



10 August 2022

Via email

Impact Assessment Agency of Canada  
210A-757 West Hastings Street  
Vancouver, British Columbia, V6C 3M2

Attention: Julie Lowry, Project Manager, Pacific and Yukon Region

Dear Ms. Lowry,

**Re: Spanish Mountain Gold Ltd. (Proponent) Request to Suspend the Federal Time Limit for the Spanish Mountain Gold Project Environmental Impact Assessment**

Spanish Mountain Gold Ltd. (SMGL) is proposing the Spanish Mountain Gold Project (the "Project") involving the development of an open pit gold mine and milling facility, 6 km east of Likely, British Columbia. The planned mine site is within the traditional territories of the Williams Lake First Nation, Xat'sull First Nation, and the Lhtako Dené Nation.

SMGL, as the Proponent of the Project requests that the Impact Assessment Agency of Canada (the "Agency") immediately suspend the timeline for the Planning Phase under the *Impact Assessment Act* (the "Federal Act") to enable alignment of the timelines of the federal and provincial assessment processes. As the Federal Act currently exists, the timelines of the federal and provincial processes diverge with the submission of a Detailed Project Description (the "DPD"). Whereas the Federal Act requires that a DPD be accepted within 10 days of submission, the provincial process involves an extended period of review and consensus seeking following DPD submission. In order to prevent misalignment of the federal and provincial processes, SMGL requests that the timeline for the federal process resume when the Agency accepts the DPD concurrent with the BC Environmental Assessment Office (the "BC EAO") issuing an EA Readiness Decision under the BC Environmental Assessment Act (EAA 2018). SMGL anticipates that a federal "Substitution Decision" by the federal minister will follow shortly after determination of the need for a federal Impact Assessment by the Agency, and a decision to proceed with the EA in the readiness decision by the provincial Minister.

The request follows discussions with the Agency and BC EAO in which the Agency and the BC EAO identified the importance of aligning and coordinating the federal and provincial assessment processes. Representatives of the Agency and BC EAO have confirmed their intention to coordinate the timelines required to review the project.

The planning phase of the federal assessment of the Project is underway, and the Early Engagement Phase of the EAA (2018) was recently completed. SMGL is now developing a DPD and draft Application Information Requirements to meet the requirements of both assessment processes. The production of a single DPD that has been through the more extensive indigenous review and consensus seeking process of the EAA (2018) has the potential to benefit the federal agency's *Notice of Impact Assessment Decision with Reasons*.

Please confirm receipt of this request for immediate suspension of the federal timeline and advise when the timeline suspension is in effect.

Sincerely,  
**Spanish Mountain Gold Ltd.**

<Original signed by>

Doug Ramsey, R.P.Bio.  
Director, Sustainability and Indigenous Affairs

Telephone <personal information removed>

Email <personal information removed>