230 Stewart Street East, Vanderhoof, BC.

The BC EAO held open houses in Fraser Lake on 15 October 2013 and in Vanderhoof on 16 October 2013. The purpose of the open houses was to obtain public input on the draft AIR. The draft AIR specifies the studies to be conducted and the information to be presented in the Project's Application. The intention of seeking public comments is to ensure that all potential effects that might result from the Project (i.e., environmental, economic, social, heritage and health) are identified for consideration as part of the assessment process. The primary intent of the open houses was to receive feedback about the studies and/or information required for a comprehensive EA.

The comments and issues the Public raised during the draft AIR review are presented in **Appendix 3.3.1A**.

Table 3.4-4 provides a list of public places where hard copies of the public comment period notification advertisement have been posted on Wednesday 2 October 2013.

Notification advertisements were also published in the following newspapers:

- Prince George Citizen newspaper (Saturday, 28 September 2013 11 days in advance);
- Lakes District News (Wednesday, 2 October 2013 seven days in advance);
- Lakes District Free Classifieds (Thursday, 3 October 2013 six days in advance);
- Caledonia Courier (Wednesday, 2 October 2013 seven days in advance);
- Cariboo Observer (Wednesday, 2 October 2013 seven days in advance); and
- Omineca Express (Wednesday, 2 October 2013 seven days in advance).



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Table 3.4-4: Public Comment Period Notification Advertisements

		Community	
Location	Libraries	Centres	Cafes/Stores/Other
Burns Lake	Burns Lake Public Library		 Regional District of Buckley-Nechako Village of Burns Lake Office Lakeview Mall Public Bulletin Board
Fort St. James	Fort St. James Public Library		District OfficeOverwaitea Foods
Fraser Lake	Fraser Lake Public Library		 Fraser Lake Municipal Office Museum and Tourist Information Centre Super-Valu Bulletin Board
Prince George	Prince George Public Library: Bob Harkins Branch	Civic CentreAquatic Centre	 College of New Caledonia – Prince George University of Northern BC Prince George Chamber of Commerce
Quesnel	Cariboo Regional District Library: Quesnel Branch	 Quesnel and District Community Arts and Rec. Centre 	College of New Caledonia - Quesnel
Vanderhoof	Vanderhoof Public Library		 Post Office College of New Caledonia – Vanderhoof Co-op Mall Public Bulletin Board Public Library District of Vanderhoof Municipal Office

3.4.1.1.2.3 Project Presentations

The Proponent delivered numerous Project presentations. The purpose of these presentations was to:

- Engage the community;
- Provide Project information;
- Provide Project updates;
- Gather feedback for the provincial and federal EA processes;
- · Provide information on employment and training opportunities; and
- · Gather information on issues and interests related to the Project.

The Proponent made presentations to the following public and stakeholder groups:

 Elected Officials: District of Vanderhoof, District of Fort St. James, Village of Burns Lake, Village of Fraser Lake, Village of Burns Lake, Regional District of Bulkley-Nechako, Regional District of Cariboo, Area I, City of Prince George, City of



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Quesnel/Cariboo Regional District Joint Planning Committee, as well as local area Members of the Legislative Assembly (MLAs) and Members of Parliament (MPs);

- Businesses: Fort St. James Chamber of Commerce, Vanderhoof Chamber of Commerce, Prince George Chamber of Commerce;
- Education/Training: College of New Caledonia; and
- Community and Environmental Groups: Nechako Valley Sporting Association Fish and Wildlife Division, Nechako Valley Regional Cattlemen's Association, Upper Nechako Wilderness Council, Community Futures Development Corporation – Stuart Nechako (attendance of open houses).

The Proponent had a tradeshow display or presented to the public and stakeholders at business forums, mining conferences, resource and economic summits, and industry events.

Presentations to date include:

- 2012 Minerals North Conference (approximately 400 delegates and 200 exhibitors);
- Regional District of Bulkley-Nechako 2012 Business Forum (approximately 140 participants);
- Minerals North 2013 Conference and Tradeshow (approximately 900 delegates and exhibitors);
- Mineral Exploration Roundup 2013 (approximately 8,000 participants from 38 countries);
- 2013 Initiatives Prince George Market Expansion Forum (approximately 130 representatives from businesses);
- 2013 BC Natural Resource Forum and Economic Summit (approximately 300 delegates);
- 2013 BC Mayors Caucus (88 Mayors);
- 2013 North Central Local Government Association annual general meeting;
- 2013 Canadian Institute of Mining North Central BC Chapter annual meeting (approximately 145 delegates);
- Northern Interior Mining Group presentation, Prince George, 21 November 2013 (approximately 60 participants); and
- Mining Leap, Quesnel, 7 November 2013.

3.4.1.1.2.4 Meetings

The Proponent participated in more than 300 meetings and phone calls with the public up to the first quarter of 2014. Regular meetings were held with stakeholders, including private land owners, range and forest tenure holders, trappers and guide outfitters, and lodge owners to provide Project updates and address comments or concerns about the Project. The focus of these meetings has



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ranged from employment opportunities to environmental issues, transmission line location, potential property impacts, and mine construction.

3.4.1.1.2.5 Community Liaison Committee

In 2012, the Proponent developed the Project CLC. The CLC comprises community members who represent a range of community and regional interests, including social, education, environment, economic, and community development, as well as local and regional governments. Members are from the following organizations:

- Village of Fraser Lake;
- Regional District of Bulkley–Nechako;
- District of Vanderhoof;
- Cariboo Regional District;
- Village of Burns Lake;
- Nechako Environment and Watershed Stewardship Society;
- District of Fort St. James:
- Nechako Valley Community Services Society;
- School District No. 91;
- College of New Caledonia;
- Village of Burns Lake; and
- Quesnel Community and Economic Development Corporation.

The purpose of the CLC is to:

- Establish a continuing relationship between the Project and the region;
- Exchange information; and
- Discuss and address community and Project interests and concerns.

The Proponent held CLC meetings in summer and fall 2012, in winter, summer, and fall 2013, and in winter 2014. As part of the 28 February 2013 meeting, the Proponent sponsored a "Mining 101" course to improve members' knowledge of the mining industry. A similar course was also offered to the public. As part of the 13 June 2013 meeting, the Proponent hosted a site tour to provide members with an opportunity to experience an active exploration project. More details on the site tour are included in **Section 3.4.1.1.2.11** Site Tours. On 31 October and 26 November 2013, representatives from the CLC participated in teleconferences about drafting an education and training position paper. On 20 January 2014, representatives from the CLC participated in a teleconference to finalize language related to the draft Position Paper on "Advanced Education and Skills Training for North Central BC." On 11 February 2014, the Proponent hosted a CLC



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meeting to discuss Project development considerations and goals for 2014. Further CLC meetings are planned for 2014.

Appendix 3.1.3B presents a summary of identified interests and issues raised by the public.

3.4.1.1.2.6 Community Leaders Meetings

The Proponent has held two Community Leaders Meetings with local and regional elected officials including mayors from Fort St. James, Fraser Lake, Vanderhoof, Quesnel and Burns Lake, and regional chairs from the Cariboo Regional District and the Regional District of Bulkley-Nechako. These meetings confirmed and adjusted the five sustainability objectives identified by the CLC and the Economic Development Officers, and provided a regional focus for the CLC and the Project.

3.4.1.1.2.7 Economic Development Workshops

In February 2013, the Proponent hosted a workshop with Economic Development Officers from the District of Vanderhoof, the District of Fort St. James, the Village of Fraser Lake, the Quesnel/Cariboo Regional District, and the Regional District of Bulkley Nechako. The workshop's objectives were to identify economic development opportunities within the region, explore the Proponent's role in economic development, and identify potential opportunities for joint action. Key regional economic goals, such as diversifying the economy and ensuring a stable, local workforce, were discussed.

Participating Economic Development Officers said they found the workshop encouraging, and appreciated the opportunity to discuss how the Proponent could support the communities and the region. The results of the workshop were shared and confirmed with members of the CLC. These results reinforced five sustainability objectives previously identified by the CLC, including:

- Enhance local and regional economies;
- Enhance workforce stability;
- Contribute to the health of communities;
- Support local and regional government cooperation and coordination; and
- Enhance environmental sustainability.

3.4.1.1.2.8 Events

The Proponent participated in events to engage community members, provide information and updates on the Project, gather feedback for the provincial and federal EA processes, provide information on employment and training opportunities, and gather information on concerns and interests related to the Project.

The following events have been attended by the Proponent:



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- Vanderhoof Chamber of Commerce Annual General Meeting (1 October 2013); and
- Association for Mineral Exploration British Columbia Mineral Exploration Roundup Conference (27 to 30 January 2014).

The Regional District of Bulkley Nechako Business Forum (scheduled for September 2014) will be attended by the Proponent. Further, the Proponent is one of the main sponsors of the Minerals North Conference (21 to 23 May 2014).

3.4.1.1.2.9 Citizens Forums

In May 2013, the Proponent hosted Citizens Forums in Vanderhoof, Fraser Lake, Burns Lake, and Fort St. James to learn more about community interests and explore ways the Proponent could maximize social and economic benefits to the region and local communities.

The forums focused on local and regional values and assets and how the Proponent could enhance community development. In the forums, participants developed a community asset map using participant images, drawings, photographs, and other visual elements.

3.4.1.1.2.10 Focus Groups

The Proponent facilitated focus groups with members of the CLC on 30 July 2013 and 21 August 2013. The purpose of the focus groups was to receive community feedback on the Project's proposed human resource strategy including local hiring, local training, and recruitment. This feedback will be taken into consideration in the Project's human resource strategy. A Focus Group Report was distributed on 21 October 2013 to participants.

3.4.1.1.2.11 Site Tours

Tours of the Project's exploration site help the public and stakeholders understand the Project, and provide opportunities for informed comment, discussion, and questions. To date, the Project has hosted the following site tours:

- June 2012 Local Media;
- August 2012 District of Vanderhoof Mayor Gerry Thiessen and Saik'uz First Nation Chief Jackie Thomas;
- September 2012 Helicopter Site Tour attended by Tatelkuz Lake Ranch Resort;
- March 2013 College of New Caledonia (Nechako Campus), School District 91 –
 Nechako Lakes, employment agencies, and an Economic Development Officer;
- March 2013 Tour of Laboratory Sample preparation laboratory with 10 students of Mining 101 CNC; and
- June 2013 CLC.



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3.4.1.1.2.12 Feedback and Community Knowledge

The Application includes community knowledge throughout the environmental process. In the Identification and Selection of Valued Components sections of the Application, public comments have been incorporated into the issues scoping process and in the sections of candidate VCs. In addition, relevant or applicable community knowledge has been considered in each VC section of the Application under the Valued Component Baseline. Feedback from consultation with the public has been documented by the Proponent and has been incorporated into the EA where appropriate as documented in the Issues Tracking Table (Appendix 3.1.3B).

3.4.1.1.3 Summary of Public Issues and Concerns

The Public Issues Tracking Table included in **Appendix 3.1.3B** presents comments and concerns raised by the public and local government agencies as well as responses to the comments. **Table 3.4-5** provides an overview of the key comments, concerns, and issues raised by the public and local government agencies and their status of resolution. Concerns and comments primarily relate to potential effects on fish and fish habitat, land use, potential effects on wildlife and habitat, concerns related to the use of cyanide, and reclamation plans as well as potential effects from increased traffic. Interests raised relate primarily to interests in potential employment and economic opportunities and opportunities for economic diversification in the region.



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Table 3.4-5: Key Comments and Concerns Expressed by the Public and Local Government Agencies and Responses

Category	Issues/Concerns/Comments	Response by the Proponent
Potential effects of Cyanide	Effect of cyanide on the environment	Section 10 Accidents and Malfunctions will address risk mitigation for the transport of hazardous materials. A cyanide management plan is presented in Section 12.2. The Proponent provided a fact sheet on cyanide and cyanide management. The Project will not treat waste rock with cyanide. Waste rock from the open pit will be disposed of at the waste rock dumps located adjacent to the open pit. Only the ore will be subject of treatment using a whole ore leach process. The tailings residue of this process will be deposited in the TSF after a cyanide destruction process has been applied.
		Mitigation measures for storage of cyanide include:
		 Use of ISOtainers (containers that are dedicated to cyanide transport) that are designed for controlled dissolution upon delivery to the site; Adequate ventilation in the storage facility;
		Containment systems in place should there be spilled cyanide materials; and
		Warning signs to alert workers that cyanide is present.
		Mitigation measures for the safe transport of cyanide include:
		Cyanide off-loading and storage facilities will be located away from surface waters and within fenced and access-controlled boundaries with locked security fencing;
		Gas detectors in the off-loading and storage area; and
		Signage for workers.
		The Proponent is a member of the International Cyanide Management Institute, adhering to the International Cyanide Management Code (the Code). The purpose of the Code is to improve management of cyanide used in gold mining and assist in protecting human health and reducing environmental impacts. The Code is an industry voluntary program for gold mining companies. It focuses exclusively on safe management of cyanide. Companies that adopt the Code (i.e., those that use cyanide to recover gold) must have their mining operations audited by an independent third party to determine compliance with the Code. Those operations that meet the Code requirements can be certified. Audit results are made public, to inform stakeholders of the status of cyanide management practices at the certified operation. This issue is considered resolved.
Community Engagement	Assistance with local community projects	The Proponent actively supports community-building and promotes opportunities for economic diversification. Section 2.8 identifies the benefits of the Project to, the communities located in close proximity to the Project as well as to the broader region, the Province of BC and all Canadians. This issue is considered resolved.
Site Access	Transportation to site, including road access from Quesnel	The Proponent is working closely with local communities on local hiring, local training, and recruitment. The Proponent will provide on-site camp for construction and operations workforce. Construction employees are expected to live in several local and regional communities and in communities outside the Socioeconomic Regional Study Area (SERSA). Vanderhoof will serve as a transportation hub for workers living within the SERSA. Regional staff and contract workers will not be permitted to drive personal vehicles to and from the proposed mine site. They must leave their vehicles at a muster point located at or adjacent to Vanderhoof and take buses provided by the Proponent to and from the proposed mine site. In addition, the Proponent will build an airstrip to transport construction workers commuting from outside the SERSA and provide daily busing services for workers between the mine, the airstrip, and the camp. During the operations phase, the use of the airstrip to transport workforce from outside the SERSA will be discontinued and the Proponent will provide busing services from Vanderhoof for all operations workers. Additional details on Project effects on regional and local employment and businesses are presented in Section 6.2.5 and the assessment of regional and community infrastructure including regional transportation is presented in Section 7.2.3 .
		Section 12 of the Application presents the Environmental Management Plans that will also address transportation and access management.
		This issue is considered resolved.
Economic Diversification and Local Employment	Desire for economic diversification and stabilization	The Proponent is working closely with local communities to support economic diversification and stabilization activities. For example, in February 2013, the Proponent hosted a workshop with Economic Development Officers to identify ways to support economic diversification in the region.
		The Project will help to develop and diversify sustainable local employment and business opportunities. Direct Project employment will offset the loss of basic jobs that has occurred in the region since 2006 due to declines in the forestry industry. In addition, creating mining jobs will help to diversify basic employment and to support current non-basic employment in the region. These changes would make the regional economy less vulnerable to changes in the forest sector. The effects assessment on regional and local employment and businesses is presented in Section 6.2.3.
		This issue is considered resolved.
	Focus on providing local jobs and local capacity building	The Proponent is committed to hiring locally whenever possible. More than 66% of the 2012 exploration workforce came from the local region.
		The Proponent is working closely with local communities on local hiring, local training, and recruitment. For example, on 30 July 2013 and 21 August 2013 focus groups were held to receive community feedback on the Project's proposed human resources strategy. Feedback will be taken into consideration in the Project's human resources strategy. To support local hiring and training, the Proponent will work with educational partners to provide training programs to develop a skilled pool of employees. In addition, the Project will provide opportunities for on-the-job training through a variety of mandatory and elective training initiatives.
		The Proponent will seek to use local and regional suppliers, where qualified and practical. The effects assessment on regional and local employment and businesses is presented in Section 6.2.3.
		The Proponent is committed to supporting initiatives that build business and contractor capacity to benefit from Project construction and operations activities.
		Of the \$246 million of Project investment from 2011 to 2013, approximately 70% to 80% has been spent with local and regional suppliers.
		This issue is considered resolved.
Employment and Businesses	Ensuring local procurement opportunities	The Proponent will seek to use local and regional suppliers, where qualified and practical. In 2012, the Proponent spent more than \$130 million on goods and services – about 75% of that was spent in the local region. The Proponent will support local procurement at every stage of the Project.
		Section 6.2.3 includes an assessment of effects on regional and local employment and business opportunities.



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Category	Issues/Concerns/Comments	Response by the Proponent
		Additional details on Project effects on regional and local employment and businesses are presented in Section 6.2.5 . This issue is considered resolved.
	Need for education and training opportunities for local residents	The Proponent is working with local colleges and the school district to develop local education and training programs. Recruitment, training, and employment is addressed in the environmental management plans (Section 12.2). The Proponent is also working closely with local communities on local hiring, local training, and recruitment. For example, on 30 July 2013 and 21 August 2013, focus groups were held to receive community feedback on the Project's proposed human resources strategy. Feedback will be taken into consideration in the Project's human resources strategy. To support local hiring and training, the Proponent will work with educational partners to provide training programs to develop a skilled pool of employees. In addition, the Project will provide opportunities for on-the-job training through a variety of mandatory and elective training initiatives. This issue is considered resolved.
Potential Effects to Fish and Fish Habitat	Effects to fish and fish habitat	The effects assessment for fish and fish habitat is presented in Sections 5.3.8 and 5.3.9 of the Application. A Fisheries Mitigation and Offsetting Plan was prepared to avoid any net loss of fish habitat as a result of constructing and operating the Project. The mine site will not impact anadromous salmon, salmon habitat, or rare or listed (threatened/endangered) fish species.
		Surface water and sediment quality will meet applicable provincial and federal standards to prevent effects on fish, furbearers, or other wildlife that uses those waters. Surface water, groundwater, and tailings water will also be monitored on an ongoing basis throughout the life of the Project and after closure. The Project will aim to operate as a zero-discharge facility during operations and closure phases. Section 13 of the Application provides details on follow-up monitoring and compliance reporting. Section 5.3.2 of the Application provides the effects assessment on surface water flow. The Proponent has committed to maintain in stream flows requirements for fish in affected streams.
		On-site and off-site infrastructure was designed to avoid the Blackwater River drainage system, which is an important tributary of the Fraser River and supports a high diversity of fish species including rainbow and bull trout. The Blackwater River system is of historical significance to Canadians and is designated as a heritage river by the BC Government. This issue is considered resolved.
Land Use	The potential for disruption to land used by trappers, guides, ranchers and lodge owners	The Proponent continues to meet with trapline holders in the Project area and will provide compensation for affected trapline holders in accordance with industry and provincial protocols with associated proof of lost revenue. The Proponent will facilitate trapper access to trails during logging and clearing. Section 7.2.6 presents the effects assessment on the interaction of the Project footprint and activities against non-traditional land and resource uses including registered traplines. Effects on wildlife, including animals that are trapped, have been assessed as presented in Sections 5.4.7 to 5.4.15. The environmental management plans in Section 1.2.2 address wildlife management. A Reclamation and Closure Plan will be implemented as described in Section 2.6. Mitigation measures are expected to be effective and can be further optimized in response to monitoring data. The Proponent has implemented a number of measures within project design that are aimed at avoiding and/or mitigating loss and degradation effects to wildlife habitat including: A Avoid high value habitat (especially mature and old growth forests) when siting roads, transmission line, and mine site footprints, through iterative changes in the mine site and access road components already completed (the Kluskus FSR is an existing road for most of its footprint); Locate facilities and topsoil piles away from wetlands, and/or minimize the ground disturbance footprint; Minimize clearance of old growth forest and maintain hydrological regimes of wetlands near Project infrastructure; Place natural cover objects such as rock piles and woody debris piles in open areas, to act as temporary cover, and small mammal habitat, as part of the Closure and Reclamation Plan; Place coarse woody debris between rocks, and parallel and perpendicular with the upland slopes, to provide habitat for small mammals and furbearers; Select revegetation species that minimize attracting wildlife to roadsides which will reduce the potential for vehicle collisions, pr
	Effects to livestock and cattle in the area (e.g., improper gating and fencing, increased traffic on nearby roads, attraction of grizzly bears, effects related to the transmission line)	The effects assessment on Non-Traditional Land Use is presented in Section 7.2.6. Mitigation for disturbance and potential disruption to agricultural practices and activities and soil will include: Implement a traffic control and management strategy along the ROWs; Require Project vehicles to use only the ROWs and designated access roads near Project development areas to minimize compaction of agricultural soil; Implementing preventative protocols for cleaning of equipment (i.e., construction and excavation) of weeds, according to government and industry standards (i.e., weed control plans and guidelines); and Ongoing consultation with farmers and ranchers to resolve issues when required and/or if applicable.
		Mitigation for disruption to ranching practices, equipment, or livestock will include: Notifying livestock owners of the construction schedule and activities to allow livestock to be moved to other pastures if necessary and/or where applicable;



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		 Facilitating movement of livestock and farm machinery across the ROW corridors, where applicable; Identifying alternative watering locations or options in discussion with the land and livestock owner, if livestock access to water supply is curtailed by mine operations activities or infrastructure; Requiring drivers to close gates properly when Project vehicles require access to the ROW corridors on fenced and gated lands; and Ongoing consultation with ranchers and livestock owners to resolve issues, when required and/or if applicable. This issue is considered resolved.
Mine cycle/ Socioeconomics	The short-term 'boom and bust' aspect of mining	The Proponent is working with the Community Liaison Committee (CLC) and community organizations to maximize long-term benefits to the local region. The Proponent actively supports community-building and promotes opportunities for economic diversification. Skills gained at the mine will likely be transferable, enabling workers to apply them at other mines, similar resource developments or heavy industrial projects in the region. The Proponent is committed to working with educational partners to provide training programs to develop a skilled pool of employees, providing long-term sustainable benefits to the community and its members. The Project will provide opportunities for on-the-job training through a variety of mandatory and elective training initiatives. This training and accumulated experience will provide residents with opportunities for increased workforce mobility and transferability of skills and experience. Section 7.2.5 provides the effects assessment on Family and Community Well-Being. The Proponent will continue to identify and address issues associated with local socioeconomic effects. The effects assessment on regional and local employment and businesses is presented in Section 6.2.3. Section 12.2 Environmental Management Plans address training, recruitment and employment.
		This issue is considered resolved.
	Scheduling of work and shifts affecting community benefits	The Proponent is engaging with the community to learn more about desired shift schedules and other elements to maximize the benefits to local communities.
		The Application includes an assessment of social (Section 7) and economic effects (Section 6), including effects on family and community well-being. This issue is considered resolved.
	Concern over Project delays or cancellation	On 12 December 2013, the Proponent has announced the results of its Feasibility Study for the Project. While the Proponent remains committed to the Project, the timeframe for development has been extended. To ensure the Project is in a position to take advantage of a recovery in gold prices, the Proponent will continue to move the project through the EA and permitting process in 2014. Throughout 2014, the Proponent will also continue to work collaboratively with community partners to help prepare local workers for employment and contracting opportunities. The extended timeframe will provide additional time to establish local training programs and partnerships. This issue is considered resolved.
Community Well-Being	Potential for increased social pressures in the communities from increased presence of workers	The Proponent will work with communities and other agencies to mitigate and manage Project related concerns about pressures on services. The Proponent will work with local agencies to assist in monitoring community well-being and to take corrective actions where appropriate.
		The Proponent will continue to provide new employees with a comprehensive site orientation and introduction to Project policies, including policies on drug and alcohol use. The Proponent will continue to employ drug and alcohol testing for employees.
		Other relevant mitigation to be implemented include:
		 Provide construction and operations camps for workers; Facilitate and maintain communication between the operation workers and their families;
		 Zero tolerance for verbal and physical abuse;
		Recreational facilities and activities for workers at the Project site;
		Offer cultural awareness training and harassment-free workplace;
		Offer counselling services to employees; and Work with local agencies to explicit in monitoring community well being and connected in taking corrective actions where appropriate.
		• Work with local agencies to assist in monitoring community well-being and cooperate in taking corrective actions where appropriate. The effects assessment dealing with family and community well-being is presented in Section 7.2.5 . The effects assessment considers the extent to which the potential change in demographics and new Project-related income and employment may affect the well-being of families and communities in the study area in terms of economic hardship, crime, and family relationships. This issue is considered resolved.
Mine Closure and Reclamation	•	To ensure land is safely returned to productive use, mine closure and reclamation are regulated under the BC Environmental Assessment Act and the BC Mines Act.
	reclamation	Section 2.6 presents the Reclamation and Closure Plan. The reclamation approach for the Project includes the incorporation of mine-related landforms into the landscape and the re-establishment of natural landforms in the remaining sites. Mine-related landforms derived from mining activities (i.e., open pit, TSF, waste rock dumps) will be reclaimed into rocky slopes, slopes with upland beach, wetlands, permanent ponds, and a pit lake. The natural landforms will have characteristics and reliefs similar to the pre-mining conditions. These include the areas of decommissioned mine buildings and infrastructure, the transmission line, and the freshwater system, including the freshwater pipeline. The reclamation design of mine-related and natural landforms will target the reclamation of pre-disturbance ecosystems on natural landforms and the establishing of whitebark pine forest on the waste rock piles. The reclamation design will incorporate features designed to provide wildlife habitat to target species. The habitat will benefit a wide variety of species, although emphasis will be given to habitat for target Valued Components including mammals (e.g., caribou, moose, marten, grizzly bear, bats), birds (e.g., water birds, Clark's nutcracker), amphibians (e.g., western toad) and invertebrates. The Closure Management Plan presented in Section 12.2 describes how the closure activities presented in Section 2.6 will be managed. Section 13 presents details on follow-up monitoring and compliance reporting.



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Access	Increased traffic on nearby roads and road safety	The Proponent has carried out research regarding existing traffic volumes as well as potential effects from foreseeable projects to determine the potential impacts on traffic in the area. Section 7.2 presents the social effects assessment including regional and community infrastructure. The residual effects of Project-related incremental traffic are expected to be minor and not significant. The following measures will be implemented to avoid or minimize potential effects on traffic and to limit undesired access: Personal vehicles will not be permitted to travel to the mine site without a permit being issued;
	Improved access facilitated by the Project may increase presence of outside hunters, particularly in areas of outfitter tenures	 An airstrip will be built near the mine site for a fly in/fly out rotation of construction workers from outside the Socioeconomic Regional Study Area; Busing workers from Vanderhoof and airstrip to reduce traffic volume; Adherence of Project-related traffic to terms and conditions of the Kluskus Road Management Agreement and the Traffic and Access Management Plan during all phases of the Project; Locking gates will be installed on the mine access road to prevent public use of the road;
		 Implementing a no hunting policy for all workers while resident at the Project site; and Wildlife sightings will be reported to supervisory personnel in a timely manner.
		Section 12.2 presents environmental management plans that address transportation and access management. Section 7.2.6 presents the effects assessment on Non-Traditional Land and Resources including hunting.
		Section 12.2 of the Application presents environmental management plans that address transportation and access management, including speed limits. Access management and mitigation measures for linear corridors will be in place to prevent increased access by hunters and predators as stated in the draft provincial framework for moose management in BC. Further, hunting and fishing will be prohibited for employees and contractors while on company business or while staying in construction or operations camps; the Proponent has a road safety policy that employees are expected to adhere to. The access management plan will also have a "Road Use Handout," which will outline the rules that are to be followed by all traffic travelling on the existing access roads; and a road map, radio frequency map, and signage map. This issue is considered resolved.
Wildlife	Impact of the TSF on birds, particularly related to intoxication	The effects assessment on water birds and forest and grassland birds is presented in Section 5.4.8 and 5.4.9 . Environmental Management Plans presented in Section 12.2 addresses wildlife
	mpastor into the original, paradalarly related to into heads.	management. The TSF will be designed, built, and managed to minimize impacts to the environment, including birds. Mitigation measures include:
		 Operating as a zero-discharge facility; Collect all drainage from the mine by gravity into the TSF to simplify water management, spill control and mine closure; During construction, sediment ponds will be used to contain and treat site runoff and reduce the concentration of suspended solids; Surface water and sediment quality will meet applicable provincial and federal standards downstream of the proposed mine site to prevent effects on fish, furbearers, or animals that use those waters; and Surface water, groundwater and tailings water will be monitored on an ongoing basis throughout the life of the Project and post-closure. This issue is considered resolved.
Transmission Line	Impact of the transmission line on the environment	To minimize environmental impacts, the proposed transmission line follows existing roads and trails whenever possible and steps will be taken to maintain vegetation to the extent possible along the route. The Project team has been working with stakeholders to confirm a route that reduces impacts to land users. DFO Operational Statements will be used with the construction of the transmission line. Potential effects of the transmission line on soils, vegetation, and wildlife have been assessed in the Application. Section 2.5 presents the alternative assessment for the transmission line alignment. Section 7.2.6 presents the effects assessment on non-traditional land use, which also addresses hunting and guide outfitting.
		Section 12.2 Environmental Management Plans address transportation and access management and landscape, soils, vegetation management and restoration. This issue is considered resolved.
Water	Water quality and control of seepage	The Project will be designed to protect water resources. A proposed monitoring plan is provided in Section 13 . Groundwater, surface water and tailings pond water will be monitored.
		The Application includes and effects assessment on Surface Water Quality (Section 5.3.3), Sediment Quality (Section 5.3.4), and Groundwater Quality (Section 5.3.6). A Human Health Ecological Risk Assessment is presented in Section 9, which considers environmental exposure pathways, such as surface water, sediment and soil quality.
		Seepage is controlled principally from dam construction making the core impermeable as possible. There is always seepage from an earth dam, thus the Proponent has designed the Project to have an ECD downstream of the main dam (D), which will capture almost all of the seepage from the main dam. A very small amount of seepage (estimated at 2 L/s) will travel below the ECD. This seepage loss is accounted for in the water quality model used to predict Project effects on surface water quality.
		At post-closure, when the TSF discharges, the ECD will be removed and seepage from the main dam will no longer be captured. The ECD will be replaced with a constructed wetland which, together with the wetland in the TSF, will polish discharge and seepage to meet water quality guidelines or site-specific objectives.
		This issue is considered resolved.

Note: CLC = Community Liaison Committee; CWD = coarse woody debris; DFO Department of Fisheries and Oceans; ECD = Environmental Control Dam; ROW = right-of-way; TSF = Tailings Storage Facility;



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3.4.1.2 Government Agency Pre-Application Consultation

This subsection highlights information sharing and consultation activities undertaken with federal and provincial government agencies. A complete record of communication with governments can be found in **Appendix 3.1.3C**. Detailed comments provided by agencies to the draft AIR and Proponent responses are presented in **Appendix 3.1.3A**.

The Proponent began engagement with federal and provincial agencies in 2011. Since that time, consultation has focused on seeking input into the development of the Project Description, design, and development.

Communication between the Proponent and the agencies included site visits, conference calls, meetings, presentations, e-mails and phone calls, which served to both provide information and address concerns and issues raised by agencies.

3.4.1.2.1 Consultation Activities Conducted

Working Group. As described in **Section 3.1.1**, the BC EAO established a Working Group to participate in the EA process, including reviewing and commenting on the draft AIR, baseline studies, and proposed mitigation measures. Working Group members include local government, Aboriginal groups (**Table 3.1-1**), and federal and provincial government agencies. The Working Group provided comments to the Proponent regarding EA methodologies including inputs, analysis, results, and potential effects mitigation. Working Group meetings were held on 30 April 2013 and 17 July 2013. The AIR Issues Tracking Table (**Appendix 3.1.3A**) presents the comments provided by Working Group members and Proponent responses.

Site Visits and Mine Tours. The Proponent led several site tours with provincial and federal government agencies. In September 2012, the BC Ministry of Environment (BC MOE) and BC Ministry of Forests, Lands and Natural Resource Operations (BC MFLNRO) participated in a site visit. Concerns were raised with respect to migrating patterns of caribou and Blue-listed whitebark pine. As a result, management plans were developed related to exploration activities which incorporated input from provincial government agencies. A second site visit was held in July 2013, which included members of the Working Group. BC MOE, DFO, and BC MFLNRO representatives who visited the site in September 2013 and provided feedback on aspects related to aquatic resources and water quality monitoring. In addition, site visits were held in August 2013 with Transport Canada and BC Ministry of Energy, Mines and Natural Gas (BC MEMNG).

Meetings and Presentations. The Proponent initiated consultation with the Agency, AANDC, Environment Canada, DFO, Health Canada, MPMO, and Transport Canada prior to the issuance of the section 11 Order. Key meetings and presentations are described below:

- Meetings on the proposed FMOP were held on 23 January 2013; 14 August 2013; 14
 August 2013; 11 September 2013; 22 November 2013, and 12 December 2013.
- On 31 October 2013, the Proponent presented preliminary results of the water quality effects assessment to government stakeholders and the LDN.



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- On 19 November 2013, the conceptual wetlands compensation and wildlife effects assessment approach was presented to government stakeholders.
- On 31 January 2014, the Proponent met with government agencies to discuss the proposed recovery strategy for woodland caribou. Mapping updated, public comment process, work completed to date and action items were discussed.
- On 10 February 2014, the conceptual wetlands compensation plan was provided to BC EAO and the Agency for further distribution to agency and government stakeholders for potential review and feedback prior to filing the Application. Comments were provided by BC MFLNRO and Canadian Wildlife Service (CWS), and were addressed in the conceptual wetlands compensation plan.
- On 13 February 2014, the Proponent and its consultant provided a presentation on visual resources to BC MFLNRO and BC EAO. Methodologies, EA results, and mitigation measures seemed reasonable to the group, given the impact of current land uses and small number of permanent residents and visitors.
- On 14 February 2014, the Proponent met with government stakeholders and the UFN to discuss the caribou recovery strategy. A strategy overview, current caribou count data, habitat mapping, work concluded to date and future plans were discussed.
- On 4 March 2014, a presentation on the groundwater effects assessment was provided to government stakeholders and the LDN. Site characterization, groundwater quality, groundwater flow, and effects predictions were discussed.
- On 9 April 2014, the TSF alternatives assessment and the "Navigable Waters Baseline Report and Technical Assessment 2014" Report was provided to the Agency and MPMO for distribution to Agency and government stakeholders for potential review and feedback prior to filing the Application.
- On 11 April 2014, the draft FMOP was provided to the Agency and MPMO for further distribution to agency and government stakeholders for potential review and feedback prior to filing the Application.
- On 25 April 2014, a meeting was conducted at the MPMO office Ottawa attended by representatives from Environment Canada, Transport Canada, the Agency, and MPMO. The Proponent presented the Multiple Accounts Analysis (MAA) results and the options assessed for both the tailings impoundment area and the waste rock dumps. A copy of the Navigable Waters Protection Act draft Application document was provided to Transport Canada, and the MAA and FMOP were provided to Environment Canada.
- Feedback from consultation with agency stakeholders has been documented by the Proponent and has been incorporated into the EA where appropriate as documented in the Issues Tracking Tables (**Appendix 3.1.3.B**).



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3.4.1.2.2 Summary of Government Agency Issues and Concerns

Consultation activities with government agencies aided in identification of issues. Issues, comments, and concerns raised by agencies include:

- Potential effects on wildlife, such as raptor nesting, salmon spawning, and ungulate disturbance/predation;
- Potential effects on caribou migration and seasonal use areas;
- Potential grizzly bear displacement from mine site;
- Potential increases to access and hunting effects on moose populations;
- Supporting habitat security for Blue-listed whitebark pine and associated birds;
- Potential effects on rare grassland ecosystems by the transmission line corridor;
- Maintenance of adequate water flow in fish bearing watercourses;
- Tailings facility management in relation to acid rock drainage and dissolved metals; and
- Cyanide transport security.

In response to the issues raised, the Proponent developed the Environmental Work Plan that outlined the required environmental and social baseline programs necessary for the Project submission as described in **Section 3.4.1.2.1**. Responses to comments provided by the provincial and federal agencies to the draft AIR are provided in **Appendix 3.1.3A.**

Detailed issues tracking tables for federal and provincial agencies are provided in **Appendix 3.1.3B**. Key comments and concerns raised by provincial agencies include cumulative effects on caribou, concerns and input into the proposed route of the transmission line to reduce disturbance, avoiding the caribou UWR, potential effects on moose, and wetland compensation.

Key comments and concerns raised by federal agencies include water monitoring, potential effects on beaver, wetlands flow attenuation, engaging Aboriginal groups in compensation planning, and protecting fish habitat.

3.4.2 Public Consultation Planned During Application Review

This section provides a description of consultation planned with the public and local government agencies during the Application review stage as well as a description of the proposed methods and process to resolve outstanding issues. During the Application review stage of the EA process, the BC EAO will hold a public comment period (at least 30 days) on the Application.

The Proponent will continue its consultation program during the Application review stage to address additional issues raised by the public. The consultation program will include open houses and information sessions held during the public comment period; ongoing consultation activities that will take place before, during, and after the public comment period.



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3.4.2.1 Proposed Public Consultation during Application Review

This section describes proposed activities with the public and government agencies during the Application review stage.

3.4.2.1.1 Proposed Public Consultation Activities

This subsection describes proposed public consultation activities during the Application review stage.

3.4.2.1.1.1 Open Houses

Open houses to provide public review and comment on the Project's Application will be held by BC EAO in Vanderhoof and/or Fraser Lake. The Application public comment period open houses will be scheduled near the middle of the Application comment period. Open houses will be scheduled for weekday evenings and will run for approximately four hours. The open houses will include information panels for review, Project information handouts, hard copies of the Application, informational mine animations, and other visual display components. Members of BC EAO and the Project will be available to respond to questions from the participants.

A media space will be available for media to privately interview meeting participants or members of the Project team. Advertising will be consistent with the requirements of the section 11 Order and will follow the same format as the notification of the AIR public comment period as directed by BC EAO.

3.4.2.1.1.2 Information Sessions

To improve the consultation on the Project's Application and ensure meaningful engagement with a diverse set of stakeholders and broad public representation, the Proponent proposes to hold one or more information sessions during the Application review stage.

Each information session will be open to the public and will provide participants with current information about the Project, environmental studies, baseline reports, and the assessment process. The information sessions will also engage the community in an information exchange on key topics related to the Project, including the effects assessment and plans to reduce, mitigate, or compensate for potential effects. Project team members will address comments, questions, and issues raised during the sessions.

Each information session will run for approximately three hours and will be professionally facilitated. Typically, the venues will contain a large screen for presentations and visual and informational panels for public review, and sessions will include an overview presentation, topic-specific presentations, an opportunity for questions and answers, and may include small group break-out sessions by VC or topic, depending on participation and level of interest.



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Typically, handouts will be provided so that participants are well prepared for the discussion topics; visual and informational panels will be displayed around the room; and the Project will prepare and deliver a PowerPoint presentation. All materials will be available on the Project website.

Subject to availability, the sessions will be held in an approximately 120-seat facility in Vanderhoof and Fraser Lake. A media room will be available for media to privately interview meeting participants or members of the Project team.

To ensure communities in the Project area are included, the information sessions will be advertised in:

- Vanderhoof;
- Fort St. James;
- Fraser Lake:
- Burns Lake;
- · Quesnel; and
- Prince George.

3.4.2.1.1.3 Ongoing Consultation and Communications Activities

The Proponent is committed to a high level of public engagement through every stage of the Project. They will continue to actively communicate and consult with the public and stakeholders through the Application review stage by:

- · Providing e-mail updates,
- Maintaining a timely and accurate website,
- Answering questions from the public through e-mail, telephone, or in person,
- Leading site tours,
- Holding a Community Liaison meeting and a Community Leaders meeting, and
- Distributing information updates through newsletters.

3.4.2.1.1.4 Information Materials Update and Distribution

Throughout the Application review stage, the Proponent will provide Project updates to more than 1,000 stakeholders on the Project's e-mail distribution list so that the public and stakeholders will continue to have accurate and up-to-date information about the Project and the assessment process.



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3.4.2.1.1.5 Website

Throughout the Application review stage, the Proponent will continue to provide up-to-date information through the Project website. The website will be used to notify the public and stakeholders of Application-related events, such as the launch of the public comment period.

The website contains a page dedicated to the assessment process, including a schematic showing where the Project is in the process and links to the Application including relevant baseline reports and effects assessments.

3.4.2.1.1.6 Correspondence

The Project team regularly receives correspondence from the public and stakeholders. This correspondence is reviewed and responded to, as appropriate, in order to ensure the writer's issues or interests are addressed.

The public can also provide comment on the Project and receive immediate feedback by calling or visiting the Project Office in Vanderhoof which is open weekdays from 8:00 a.m. to 4:30 p.m.

All correspondence is tracked using an electronic database of public and stakeholder issues and response.

3.4.2.1.1.7 Site Tours

The Proponent has regularly held site tours with members of the community and will continue these through the Application review stage and the life cycle of the Project.

Site tours provide an opportunity for participants to experience bus travel to the site, travel the main access road, see the site itself, and ask questions of Project staff including the lead geological engineer and the health and safety officer.

3.4.2.1.1.8 Community Leaders Meetings

As a follow-up to the meeting held in summer 2014, the Proponent will hold a Community Leaders meeting during the Application review stage to receive their feedback on its community engagement and community development work, and to receive comments on the Application.

3.4.2.1.1.9 Community Liaison Committee Meeting

As a follow-up to CLC held during the Pre-Application Stage, the Proponent will hold a CLC meeting during the Application review stage to receive comments on the baseline reports, effects assessment, and plans to reduce, mitigate, or compensate for potential Project effects.

The Proponent will receive participant input on how the Project has addressed local and regional interests and review the progress of community partnerships. These comments will be recorded and addressed as part of the Application review process.



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3.4.2.1.1.10 Meetings (one-on-one and small groups)

During the Application review process, the Project team will continue to meet with Project stakeholders to obtain additional feedback and input into the proposed mitigation measures.

3.4.2.1.1.11 Focus Groups

The Proponent held Focus Groups with CLC and other community members in order to receive feedback on its human resource strategy and expects to continue this approach throughout the Application review stage when topics arise that require focused discussion and input.

3.4.2.1.1.12 Issues Tracking

All public and stakeholder comments gathered through consultation vehicles are tracked and addressed using an electronic tracking system.

3.4.2.1.2 Proposed Methods and Processes to Resolve Outstanding Issues with the Public

During the Application review stage, the Proponent will work with the public to understand potential Project effects and respond to information requests. The Proponent will endeavour to resolve any outstanding issues through continued dialogue, which include the consultation activities identified above. The Proponent will attempt to resolve outstanding issues by:

- Obtaining additional details regarding the issue as necessary (from the public or agency representative and/or from technical experts with expertise on the issue);
- Responding to the public or agency representatives about the issue that is still
 outstanding, and checking with the group to determine whether the issue has been
 sufficiently addressed;
- Meeting with the public or agency representatives as needed to discuss and resolve the issue; and
- Reporting back to the public or agency representatives on the status of the issue.

During the Application review stage, the Proponent will continue to work with the public and stakeholder groups to understand potential Project effects and respond to information requests. The Proponent will endeavour to resolve outstanding issues through continued dialogue with the public, including the consultation activities identified above.

3.4.2.2 Proposed Government Agency Application Review Consultation

Government agency consultation during the Application review stage is designed to meet the BC EAO section 11 Order and *CEAA*, *2012* requirements. During the review the Proponent will:



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- Provide copies of the Application to relevant government agencies for review and comment;
- Respond to comments identified by federal, provincial, and local government agencies through Application review;
- Provide additional information where necessary and/or requested by government agencies to support information contained in the Application;
- Attend Working Group meetings as requested by the BC EAO or the Agency to discuss issues and respond to any questions related to the Application;
- Track concerns, comments, and issues raised by government agencies during Application review by maintaining a table of issues, including responses and identified resolutions; and
- Document mitigation strategies and commitments for addressing stated concerns and ongoing issues identified by government agencies.

