

BRUCEJACK GOLD MINE PROJECT
Application for an Environmental Assessment Certificate /
Environmental Impact Statement

Appendix 3-E
Aboriginal Issues Tracking Tables

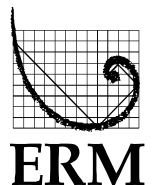


Table 3-E1. Skii km Lax Ha Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response
<p>Aboriginal - A specific chapter or section for Skii km Lax Ha required to adequately address Skii km Lax Ha interests, including downstream of the biophysical assessment area.</p>	<p>A separate subsection on the effects to Skii km Lax Ha rights and title, and related interests (Section 26.7.3), is found in Chapter 26, Aboriginal Rights and Interests. Chapter 25, Current Use of Lands and Resources for Traditional Purposes, discusses current Aboriginal use. The chapter is organized by land use activity with Skii km Lax Ha specific information discussed for each land use activity.</p>
<p>Aboriginal - Interested in discussing proposed mitigations with the proponent.</p>	<p>On May 7, 2014, Pretivm provided the Skii km Lax Ha with a memo summarizing the assessment of potential effects of the Project on Skii km Lax Ha rights and interests. On May 15, 2014, Pretivm followed up with Skii km Lax Ha to inquire whether they would like to discuss the memo prior to the submission of the Application/EIS and offered to arrange a meeting. Follow-up communication is on-going.</p>
<p>Consultation and Engagement - Draft AIR does not clearly lay out how the Skii km Lax Ha will be engaged to help interpret the impact on use of land and impact to rights.</p>	<p>Planned engagement and consultation activities with Aboriginal groups are described in the Aboriginal Consultation Plan (Appendix 3-K). On May 7, 2014, Pretivm provided the Skii km Lax Ha with a memo summarizing the assessment of potential effects of the Project on Skii km Lax Ha rights and interests. On May 15, 2014, Pretivm followed up with Skii km Lax Ha to inquire whether they would like to discuss the memo prior to the submission of the Application/EIS and offered to arrange a meeting. Follow-up communication is on-going.</p>
<p>Current Use of Lands and Resources for Traditional Purposes; Indirect Economic Effects - Where in Application will current use of lands and resources, including economic losses to Aboriginal groups, be captured.</p>	<p>Indirect effects on current use of lands and resources as a result of changes to the environment caused by the Project are considered in Chapter 25. Indirect economic effects on Aboriginal groups from changes to the environment caused by the Project are considered in Chapter 19.</p>
<p>Education/Training - Interest in training to create a skilled labour force to take advantage of employment opportunities.</p>	<p>Pretivm will communicate the Project development schedule and workforce requirements to local post-secondary educational institutions to ensure that relevant programs are available to support Project employment opportunities. Information will be provided with respect to workforce job categories, workforce schedule, and training needs to assist administrators in taking pro-active steps to prepare resources to meet the demand. Pretivm will make available training and skill development to Project employees across departments, including on-the job training, in order to support on-going enhancement of worker skillsets and internal job advancement.</p>
<p>Land Use - Difference between commercial and non-commercial land use as it applies to First Nations traditional land use and where in EA would the latter be considered.</p>	<p>Effects to commercial and non-commercial land use, excluding Aboriginal land use, are assessed in Chapter 24 of the Application/EIS, "Commercial and Non-commercial Land Use." Consideration of Aboriginal traditional land use is assessed in Chapter 25 of Application/EIS, "Current Use of Lands and Resources for Traditional Purposes".</p>
<p>Mitigation - Interested in discussing the definitions of the significance ratings.</p>	<p>On May 7, 2014, Pretivm provided the Skii km Lax Ha with a memo summarizing the assessment of potential effects of the Project on Skii km Lax Ha rights and interests. On May 15, 2014, Pretivm followed up with Skii km Lax Ha to inquire whether they would like to discuss the memo prior to the submission of the Application/EIS and offered to arrange a meeting. Follow-up communication is on-going. No significance ratings are considered with respect to the assessment of potential effects on Aboriginal rights and interests.</p>

Table 3-E1. Skii km Lax Ha Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response
Project Design - Preference for burning waste wood at Brucejack site.	Waste wood will be burned on site and pressure wood will be removed from the site and disposed of in a permitted facility.
Scope of Project - Rationale for excluding an assessment of exploration road construction.	<p>In 2011, a screening level type of environmental assessment for the Brucejack Exploration Road was undertaken and coordinated by the CEA Agency for the exploration access road under CEAA 1992 due to a federal permitting trigger under the now repealed <i>Navigable Waters Protection Act</i> (Transport Canada was the Responsible Authority). When CEAA 2012 came into force, the screening level EA for the Brucejack exploration road was terminated.</p> <p>The scope of the assessment of the Application/EIS includes the construction, operation, closure, and post-closure phases of the Project and does not include the exploration phase of the Project. Upgrades to the road required to support operational traffic and use of the access road from construction through closure are described in Section 5.13.1.1 and Appendix 5-F of the Application/EIS. Potential effects related to the access road upgrades as well as use of the road throughout the construction, operation, closure phases are part of the scope of the assessment and are included in the relevant chapters for each Valued Component.</p>
Traditional Knowledge/Use - Confidentiality concerns related to sensitive information in TK/TU Study.	TK/TU information provided by the Skii km Lax Ha has not been identified by the Skii km Lax Ha as sensitive or confidential. Pretivm understands the sensitive nature of some TK/TU information and will consider any requests from Skii km Lax Ha respecting the treatment of sensitive information.
Wildlife - Increase in bear and martin sightings near camps probably as a result of cooking odors in camp.	Garbage will be managed to mitigate the potential for bears to become attracted to the camp. An Environmental Management Plan and Standard Operating Procedures - Bear, Marten, Education and Camp Hygiene/Exclusion has been implemented during exploration to minimize wildlife-human interaction. This plan was provided to the Skii km Lax Ha for review and comment.
Wildlife - Observed impacts to bear and marten during the summer as a result of (unspecified) Project activity.	As a result of concerns raised by the Skii km Lax Ha, an Environmental Management Plan and Standard Operating Procedures - Bear, Marten, Education and Camp Hygiene/Exclusion was developed to minimize wildlife-human interaction and attraction to the Project area. This plan was provided to the Skii km Lax Ha for review and feedback. The plan has been implemented.
Wildlife - Plow escape openings for moose in snow banks along access road where the road curves.	The Wildlife Management and Monitoring Plan (Section 29.21 of Chapter 29, Environmental Management and Monitoring Plans of the Application/EIS) includes a commitment stating that refuge areas will be ploughed along the road during winter; further, gaps in snow banks on roads will be created at optimal spacing to allow an escape for wildlife, preferably on corners to allow moose to escape. Wildlife sightings for moose will also be recorded along the access road to identify high use areas such as movement corridors.

Table 3-E2. Tahltan Nation Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Cumulative Effects - Eight new mines proposed in Tahltan territory.	Past, present and reasonably foreseeable future projects with the potential to interact with the Project are listed in Section 6.9.1 in Chapter 6, Assessment Methodology. The projects that are considered include mining activity, the Red Chris Project, Northwest Transmission Line, Forrest Kerr Hydroelectric Power Facility, and KSM Project. Some of these proposed projects such as the Red Chris Project, Northwest Transmission Line, Forrest Kerr Hydroelectric Power Facility, KSM Project, and the Arctos Anthracite Coal Project are within, or overlap Tahltan traditional territory. Potential cumulative effects between residual effects of the Project and these regional projects are considered in each predictive study and effects assessment chapter, as well as the federal Cumulative Effects Assessment (Chapter 34 of the Application/EIS).	TCC, THREAT
Cumulative Effects - Would like to be involved in the design of the cumulative effects study.	Management of cumulative effects is the responsibility of all contributors to a cumulative effect. Pretivm is open to discussions on this subject and will defer to the BC EAO and the CEA Agency to guide the establishment of future sub-working groups on cumulative effects as required.	TCC
Employment/Economic Opportunities - General Interest.	The Project will provide substantial employment and numerous business opportunities. The Project will contribute to household income, regional and provincial GDP, as well as regional, provincial and federal tax revenue. Project benefits are described in Section 1.9 of Chapter 1 (Project Overview) of the Application/EIS. In general, the Project is expected to create 3,912 person-years of direct (on-site), indirect and induced employment in BC during Construction (estimated duration of 2 years), which will contribute approximately \$308 million to household income. The provincial GDP is expected to benefit by \$395 million, whereas regional, provincial and federal government revenue will increase by approximately \$64 million. During the 22 years of Operations, approximately 28,956 person-years of direct (on-site), indirect and induced employment is expected to be created in BC with household income of \$2,331 million. Provincial GDP is expected to increase by \$2,914 million, whereas regional, provincial and federal tax revenue will increase by approximately \$527 million. Construction and Operation of the Project will bring jobs mainly in construction and mining; however, other industries in BC will also benefit, including, but not limited to: professional, scientific, and technical services, accommodation and food services, manufacturing, transportation, warehousing, wholesale and trade.	TNDC
Scope of Assessment - Comparative analysis of impacts of building a new access road and upgrading the existing exploration road, including effects to moose.	Ground access alternatives to the Knipple Transfer Area are considered in Chapter 4 (Alternatives Analysis), including a screening level comparison of upgrading the existing exploration access road, constructing a new access road extending north from the Granduc area in the Upper Bowser River Valley, and barging across Bowser Lake. Options other than upgrading the existing access road are not technically or economically feasible.	TCC
Scope of Project - Brucejack Access Road should be included within the scope of the EA.	The use of the Brucejack Access Road during the construction and operation phases of the Project is included in the scope of the assessment.	TCC
Traffic - Concern about number of trucks and traffic on Highway 37 from a safety perspective.	The scope of the EA does not include Highway 37 as the Project will contribute a negligible number of vehicles. Thus safety impacts are not expected. Pretivm is participating in the Highway 37 advisory group, which will be considering safety issues in addition to potential environmental impact issues.	TCC, THREAT
Wildlife - Cumulative impacts to moose, especially as a result of the access road.	The effects of traffic along the access road on moose are assessed in the Wildlife Effects Assessment chapter (Section 18.6.1 of Chapter 18) in the Application/EIS. Residual effects on moose (Section 18.7.1 of Chapter 18) include: disruption of movement, direct mortality, and indirect mortality. An analysis was conducted for each species to characterize the residual effects, significance, likelihood and confidence. The residual effect of disruption of movement, direct mortality, and indirect mortality due to the Project (including the access road) is considered not significant.	TCC

Table 3-E3. Nisga'a Nation Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Aboriginal - Any impact to traditional foods (e.g., fish harvesting - present and future) is an impact to treaty rights regardless of consumption.	Potential effects to traditional foods are assessed in Chapter 21, Assessment of Potential Health Effects and summarized in Chapter 25, Current Use of Land and Resources for Traditional Purposes. Impacts to traditional foods as they relate to treaty rights will be discussed in Chapter 27, Assessment of Nisga'a Nation Treaty Rights, Interests, and Information Requirements. Impacts to harvesting are discussed in Chapter 25. There are no anticipated effects to fish and cultural plant harvesting in the Nass Area and effects to moose, grizzly bear and mountain goat are not anticipated to be significantly affected.	NLG
Consultation - Concern about low level of attendance by Nisga'a at the Nov. 25, 2013 Open House in New Aiyansh.	Pretivm placed notices advertising the dates of the open houses, and the locations and timing of the public comment period in the following newspapers for a three-week period: Northern Connector, Terrace Standard, and Interior News. Pretivm notified NLG and the four village governments of the open house in New Aiyansh and provided advertising materials for posting in the villages including small posters. Pretivm will continue to work with NLG and village governments for better outreach in advance of the next anticipated open house, which will be likely be following submission of the Application/EIS.	Gitlaxt'aamiks Village Government
Consultation - Establishment of, and adherence to, a formal Nisga'a communications protocol.	A Communications Protocol was signed by Pretivm and NLG in February 2013.	NLG
Consultation - Pretivm to provide baseline material to NLG directly (not via provincial and federal governments).	Baseline reports have been distributed to the BC EAO Project Working Group, of which NLG is a member.	NLG
Consultation - Would like the PEA to be presented to NLG.	Pretivm presented the PEA results in a meeting with NLG on April 4, 2012 in Vancouver, BC.	NLG
Employment/Economic Opportunities - General Interest.	Pretivm communications with Aboriginal and non-Aboriginal communities within the Local Study Area (LSA) will include the Project development schedule, workforce requirements and the hiring schedule, the workforce recruitment process, and procurement. Information will assist communities in their planning activities and making decisions to take advantage of the economic opportunities. Hiring practices will follow BC and federal legislation and regulations with a focus on hiring LSA and RSA residents, where possible, in consultation with local Aboriginal groups and LSA communities. Further, expected Project benefits relate to Project regional spending and employment, as well as spending and employment in BC and Canada (Section 1.9 of Chapter 1, Project Overview). Indirect and induced Project benefits such as increase in household income, higher GDP/output, and supplier industries to benefit from the Project are also described.	Gitlaxt'aamiks Village Government, NAE
Employment/Economic Opportunities - NLG would like to be involved in all stages of the Project from construction, to maintenance, to reclamation.	Pretivm is committed to developing an IBA, or similar negotiated agreement, with NLG.	NLG

Table 3-E3. Nisga’a Nation Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
<p>Employment/Economic Opportunities - Select the union for contracting so Nisga’a Villages can start speaking with them proactively.</p>	<p>Pretivm will offer assistance in connecting the relevant individuals within Nisga’a Nation and First Nations with external organizations including contractors and other potential suppliers to the Project. This is to facilitate the development of relationships between Aboriginal workers and businesses, and between Aboriginal businesses and non-Aboriginal businesses. It is not appropriate for Pretivm to preferentially encourage the development of relationships with specific unions; rather, ongoing communications will foster the development of relationships among all interested and active participants with an interest in benefiting from the Project, as appropriate.</p>	<p>Gitlaxt’aamiks Village Government</p>
<p>Fish - A water quality incident could affect Sockeye Salmon in Bowser Lake.</p>	<p>Pretivm acknowledges the importance of Sockeye Salmon in Bowser Lake. Sockeye Salmon are known to be present in Bowser Lake (see Table 15.3-3 in Chapter 15, Assessment of Potential Fish and Fish Habitat Effects). The proposed Project is not expected to affect Sockeye Salmon in the Bowser River and Lake watersheds, nor any other watershed with Sockeye Salmon within the regional study area. Significant effects on Sockeye Salmon spawning or rearing (e.g., fish habitat loss) habitat are not predicted due to access road upgrades or use with the proposed mitigation measures (Section 15.6.1 to 15.6.4 of Chapter 15). Significant effects on Sockeye Salmon populations and habitat due to a spill are not predicted because of the spill prevention measures proposed and spill response plan (Chapter 31 and Section 15.5.1). Effects on Sockeye Salmon populations and habitat downstream in Bowser Lake, due to a change in water quality, are not predicted to occur because tailings are proposed to be deposited in Brucejack Lake, which is located in the Unuk River watershed. Furthermore, the mine site discharges will be directed to Brucejack Lake, which is not hydrologically connected to the Nass River or Bowser Lake watersheds; therefore, there would not be any effects on the downstream receiving environment as a result of the discharge of tailings.</p>	<p>NLG</p>
<p>Fish - Nisga’a fish for spring salmon in Bowser Lake.</p>	<p>Pretivm acknowledges the importance of Nisga’a Chinook Salmon fishing in Bowser Lake. Chinook Salmon are known to be present in Bowser Lake (see Table 15.3-3 in Chapter 15, Assessment of Potential Fish and Fish Habitat Effects). The proposed Project is not expected to affect Chinook Salmon in the Bowser River and Lake watersheds, nor any other watershed with Chinook Salmon within the regional study area. Effects on Chinook Salmon spawning or rearing (e.g., fish habitat loss) habitat are not predicted due to access road upgrades or use with the proposed mitigation measures (Section 15.6.1 to 15.6.4 of Chapter 15). Effects on Chinook Salmon populations and habitat downstream in Bowser Lake are not predicted to occur because tailings are proposed to be deposited in Brucejack Lake, which is located in the Unuk River watershed. Furthermore, the mine site discharge will be directed to Brucejack Lake, which is not hydrologically connected to the Nass River or Bowser Lake watersheds; therefore, there would not be any effects on the downstream receiving environment as a result of the discharge of tailings.</p>	<p>NLG</p>
<p>Human Health - Consider a food web study in Nass area to ensure impacts are captured.</p>	<p>Country foods are included in the human health impact assessment both for baseline conditions (Appendix 21-A of Chapter 21) and for predicted Project-related potential effects (Chapter 21). The approach for the assessment of human health due to consumption of country foods was based on Health Canada guidelines for assessing food issues in environmental impact assessment (Health Canada 2010a, 2010c, 2010b, 2010d). The country foods baseline study area was chosen based on the proposed infrastructure footprint, Project development, physical barriers, and watershed boundaries (see Appendix 21-A, Section 5). The country foods baseline LSA was adopted as the country foods effects assessment LSA. For further information on the country foods baseline study area, please refer to Appendix 21-A, Section 5. The Nass Area is to the southeast of the country foods LSA. The extent of any potential Project related changes in the quality of country foods are expected to remain within the country foods LSA. Therefore no Project related human health effects due to consumption of country foods from the Nass area are expected.</p>	<p>NLG</p>

Table 3-E3. Nisga’a Nation Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Hydrology - Potential impacts on the Knipple Glacier and the watershed due to glacial melt and vehicle traffic.	Glaciers were considered as a sub-component of surface water hydrology in the EIS/Application (Section 10.4.1). Glacier ablation, which is of primary concern, was selected as an indicator for this sub-component. Potential effects of the Project, including debris and increased dust, on Knipple Glacier have been characterized qualitatively. The potential effects of the access road debris on the glaciohydrology of the Knipple Glacier are assessed in Appendix 10-D. Based on a first approximation analysis of the glaciohydrology, the changes in the summer ablation of Knipple Glacier due to the access road are less than 1% of the baseline summer ablation values. Increased fugitive dustfall levels were estimated due to their potential effect on albedo, and in turn, on glacier melt. The air quality dispersion model (Chapter 7) predicted increased dustfall levels covering approximately 3 km of the southeast end, and 200 m of the northwest end, of Knipple Glacier. The dustfall level on these segments of Knipple Glacier is predicted to be up to 0.95 mg/dm ² /day (Chapter 7). Compared to the baseline level of 0.71 gm/dm ² /day, this is approximately an increase of 34%, but it is still lower than the objectives of 1.7 to 2.9 mg/dm ² /day stated in the provincial objectives (BC MOE 1979).	NLG
Scope of Assessment - Brucejack Access Road should be included within the scope of the EA.	Upgrades to the existing exploration access road and its use and maintenance throughout the Construction and Operation phases of the Project are included in the scope of the project to be assessed. Its decommissioning and eventual closure during the Closure and Post-closure phases respectively are also addressed in the Closure and Reclamation Plan (Chapter 30).	NLG
Water Quality - Add Knipple Creek to baseline water quality program (related to concerns related to glacial melt and potential sedimentation).	Knipple Creek was added to the baseline water quality program in September of 2013, referred to as “Knipple Glacier Outflow” in both the Cumulative Water Quality and Aquatic Resources Baseline Reports, appended to Chapters 13 (Assessment of Potential Surface Water Quality Effects) and 14 (Assessment of Potential Aquatic Resources Effects), respectively. In 2013, Knipple Glacier Outflow was sampled monthly from September to November, and will be sampled monthly in 2014. Additionally, samples were collected at three points along Knipple Glacier to determine any effects from the existing road. Water quality parameters measured include: general physicochemistry (total suspended solids, pH), nutrients, anions and metals (total and dissolved).	NLG
Water Quality - Concern about potential for leach tailings to affect Bowser Lake.	Pretivm acknowledges the importance of water quality within the Bowser River. Changes in water quality are not predicted to occur as tailings and waste rock are proposed to be deposited in Brucejack Lake, which is located in the Unuk River watershed. Furthermore, the mine site discharge pathway is towards Brucejack Lake, which is not hydrologically connected to the Bowser Watershed; therefore, there would not be any effects to the Bowser River or Bowser Lake as a result of tailings discharge.	NLG
Wildlife - Cumulative impacts to moose, especially as a result of the access road.	The effects of traffic along the access road on moose are assessed in the Wildlife Effects Assessment chapter (Section 18.6.1 of Chapter 18) in the Application/EIS. Residual effects on moose (Section 18.7.1 of Chapter 18) include: disruption of movement, direct mortality, and indirect mortality. An analysis was conducted for each species to characterize the residual effects, significance, likelihood and confidence. The residual effect of disruption of movement, direct mortality, and indirect mortality due to the Project (including the access road) is considered to be not significant.	NLG
Wildlife - General interest.	Please refer to Chapter 18, Assessment of Potential Wildlife Effects for information on the wildlife effects assessment. Wildlife VCs included in the Application/EIS are moose, mountain goat, grizzly bear, American marten, hoary marmot, bats, migratory waterbirds, migratory landbirds, raptors, and amphibians (western toad). Rationale for inclusion and exclusion of wildlife VCs in the effects assessment is provided in Tables 18.4-2 and 18.4-3 of Chapter 18. Wildlife management plans are included in Chapter 29, Environmental Management and Monitoring Plans (Section 29.21).	Gitlaxt’aamiks Village Government

Table 3-E4. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Aboriginal - Concern about the sources used in the Métis Desktop Study.	Pretivm acknowledges Métis Nation BC's (MNBC) concern about the potential inappropriate access of the MNBC Historic Document Database. Information included in the Métis Interests Desktop Study (a draft of which was provided to MNBC for comment) was derived from publicly available sources, including the KSM Project: Métis Interests Desktop Study (Rescan 2013), and was not a result of direct access to the MNBC Historic Document Database. Pretivm is amending the report to reflect the appropriate data source attribution. Further, a review of all sources, including the BC Métis Federation, the MNBC Consultation Guidelines, and MNBC <i>Natural Resource Act</i> will be completed in light of MNBC's comments.	MNBC
Consultation - Consider a funding agreement with GHC to facilitate Gitanyow participation in consultation activities (GHC to provide budget for Pretivm to review).	GHC raised this issue in a meeting with Pretivm on March 28, 2012. On July 4, 2013, the BC EAO issued a Section 11 Order under the British Columbia <i>Environmental Assessment Act</i> confirming Pretivm's obligations to consult with Aboriginal groups. The Order listed Nisga'a Nation, Tahltan Nation, and Skii km Lax Ha as requiring consultation by Pretivm. The BC EAO states in the Section 11 Order (Section 13) that it will consult with Gitanyow Wilp Wii'litsxw through the GHC. Prior to this direction from BC EAO, Pretivm met with the GHC on November 15, 2011, March 28, 2012, and July 13, 2012 to discuss the Project and Gitanyow interests that could be potentially affected by the Project. Pretivm also provided GHC representatives with a tour of the site on August 21, 2012. Pretivm will consult further with GHC should Gitanyow specific issues arise requiring further discussion and consideration.	GHC
Consultation - GCO would like Pretivm to consider a basic protocol for a relationship as Project moves forward including support to attend consultation meetings.	GCO raised this issue in a meeting with Pretivm on March 28, 2012. On July 4, 2013, the BC EAO issued a Section 11 Order under the British Columbia <i>Environmental Assessment Act (2002)</i> confirming Pretivm's obligations to consult with Aboriginal groups. The Order listed Nisga'a Nation, Tahltan Nation, and Skii km Lax Ha as requiring consultation by Pretivm. Prior to this direction from BC EAO, Pretivm met with the GCO on November 16, 2011 and March 28, 2012 to discuss the Project and Gitxsan interests that could be potentially affected by the Project. Pretivm also provided GCO representatives with a tour of the site on August 22, 2012. Pretivm invited GGO representatives to any of the Draft AIR open houses held November 25 to 28 in northwest BC. Pretivm will consult further with GCO should Gitxsan specific issues arise requiring further discussion and consideration.	GCO
Consultation - GHC would like a meeting prior to submission of Project Description to BC EAO.	GHC raised this issue at a meeting with Pretivm on March 28, 2012. Pretivm met with GHC again on July 13, 2012, and provided GHC representatives with a site tour on August 21, 2012. Pretivm submitted the Project Description to BC EAO on January 5, 2013.	GHC
Consultation - Interest in quarterly meetings to discuss project progress and communicate concerns and interests.	GHC raised this issue in a meeting with Pretivm on March 28, 2012. On July 4, 2013, the BC EAO issued a Section 11 Order under the British Columbia <i>Environmental Assessment Act</i> confirming Pretivm's obligations to consult with Aboriginal groups. The Order listed Nisga'a Nation, Tahltan Nation, and Skii km Lax Ha as requiring consultation by Pretivm. The BC EAO states in the Section 11 Order (Section 13) that it will consult with Gitanyow Wilp Wii'litsxw through the GHC. Prior to this direction from BC EAO, Pretivm met with the GHC on November 15, 2011, March 28, 2012, and July 13, 2012 to discuss the Project and Gitanyow interests that could be potentially affected by the Project. Pretivm also provided GHC representatives with a tour of the site on August 21, 2012. Pretivm invited GHC to attend any of the Draft AIR Open Houses November 25 to 28 in northwest BC.	GHC

Table 3-E4. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Consultation - Request for regular update meetings with Pretivm.	On July 4, 2013, the BC EAO issued a Section 11 Order under the British Columbia <i>Environmental Assessment Act</i> (2002) confirming Pretivm's obligations to consult with Aboriginal groups. The Order lists Nisga'a Nation, Tahltan Nation, and Skii km Lax Ha as requiring consultation by Pretivm. Prior to this direction from BC EAO, Pretivm met with the GCO on November 16, 2011 and March 28, 2012 to discuss the Project and Gitxsan interests that could be potentially affected by the Project. Pretivm also provided GCO representatives with a tour of the site on August 22, 2012. Pretivm invited GGO representatives to any of the Draft AIR open houses held November 25 to 28 in northwest BC. Pretivm will consult further with GCO should Gitxsan specific issues arise requiring further discussion and consideration.	GCO
Consultation - Would like to tour the site.	Pretivm provided GCO representatives with a tour of the site on August 22, 2012.	GCO, GDC
Consultation- Would like to tour the site.	Pretivm provided GHC representatives with a tour of the site on August 21, 2012.	GHC
Cumulative Effects - Cumulative effects resulting from increased traffic on Highway 37.	<p>The effects of increased traffic along Highway 37 on moose and grizzly bears are assessed in the Cumulative Effects Assessment section of the Wildlife Effects Assessment chapter (Section 18.9 of Chapter 18, Assessment of Potential Wildlife Effects) in the Application/EIS. Cumulative residual effects on wildlife (Section 18.9.4 of Chapter 18) include disruption of movement, sensory disturbance, direct mortality, and indirect mortality for moose, Grizzly Bear, mountain goat, and Western Toad. An analysis was conducted for each species to characterize the cumulative residual effects, significance, likelihood and confidence (Section 18.9.5 of Chapter 18). The cumulative residual effect of increased traffic along Highway 37 is considered to be not significant.</p> <p>Daily average vehicle traffic is estimated to be approximately 10 return trips per day, or 20 one-way trips. Vehicles will range in size from small personal vehicles to 40 tonne transport trucks in B-train configuration. Traffic estimates for the Project are described in Section 5.13 of Chapter 5, Project Description, of the Application/EIS. This is considered to be a small proportion of total vehicle traffic along Highway 37. Traffic related issues along Highway 37 are outside the scope of the Project effects assessment; however, Pretivm is participating in a Highway 37 Advisory Group chaired by the BC EAO.</p>	GHC, GFA
Cumulative Effects- General.	Past, present and reasonably foreseeable future projects with the potential to interact with the Brucejack Gold Mine Project are listed in Section 6.9.1 in Chapter 6, Assessment Methodology. The projects that are considered include a variety of proposed mining, the Red Chris Project, Northwest Transmission Line, Forrest Kerr Hydroelectric Power Facility, KSM Project, and the Arctohydroelectric, gas transmission line, pipeline and LNG projects. Potential cumulative effects between potential residual effects of the Brucejack Project and these regional projects are considered in each predictive study and effects assessment chapter, as well the Federal Cumulative Effects Assessment (Chapter 34 of the Application/EIS).	GHC, GFA
Cumulative Effects - Moose mortality as a result of traffic - consider Banff-style wildlife crossings.	Mitigations such as wildlife crossings and management of the highways are outside of the scope of the EA, and falls under the jurisdiction of the BC Ministry of Transportation. Pretivm is participating in a regional traffic impact study along Highway 37 being chaired by the BC EAO	GHC, GFA

Table 3-E4. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Education/Training - Consider offering training in Hazelton in conjunction with NWCC.	Pretivm will communicate the Project development schedule and workforce requirements to encourage educational institutions to ensure that relevant programs are available within the RSA and LSA communities for residents to take advantage training and education opportunities relevant to Project employment. Communications are to provide educational institutions throughout the RSA with early notice with respect to workforce job categories, the workforce schedule, and training needs to assist administrators in taking pro-active steps to prepare resources to meet the demand. Pretivm will promote and support mining-related training and education as led and implemented by educational institutions within the RSA (Section 19.5.1. of Chapter 19, Assessment of Potential Economic Effects).	GCO
Education/Training - Gitxsan may be able to deliver training locally for mining related jobs; preference for training to be available locally.	Pretivm will communicate the Project development schedule and workforce requirements to encourage educational institutions to ensure that relevant programs are available within the RSA and LSA communities for residents to take advantage training and education opportunities relevant to Project employment. Communications are to provide educational institutions throughout the RSA with early notice with respect to workforce job categories, the workforce schedule, and training needs to assist administrators in taking pro-active steps to prepare resources to meet the demand. Pretivm will promote and support mining-related training and education as led and implemented by educational institutions within the RSA (Section 19.5.1. of Chapter 19, Assessment of Potential Economic Effects).	GCO
Education/Training - Interest in mining-related training opportunities.	Pretivm will communicate the Project development schedule and workforce requirements to encourage educational institutions to ensure that relevant programs are available within the RSA and LSA communities for residents to take advantage training and education opportunities relevant to Project employment. Communications are to provide educational institutions throughout the RSA with early notice with respect to workforce job categories, the workforce schedule, and training needs to assist administrators in taking pro-active steps to prepare resources to meet the demand. Pretivm will make available training and skill development to Project employees across departments, including on-the job training, in order to support on-going enhancement of worker skillsets and internal job advancement (Section 19.5.1. of Chapter 19, Assessment of Potential Economic Effects). To date, Pretivm has provided on-site training through Tsetsaut Ventures for equipment operators and carpentry and has provided "Foodsafe" training and certification for kitchen staff.	GCO
Education/Training - Potential interest in Pretivm participating in career fairs.	Pretivm participated in a career fair in Gitanyow on April 25, 2014 and will consider other opportunities to participate in career fairs in the future.	GCO
Employment/Economic Opportunities - Concern Gitanyow won't be hired if another Aboriginal group is preferentially hired.	Pretivm is committed to providing employment opportunities to individuals from several Aboriginal groups. Pretivm will consider the needs of workers from Aboriginal communities with the aim of increasing the level of employment participation in the Project. Hiring practices will follow BC and federal legislation and regulations with a focus on hiring LSA and RSA residents, where possible, in consultation with local Aboriginal groups and LSA communities (see Section 19.5.1 of Chapter 19, Economic Effects Assessment). Hiring practices will focus on hiring local and regional residents, but not to the exclusion of others.	GHC

Table 3-E4. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Employment/Economic Opportunities - GCO want to see development, investment, and employment.	Pretivm communications with Aboriginal and non-Aboriginal communities within the Local Study Area (LSA) will include the Project development schedule, workforce requirements and the hiring schedule, the workforce recruitment process, and procurement. Information will assist communities in their planning activities and making decisions to take advantage of the economic opportunities. Hiring practices will follow BC and federal legislation and regulations with a focus on hiring LSA and RSA residents, where possible, in consultation with local Aboriginal groups and LSA communities. Further, expected Project benefits relate to Project regional spending and employment, as well as spending and employment in BC and Canada (Section 1.9 of Chapter 1, Project Overview). Indirect and induced Project benefits such as increase in household income, higher GDP/output, and supplier industries to benefit from the Project are also described.	GCO
Employment/Economic Opportunities - General Interest.	The Project will provide substantial employment and numerous business opportunities. Through this, it will contribute to household income, and regional and provincial GDP, as well as regional, provincial and federal tax revenue. Project benefits are described in detail in Section 1.9 of Chapter 1 (Project Overview) of the Application/EIS. In general, the Project is expected to create 3,912 person-years of direct (on-site), indirect and induced employment in BC during Construction (estimated duration of 2 years), which will contribute approximately \$308 million to household income. The provincial GDP is expected to benefit by \$395 million, whereas regional, provincial and federal government revenue will increase by approximately \$64 million. During Operations (estimated duration of 22 years), approximately 28,956 person-years of direct (on-site), indirect and induced employment is expected to be created in BC with household income of \$2,331 million. Provincial GDP is expected to increase by \$2,914 million, whereas regional, provincial and federal tax revenue will increase by approximately \$527 million. Construction and Operation of the Project will bring jobs mainly in construction and mining; however, other industries in BC will also benefit, including, but not limited to: professional, scientific, and technical services, accommodation and food services, manufacturing, transportation, warehousing, wholesale and trade.	GHC
Employment/Economic Opportunities - Gitxsan Development Corporation interested in exploring business opportunities.	The Project will encourage the involvement of local and regional businesses interested in the opportunities to directly and indirectly supply the Project to maximize the benefits within the region. Suppliers will be selected based on location, quality, price, and delivery (among other criteria) with the standards for purchasing determined during the initial stages of the Project. Suppliers that may benefit include, but certainly are not limited to, road maintenance services, long-haul and heavy-haul trucking companies, and scheduled and chartered cargo service located in nearby communities such as Terrace, Smithers and Dease Lake Other local suppliers could include businesses in safety services, catering, janitorial, electrical, mechanical, and similar. However, at this point, the specifics of sourcing services are not yet known, as this will be determined by the level of interest among regional businesses and their ability to serve the mining sector.	GCO, GDC

Table 3-E4. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Employment/Economic Opportunities - Interested in Project-related benefits.	Pretivm communication with Aboriginal and non-Aboriginal communities within the Local Study Area (LSA) will include sharing current information on the Project development schedule, workforce requirements and the hiring schedule, the workforce recruitment process, and procurement. Information will assist communities in their planning activities and making decisions to take advantage of the economic opportunities. Hiring practices will follow BC and federal legislation and regulations with a focus on hiring LSA and RSA residents, where possible, in consultation with local Aboriginal groups and LSA communities. Pretivm will offer training and skill development to Project employees across departments, including on-the job training, in order to support on-going enhancement of worker skillsets and internal job advancement (Section 19.5.1. of Chapter 19, Assessment of Potential Economic Effects). Through the pursuit of Impact Benefit Agreements (IBAs) or other forms of agreements, Pretivm will work with First Nations and Nisga'a Nation to address some of the barriers their community members face with respect to gaining higher levels of education attainment and employment.	GCO
Employment/Economic Opportunities - Interested in training and employment outreach.	Pretivm will communicate the Project development schedule and workforce requirements (including workforce job categories, the workforce schedule, and training needs) to Aboriginal and non-Aboriginal communities, as well as educational institutions, so that appropriate decisions can be made in taking pro-active steps so that local and regional residents are able to take advantage of employment opportunities. Hiring practices will follow BC and federal legislation and regulations with a focus on hiring local and regional residents, where possible, in consultation with local Aboriginal groups and local communities. Pretivm will consider the needs of workers from regional and Aboriginal communities with the aim of increasing the level of employment participation in the Project. Pretivm will offer training and skill development to Project employees across departments, including on-the job training, in order to support on-going enhancement of worker skillsets and internal job advancement (Section 19.5.1. of Chapter 19, Assessment of Potential Economic Effects).	GCO
Fish and Fish Habitat - Sockeye spawning is vital to Gitanyow.	Pretivm acknowledges that Sockeye Salmon spawning is vital to Gitanyow First Nation. Sockeye Salmon are present within the following baseline fish and fish habitat study area watersheds: Bell-Irving River, Bowser River, Bowser Lake, Todedada Creek, and Unuk River. Bowser Lake is known to have a substantial Sockeye Salmon population (see Section 15.3.4.3 in Chapter 15, Assessment of Potential Fish and Fish Habitat Effects). The Bowser Lake Sockeye Salmon population is one of the four main stocks in the Nass system (BC MOE 2008). The Bowser Lake Sockeye Salmon population makes up approximately 8% of the Nass River stock (English, Mochizuki, and Robichaud 2012). The proposed Project is not expected to affect Sockeye Salmon in the Bowser River and Lake watersheds, nor any other watershed with Sockeye Salmon within the regional study area. Effects on Sockeye Salmon spawning (e.g., fish habitat loss) habitat are not predicted due to access road upgrades or use with the proposed mitigation measures (Sections 15.6.1 to 15.6.4 of Chapter 15). Effects on Sockeye Salmon populations and habitat downstream in Bowser Lake are not predicted to occur because tailings are proposed to be deposited in Brucejack Lake, which is located in the Unuk River watershed. Furthermore, the mine site discharge pathway is towards Brucejack Lake, which is not hydrologically connected to the Nass River or Bowser Lake watersheds so there would not be any effects on the downstream receiving environment in relation to the discharge of tailings.	GHC

Table 3-E4. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Human Health - Medicinal plants, berries, fish, wildlife and water are vital to Gitanyow food security.	A country foods baseline assessment report was completed for the Application/EIS (Appendix 21-A). In addition, an assessment of potential health effects (Chapter 21) includes an assessment for the potential Project-related effects on country food quality. Country foods included moose, snowshoe hare, grouse, Dolly Varden/bull trout, and berries. The country foods LSA was based on the outer limits of the proposed infrastructure, development, physical barriers, and watershed boundaries. Within the country foods study area, no residual effects on human health due to the consumption of country foods was identified through a predictive, quantitative screening level risk assessment, as described in Section 21.6.4 of the assessment. The LSA for country foods and drinking water does not overlap with Gitanyow traditional territory. Project effects to country foods or drinking water quality are not expected outside of the LSA. Therefore, no human health effects from country foods or drinking water to Gitanyow are anticipated.	GHC, GFA
Project Design - Designing for ground stability in the advent of potential earthquakes.	The project will be designed and constructed to current engineering best practices with regards to resiliency in the event of any anticipated earthquakes. Chapter 32, Effects of the Environment on the Project, addresses the issue of earthquakes.	GCO
Project Roads - General comment about controlling access on exploration roads.	The existing exploration access road (from Highway 37 to the Project site) is controlled at its intersection with Highway 37. The control point comprises a permanently staffed facility where each vehicle movement through the control point is checked and recorded. This level of access control will be maintained on the Brucejack Access Road throughout the Construction and Operation phases of the Project. Access control will be maintained during the Closure and Post-closure phases, but permanent staffing will be scaled down appropriately. Access control will cease once the road is deactivated. A Transportation and Access Management Plan (Section 29.16) has been prepared that stipulates the mitigation and management measures envisaged for the road.	GCO
Project Roads - Would like Brucejack Access Rd. to be controlled and would like Pretivm to employ Gitxsan to control road access.	The existing exploration access road (from Highway 37 to the Project site) is controlled at its intersection with Highway 37. The control point comprises a permanently staffed facility where each vehicle movement through the control point is checked and recorded. This level of access control will be maintained on the Brucejack Access Road throughout the Construction and Operation phases of the Project. Access control will be maintained during the Closure and Post-closure phases, but permanent staffing will be scaled down appropriately. Access control will cease once the road is deactivated. A Transportation and Access Management Plan (Section 29.16) has been prepared that stipulates the mitigation and management measures envisaged for the road. Pretivm aim to preferentially hire qualified personnel from local communities.	GCO
Socio-economic - Gitanyow does not want "socio-economic" data to be lumped into general socio-economic study.	Where possible, the socio-economic study is disaggregated at a community level. However, often information at a community level is not available and only aggregate data for a larger municipal area, Regional District, or province is provided. Consequently, certain information is considered at a broader collection of communities and inferences are made with respect to individual communities when possible. Potential economic effects of the Project are assessed in Chapter 19, and potential social effects in Chapter 20.	GHC

Table 3-E4. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until May 16, 2014)

Issue	Pretivm Response	Issue Raised by
Tailings Management - Sub-aqueous deposition of tailings in Brucejack Lake (water contamination).	Brucejack Lake is the proposed site of sub-aqueous waste rock and tailings disposition. Any potential effects on surface water quality from sub-aqueous tailings deposition are predicted to be localized to Brucejack Lake and Brucejack Creek (see Chapter 13, Assessment of Potential Surface Water Quality Effects, for further details). Further, water quality predictions have been modeled for Brucejack Lake and the immediate downstream receiving environment (Chapter 13). The water quality model included tailings/waste rock deposition and other project related discharges to Brucejack Lake. The results of the water quality model conclude predict that there will be no measurable change in water quality of downstream receiving waters beyond (Brucejack Creek). Further, all points of discharge will be monitored and mitigated as required by standards outlined in the MMER (MMER; SOR/2002-222) and EMA permits.	GCO
Traditional Knowledge/Use - Concern about “traditional animals and plants.”	Concerns regarding “traditional animals and plants,” particularly regarding the effects of the Project on those animals and plants, are addressed in Chapter 18, Assessment of Potential Wildlife Effects, and Chapter 16, Assessment of Potential Terrestrial Ecology Effects. “Culturally Important Plants” have been included as a Valued Component (VC) in Chapter 16 and have been assessed separately from other ecosystems. VC’s included for assessment in Chapter 18 include those that, among other reasons, are, or were, important to Aboriginal groups for harvesting or spiritual purposes. Potential effects to wildlife include habitat loss/degradation, disruption of movement, sensory disturbances, direct and indirect mortality, and effects from attractants and chemical hazards. Potential effects to culturally important plants include plant habitat loss and degradation (dusting, invasive plants, etc.). Effects to hunting/trapping and plant gathering opportunities and practices, partly as a result of effects to wildlife and culturally important plants, are addressed in Chapter 25 (Current Use of Lands and Resources for Traditional Purposes). Any Project related effects on country foods are considered minor or negligible. Based on the quantitative screening level risk assessment conducted, minimal to no human health risk is expected from consumption of country foods. Calculated hazard quotient for selected contaminants of potential concern were below threshold values, indicating negligible/low project related human health effects due to country foods consumption (see Chapter 21 of the Application/EIS further information).	GCO
Traffic - Concern about number of trucks and traffic on Highway 37 from a safety perspective.	The scope of the assessment does not include Highway 37 as the number of vehicles are considered to be a negligible increase in traffic, thus safety impacts are not expected. Pretivm is participating in the Highway 37 advisory group, which will be considering safety issues in addition to potential environmental impact issues.	GHC
Traffic - Concern about number of trucks and traffic on Highway 37 from a wildlife perspective.	The effects of increased traffic along Highway 37 on moose and grizzly bears are assessed in the Cumulative Effects Assessment section of the Wildlife Effects Assessment chapter (Section 18.9 of Chapter 18, Assessment of Potential Wildlife Effects) in the Application/EIS. Cumulative residual effects on wildlife (Section 18.9.5 of Chapter 18) include: 1) disruption of movement, direct mortality, and indirect mortality for moose; 2) disruption of movement, direct mortality, indirect mortality, and attractants for grizzly bear; 3) sensory disturbance and indirect mortality for mountain goat; 4) attractants for American marten; and 5) direct mortality and indirect mortality for western toad. An analysis was conducted for each species to characterize the cumulative residual effects, significance, likelihood and confidence (Section 18.9.5 of Chapter 18). The cumulative residual effect of increased traffic along Highway 37 is considered to be not significant. Pretivm is participating in a regional traffic impact study along Hwy 37 being chaired by the BC EAO.	GHC

Table 3-E4. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until May 16, 2014)

Issue	Project Response	Issue Raised by
Water Quality - General.	Surface Water Quality was screened for inclusion as a receptor value component (VC) based on the results of the scoping process as described in Section 6.4.1. (Chapter 6, Assessment Methodology). Concerns regarding surface water quality are addressed in Chapter 13 (Assessment of Potential Surface Water Quality Effects). The assessment considered a range of spatial scales from local (e.g., immediately downstream of Brucejack Lake) to regional (e.g., Unuk River at the international border). Identified potential effects to surface water quality include changes to surface water quality due to erosion and sedimentation, metal leaching/acid rock drainage (ML/ARD), nitrogen loading from leaching of blasting residues, dust deposition, planned discharges, and groundwater interactions and seepage. Outside the mine site area, Project related residual effects on surface water quality are considered minor or negligible (see Sections 13.5.1 and 13.6.1 of Chapter 13 for further information). Within the Mine Site area, water quality effects are expected to be limited to Brucejack Lake, based on predictive water quality modelling as well as semi-quantitative assessments for areas outside of the modelling domain (mid- and far-field receiving environments). Active monitoring of receiving environments will be designed and executed to detect any potential changes in water quality as part of the Aquatics Environment Effects Monitoring and Management Program (see Chapter 29, Environmental Management and Monitoring Plans). Adaptive management and mitigation measures will be implemented to manage any potential effects on surface water quality, as required (Chapter 29).	GCO
Water Quality - Mine seepage contaminating surrounding and downstream water.	Water quality predictions were modeled for Brucejack Lake and the immediate downstream receiving environment (Chapter 13, Assessment of Potential Surface Water Quality Effects). The water quality model included groundwater interactions and seepage, as well as waste rock and tailings deposition. The results of the water quality model conclude that there will be no change to the water quality in the downstream receiving waters (Brucejack Creek) and no effects on water quality in surrounding waters from seepage. Therefore, no water quality changes are predicted to occur in surrounding-, mid-, or far- field receiving environments (Section 13.6, Chapter 13).	GCO
Wildlife - Consider Banff-style wildlife crossings (assuming Hwy 37 but not clear).	Mitigations such as wildlife crossings and management of the highways are outside of the scope of the EA, and falls under the jurisdiction of the BC Ministry of Transportation.	GHC
Wildlife - Effects of transportation on wildlife (unspecified).	The effects of increased traffic along Highway 37 on moose and grizzly bears are assessed in the Cumulative Effects Assessment section of the Wildlife Effects Assessment chapter (Section 18.9 of Chapter 18, Assessment of Potential Wildlife Effects) in the Application/EIS. Cumulative residual effects on wildlife (Section 18.9.5 of Chapter 18) include: 1) disruption of movement, direct mortality, and indirect mortality for moose; 2) disruption of movement, direct mortality, indirect mortality, and attractants for grizzly bear; 3) sensory disturbance and indirect mortality for mountain goat; 4) attractants for American marten; and 5) direct mortality and indirect mortality for western toad. An analysis was conducted for each species to characterize the cumulative residual effects, significance, likelihood and confidence (Section 18.9.5 of Chapter 18). The cumulative residual effect of increased traffic along Highway 37 is considered to be not significant.	GCO