



Canadian Environmental  
Assessment Agency

Agence canadienne  
d'évaluation environnementale

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January 31, 2018

File no.: 005533

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

Dear Mr. McPhie:

**Re: Review of IDM Mining's response to Information Request #1 for the  
Red Mountain Underground Gold Project**

On December 22, 2017, the Canadian Environmental Assessment Agency (the Agency) issued an Information Request (IR) to IDM Mining Inc. in relation to the Red Mountain Underground Gold Project. The Agency, supported by Fisheries and Oceans Canada, Natural Resources Canada, and Health Canada, has reviewed IDM's January 16, 2018 response. The Agency has determined that further information is necessary to fully satisfy the required information.

**Human health (IR1-03, IR1-04, IR1-05)**

The Agency requested additional information about the Human Health Risk Assessment, including "an updated Health Effects Assessment (i.e. chapter 22) and Human Health Risk Assessment (i.e. Appendix 22-A) that considers [the requested information]". IDM provided responses to the request except for the request for an updated Human Health Risk Assessment and updated Health Effects Assessment chapter. Given the number of changes to the Human Health Risk Assessment and the potential for changes to the Health Effects Assessment since the EIS was first submitted, the Agency requires these sections to be updated. This information is needed for the Agency to evaluate how human health may be affected by a change to the environment, with a focus on Indigenous peoples' health.

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Outstanding information: Provide an updated Health Effects Assessment (i.e. chapter 22) and Human Health Risk Assessment (i.e. Appendix 22-A) that reflects the updates made as a result of IR1-03, IR1-04, and IR1-05, IDM's response to the British Columbia's supplemental information requests issued on October 24, 2017, IDM's response to the action items coming out of November 21, 2017 working group meeting, and any provincial working group comments.

**Fish and fish habitat (IR1-10)**

- a) The Agency requested "a table showing linear length (m) and areal extent (m<sup>2</sup>) of the maximum flow changes (increases and decreases) as a result of the water supply changes in the affected streams." In response, IDM points back to the EIS and states that "These results were sufficient to assess effects from changes in flow on other valued components, namely Fish and Fish Habitat." Given that none of the requested information was provided, the Agency considers this response inadequate. The requested information is necessary to substantiate IDM's conclusions of the effects assessment.
- b) The Agency requested a description of "what these [maximum flow changes] would mean to available fish habitat (quality and quantity) during seasons when relative changes would be greatest." In response, IDM summarizes the information in the EIS which exclusively describes effects of increases to average monthly flow rates, and neglects to consider effects to maximum flow increases or flow decreases.

Outstanding information:

- a) Provide a table showing the linear length (m) and areal extent (m<sup>2</sup>) of the maximum flow changes as a result of water supply changes (increases and decreases) in the affected streams (e.g., 0, 5, 10, 15, 20% contours).
- a) Provide an analysis of what these changes would mean to available fish habitat (quality and quantity) during the seasons when relative changes would be greatest, for example overwintering.

**Mitigation measures (IR1-01)**

The Agency requested additional specificity around mitigation measures. In a teleconference call on January 5, 2018, IDM clarified that some of mitigation measures identified by the Agency as requiring more detail were contingency measures that would be considered in the event that additional mitigation was required, rather than key mitigation measures. On January 18, 2018, IDM provided a table of key mitigation measures to support the review of IDM's response to IR1-01. The Agency continues to review IDM's response on mitigation measures and may provide an adjusted request for information at a later date.

The federal timeline for the environmental assessment remains paused at day 122 of 365. Upon receipt of a response from IDM to address these deficiencies, the Agency may take up to 15 days that is not counted against the federal timeline for the environmental assessment to form an opinion about whether the requested information has been provided. If the Agency has not come to a conclusion regarding the sufficiency of the IR responses during this period, the federal timeline will resume on the following day.

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

Sincerely,

<Original signed by>

Andrea Raska  
Project Manager, Pacific and Yukon Region

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