



August 11, 2017

File no.: 005533

Michael McPhie
Executive Chairman
IDM Mining Ltd.
Suite 1500 - 409 Granville St.
Vancouver, BC V6C 1T2

Dear Mr. McPhie:

**Re: Results of Conformity Review of the Environmental Impact Statement
for the Red Mountain Gold Mine Project**

On July 12, 2017, the Canadian Environmental Assessment Agency (the Agency) received the "Red Mountain Underground Gold Project Environmental Assessment Application and Environmental Impact Statement" (EIS/Application) for the Red Mountain Gold Mine Project (the Project) from IDM Mining Ltd. (the proponent). The Agency has conducted a conformity review of the EIS/Application to determine whether it contains the necessary information, as outlined in the federal EIS Guidelines, to proceed to technical review. The Agency has determined that additional information must be provided before proceeding to technical review of the EIS/Application.

Annex 1 (attached) includes comments on sections of the EIS/Application where additional information is required before the Agency can proceed to the technical review of the EIS/Application. Annex 1 includes, but is not limited to, comments relating to the following topics:

- the standalone summary of the EIS;
- the assessment of alternative means of carrying out the project;
- the description of engagement with Indigenous groups;
- the baseline characterization of groundwater and surface water;
- the baseline characterization of fish and fish habitat, species at risk, migratory birds;
- the assessment of effects to fish and fish habitat;
- the assessment of effects to current use of lands and resources for traditional purposes;
- the assessment of effects to human health;

.../2



- the Nisga'a Nation Economic, Social and Cultural Impact Assessment;
- the assessment of accidents and malfunctions; and
- the effects of the environment on the project.

The proponent must address the comments included in Annex 1 to the satisfaction of the Agency by providing a response demonstrating how each comment has been addressed and incorporating additional information into the EIS/Application. Upon your resubmission of the EIS/Application, the Agency will conduct a focused review of the revisions to the EIS/Application to verify that the changes are adequate.

Should the Agency determine that IDM Mining Ltd. has adequately addressed all comments in Annex 1, the EIS/Application will be subject to a technical review which includes a detailed review by the Agency, Indigenous groups, and the working group. The technical review will also include a public comment period on the EIS Summary. The technical review may result additional requests for information or clarification from the Agency.

Annex 2 (attached) includes two types of comments: (1) issues for clarification, and (2) early notification of technical review issues. These comments are intended to provide you with advance notification of comments identified by the Agency and the federal review team. Please note that while the Agency encourages you to address these comments, a response is not required in order to begin technical review. However, these issues will be raised during the technical review and may become part of a formal Information Requirement at that time.

The Agency is also aware that British Columbia's Environmental Assessment Office (BC EAO) is in the process of completing the provincial screening of the EIS/Application against the provincial Application Information Requirements. The Agency understands that the BC EAO may ask for changes to the EIS/Application as part of its screening process. To ensure that both governments have the same information moving into the coordinated technical review phase, the Agency requests that IDM Mining Ltd. submit a revised EIS/Application which fully incorporates any additional information or changes requested by either the Agency or the BC EAO.

Please be aware that the 365-day federal timeline for conducting the environmental assessment remains paused at day 71 of 365. The federal timeline will resume when the Agency determines that the proponent has adequately addressed all comments in Annex 1.

Please do not hesitate to contact me with any questions at 604-666-9162 or andrea.raska@ceaa-acee.gc.ca.

Sincerely,

<Original signed by>

Andrea Raska
Project Manager

Attachment 1: Annex 1 – Information Required in the EIS for Technical Review
Attachment 2: Annex 2 – Issues for Clarification and Early Notification of
Technical Review Issues

c.c.: Max Brownhill, Falkirk Resource Consultants Ltd.
Jasmin Flores, Falkirk Resource Consultants Ltd.
Claire Backus, Catana Consulting Ltd.
Lindsay Luke, British Columbia Environmental Assessment Office
Ian Bergsma, Fisheries and Oceans Canada
Jennifer Dore, Natural Resources Canada
Nadine Parker, Environment and Climate Change Canada
Paula Smith, Health Canada
Yota Hatziantoniou, Health Canada
Tim Archer, Major Projects Management Office
Collier Azak, Nisga'a Lisims Government
Mansell Griffin, Nisga'a Lisims Government
Darlene Simpson, Tsetsaut/Skii km Lax Ha
Chris Gall, Métis Nation British Columbia

Red Mountain Gold Mine Project – Conformity Review

Annex 1 – Information Required in the EIS for Technical Review

Table of Concordance Row No.: n/a

Section of EIS Guidelines: EIS Summary

Requirement of the EIS Guidelines: The title page of the EIS and its related documents will contain the following information: Project name and location

EIS Section: Volume 1, Section 00c

Information Required: Provide project location on the title page of the EIS Summary.

Table of Concordance Row No.: n/a

Section of EIS Guidelines: EIS Summary

Requirement of the EIS Guidelines: A summary of the consultation conducted with Aboriginal groups, the public, and government agencies, including a summary of the issues raised and the proponent's responses

EIS Section: Volume 1, Section 00c

Information Required: Provide a summary of consultation conducted with Indigenous groups, the public, and government agencies, including a summary of issues raised and proponent responses in the EIS Summary. It is not sufficient to refer readers to the EIS, given that the public comment period is on the EIS Summary.

Table of Concordance Row No.: n/a

Section of EIS Guidelines: EIS Summary

Requirement of the EIS Guidelines: The proponent's conclusions on the residual environmental effects of the project after taking mitigation measures into account and the significance of those effects.

EIS Section: Volume 1, Section 00c

Information Required: Provide the proponent's conclusions on the residual environmental effects. The significance determination was missing for hydrology (section 7.6).

Table of Concordance Row No.: n/a

Section of EIS Guidelines: EIS Summary

Requirement of the EIS Guidelines: The summary is to be provided as a separate document and should be structured as follows...

EIS Section: Volume 1, Section 00c

Information Required: Provide the EIS as a standalone document. The following things should be done to make the EIS Summary a standalone document:

- Re-title Executive Summary to "EIS Summary"; and
- Remove the "Volume1/Front Matter" text in the title, and the "EA Application/EIS" header.

Table of Concordance Row No.: n/a

Section of EIS Guidelines: EIS Summary

Requirement of the EIS Guidelines: The summary is to be provided as a separate document and should be structured as follows: Anticipated effects

EIS Section: Volume 1, Section 00c

Information Required: Provide a summary of the anticipated effects to current use of lands and resources for traditional purposes. This information was included in the EIS but not the EIS Summary.

Table of Concordance Row No.: 35

Section of EIS Guidelines: Alternative Means of Carrying Out the Project

Requirement of the EIS Guidelines: The proponent will complete the following procedural steps for addressing alternative means: Assess the environmental effects of the alternative means

EIS Section: Chapter 4, Section 4.2.1

Information Required: Assess the environmental effects of each alternative means of carrying out the project. The EIS contains very brief mention of environmental effects from each alternative (2-5 words), which is insufficient; more detail explaining the effects from each alternative is required.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 40

Section of EIS Guidelines: Alternative Means of Carrying Out the Project

Requirement of the EIS Guidelines: The proponent will complete the following procedural steps for addressing alternative means: Location of fuel storage

EIS Section: Chapter 4, Section 4.4.1

Information Required: Assess the alternative means of carrying out the project, including alternative locations for fuel storage. Otherwise, provide a rationale as to why this was not included.

Table of Concordance Row No.: 110

Section of EIS Guidelines: Aboriginal Engagement and Concerns

Requirement of the EIS Guidelines: Based on the proponent's perspective, the potential adverse impacts of each of the project components and physical activities, in all phases, on potential or established Aboriginal or treaty rights, or related interests. This assessment is to be based on a comparison of the exercise of the identified rights between the predicted future conditions with the project and the predicted future conditions without the project. Include the perspectives of Aboriginal groups where these were provided to the proponent by the groups.

EIS Section: Chapter 25, Section 25.5; Chapter 26, Section 26.5; Chapter 27, Section 27.4

Information Required: Provide a comparison of the exercise of rights between predicted future conditions with and without the project for Nisga'a Nation, Tssetsaut/Skii km Lax Ha and Métis Nation British Columbia.

Table of Concordance Row No.: 112

Section of EIS Guidelines: Aboriginal Engagement and Concerns

Requirement of the EIS Guidelines: Based on the proponent's perspective, the effects of changes to the environment on Aboriginal peoples or potential adverse impacts on potential or established Aboriginal or treaty rights that have not been fully mitigated or accommodated as part of the EA and associated engagement with Aboriginal groups, including the potential adverse effects that may result from the residual and cumulative environmental effects. Include the perspectives of Aboriginal groups where these were provided to the proponent by the groups.

EIS Section: Chapter 25, Section 25.8; Chapter 26, Section 26.9; Chapter 27, Section 27.4

Information Required: Provide the effects of changes to the environment on Indigenous peoples or Aboriginal or treaty rights that have not been fully mitigated or accommodated. If all impacts can be fully mitigated, then an explanation to that effect must be provided.

Table of Concordance Row No.: 113

Section of EIS Guidelines: Aboriginal Engagement and Concerns

Requirement of the EIS Guidelines: Specific suggestions raised by Aboriginal groups for mitigating the effects of changes to the environment on Aboriginal peoples or accommodating potential adverse impacts of the project on potential or established Aboriginal or treaty rights, and related interests.

EIS Section: Chapter 25, Section 25.8 and Section 25.6; Chapter 26, Section 26.3 and Section 26.6; Chapter 27, Section 27.3

Information Required: Identify which mitigation measures, if any, were suggested by Indigenous groups. If views were requested but not provided, that should be stated.

Table of Concordance Row No.: 114

Section of EIS Guidelines: Aboriginal Engagement and Concerns

Requirement of the EIS Guidelines: Views expressed by Aboriginal groups on the effectiveness of the mitigation or accommodation measures

EIS Section: Chapter 25, Section 25.3; Chapter 26, Section 26.3; Chapter 27, Section 27.3

Information Required: Provide a description of views expressed by Indigenous groups on the effectiveness of mitigation or accommodation measures. If feedback was not provided by Indigenous groups, describe how feedback will be obtained in the future. If views were requested but not provided, that should be stated.

Table of Concordance Row No.: 115

Section of EIS Guidelines: Aboriginal Engagement and Concerns

Requirement of the EIS Guidelines: Views expressed by Aboriginal groups on past, present or future Aboriginal fisheries

EIS Section: Chapter 25, Section 25.3; Chapter 26, Section 26.3; Chapter 27, Section 27.3; Appendix 27-A

Red Mountain Gold Mine Project – Conformity Review

Information Required: Provide a description of views expressed by Indigenous groups on Indigenous fisheries. If none were provided, that should be stated. This information was not provided in the EIS for Tsetsaut/Skii km Lax Ha and Métis Nation British Columbia.

Table of Concordance Row No.: 118

Section of EIS Guidelines: Aboriginal Engagement and Concerns

Requirement of the EIS Guidelines: Changes made to the project design and implementation directly as a result of discussions with Aboriginal groups

EIS Section: Chapter 25, Section 25.3; Chapter 26, Section 26.3; Chapter 27, Section 27.3; Appendix 27-A

Information Required: Provide a description of changes made to project design and implementation as a result of discussions with Indigenous groups. This information was not provided in the EIS for Nisga'a Nation, Tsetsaut/Skii km Lax Ha and Métis Nation British Columbia.

Table of Concordance Row No.: 119

Section of EIS Guidelines: Aboriginal Engagement and Concerns

Requirement of the EIS Guidelines: Where and how Aboriginal traditional knowledge was incorporated into the environmental effects assessment (including methodology, baseline conditions and effects analysis for all VCs) and the consideration of potential adverse impacts on potential or established Aboriginal or treaty rights, and related interests and related mitigation measures

EIS Section: Chapter 6, Section 6.1.2, Section 6.4, Section 6.4.3, Section 6.5, Section 6.6.1, Section 6.7.1, Section 6.12.2.3, Section 6.12.3.4, and Section 6.13

Information Required: Provide a description of where and how Indigenous traditional knowledge was incorporated into the environmental effects assessment.

Table of Concordance Row No.: 120

Section of EIS Guidelines: Aboriginal Engagement and Concerns

Requirement of the EIS Guidelines: Any additional issues and concerns raised by Aboriginal groups in relation to the environmental effects assessment or the potential adverse impacts of the project on potential or established Aboriginal or treaty rights, and related interests.

EIS Section: Chapter 25, Section 25.9; Chapter 26, Section 26.9; Chapter 27, Section 27.6

Information Required: Provide a description of any additional issues or concerns were raised by Indigenous groups in relation to the environmental effects assessment or the potential adverse impacts of the project on potential or established Aboriginal or treaty rights, and related interests. If no other issues or concerns were raised, please state so.

Table of Concordance Row No.: 123

Section of EIS Guidelines: Aboriginal Groups to Engage & Engagement Activities

Requirement of the EIS Guidelines: With respect to engagement activities, the EIS will document: Any future planned engagement activities

EIS Section: Chapter 25, Section 25.3; Chapter 26, Section 26.3; Chapter 27, Section 27.3; Appendix 27-A

Information Required: Provide a description of future planned engagement activities for Tsetsaut/Skii km Lax Ha and Métis Nation British Columbia.

Table of Concordance Row No.: 132

Section of EIS Guidelines: Project Setting and Baseline Conditions – Atmospheric Environment

Requirement of the EIS Guidelines: Ambient air quality in the project areas and, for the mine site, the results of a baseline survey of ambient air quality, including the following contaminants: total suspended particulates, fine particulates (PM_{2.5}), particulate matter up to 10 micrometers in size (PM-10), sulfur oxides (SO_x), volatile organic compounds (VOCs) and nitrogen oxides (NO_x)

EIS Section: Chapter 7, Section 7.4.4

Information Required: Provide a description of ambient air quality in the project area. A discussion of VOCs was not provided in the EIS, except in the context of formation of ground level ozone.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 134

Section of EIS Guidelines: Atmospheric Environment

Requirement of the EIS Guidelines: Existing greenhouse gas emissions measured as kilotonnes of CO₂ equivalent per year in the project study areas

EIS Section: n/a

Information Required: Provide existing greenhouse emissions measured as kilotonnes of CO₂ equivalent per year in the project study areas. For greater clarity, the Agency is seeking this information for the purposes of a comparison of project emissions in relation to regional, provincial and national emissions inventories, including a breakdown of industrial sources.

Please note that this information requirement is the same as row no. 333.

Table of Concordance Row No.: 135

Section of EIS Guidelines: Atmospheric Environment

Requirement of the EIS Guidelines: Current provincial/territorial/federal limits for greenhouse gas emission targets

EIS Section: n/a

Information Required: Provide current provincial/territorial/federal limits for greenhouse gas emissions targets. If these do not exist, that should be stated. For greater clarity, the Agency requires this information for the purposes of seeking a comparison of project emissions in relation to provincial and national emissions inventories, including a breakdown of industrial sources.

Table of Concordance Row No.: 136

Section of EIS Guidelines: Atmospheric Environment

Requirement of the EIS Guidelines: Current ambient daytime and night-time noise levels at key receptor points (e.g. Aboriginal communities), including the results of a baseline ambient noise surveys. Information on typical sound sources, geographic extent and temporal variations will be included

EIS Section: Chapter 8, Section 8.4.4

Information Required: Provide the results of a baseline ambient noise survey. Alternatively, provide a rationale for why the proxy sites represent ambient noise at the project site.

Table of Concordance Row No.: 146

Section of EIS Guidelines: Topography and Soil

Requirement of the EIS Guidelines: Baseline mapping and description of landforms and soils within the local and regional project areas

EIS Section: Chapter 9, Section 9.4.4; Appendix 9-A; Appendix 9-B

Information Required: Provide baseline mapping of landforms and soils in the regional study area.

Table of Concordance Row No.: 148

Section of EIS Guidelines: Topography and Soil

Requirement of the EIS Guidelines: Suitability of topsoil and overburden for use in the rehabilitation of disturbed areas

EIS Section: Chapter 9, Section 9.4.4.2; Appendix 9-A

Information Required: Provide a description of the suitability of topsoil and overburden for use in rehabilitation of disturbed areas.

Table of Concordance Row No.: 161

Section of EIS Guidelines: Groundwater and Surface Water

Requirement of the EIS Guidelines: Local and regional potable groundwater supplies, including their current use and potential for future use

EIS Section: Chapter 10, Section 10.4.4.1; Appendix-10A; Appendix-10B

Information Required: Identify and describe any known future groundwater uses in the area. If there are no known future uses, a description of the potential uses must be provided.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 163

Section of EIS Guidelines: Groundwater and Surface Water

Requirement of the EIS Guidelines: The delineation of drainage basins, at appropriate scales (water bodies and watercourses), including intermittent streams, flood risk areas and wetlands, boundaries of the watershed and subwatersheds, overlaid by key project components

EIS Section: Chapter 10, Section 10.4; Appendix-10A; Appendix-10B; Appendix 12-A

Information Required: The EIS presents a description of streams and watersheds, but this information is not overlaid with key project component. In addition, flood risk areas and wetland boundaries are not described.

Describe, or provide a map of, the delineation of drainage basins, including intermittent streams, flood risk areas and wetlands, and boundaries of the watershed and subwatersheds overlaid by key components.

Table of Concordance Row No.: 165

Section of EIS Guidelines: Groundwater and Surface Water

Requirement of the EIS Guidelines: For each affected water body, the total surface area, bathymetry, maximum and mean depths, water level fluctuations, types of substrate (sediments)

EIS Section: Chapter 12; Chapter 10, Section 10.4; Appendix-12-A; Appendix-14-C; Appendix-18-A; Appendix-10A; Appendix-10B

Information Required: The EIS provides a description of surface water generally, but the information is indistinguishable for each water body.

For each water body in the study area, provide the total surface area, bathymetry, maximum and mean depths, water level fluctuations and type of substrate.

Table of Concordance Row No.: 167

Section of EIS Guidelines: Groundwater and Surface Water

Requirement of the EIS Guidelines: Any local and regional potable surface water resource

EIS Section: Chapter 10, Section 10.1.4.4.1; Appendix-10A; Appendix-10B

Information Required: Provide a description of local and regional potable surface water resources.

Table of Concordance Row No.: 172

Section of EIS Guidelines: Fish and Fish Habitat

Requirement of the EIS Guidelines: A list of any fish or invertebrate species at risk known to be present in the project area

EIS Section: Chapter 18, Section 18.3.3; Appendix 18-A

Information Required: Provide a list of invertebrate species at risk known to be present in the project area. If no invertebrate species at risk are known to be present in the project area, this must be stated.

Table of Concordance Row No.: 173

Section of EIS Guidelines: Fish and Fish Habitat

Requirement of the EIS Guidelines: A description of the habitat by homogeneous section, including the length of the section, width of the channel from the high water mark (bankful width), water depths, type of substrate (sediments), aquatic and riparian vegetation, and photos

EIS Section: Chapter 18, Section 18.4.4.1; Appendix 18-A

Information Required: Provide a description of the habitat in each waterbody within the local study area. The following information was not provided:

- Width, depth, vegetation, type of substrate and photos for each of the six segments of Bitter Creek;
- Width, depth of Hartley Gulch, Cambria Creek and Roosevelt Creek;
- Photo for Roosevelt Creek; and
- Width, depth, substrate, vegetation information, and photo for the section of Bear River that is located within the local study area.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 174

Section of EIS Guidelines: Fish and Fish Habitat

Requirement of the EIS Guidelines: Cross reference habitat descriptions with fish species utilization of those habitats and timing as related to life history stage

EIS Section: Chapter 18, Section 18.4.4.2; Appendix 18-A

Information Required: Provide a discussion of fish life stage utilization (rearing, spawning, overwintering, etc.) of specific habitats within the local study area, including a characterization of Dolly Varden life stage during the time that they occupy each of these habitats. The EIS includes habitat descriptions for mature individuals, but not other life stages. For greater clarity, provide a discussion of whether habitat utilization differs by life stage, and provide the location of these habitats.

For the section of Bear River that is within the local study area, cross reference habitat descriptions with fish species utilization of those habitats and timing as related to life stage. Alternatively, provide a rationale for why this is not included.

Table of Concordance Row No.: 176

Section of EIS Guidelines: Fish and Fish Habitat

Requirement of the EIS Guidelines: Maps, at a suitable scale, indicating the surface area of potential or confirmed fish habitat for spawning, nursery, feeding, overwintering, migration routes, etc. This information should be linked to water depths (bathymetry) to identify the extent of a water body's littoral zone

EIS Section: Chapter 18, Section 18.4.4.2; Appendix 18-A

Information Required: Provide maps outlining fish habitat for spawning, nursery, feeding, overwintering, migration, etc. In addition, this information must be linked to bathymetric information. Existing maps do not outline fish habitat or bathymetric information.

Table of Concordance Row No.: 181

Section of EIS Guidelines: Migratory Birds and their Habitat

Requirement of the EIS Guidelines: Year-round migratory bird use of the area (e.g. winter, spring migration, breeding season, fall migration)

EIS Section: Chapter 16, Section 16.4.5, and Section 16.7.9 to Section 16.7.12; Appendix 16-A

Information Required: Describe the year-round use patterns by migratory breeding bird species. This information was provided for all appropriate valued components except for migratory breeding birds.

Table of Concordance Row No.: 182-183

Section of EIS Guidelines: Species at risk

Requirement of the EIS Guidelines: A list of all potential or known federally listed species at risk that may be affected by the project (fauna and flora), using existing data and literature as well as surveys to provide current field data

A list of all federal species designated by the Committee on the Status of Endangered Wildlife in Canada for listing on Schedule 1 of the Species at Risk Act. This will include those species in the risk categories of extirpated, endangered, threatened and special concern

EIS Section: Chapter 16, Section 16.3.3; Appendix 16-A

Information Required: Provide a list of all potential or known federally listed species at risk in the project area, including all species listed under either the *Species At Risk Act* or by the Committee on the Status of Endangered Wildlife in Canada. Information was found only for amphibian, reptile, bird and mammal species at risk. It is unclear if there are any plants, invertebrates, or other species at risk that may also be present.

Table of Concordance Row No.: 184

Section of EIS Guidelines: Species at risk

Requirement of the EIS Guidelines: Any published studies that describe the regional importance, abundance and distribution of species at risk

EIS Section: Chapter 16, Section 16.2.1, Section 16.2.2, Section 16.4.4, Section 16.4.5, and Section 16.7.3 to Section 16.7.11; Appendix 16-A

Information Required: Provide a discussion of the regional importance, abundance and distribution of the Northern Myotis and any plant, invertebrate, or other species at risk that may be found in the project area.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 185

Section of EIS Guidelines: Species at risk

Requirement of the EIS Guidelines: Residences, seasonal movements, movement corridors, habitat requirements, key habitat areas, identified critical habitat and recovery habitat (where applicable) and general life history of species at risk that may occur in the project area, or be affected by the project including Marbled Murrelet, Northern Myotis, Little Brown Myotis and Western Toad.

EIS Section: Chapter 16, Section 16.4.4, Section 16.4.5, Section 16.4.6, and Section 16.7.3 to Section 16.7.13; Appendix 16-A

Information Required: Describe the residences, seasonal movement, movement corridors, habitat requirements, key habitat areas, critical habitat, and general life history for all species at risk that may occur in the project area. This information was only provided in the EIS for species at risk specifically assessed as individual valued components (see the single exception, below). If the species identified as valued components are intended to act as indicator species, a discussion of how and why they are indicator species must be provided.

Information Required: Provide a discussion of life requisite stages for Western toad, including migration (non-breeding) and hibernating. Only breeding habitat was assessed in the EIS.

Table of Concordance Row No.: 195

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Access and travel routes for conducting traditional practices

EIS Section: Chapter 20, Section 20.10.5; Chapter 25, Section 25.5.2; Chapter 26, Section 26.5.2; Chapter 27, Section 27.4

Information Required: Describe the access and travel routes for conducting traditional practices for Métis Nation British Columbia. If this information has been requested and not provided, please state so.

Table of Concordance Row No.: 196

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Frequency, duration, seasonality, timing of traditional practices

EIS Section: Chapter 20, Section 20.10.5; Chapter 25, Section 25.5.2; Chapter 26, Section 26.5.2; Chapter 27, Section 27.4

Information Required: Describe the frequency, duration, seasonality, and timing of traditional practices for Tsetsaut/Skii km Lax Ha. If this information has been requested and not provided, please state so.

Table of Concordance Row No.: 198

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Baseline information for health and socio-economic conditions will include the functioning and health of the socio-economic environment, encompassing a broad range of matters that affect communities in the study area in a way that recognizes interrelationships, system functions and vulnerabilities.

EIS Section: Chapter 19, Section 19.4; Chapter 20, Section 20.4; Chapter 22, Section 22.4; Appendix 22-A

Information Required: Confirm whether or not the City of Terrace is in the local study area for the social effects assessment. The text contradicts Figure 20.3-1 on page 15 of chapter 20.

Figure 22.3-1 in Chapter 22, as well as Figure 8 on page 26 of Appendix 22-A is incomplete. Provide a complete figure that shows the local and regional study areas for the health effects assessment.

Provide baseline information on human health that is specific to Indigenous groups. Alternatively, provide a rationale for why this was not provided.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 200

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Drinking water (sources - permanent, seasonal, periodic, or temporary; consumption patterns)

EIS Section: Chapter 20, Section 20.5.3.5; Chapter 22, Section 22.4; Chapter 25, Section 25.5.2; Chapter 26, Section 26.5.2; Appendix 22-A

Information Required: Describe drinking water sources and consumption patterns in the project area. The EIS states that there are no drinking water wells in the local study area, but there was no information provided for the regional study area, or for other sources of drinking water.

Table of Concordance Row No.: 203

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Recreational uses

EIS Section: Chapter 20, Section 20.3.3, Section 20.5.2, Section 20.5.3.8; Chapter 25, Section 25.5.2; Chapter 26, Section 26.5.2; Chapter 27, Section 27.4; Appendix 22-A

Information Required: The EIS states that "effects to fish and fish habitat from the Project will not result in an adverse effect on recreational values as recreational fishing is not permitted on the Bear River and its tributaries, including Bitter Creek" (page 51 of chapter 20). Provide more information as to why recreational fishing is not permitted on Bear River and Bitter Creek.

Describe whether Indigenous groups currently use Bear River and Bitter Creek for traditional activities, including harvesting freshwater resources. If this information has been requested and not provided, please state so.

Table of Concordance Row No.: 208

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Sacred, ceremonial or culturally important places, objects or things

EIS Section: Chapter 21, Section 21.4.3; Volume 8, Appendix 21-A; Volume 8, Appendix 21-B

Information Required: Describe any sacred, ceremonial or culturally important places, objects or things.

Table of Concordance Row No.: 210

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Any other baseline information that supports the analysis of predicted effects on Aboriginal peoples will be included as necessary. The EIS will also indicate how input from Aboriginal groups was used in establishing the baseline conditions related to health and socio-economics, physical and cultural heritage and current use of lands and resources for traditional purposes.

EIS Section: Chapter 25, Section 25.3; Chapter 26, Section 26.3; Chapter 27, Section 27.3; Appendix 27-A

Information Required: Describe how input from Tsetsaut/Skii km Lax Ha and Métis Nation British Columbia was incorporated into the characterization of baseline conditions of health and socio-economics, and physical and cultural heritage. This information was provided for Nisga'a Nation only.

Table of Concordance Row No.: 236

Section of EIS Guidelines: Nisga'a Nation

Requirement of the EIS Guidelines: The baseline information described above must be collected in accordance with the Nisga'a Work Plan and the Economic, Social and Cultural Impact Assessment Guidelines dated November 2010, which are both referenced in section 5.1.1 of these EIS Guidelines.

EIS Section: Chapter 27, Section 27.1.1

Information Required: Provide an explanation of how the baseline data was collected in accordance with the Nisga'a Work Plan and the Economic, Social, and Cultural Impact Assessment Guidelines.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 237

Section of EIS Guidelines: Other Environmental Changes Arising as a Result of a Federal Decision or Authorisation

Requirement of the EIS Guidelines: Should there be the potential for a change to the environment arising as a result of a federal decision(s), or on federal lands, lands in another province or lands outside Canada, the EIS will include baseline information on the environmental component likely to be affected (if this information is not already covered in other subsections of these guidelines). For example, if an authorization provided under the Fisheries Act was to result in the flooding of key wildlife habitat, baseline information should be provided on the wildlife species likely to be affected

EIS Section: n/a

Information Required: Provide a description of environmental components outside Canada likely be affected by the project. If no effects are expected, then a statement and rationale must be provided.

Please note that this information requirement is similar to row no. 341-344.

Table of Concordance Row No.: 242

Section of EIS Guidelines: Human Environment

Requirement of the EIS Guidelines: Current use of all waterways and water bodies that will be directly affected by the project, including recreational uses, where available

EIS Section: Chapter 19, Section 19.4.4.3; Chapter 20, Section 20.4.4.6; Appendix 20-A

Information Required: Describe the current use of all waterways and water bodies that will be affected by the project. It is not clear which waterways are used for recreational purposes.

Table of Concordance Row No.: 250

Section of EIS Guidelines: Changes to Groundwater and Surface Water

Requirement of the EIS Guidelines: Changes to turbidity, oxygen level, water temperature, ice regime, water quality

EIS Section: Chapter 13, Section 13.5.2, Section 13.5.3; Appendix 14-C

Information Required: Describe predicted changes to turbidity, oxygen, water temperature and ice regime. The EIS focuses on changes to water quality, and there is no mention of changes to turbidity, oxygen level, and ice regime. Table 13-3.2 says that temperature is a primary measurement indicator, but it does not appear to discuss predicted changes to temperature.

Table of Concordance Row No.: 276

Section of EIS Guidelines: Predicted Effects on Valued Components- Fish and Fish Habitat

Requirement of the EIS Guidelines: Anticipated changes in the composition and characteristics of the populations of various fish species, included shellfish and forage fish

EIS Section: Chapter 18, Section 18.5.3

Information Required: Describe any predicted changes to Dolly Varden population composition and characteristics in Bitter Creek. For greater clarity, the Agency is seeking information on whether the life stages for Dolly Varden in Bitter Creek will change.

Table of Concordance Row No.: 281

Section of EIS Guidelines: Fish and Fish Habitat

Requirement of the EIS Guidelines: A discussion of how project construction timing correlates to key fisheries windows for freshwater and anadromous species, and any potential impacts resulting from overlapping periods

EIS Section: Chapter 18, Section 18.6.1.5

Information Required: Provide a discussion of how fisheries windows overlap with construction periods. The EIS only states that mitigation will take these windows into account and that instream work will be conducted during lowest risk periods.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 286

Section of EIS Guidelines: Species at Risk

Requirement of the EIS Guidelines: The potential effects of the project on federally listed species at risk (e.g. Marbled Murrelet, Northern Myotis, Little Brown Myotis and Western Toad) and those species listed by the Committee on the Status of Endangered Wildlife in Canada classified as extirpated, endangered, threatened or of special concern (flora and fauna) and their critical habitat.

EIS Section: Chapter 16, Section 16.4.4 to 16.4.6, and Section 16.7.3 to Section 16.7.13; Appendix 16-B

Information Required: Describe the potential effects to all federally listed species at risk in the project area. Alternatively, describe how the existing effects assessment using indicator species accounts for all species at risk.

Table of Concordance Row No.: 289

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Any effects of changes to resources (e.g. fish, wildlife, birds, plants or other natural resources) used for traditional uses (e.g. hunting, fishing, trapping, collection of medicinal plants, use of sacred sites)

EIS Section: Chapter 20, Section 20.1.6

Information Required: Describe effects of changes to resources for traditional uses. The current use of land and resources for traditional purposes effects assessment refers back to the effect pathways, whereas it must focus on the changes to use rather than the biophysical attributes that support the use. The following must be included:

- A discussion of how predicted effects might affect use of those resources;
- A description of residual effects to current use;
- A significance characterization and determination which is specific to effects to current use;
- A cumulative effects assessment, if applicable; and
- A follow-up and monitoring plan, if applicable.

Please note that the Agency disagrees with the statement in the EIS that "a significance determination for CULRTP is not required under the EIS Guidelines."

Table of Concordance Row No.: 292

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: How project construction timing correlates to the timing of traditional practices, such as seasonal rounds, and any potential impacts resulting from overlapping periods

EIS Section: Chapter 20, Section 20.10.4.2, Section 20.10.5, and Section 20.10.6

Information Required: Describe how project timing correlates to the timing of traditional practices, and any potential impacts resulting from overlapping periods.

Table of Concordance Row No.: 293

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: The regional value of traditional use of the project area and the anticipated effects to traditional practice of the Aboriginal group, including alienation of lands from Aboriginal traditional use

EIS Section: Chapter 20, Section 20.1.6

Information Required: Describe the regional value of traditional use in the project area, including the anticipated effects to traditional practices including alienation of lands.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 296

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Human health, considering, but not limited to potential changes in air quality, quality and availability of country foods, drinking water quality, and noise exposure. When risks to human health due to changes in one or more of these components are predicted, a complete Human Health Risk Assessment (HHRA) examining all exposure pathways for pollutants of concern may be necessary to adequately characterize potential risks to human health.

EIS Section: Chapter 25, Section 25.5.3.7; Chapter 26, Section 26.5.3.6

Information Required: Complete an assessment of the Project on human health. The health effects assessment in the EIS refers back to two effect pathways (air quality and water quality), and it is unclear whether those effects assessments are appropriate to make conclusions about effects to human health. The relevant aspects of each of the air quality and water quality assessments need to be pulled into the assessment of effects to health. The following must be included:

- A discussion of the predicted parameter values in air and water against health-based guideline values. The water quality assessment appears to focus on effects to freshwater aquatic life, and therefore it's unclear how predicted water quality compares to health-based guidelines;
- A description of residual effects to health;
- A significance characterization and determination which is specific to effects to health;
- A cumulative effects assessment, if applicable; and
- A follow-up and monitoring plan, if applicable.

Information Required: Provide a HHRA that considers effects to human health from construction. The existing HHRA focuses on operation and closure phases. Alternatively, provide a rationale for why an assessment was not provided.

Information Required: The air quality model assumed a 500 m buffer around project infrastructure, and that no receptors would be located within that buffer. Given that the site will not be fenced, the health effects assessment must consider the presence of receptors within the 500 m buffer.

Information Required: The EIS states that future groundwater concentrations were not considered in the HHRA because predictive modelling for groundwater concentrations is not available (page 24 of Appendix 22-A). However, chapter 13 of the EIS presents predictive modeling for groundwater. The HHRA must use the predictive modeling provided. Provide predictive modelling for groundwater concentrations with regards to effects to human health. Alternatively, provide a rationale as to why it is not provided.

Information Required: The EIS states that "no predictive modelling was completed for sediment" (page 27 of Appendix 22-A). However, chapter 14 of the EIS provided predictive modeling for sediment quality, and that information must be used for the HHRA. Provide predictive modelling for sediment concentrations with regards to effects to human health. Alternatively, provide a rationale as to why it is not provided.

Information Required: The EIS states that "changes in country food quality" is a residual effect for a summer resident receptor (page 32 of chapter 22), but a residual effects characterization was not conducted. Provide a residual effects characterization for the effects to human health from consumption of country foods.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 314

Section of EIS Guidelines: Nisga'a Nation

Requirement of the EIS Guidelines: Environmental assessments under paragraph 8(e) of the Nisga'a Final Agreement, must include those effects that could manifest via direct connections between the natural resource and the Project (e.g., impacts to Nisga'a citizens from the loss of mushroom habitat via land clearing) as well as by pathways with one or more intermediary steps (e.g., impacts to Nisga'a citizens from reduced predator population via reduced prey population via changes in habitat caused by introduced species that were promoted by poor land-clearing practices).

EIS Section: Chapter 27, Section 27.4

Information Required: The EIS focuses on the pathways to the environmental effects, rather than the effects themselves. Describe the specific effects to residents of Nisga'a Lands, Nisga'a Lands, or Nisga'a interests that could manifest from changes to the environment.

Table of Concordance Row No.: 333

Section of EIS Guidelines: Other Valued Components that may be Affected as a Result of a Federal Decision or Authorisation

Requirement of the EIS Guidelines: If there is the potential for a change to the environment arising as a result of a federal decision(s), for example an authorisation under section 35 of the Fisheries Act, the EIS should include a description of the specific project components for which a federal authorisation/decision is required, and an assessment of any other valued components (not already covered in other subsections of these guidelines) that may be affected by the changes to the environment caused by these specific project components.

EIS Section: n/a

Information Required: Provide a description of any changes to the environment arising as a result of a federal decision. Provide a description of the specific project components for which a federal authorization is required, and an assessment of any other valued components that may be affected. If all potential environmental effects have already been captured, include a statement and rationale to that effect.

Table of Concordance Row No.: 333

Section of EIS Guidelines: Other Valued Components that may be Affected as a Result of a Federal Decision or Authorisation

Requirement of the EIS Guidelines: If there is the potential for the project to result in environmental changes on federal lands, another province, or another country, then valued components of importance not already identified should be included. For example, if the project will result in the generation of greenhouse gas emissions, the EIS should include a description of the project's greenhouse gas emissions in a regional, provincial, national or international context if applicable. Suggested VCs are noted below for this project.

EIS Section: n/a

Information Required: Provide a description of the project's greenhouse gas emissions in a regional, provincial and national context.

Please note that this requirement is the same as row no. 134.

Table of Concordance Row No.: 341-344

Section of EIS Guidelines: Effects Outside of Canada

Requirement of the EIS Guidelines: The identification of any potential effects on areas outside of Canada including: Water quality and quantity; air quality; and organic, inorganic and living organisms

EIS Section: n/a

Information Required: Many valued components define a study area as a buffer around the project that would include effects outside Canada, but appear to exclude any effects outside Canada. For example, the social effects assessment states that the local study area is a 50 km radius around the project, but then the local study area map shows a 50 km buffer which cuts off at the US-Canada border.

Identify and describe any potential transboundary effects. If there are no effects outside Canada, provide a statement and rationale.

Please note that this information requirement is similar to row no. 237.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 346

Section of EIS Guidelines: Mitigation

Requirement of the EIS Guidelines: The EIS will describe the standard mitigation practices, policies and commitments that constitute technically and economically feasible mitigation measures and that will be applied as part of standard practice regardless of location (including the measures directed at promoting beneficial or mitigating adverse socio-economic effects).

EIS Section: Volume 3, Chapter 7 to 22, Section X.6; Volume 5, Chapter 29

Information Required: The EIS explains that some interactions were not carried forward into the assessment of potential effects because “there are proven effective mitigation measures or best management practices which IDM commits to implement, and would eliminate or reduce to a negligible level any residual adverse effects.” The Agency notes that this language appears in the “Project Interactions” section for many valued components including fish and fish habitat, sediment quality, and surface water quality. Other valued components, including wildlife, and vegetation and ecosystems, do not specifically contain this language but it is unclear whether the same approach was applied.

For each valued component, the EIS must identify and describe all potential effects from the project before the consideration of any mitigation measures, including those proven mitigation measures or best management practices. Further, the EIS must identify those proven mitigation measures and best management practices that reduce or eliminate residual effects.

Table of Concordance Row No.: 379

Section of EIS Guidelines: Mitigation

Requirement of the EIS Guidelines: The EIS will then describe mitigation measures that are specific to each environmental effect identified. Measures will be written as specific commitments and with an adequate level of specificity that clearly describe how the proponent intends to implement them and the environmental outcome the mitigation is designed to address. Where mitigation measures have been identified in relation to species and/or critical habitat listed under the Species at Risk Act, the mitigation measures will be consistent with any applicable recovery strategy and action plans (e.g. for Marbled Murrelet, Northern Myotis, Little Brown Myotis and Western Toad).

EIS Section: Chapter 7 to 22, Section X.6; Chapter 29

Information Required: In many cases, existing mitigation measures are too high-level and do not contain specific commitments. It is not sufficient to state that mitigation will be required, or to commit to reaching a certain level of mitigation effectiveness or a certain objective such as “compliance with *Fisheries Act*.” For example, the EIS states that mitigation measures will be implemented to prevent or avoid the destruction of fish, but it does not identify what those mitigation measures are. Also note that follow-up, monitoring, and/or management plans might be useful in the context of implementing mitigation measures, but they are not mitigation in themselves.

Identify mitigation measures that are specific to each environmental effect.

Table of Concordance Row No.: 381

Section of EIS Guidelines: Mitigation

Requirement of the EIS Guidelines: The EIS will indicate what other technically and economically feasible mitigation measures were considered, and explain why they were rejected. Trade-offs between cost savings and effectiveness of the various forms of mitigation will be justified. The EIS will identify who is responsible for the implementation of these measures and the system of accountability.

EIS Section: Volume 5, Chapter 29

Information Required: There is no mention of other technically and economically feasible mitigation measures that were considered.

Identify what other technically and economically feasible mitigation measures were considered, and explain why they were rejected.

Identify who is responsible for the implementation of mitigation measures as well as the system of accountability.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 382

Section of EIS Guidelines: Mitigation

Requirement of the EIS Guidelines: Where mitigation measures are proposed to be implemented for which there is little experience or for which there is some question as to their effectiveness, the potential risks and effects to the environment should those measures not be effective will be clearly and concisely described. In addition, the EIS will identify the extent to which technology innovations will help mitigate environmental effects. Where possible, it will provide detailed information on the nature of these measures, their implementation, management and the requirements of the follow-up program.

EIS Section: Chapter 7 to 22, Section X.6, Section X.7, and Section X.9; Chapter 29

Information Required: Discuss the extent to which technological innovations will help mitigate environmental effects. Alternatively, provide a rationale why this is not included.

Table of Concordance Row No.: 402

Section of EIS Guidelines: Effects of Potential Accidents or Malfunctions

Requirement of the EIS Guidelines: Taking into account the lifespan of different project components, the proponent will identify the probability of potential accidents and malfunctions related to the project, including an explanation of how those events were identified, potential consequences (including the environmental effects as defined in section 5 of CEEA 2012), the plausible worst case scenarios and the effects of these scenarios.

EIS Section: Chapter 23, Section 23.4, Section 23.4.1 to Section 23.4.5, Section 23.5, Section 23.5.1 to 23.5.8, and Section 23.3

Information Required: Describe the worst case scenario for each potential accident or malfunction. The description should include the quantity and rate of release of any contaminants.

Table of Concordance Row No.: 403

Section of EIS Guidelines: Effects of Potential Accidents or Malfunctions

Requirement of the EIS Guidelines: This assessment will include an identification of the magnitude of an accident and/or malfunction, including the geographic scope, quantity, mechanism, rate, form and characteristics of the contaminants and other materials likely to be released into the environment during the accident and malfunction events and would potentially result in an adverse environmental effect as defined in section 5 of CEEA 2012. The potential effects to Nisga'a interests will also be described.

EIS Section: Chapter 23, Section 23.4, Section 23.4.1 to Section 23.4.5, Section 23.5, and Section 23.5.1 to 23.5.8,

Information Required: Describe the potential effects of each accident and malfunction to Nisga'a interests, as well as other section 5 environmental effects. If no effects are predicted, a statement and rationale must be provided.

Table of Concordance Row No.: 405

Section of EIS Guidelines: Effects of the Environment on the Project

Requirement of the EIS Guidelines: The EIS will take into account how local conditions and natural hazards, such as severe and/or extreme weather conditions and external events (e.g. flooding, drought, ice jams, landslides, avalanches, erosion, subsidence, fire, outflow conditions and seismic events) could adversely affect the project and how this in turn could result in impacts to the environment (e.g. extreme environmental conditions result in malfunctions and accidental events). These events will be considered in different probability patterns (i.e. 5-year flood vs. 100-year flood). Longer-term effects of climate change will also be discussed up to the projected post-closure phase of the project. This discussion will include a description of climate data used.

EIS Section: Chapter 24, Sections 24.1 to 24.11; Chapter 23, Section 23.4, Section 23.5

Information Required: Describe how droughts, ice jams, erosion, subsidence and outflow conditions may affect the project. This description must include the probability patterns for each event. If these events are not applicable, provide a statement and rationale for why they have been excluded from the analysis.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 404

Section of EIS Guidelines: Effects of Potential Accidents or Malfunctions

Requirement of the EIS Guidelines: The EIS will describe the safeguards that have been established to protect against such occurrences and the contingency and emergency response procedures in place if such events do occur including a Tailings Dam Failure Analysis.

EIS Section: Chapter 23, Section 23.3; Volume 8, Appendix 23-A

Information Required: The EIS states that EMPs establish contingency measures to manage potential accidents and malfunctions, but does not describe what those contingency measures actually are.

Describe safeguards that have been established to protect against accidents and malfunctions.

Table of Concordance Row No.: 412

Section of EIS Guidelines: Cumulative Effects Assessment

Requirement of the EIS Guidelines: VCs that would not be affected by the project or would be affected positively by the project can, therefore, be omitted from the cumulative effects assessment. A cumulative effect on an environmental component may, however, be important even if the assessment of the project's effects on this component reveals that the effects of the project are minor.

EIS Section: n/a

Information Required: For most valued components, if residual effects were identified as “negligible”, then those effects were not carried forward into the cumulative effects assessment. But for residual effects on hydrology (and potentially other valued components), those negligible effects were carried forward into a cumulative effects assessment.

Clarify the methodology for the cumulative effects assessment.

Table of Concordance Row No.: 430

Section of EIS Guidelines: Summary of Environmental Effects Assessment

Requirement of the EIS Guidelines: In a second table, the EIS will summarize all key mitigation measures and commitments made by the proponent which will mitigate any significant adverse effects of the project on VCs (i.e., those measures that are essential to ensuring that the project will not result in significant adverse environmental effects).

Chapter 31, Section 31.3

Information Required: Provide a table of key mitigation measures. Each key mitigation measure must be linked to one or more specific effects.

Red Mountain Gold Mine Project – Conformity Review

Annex 2 – Issues for Clarification and Early Notification of Technical Review Issues

Table of Concordance Row No.: 54

Section of EIS Guidelines: Regulatory Framework and the Role of Government

Requirement of the EIS Guidelines: Any federal power, duty or function that may be exercised that would permit the carrying out (in whole or in part) of the project or associated activities

EIS Section: Chapter 1, Section 1.3

Information Required: Table 1.3-2 indicated that NRCAN may issue an authorization under the *Explosives Act (1985)*. The table should be updated to reflect the *Explosives Regulations, 2013*.

Information Required: Table 1.3-2 indicates that the project will require "authorization for an explosives storage magazine, and for explosives manufacture/mixing". While NRCAN may issue a licence for magazine storage during construction, additional information about the manufacture and mixing activities in order to determine whether a Factory Licence will be required.

Information Required: Table 1.3-2 indicates that the Project will require a Radio-isotope licence from NRCAN. NRCAN does not issue such a licence.

Table of Concordance Row No.: 79

Section of EIS Guidelines: Site Preparation and Construction

Requirement of the EIS Guidelines: The EIS will include a description of the following project activities as they relate to project components: Transportation of employees, equipment and supplies including the number of trips to and from the site

EIS Section: Chapter 1, Section 1.5.7, Section 1.6.3.1

Information Required: Clarify whether one "load" is considered a one-way or round trip.

Table of Concordance Row No.: 81

Section of EIS Guidelines: Operation

Requirement of the EIS Guidelines: The EIS will include a description of the following project activities as they relate to project components:

Mining activities including mining sequence, ore production, and doré production

EIS Section: Chapter 1, Section 1.7.3.1

Information Required: Provide a description of doré production. Table 1.7-2 only contains gold and silver production separately.

Table of Concordance Row No.: 185

Section of EIS Guidelines: Species at Risk

Requirement of the EIS Guidelines: Residences, seasonal movements, movement corridors, habitat requirements, key habitat areas, identified critical habitat and recovery habitat (where applicable) and general life history of species at risk that may occur in the project area, or be affected by the project including Marbled Murrelet, Northern Myotis, Little Brown Myotis and Western Toad.

EIS Section: Chapter 16, Section 16.4.4, Section 16.4.5, Section 16.4.6, and Section 16.7.3 to Section 16.7.13

Information Required: Bat surveys were conducted in 2016, but there is not sufficient discussion on inter-annual variation. Bat detectors do not appear to have been placed in the highly suitable habitat that overlaps with project infrastructure identified in Figure 16.7-15.

Information Required: Provide a description of the gaps in the baseline data for migratory breeding birds.

Information Required: Provide a description of the gaps in the baseline data for MacGill Warbler (e.g. inter-annual variation).

Information Required: The Agency understands that field studies were recently conducted for Black Swift, but that this information was not captured in the EIS.

Provide field surveys for the Black Swift.

Information Required: Provide a description of the uncertainties and gaps in the baseline data for the Common Nighthawk.

Red Mountain Gold Mine Project – Conformity Review

Information Required: Egg shell remnant surveys were completed for Marbled Murrelet, but ECCC recommends radar surveys. The Agency understands that field surveys were recently conducted, but that this information was not captured in the EIS.

Provide field surveys for the Marbled Murrelet.

Information Required: Provide a description of the gaps in the baseline data for the Olive-sided Flycatcher.

Information Required: Provide a description of field surveys for Western Screech Owl, as well as a discussion on inter-annual variation. Some silent listening surveys were conducted at Common Nighthawk stations, but not at Western Screech Owl specific stations. Alternatively, provide a rationale for why the existing information is sufficient.

Information Required: For the Western toad, only breeding habitat is assessed, not other life stages. The EIS should discuss the potential for migration corridors (non-breeding habitat), and hibernating life requisite.

Table of Concordance Row No.: 296

Section of EIS Guidelines: Aboriginal Peoples

Requirement of the EIS Guidelines: Human health, considering, but not limited to potential changes in air quality, quality and availability of country foods, drinking water quality, and noise exposure. When risks to human health due to changes in one or more of these components are predicted, a complete Human Health Risk Assessment (HHRA) examining all exposure pathways for pollutants of concern may be necessary to adequately characterize potential risks to human health.

EIS Section: Chapter 25, Section 25.5.3.7; Chapter 26, Section 26.5.3.6

Information Required: There is no discussion about Hazard Quotients (HQ) and Incremental Lifetime Cancer Risk (ILCR) in the residual effects sections. HQs and ILCR information is used to estimate potential risks to human health. Calculations for country foods that show several exceedances of the 0.2 target ratios, and this has not been acknowledged as a residual effect.

Information Required: There is no discussion about particulate matter and NO₂ in the residual effects sections. Health Canada recognises particulate matter and NO₂ as non-threshold contaminants, meaning that health effects may be experienced at any level of exposure. These contaminants should be identified and discussed as residual effects.

Information Required: The EIS compares the estimated project contribution to total concentration. The Agency recommends that the HHRA be conducted in accordance with the Federal Contaminated Site Risk Assessment in Canada, Part 1: Guidance on Human Health Preliminary Quantitative Risk Assessment, version 2.0, 2012. In particular, baseline measurements and predictions should be compared to applicable environmental quality screening thresholds to select contaminants of potential concern.

Table of Concordance Row No.: 421

Section of EIS Guidelines: Cumulative Effects Assessment

Requirement of the EIS Guidelines: Describe the mitigation measures that are technically and economically feasible. The proponent shall assess the effectiveness of the measures applied to mitigate the cumulative effects. In cases where measures exist that are beyond the scope of the proponent's responsibility that could be effectively applied to mitigate these effects, the proponent will identify these effects and the parties that have the authority to act. In such cases, the EIS will summarize the discussions that took place with the other parties in order to implement the necessary measures over the long term;

EIS Section: Chapter 7 - 17, 10-22, Section X.6, and Section X.6.1 to X.6.3; Chapter 18, Section 18.6, and Section 18.6.1.1 to 18.6.1.7

Information Required: Describe the mitigation measures that are technically and economically feasible to mitigate cumulative effects specifically. In cases where measures exist that are beyond the scope of the proponent's responsibility, identify these effects and the parties that have the authority to act, and provide a summary of the discussions that took place with the other parties in order to implement the necessary measures over the long term.

Red Mountain Gold Mine Project – Conformity Review

Table of Concordance Row No.: 427

Section of EIS Guidelines: Summary of Environmental Effects Assessment

Requirement of the EIS Guidelines: The EIS will contain a table summarizing the following key information: Proposed mitigation measures to address the effects identified above

EIS Section: Chapter 31, Section 31.4

Information Required: Provide a table summarizing mitigation measures. Mitigation measures must be linked to specific environmental effects. Table 31.5-2 describes mitigation measures for wildlife in general, but does not identify the specific valued component or effect that each mitigation measure is intended to address.