

3 Information Distribution and Consultation

3.1 Introduction

This chapter describes the information distribution and consultation (engagement) activities that have been undertaken to date during the EA process, and the proposed plan for consultations with Nisga'a Nation, Aboriginal groups, government agencies, local government, and the public and stakeholders during the review of the Application for an Environmental Assessment Certificate and Environmental Impact Statement (Application/EIS). Seabridge Gold Inc. (Seabridge) initiated consultations with Aboriginal and non-Aboriginal communities prior to formally entering the environmental assessment (EA) process in spring 2008. This chapter includes a description of Seabridge's efforts to build relationships with Aboriginal and non-Aboriginal communities.

3.1.1 Provincial Requirements

Public consultation requirements for the British Columbia (BC) EA process are set out in the BC *Environmental Assessment Act* (2002) Public Consultation Policy Regulation (BC Reg. 373/2002). The Regulation includes provisions for giving public notice, providing public access to information, establishing formal public comment periods, and engaging the public. These requirements are reflected in the Section 11 Order (Order) issued for the KSM Project (the Project). In addition, the Order specifies consultation requirements related to Nisga'a Nation, First Nations, government agencies, and the public during the pre-Application stage and Application review stage. The Section 13 Order issued on September 29, 2011 (see Chapter 2 for a description) provided additional direction to Seabridge related to consultations with Nisga'a Nation and First Nations.

3.1.2 Federal Requirements

The preamble of the *Canadian Environmental Assessment Act* (CEAA; 1992) notes:

...the Government of Canada is committed to facilitating public participation in the environmental assessment of projects to be carried out by or with the approval or assistance of the Government of Canada and providing access to the information on which those environmental assessments are based.

Two purpose statements in the CEAA (1992) speak to public and Aboriginal consultation. Purpose 4.b.3 refers to promoting "...communication and cooperation between responsible authorities and Aboriginal peoples with respect to environmental assessment," and purpose 4.d refers to ensuring "...that there be opportunities for timely and meaningful public participation throughout the environmental assessment process." Section 16 of the CEAA identifies the factors that must be considered in comprehensive studies. Section 16(1)(c) requires a comprehensive study to consider comments from the public in accordance with the CEAA and the regulations. Section 16.1 indicates that community knowledge and Aboriginal traditional knowledge may be considered in conducting an EA.

Annex III of the December 2012 Project Agreement for the KSM Project issued by the federal Major Projects Management Office sets out the roles and responsibilities of the Canadian Environmental Assessment Agency (CEA Agency), responsible authorities, and the Major Projects Management Office with respect to Aboriginal engagement and consultation (NRCan 2012). The Agreement acknowledges that the CEA Agency and the Province of British Columbia will work together toward a coordinated approach for Aboriginal engagement and consultation that is integrated with the federal EA review.

3.1.3 Information Distribution and Consultation Objectives

The objectives of information distribution and consultation activities undertaken to date have been to:

- share information about the Project and associated environmental and socio-economic baseline studies and obtain feedback on the Project and related studies;
- consider the feedback and make changes to the Project where feasible;
- document the issues raised to date in the EA process and provide responses to the issues in the Application/EIS, including proposed measures to enhance positive effects and avoid or mitigate potential adverse effects; and
- comply with provincial and federal requirements related to public and Aboriginal consultation, including the Section 11 Order issued by the BC Environmental Assessment Office (BC EAO) and the CEAA (1992) requirements.

3.1.4 Project Materials and Information Dissemination

Seabridge developed a variety of Project materials and used a range of methods to disseminate information on the Project. Seabridge has ensured that materials could be easily understood by a lay audience. A description of these materials and the methods used to disseminate information is provided below.

Seabridge Website (<http://www.seabridgegold.net>): This website provides a link to Seabridge projects as well as copies of engineering studies and press releases reporting on mineral exploration results and other matters pertaining to the KSM Project.

KSM Community Website (established July 2012: <http://ksmproject.com>): This website provides information on the Project and responses to frequently asked questions. It also includes an event calendar, photographs of the Project site, a Resource Centre where materials can be downloaded, and contact information.

Community Meetings and Open Houses: Materials prepared for community meetings and open houses identified in this chapter include:

- **Initial KSM Project Brochure** (2008; [Appendix 3-A](#))
- **KSM Project Factsheets** (2010 to 2012; [Appendix 3-B](#))
 1. Project Overview
 2. Environmental Management

3. Natural Environment Studies
4. Regulatory Review
- **KSM Project Posters¹** ([Appendix 3-C](#))
 1. BC Mining Overview
 2. KSM Project Overview
 3. Natural Environment Studies
 4. Human Environment Studies
 5. Environmental Management
 6. Project Components
 7. EA Process
 8. Seabridge Gold Inc.
 9. Estimated Economic Benefits from the KSM Project
 10. KSM Project Geology
 11. KSM Project Geology: Deposit Cross-sections
 12. Working in the Nass Area
 13. Water Management
 14. Working with our US Neighbours
 15. Essential Elements in our Daily Lives
- **KSM Project Economics Infographic** (2012; [Appendix 3-D](#))
- **Careers in Mining Infosheets** (2011 to 2012; [Appendix 3-E](#))
 - Minerals and Metal Processing Labourers
 - Drillers and Blasters
 - Industrial Electricians
 - Construction Electricians
 - Plumbers
 - Steamfitters and Pipefitters
 - Construction Millwrights and Industrial Mechanics

¹Posters #1-8 developed in 2010; #9-12 developed in spring 2011; #13-15 developed in summer 2011. Many of the posters were updated with new Project information in 2011 and 2012.

- Heavy Equipment Operators
 - Construction Labourers
 - Geological Engineers
 - Metallurgical and Materials Engineers
 - Geological and Mineral Technologists & Technicians
 - Health and Safety Coordinators
 - Cooks and Kitchen Helpers
 - Security Guards
 - Janitors and Caretakers
 - Accounting Clerks
 - HR Assistants
 - First Aid Attendants
 - Truck Drivers
 - Welders
- **Project Video** (available on Seabridge's main website: <http://www.seabridgegold.net/News/Article/294/ksm-video>)
 - **KSM Project Summer 2010 Open House PowerPoint Presentation and Notification (Appendix 3-F)**
 - **KSM Project 2011 and 2012 Advertorials, Meetings Notices, and Newspaper Articles (Appendices 3-G and 3-H):** The advertorials were intended to ensure that local communities had up to date information on the Project and its progress.
 - **Feedback Forms (Appendix 3-I)**
 - **Press Releases:** Over 40 press releases related to current Project developments have been posted to the Seabridge website and provided to Aboriginal groups on a regular basis.
 - **Two Three-dimensional Models of the Project:** In 2012, Seabridge built two three-dimensional models replicating the topography and natural features of the area of the Project. One model illustrates the Mine Site and the other model illustrates the Processing and Tailing Management Area. The models measure approximately 4 feet by 4 feet. These models have been displayed at KSM Project EA Working Group and community meetings.

3.2 Nisga'a Nation Information Distribution and Consultation

Nisga'a Nation was represented by Nisga'a Lisims Government (NLG) in consultations on the Project. This section describes consultation requirements pursuant to Chapter 10 of the Nisga'a Final Agreement (NFA; NLG, Province of British Columbia, Government of Canada 1998), and information distribution and consultation activities undertaken to date. Studies completed by Seabridge to address the requirements of Chapter 10, paragraph 8(f) in response to direction

provided by the BC EAO and CEA Agency is outlined in Section 3.2.3. Issues raised during consultations with NLG since the EA process was initiated and responses to these issues are summarized in Section 3.2.4 and further discussed in Chapter 29, Nisga'a Nation Interests. This section also provides a summary of the steps that have been taken by Seabridge to meet the requirements related to paragraph 6 of Chapter 10 of the NFA prior to submitting the Application/EIS. This section concludes with a proposed plan for consultation with Nisga'a Nation during the Application/EIS review.

3.2.1 Chapter 10 of the Nisga'a Final Agreement

Project components fall within the Nass Area as defined by the NFA (Figure 3.2-1). Accordingly, BC and Canada, in undertaking the EA of the Project, are required to comply with Chapter 10 of the NFA. Provisions of Chapter 10 applicable to the conduct of the EA are as follows:

6. If a proposed project that will be located off Nisga'a Lands may reasonably be expected to have adverse environmental effects on residents of Nisga'a Lands, Nisga'a Lands or Nisga'a interests set out in this Agreement, Canada or British Columbia, or both, as the case may be, will ensure that the Nisga'a Nation:

- a. receives timely notice of, and relevant available information on, the project and the potential adverse environmental effects;*
- b. is consulted regarding the environmental effects of the project; and*
- c. receives an opportunity to participate in any environmental assessment under federal or provincial laws related to those effects, in accordance with those laws, if there may be significant adverse environmental effects.*

8. All environmental assessment processes referred to in this Agreement will, in addition to the requirements of applicable environmental assessment legislation:

(e) assess whether the project can reasonably be expected to have adverse environmental effects on residents of Nisga'a Lands, Nisga'a Lands, or Nisga'a interests set out in this Agreement and, where appropriate, make recommendations to prevent or mitigate those effects;

(f) assess the effects of the project on the existing and future economic, social and cultural well-being of Nisga'a citizens who may be affected by the project;

(i) take into account any agreements between the project proponent and the Nisga'a Nation or a Nisga'a Village concerning the effects of the project.

10. In exercising decision-making authority for projects that may have adverse environmental effects on residents of Nisga'a Lands, Nisga'a Lands or Nisga'a interests set out in this Agreement, the decision maker will take into account, but will not be bound by, any agreement between the Nisga'a Nation or a Nisga'a Village and the project proponent concerning the project (NLG, Province of British Columbia, Government of Canada 1998).

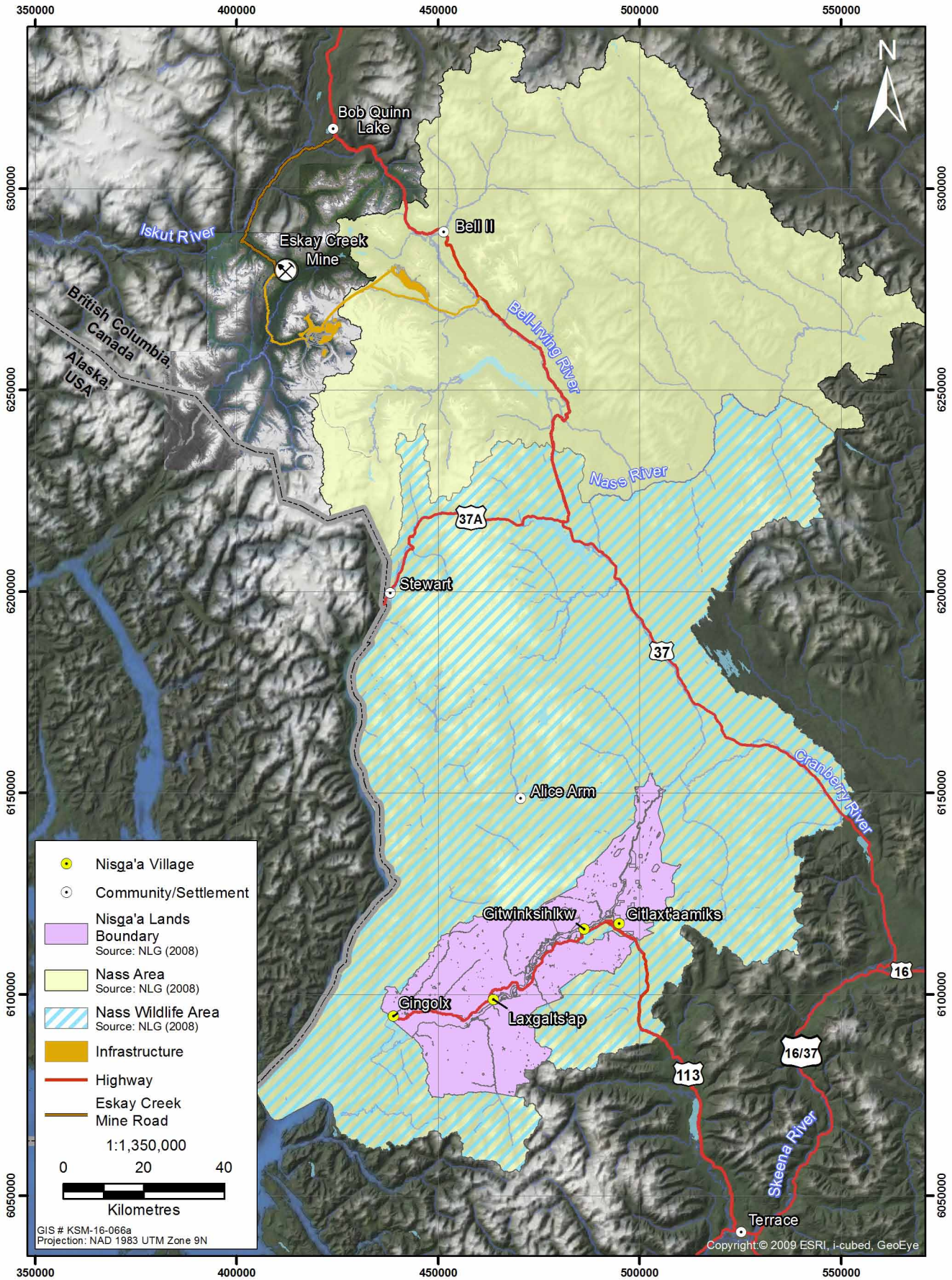


Figure 3.&1

The Application Information Requirements (AIR) note that the obligation to comply with the NFA is an obligation of the Province and Canada. To assist the Crown in meeting its obligations under paragraphs 8 and 10, the AIR direct Seabridge to:

- carry out and report on the steps taken under paragraph 6 of Chapter 10 of the NFA;
- provide the information as described in the AIR or other written notices provided by Canada and BC, necessary for the Province and Canada to conduct the assessments required by paragraphs 8(e) and 8(f) of Chapter 10 of the NFA, including information or recommended measures to prevent or mitigate environmental adverse effects on residents of Nisga'a Lands, Nisga'a Lands, or Nisga'a interests; and
- provide information regarding any agreements between Seabridge and Nisga'a Nation or a Nisga'a village concerning the effects of the proposed Project so that the Province and Canada can take those agreements into account as required by paragraph 8(i) of Chapter 10 of the NFA.

3.2.2 Pre-Application Consultation with Nisga'a Nation

This section describes consultations with NLG during the pre-Application stage of the EA process. Some government-led activities involving NLG are included. Communications initiated by Seabridge with Nisga'a Nation are identified in [Appendix 3-J](#).

3.2.2.1 Environmental Assessment Capacity Funding

On October 2012, Seabridge and Nisga'a Nation entered into a funding agreement pursuant to which Seabridge agreed to provide funding to Nisga'a Nation in order to facilitate its participation in the EA.

3.2.2.2 KSM Project Environmental Assessment Working Group

The BC EAO and CEA Agency formed the KSM Project EA Working Group in June 2008 and invited NLG representatives to participate as members of the working group. NLG attended all but two working group meetings (see Table 3.4-1 for dates, locations, and topics of working group meetings and NLG's participation in these meetings). Through the working group, NLG has had an opportunity to review and provide verbal and written comments on the selection of valued components for the effects assessment, design of the baseline study programs, proposed environmental and socio-economic studies, potential Project effects, proposed mitigation measures, and Project-related reports. Seabridge attended working group meetings and was responsible for preparing written responses to address Nisga'a comments and comments from other working group members for the BC EAO and CEA Agency to convey to NLG and other members of the working group.

3.2.2.3 Application Information Requirements

The BC EAO provided NLG with opportunities to review and comment on drafts of the AIR, initially prepared in draft form by Seabridge (formerly referred to as the Terms of Reference). NLG provided written comments to the BC EAO on the May 2009 draft AIR on July 31, 2009, as well as the March 2010 draft on March 30, 2010. NLG provided comments on the June 15, 2010 draft AIR on July 26, 2010. Seabridge prepared written responses to NLG

comments, which were provided to the BC EAO to convey to NLG. Seabridge emailed a copy of the draft AIR followed by paper copies to NLG in mid-June 2010, advising of BC EAO open house dates (see Section 3.5.1 for further details on open houses).

3.2.2.4 Workshops and Training

Seabridge contracted a third party, Runge International, to deliver a “Mining 101: Mining for Non-miners” workshop for Nisga’a Nation (eight participants) on June 5, 2009, in Vancouver. Seabridge made a contribution of \$100,000 to the BC Aboriginal Mine Training Association in 2011. A portion of the funding was made available for Nisga’a-related training initiatives such as the Train the Trainer Program, Essential Skills Program, and Nisga’a Mining Skills.

3.2.2.5 Nisga’a Field Assistants

In May 2008, Seabridge provided NLG with a proposal to employ Nisga’a citizens in baseline field studies for the Project. Nisga’a citizens were hired as field assistants for environmental fieldwork and work associated with the economic, social, cultural impact assessment where possible in 2008 and 2011. The 2012 field program had a limited field season with few opportunities for field assistants.

3.2.2.6 Site Visits

Seabridge has hosted about 20 separate helicopter visits to the Project site since summer 2008. NLG representatives participated in site visits on September 12 and 13, 2011. Participants flew over the Mine Site and Processing and Tailing Management Area by helicopter, landing at several vantage points as well as the camp for lunch and a presentation on the Project.

3.2.2.7 Nisga’a Community Meetings

Seabridge and NLG hosted four community meetings in Nisga’a villages in June 2011 to provide information on the Project. Posters were displayed and Project factsheets, career infosheets, and maps with Project information were made available to attendees. A short Project video was screened, and Seabridge gave a presentation on the Project. This was followed by questions and answers. Attendees were interested in employment opportunities and expressed concerns about union involvement in the Project as it could affect employment of Nisga’a citizens. Attendees were also interested in construction and operation timelines. Table 3.2-1 identifies the meeting dates, locations, and number of attendees.

Table 3.2-1. Nisga’a Community Meetings

Date and Time	Location	Number of Attendees
June 13, 2011, 9 a.m. - 12 p.m.	Gitwinksihlkw	13
June 13, 2011, 2 p.m. - 5 p.m.	Gitlaxt’aamiks	32
June 20, 2011, 9 a.m. - 12 p.m.	Laxgalts’ap	10
June 20, 2011, 2 p.m. - 5 p.m.	Gingolx	17

3.2.2.8 Nisga'a Sponsored Events

Seabridge participated in the Nisga'a Prosperity Forum on March 15, 2012, in Laxgalts'ap. This included participating on a panel, making a presentation, and setting up a booth. The forum was attended by about 100 people.

3.2.2.9 Community Investment

Seabridge has made several donations to Nisga'a events including Silver Sponsorship for the October 4 to 5, 2011 Nisga'a Nation Elders and Youth Gathering in Gitlaxt'aamiks; and the Nisga'a Prosperity Forum held on March 15, 2012. In June 2012, Seabridge provided a letter of support for NLG's application to the Skills and Partnership Fund (Human Resources and Skills Development Canada). Seabridge also provided sponsorship for Crabfest 2011.

3.2.2.10 Nisga'a Nation Consultation Summary Report

Pursuant to section 16.2 of the Section 11 Order, Seabridge prepared a draft report summarizing the consultations that have been undertaken with NLG in relation to the Project, and a proposal for a consultation process with NLG that Seabridge would undertake for the purposes of the review of the Application/EIS. This draft report was provided to NLG on December 12, 2012 for review and comment. Seabridge received comments from NLG on January 2, 2013 and these comments have been taken into consideration in the writing of this chapter.

3.2.3 Nisga'a Economic, Social, Cultural Impact Assessment

To address the requirements of Chapter 10, paragraph 8(f) in the NFA, Seabridge prepared the Nisga'a ESCIA based on NLG Guidelines (November 2010) and subsequent work plan (July 2011; ESCIA Workplan), which was approved by the NLG, BC EAO, and CEA Agency. The ESCIA report has been provided to NLG, BC EAO, and CEA Agency.

NLG Guidelines and the ESCIA Workplan also applied to Avanti Mining Ltd.'s (Avanti) Kitsault Mine Project, which is subject to Chapter 10 of the NFA. As a result, at the request of NLG, BC EAO, and CEA Agency, Seabridge and Avanti Mining Ltd. (Avanti) agreed to jointly undertake and share the ESCIA research and data collection required under NLG Guidelines and the ESCIA Workplan. Seabridge and Avanti have each prepared separate ESCIA reports for their respective projects. Provided below is a summary of the work that was undertaken to prepare the Nisga'a ESCIA report.

3.2.3.1 Surveys

Two surveys were conducted to support the Nisga'a ESCIA report: the Social, Economic, Resource Use, and Cultural (SERC) Survey between August and November 2011 ([Appendix 29-A](#)); and the Nisga'a Business Survey in fall 2011 ([Appendix 29-B](#)). The surveys were developed collaboratively with significant input from the NLG, BC EAO, and CEA Agency over several months. The surveys and focus groups are the primary research for understanding and assessing the economic, social, and cultural effects of the Project.

The SERC survey had 405 respondents, including Nisga'a citizens in the four Nisga'a villages and Nisga'a Urban Locals in Terrace, Prince Rupert, and Vancouver. The SERC survey obtained information on demographics, employment history, skills, language use, harvesting activities, employment barriers, and participation in cultural activities as well as views on mine employment, and intentions to move to or away from Nisga'a communities.

The Nisga'a Business Survey involved interviews with 22 local Nisga'a businesses located in Nisga'a villages. The Nisga'a Business Survey obtained information on how Nisga'a businesses might respond to anticipated business opportunities related to the two mines (e.g., provision of goods and/or services, contracting).

A number of Nisga'a citizens from the four Nisga'a villages, Prince Rupert, and Terrace were hired as field assistants to help conduct the surveys, which were done in-person in the four Nisga'a communities and in Prince Rupert and Terrace, and by phone for Nisga'a citizens located in Vancouver and other locations. Seabridge, in collaboration with Avanti, hosted full-day training for field assistants, facilitated by NRG Research Group and Rescan Environmental Services Ltd. (see Table 3.2-2).

Table 3.2-2. Nisga'a Social, Economic, Resource Use, and Cultural Survey Training Sessions

Date	Location	Number of Participants
August 15, 2011	Gingolx	10
September 19, 2011	Terrace	4
September 20, 2011	Prince Rupert	4

3.2.3.2 Focus Groups

In 2012, Seabridge held 25 focus groups over 7 days in Nisga'a villages, Terrace, Prince Rupert, and Vancouver. Focus group participants were recruited with the help of the four Nisga'a village governments and Nisga'a societies in Terrace, Prince Rupert, and Vancouver. Table 3.2-3 identifies focus group locations and participation levels. The purpose of the focus groups was to identify issues and concerns related to the potential and/or anticipated social, economic, and cultural impacts of the proposed KSM and Kitsault projects on Nisga'a citizens and communities. Specifically, the intent and design of the focus groups was to serve the following purposes:

- to follow up in greater detail on questions and responses that arise from the survey;
- to allow an opportunity to follow up on issues and concerns identified by the survey but not anticipated or explicitly included in the survey;
- to allow the group dynamic to lead to real-time discussion of an issue and allow multiple perspectives to be observed and understood; and
- to complement survey (quantitative) element with qualitative component. This is in sync with qualitative, quantitative, qualitative sequence that can be used for socio-economic or market research.

Table 3.2-3. Focus Group Participation by Group Type and Location

March 12, 2012		March 15, 2012	
Gitlaxt'aamiks	Number Participants	Gingolx	Number Participants
Youth	8	Youth	5
Elders	9	Elders	6
Women	10	Women	11
Men	8	Men	11
Total	35	Total	33
March 13, 2012		March 20, 2012	
Gitwinksihkw	Number Participants	Terrace	Number Participants
Youth	7	Youth	1
Elders	7	Elders	10
Women	10	Women	4
Men	17	Men	8
Total	41	Total	23
March 14, 2012		March 21, 2012	
Laxgalts'ap	Number Participants	Prince Rupert	Number Participants
Youth	5	Youth	6
Elders	11	Elders	4
Women	9	Women	8
Men	13	Men	8
Total	38	Total	26
		April 2, 2012	
		Vancouver	Number Participants
		Mixed*	10
		Total	10

Note: A single, mixed focus group was held in Vancouver as per the requirements of the ESCIA Workplan.

3.2.4 Issues Raised by Nisga'a Nation and Responses

Table K-1 in [Appendix 3-K](#) summarizes the issues raised by NLG to date and responses to these issues. The issues identified in Table K-1 were compiled from comments provided by NLG at working group meetings; individual meetings between Seabridge and NLG; written comments on drafts of the AIR, annual baseline study work plans, *Assessment of Alternatives for KSM Project Tailing Management Facility* ([Appendix 33-B](#)), and *Highways 37 and 37A Traffic Effects Assessment* ([Appendix 22-C](#)); community meetings and ESCIA work (e.g., focus groups); and correspondence. Nisga'a Nation requested the EA review process be undertaken in accordance with the NFA. They sought clarification on Project design, identified valued components for the effects assessment, and commented on baseline study programs. They raised concerns about potential effects on Nisga'a treaty rights and interests, including potential effects related to water quality and quantity; wildlife, including moose and migratory birds; and fish and aquatic habitat. They also raised concerns about potential effects on Nisga'a village services and infrastructure and the potential effects of Project traffic on moose and public safety. NLG expressed interest in Project benefits such as training, employment, and business opportunities. Chapter 29, Nisga'a

Nation Interests, identifies the specific issues raised by NLG and considers the potential effects of the Project on Nisga'a interests.

3.2.5 Paragraph 6 of the Nisga'a Final Agreement

The AIR require Seabridge to carry out and report on the steps taken under paragraph 6 of Chapter 10 of the NFA. NLG has actively participated in the EA of the Project since the BC EAO established the working group in spring 2008. Through participation in the working group, NLG has received information on the Project and has had opportunities to comment on proposed baseline studies, potential environmental and socio-economic effects of the Project, and proposed mitigation plans and specific Project-related reports. Seabridge has prepared written responses and/or provided additional information to address Nisga'a comments. Seabridge has also made changes to the design of the Project to respond to NLG comments and comments from other working group members as described in Chapter 1, Overview of the Proposed Project.

To address the requirements of Chapter 10, paragraph 8(f), of the NFA, Seabridge prepared the Nisga'a ESCIA based on NLG Guidelines (November 2010) and subsequent ESCIA Workplan (July 2011) approved by the NLG, BC EAO, and CEA Agency. In order to complete the report, surveys and focus groups were conducted with Nisga'a businesses and Nisga'a citizens, and research was undertaken to prepare the report. The work to support the ESCIA helped identify Nisga'a interests and concerns with the Project.

NLG and Seabridge are currently undertaking discussions related to the Project. These discussions are expected to continue during the Application/EIS review stage.

3.2.6 Proposed Plan for Consultation with Nisga'a Nation during the Application/EIS Review

Consultation planned with Nisga'a Nation during the Application/EIS review stage is intended to meet the BC EAO Section 11 Order and the CEAA (1992) requirements. During the Application/EIS review, Seabridge will:

- distribute copies of the Application/EIS to NLG for information and consultation purposes (Section 19.1 of the Section 11 Order);
- provide electronic and/or hard copies of the Application/EIS to each Nisga'a village government office;
- write to Nisga'a village governments and NLG to identify dates of the BC EAO/CEA Agency public comment period on the Application/EIS, and the dates, times, and locations of BC EAO and CEA Agency open houses;
- within time limits set by the BC EAO, provide a written report to NLG and BC EAO and CEA Agency on the results of consultation activities with NLG (Section 19.5 of the Section 11 Order);
- within any time limits set by the BC EAO, consider and respond to issues that are identified in comments submitted by NLG during the Application/EIS review (Section 23.1 of the Section 11 Order);

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- where requested by, and within any time limits set by the BC EAO, provide specified additional information in relation to, or to supplement, the information provided in the Application/EIS (Section 23.2 of the Section 11 Order);
- provide, to the BC EAO and CEA Agency, a written summary report of any agreements reached with Nisga'a Nation or a Nisga'a village within the meaning of paragraphs 8(i) and 10 of Chapter 10 of the NFA (Section 19.6 of the Section 11 Order);
- attend working group meetings organized by the BC EAO and CEA Agency to provide information related to the Application/EIS and respond to questions on the Application/EIS;
- prepare a table to track issues raised by NLG during the Application/EIS review and responses to those issues (see table in [Appendix 3-L](#));
- consider and prepare written responses to key issues raised by NLG during the Application/EIS review;
- by mutual agreement, arrange consultation meetings with NLG to discuss issues related to the Application/EIS review and the Project (Section 19.3 of the Section 11 Order). These meetings would also provide an opportunity to present the results of the Nisga'a ESCIA report; and
- undertake further consultations with NLG as directed by the BC EAO (Sections 16.3 and 19.7 of the Section 11 Order) and CEA Agency.

Based on issues and concerns raised by NLG during the Application/EIS review, and based on input from NLG, Seabridge will consider other measures to respond to issues and concerns raised by NLG, as well as methods to attempt to resolve outstanding issues.

3.3 First Nations Information Distribution and Consultation

The Section 11 Order requires Seabridge to consult with First Nations, defined as “the Tahltan Central Council (on behalf of the Tahltan Nation), the Gitanyow wilp Wiiltsx-Txawokw, and the wilps of the Gitksan Nation (as identified by the Gitksan Hereditary Chiefs), including, but not limited to, wilp Skii km Lax Ha.” The Section 13 Order, issued on September 29, 2011, amending the Section 11 Order, changed the term “First Nations” to include Gitanyow wilp Malii, wilp Gamlaxyeltxw, wilp Gwaas Hlaam, and wilp Gwinuu for the purposes of Section 4.1.2 of the Order. It also added these First Nations to Sections 23.1, 24.1, 25.1, and 27.1.1 of the Order (see Section 2.1.3.1.1 of the Application/EIS for a description of the changes to the Section 11 Order).

This section identifies information distribution and consultation activities undertaken to date, and proposes a plan for consultations with First Nations during the Application/EIS review stage. Tables summarizing communications with each First Nation are provided in [Appendix 3-M](#) (Tables M-1 to M-5). Tables summarizing issues raised by each of the First Nations since the EA process was initiated and responses to these issues are provided in [Appendix 3-N](#). A detailed discussion of the responses raised by First Nations and potential effects on First Nation interests is provided in Chapter 30, First Nations Interests. This chapter also discusses the desk-based

report prepared to assist the CEA Agency with the identification of Métis interests in the area of the Project ([Appendix 30-E](#)). This section concludes with a proposed plan for consulting First Nations during the Application/EIS review stage. The engagement activities provided below include some government-led activities involving First Nations and Seabridge's role.

3.3.1 Pre-Application Consultation with First Nations

This section describes consultations with First Nations during the pre-Application stage of the EA process.

3.3.1.1 Notification of the Project

Seabridge met with the Tahltan Nation, Gitksan Nation, Skii km Lax Ha, and Gitanyow First Nation in February 2008 and March 2008 to introduce the Project and to meet each First Nation. These meetings occurred prior to Seabridge formally entering the provincial and federal EA processes.

3.3.1.2 KSM Project Environmental Assessment Working Group

The BC EAO and CEA Agency invited representatives of the Tahltan Nation, Gitanyow First Nation, Gitksan Nation, and Skii km Lax Ha to participate on the KSM Project EA Working Group. The First Nations were invited to all working group meetings (see Table 3.4-1 for dates, locations, and topics of working group meetings and First Nations participation in these meetings). Through the working group, First Nations had an opportunity to review and provide verbal and written comments on proposed environmental and socio-economic studies, potential Project effects, proposed mitigation measures, and Project-related reports. Seabridge attended working group meetings and was responsible for preparing written responses to address First Nations comments for the BC EAO to convey to First Nations, or for preparing tables to address issues raised at meetings for the BC EAO to provide to the working group.

3.3.1.3 Application Information Requirements

The BC EAO provided Tahltan Nation, Gitanyow First Nation, and Gitksan Nation with opportunities to review and comment on drafts of the AIR, initially prepared in draft form by Seabridge. The BC EAO received written comments on the draft AIR from the Tahltan Nation (Tahltan Central Council and Tahltan Heritage Resources Environmental Assessment Team [THREAT]) on August 10, 2009, and from Gitanyow First Nation on September 30, 2010. Seabridge provided the BC EAO with formal responses to comments from these First Nations. Seabridge emailed a copy of the draft AIR on June 16, 2010, followed by paper copies on June 18, 2010, to Tahltan Nation, Gitanyow First Nation and wilp Wii'litsxw, Gitksan Nation, and Skii km Lax Ha advising them of open house dates, seven days before the open houses.

3.3.1.4 First Nations Field Assistants

In spring 2008, Seabridge provided each First Nation with a proposal to employ First Nations field assistants in baseline field studies. First Nations field assistants were hired for environmental fieldwork in each year between 2008 and 2011/2012. The 2012 field season was limited, so there were few opportunities for field assistants. Seabridge also directly employed

First Nations for employment at the exploration camp; for example, for core cutting and construction of core boxes.

3.3.1.5 Funding for Environmental Assessment Participation, Traditional Knowledge/Traditional Use and Other Studies

Seabridge offered EA process participant funding to First Nations, leading to funding agreements with the Tahltan Central Council (TCC), Gitanyow Hereditary Chiefs' Office (GHCO), Gitxsan Chiefs' Office (GCO), and the Skii km Lax Ha.

Seabridge made a number of offers to fund and work with First Nations to undertake traditional knowledge/traditional use (TK/TU) studies. Seabridge prepared draft desk-based TK/TU reports for each First Nation and provided the draft reports to each First Nation for review and comment.

Seabridge provided funding to THREAT in 2010 to undertake a TK/TU study. This study was completed and provided to Seabridge. In June 2012, THREAT was provided with the draft Tahltan TK/TU desk-based report for review and comment. On August 7, 2012, Seabridge met with THREAT to discuss the report and other matters. THREAT recommended that a TK/TU workshop be held to discuss the integration of Tahltan knowledge in the EA. This meeting was held on August 28, 2012, with members of THREAT and Seabridge's environmental and socio-economic consultants. General TK/TU information was provided at this meeting.

In February 2011, the GHCO and wilp Wii'litsxw were provided with the draft Gitanyow First Nation TK/TU desk-based report for review and comment. Seabridge met with wilp Wii'litsxw representatives on April 13, 2011 to discuss the draft report. Seabridge provided additional funding in 2012 to the GHCO for traffic or socio-economic studies, or for community infrastructure.

In February 2011, the GCO was provided with the draft Gitxsan Nation TK/TU desk-based report for review and comment. On April 11, 2011 Seabridge met with GCO representatives to discuss the report. The Gitxsan advised that they had no specific comments on the report but provided feedback on some maps portraying watersheds and Gitxsan boundaries, which were incorporated into the report.

Seabridge provided funding to TCC/THREAT, GHCO, GCO, and Skii km Lax Ha in 2009 to review the initial KSM Project Preliminary Economic Assessment.

3.3.1.6 Workshops and Training

Seabridge contracted a third party, Runge International, to deliver workshops called "Mining 101: Mining for Non-miners" for First Nations as follows:

- April 9, 2010 in Dease Lake during the Tahltan Youth Conference (April 9 to 10, 2010);
- June 14, 2010 in Hazelton for the Gitxsan Nation; and
- June 15, 2010 for the Gitanyow First Nation with participation from the Northwest Community College (NWCC) School of Exploration and Mining.

Seabridge sponsored an Occupational First Aid Level 1 course at the NWCC on September 21, 2011, for Gitxsan members. Seabridge also offered to hold a course for Gitanyow First Nation in Hazelton; however, it was not pursued by the Gitanyow.

Seabridge contributed \$100,000 to the BC Aboriginal Mine Training Association in 2011 for training initiatives such as the Train the Trainer Program, Essential Skills Upgrading, and Gitxsan Construction Craft Worker Program. Some of this training is aimed at upgrading skills to help First Nations assume jobs in the mining industry.

3.3.1.7 Site Visits

Seabridge has hosted about 20 separate helicopter visits to the Project site since 2008. Participants have included First Nations. A site visit involved flying over the Mine Site and Processing and Tailing Management Area and landing at several areas in the Project site. First Nations visited the site as follows:

- Tahltan Nation: July 29, 2008; June 30, 2009; July 23, 2009; October 6, 2009; and September 13, 2011;
- Gitanyow First Nation: August 19, 2010 and September 13, 2011;
- Gitanyow wilp Wii'litsxw: August 25, 2009 and August 20, 2010;
- Gitxsan Nation: September 17, 2008 and August 18, 2010; and
- Skii km Lax Ha: July 29, 2008.

3.3.1.8 First Nations Consultation Summary Reports

Pursuant to Section 17.2 of the Section 11 Order, Seabridge prepared four draft reports summarizing the consultations that have been undertaken with the Tahltan Nation, Gitanyow First Nation, Gitxsan Nation, and Skii km Lax Ha in relation to the Project. The draft reports also proposed a consultation process with First Nations that would be carried out by Seabridge for the purpose of reviewing the Application/EIS. These reports were provided to each First Nation on December 12, 2012 for review and comment. Seabridge received comments from the GHCO on December 20, 2012, and has taken these comments into consideration in the writing of this chapter.

3.3.2 First Nations-specific Consultation Activities

3.3.2.1 Tahltan Nation

THREAT represents the TCC on the KSM Project EA Working Group. THREAT participated in most of the working group meetings as described in Table 3.4-1. Figure 3.3-1 identifies the location of the Project in relation to the Tahltan Nation traditional territory.

Seabridge attended several TCC organized events including:

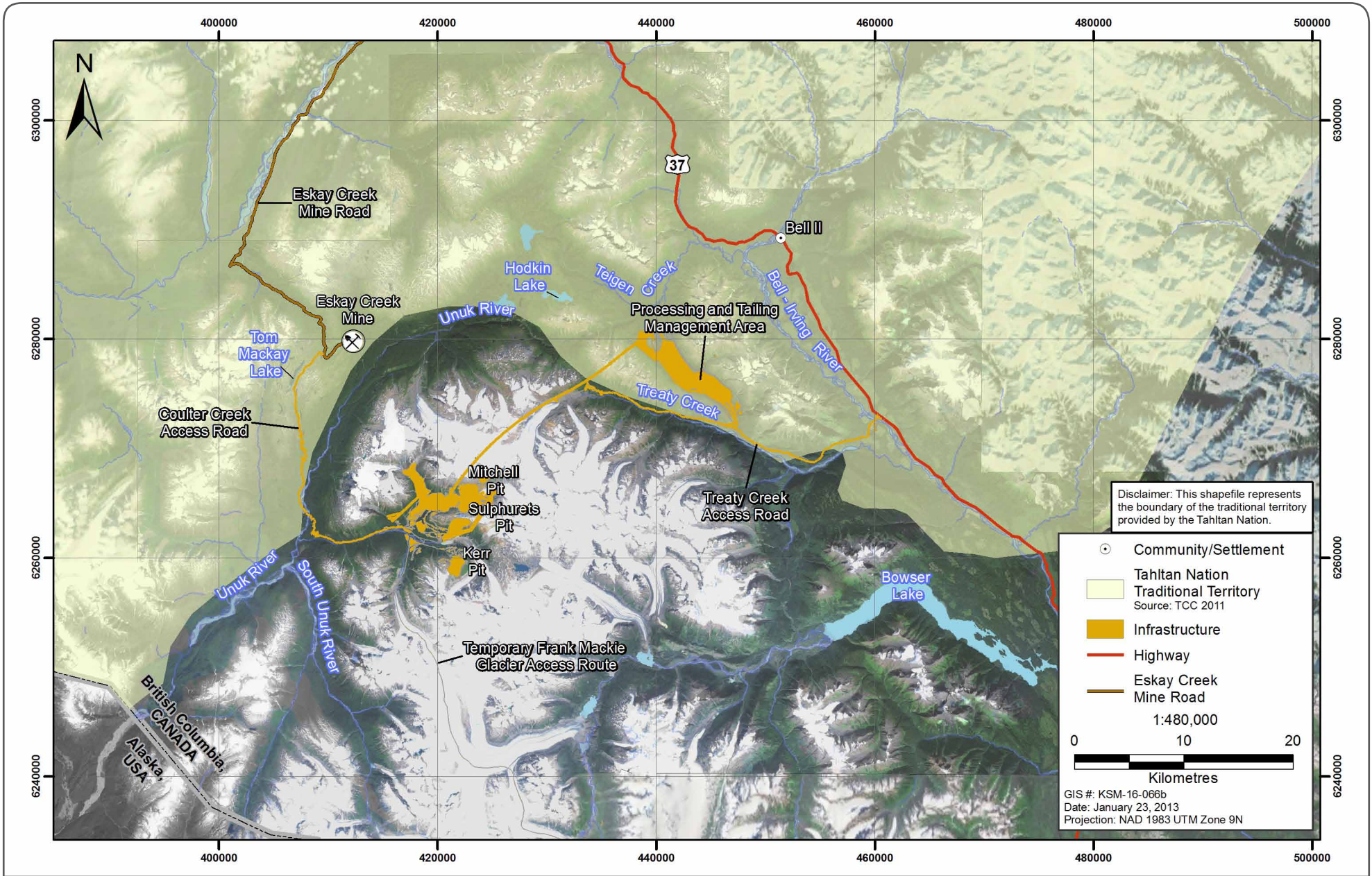


Figure 3. -1

Figure 3. -1

Information Distribution and Consultation

- Tahltan Resources Forum (June 11 to 13, 2008 in Telegraph Creek); and
- Tahltan Career Fair (May 12, 2012 in Dease Lake). Seabridge set up a booth, gave a presentation and distributed Project information (factsheets, Project maps, and job specification sheets).

On October 15 and 16, 2012, Seabridge hosted community meetings in Dease Lake (5 participants), Iskut (15 participants), and Telegraph Creek (25 participants) to present information on the Project as well as fisheries, water quality, and wildlife studies that have been undertaken to support the EA.

Seabridge provided funding for:

- Tahltan representatives to attend the 2008 First Nations Mining Forum in Prince George, BC, and 2010 and 2011 Mineral Exploration Roundup;
- two Tahltan youths to attend the Canadian Aboriginal Minerals Association Conference in Vancouver, BC (2011);
- Children's Day activities at the 2009 Tahltan Nation Annual General Meeting;
- the Tahltan Central Council April 27 to 29, 2012 Youth Conference in Dease Lake;
- Tahltan representatives to attend June 3 to 8, 2012 the "Frozen Pasts: Third International Glacial Archaeological Symposium" in Whitehorse, Yukon;
- two Tahltan youths to attend a 2012 youth conference;
- the 100th Year Celebration of the Tahltan Declaration in 2010;
- the TCC's Second Annual Dease Lake Job Fair (May 12, 2012);
- the Spring Box Social Fundraiser on May 26, 2012 in Dease Lake; and
- the Iskut Minor Hockey League to participate in Spring 2012 tournament in Whitehorse, Yukon.

Seabridge also offered to provide a bursary for a Tahltan student in the natural resources/engineering field; however, it was not pursued by the TCC. Seabridge provided funding for a Tahltan employee to receive on-the-job training with its helicopter contractor. This individual is now pursuing a helicopter licence.

Seabridge hosted three meetings in Tahltan communities in October 2012 to present information on the Project, and information related to fisheries, water quality, and wildlife studies to support the EA. Information handouts were developed for several species of importance to the Tahltan Nation (moose, mountain goats, and grizzly bear) and distributed at the meetings ([Appendix 3-O](#)). The meetings were set up to enable participants to circulate the room, view the Project posters and wall maps, interact with the three-dimensional Project models, and speak with members of the Project team. Table 3.3-1 identifies the community meeting dates, locations and number of attendees.

Table 3.3-1. Tahltan Community Meetings

Meeting Date and Time	Location	Number of Attendees
October 15, 2012, 6 p.m - 8 p.m.	Dease Lake	6
October 15, 2012, 1 p.m. - 3 p.m.	Telegraph Creek	18
October 16, 2012, 6 p.m.-8 p.m.	Iskut	11

Fliers advertising the community meetings were produced by Seabridge and provided to the TCC for distribution. They were placed in mailboxes in Dease Lake, Iskut, and Telegraph Creek, and were posted on bulletin boards in Band offices and stores. Seabridge also ran a radio ad on Canada's First Nation's Radio (CFNR) between October 9 and 15, 2012 to advertise the meetings. These meetings were open to the community.

3.3.2.2 Gitanyow First Nation

The Gitanyow First Nation is represented by the GHCO on the EA Working Group. The GHCO participated in most of the working group meetings as described in Table 3.4-1. Figure 3.3-2 identifies the location of the Project in relation to the traditional territory of the Gitanyow First Nation.

Seabridge participated in the Gitanyow Career Fair (April 27, 2012) in Gitanyow and provided a presentation on the Project.

Seabridge provided funding for:

- Gitanyow representatives to attend Minerals North in Prince George (April 21 to 23, 2010);
- uniforms and equipment for the Hazelton Spartans Senior Soccer Team (2009);
- youth soccer players to attend tryouts for the Victoria Highlanders Football Club in Victoria, BC (2010); and
- the 2012 Gitanyow Career Fair (April 27, 2012).

3.3.2.3 Gitksan Nation

The Gitksan Nation is represented by the GCO (formerly the Gitksan Treaty Office) on the KSM Project EA Working Group. The GCO participated in a number of working group meetings as described in Table 3.4-1. Figure 3.3-3 identifies the location of the Project in relation to the traditional territory of the Gitksan Nation, and wilp Skii km Lax Ha, and the area being claimed by the Skii km Lax Ha.

Seabridge participated in Gitksan-organized events and initiatives including:

- the Gitksan Annual Summit on October 20, 2011, and October 18, 2012, where Seabridge gave a presentation on the Project; and
- the Job Fair at the Gitsegukla Community Centre on June 1, 2012.

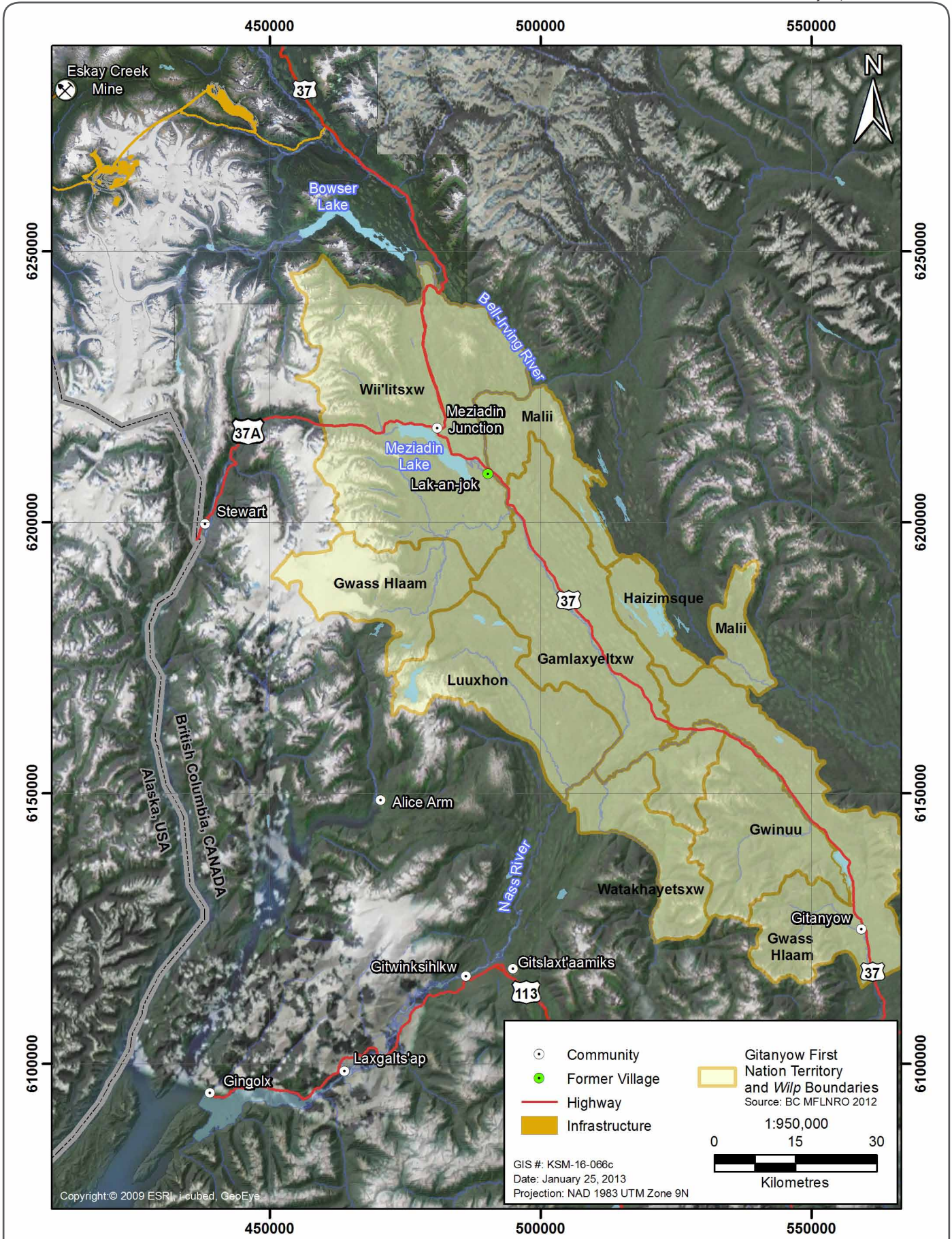


Figure 3.' -2

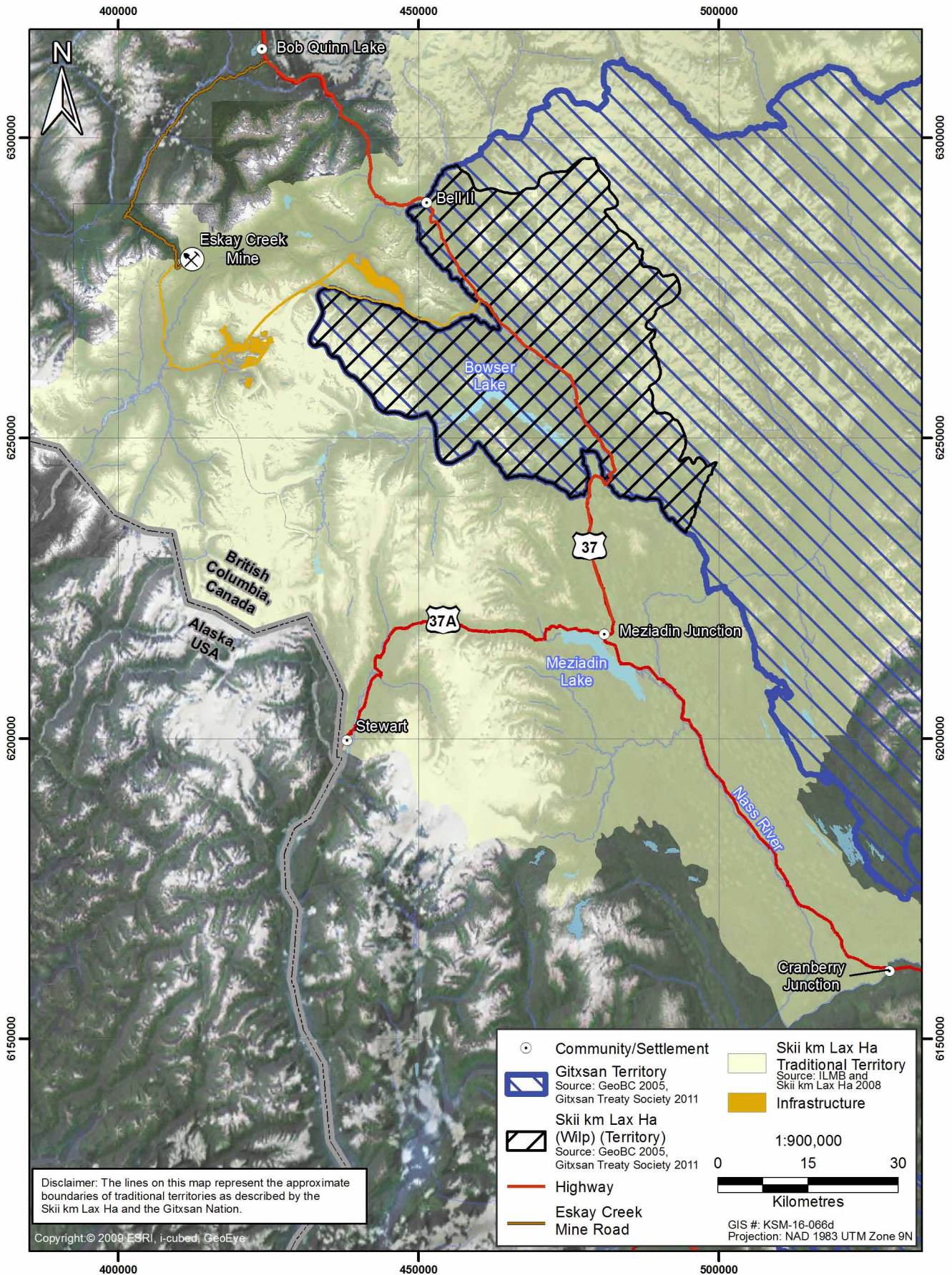


Figure 3.' -3

Seabridge provided funding for:

- the annual 2008 to 2011 Gitxsan golf tournaments;
- the Gitwangak Youth and Family Halloween Dance (October 28, 2011);
- a Gitxsan member's participation in the 2012 Vancouver Sun Run;
- a GCO representative to attend Mineral Exploration Roundup 2012 in Vancouver (January 23 to 26, 2012); and
- sponsorship of, and door prizes for, the 2012 Gitxsan Summit (October 17 to 19, 2012).

3.3.2.4 Skii km Lax Ha

Skii km Lax Ha participated in some working group meetings as described in Table 3.4-1. Although Skii km Lax Ha stopped attending working group meetings in 2010, they were provided with working group meeting materials and meeting summary notes by the BC EAO and CEA Agency.

Seabridge provided funding to the Skii km Lax Ha in 2009 to cover the cost of core cutting training in lieu of employment opportunities that did not materialize that year. Skii km Lax Ha provided Seabridge with core boxes in 2010, 2011, and 2012.

3.3.3 Issues Raised by First Nations and Responses

[Appendix 3-N](#) summarizes issues that have been raised by the Tahltan Nation, Gitanyow First Nation, Gitxsan Nation, and Skii km Lax Ha to date and responses to these issues. These issues were compiled from comments provided by First Nations at working group meetings; individual meetings between Seabridge and First Nations' representatives; written comments on drafts of the AIR, annual baseline study work plans, *Assessment of Alternatives for KSM Project Tailing Management Facility* ([Appendix 33-B](#)), and *Highways 37 and 37A Traffic Effects Assessment* ([Appendix 22-C](#)); and in comments raised in correspondence.

First Nations sought clarification on Project design and baseline study programs. They raised concerns about potential environmental effects related to water quality and quantity, moose, mountain goats, migratory birds, country foods, land use, cultural practices, and drinking water, as well as potential downstream effects on fish and aquatic habitat. They also expressed concerns about potential effects of Project traffic on moose due to vehicle interactions, and wetlands fish and fish habitat due to spills and accidents, and public safety. They expressed an interest in Project benefits such as training, employment, and contracts.

Chapter 30, First Nations Interests, provides a detailed discussion of the issues raised by First Nations and the responses provided to First Nations on potential effects on their interests.

3.3.4 Proposed Plan for Consultation with First Nations during the Application/EIS Review

Consultation planned with First Nations during the Application/EIS review stage is intended to meet the BC EAO Section 11 Order and the CEAA (1992) requirements. The goal is to maintain open lines of communication and develop mutually beneficial working relationships with identified Aboriginal groups during the Application/EIS review phase and, ultimately, throughout the life of the Project. During the Application/EIS review stage, Seabridge will:

- distribute copies of the Application/EIS to First Nations for information and consultation purposes (Section 20.1 of the Section 11 Order);
- write to each First Nation to identify the dates of the public comment period on the Application/EIS, and the dates, times, and locations of BC EAO and CEA Agency open houses;
- within time limits set by the BC EAO and CEA Agency, provide a written report to First Nations, BC EAO, and CEA Agency on the results of consultation activities with First Nations (Section 20.5 of the Section 11 Order);
- within any time limits set by the BC EAO, consider and respond to issues that are identified in comments submitted by First Nations during the review of the Application/EIS (Section 23.1 of the Section 11 Order);
- where requested by, and within any time limits set by, the BC EAO, provide specified additional information in relation to, or to supplement, the information provided in the Application/EIS (Section 23.2 of the Section 11 Order);
- attend working group meetings organized by the BC EAO and CEA Agency to provide information related to the Application/EIS and respond to questions on the Application/EIS;
- prepare a table that tracks issues raised by First Nations on the Application/EIS and responses to those issues (see [Appendix 3-L](#));
- consider and prepare written responses to key issues raised by First Nations on the Application/EIS;
- by mutual agreement, arrange consultation meetings with First Nations to identify any specific Aboriginal interests that may be potentially affected by the Project, as identified in Aboriginal interest and use studies, traditional use studies, or other sources of information; to identify measures to avoid or mitigate potential adverse effects; and/or to otherwise address or mitigate First Nations' concerns (Section 20.4 of the Section 11 Order);
- implement additional measures for First Nations consultations and accommodations as required by the BC EAO (Section 20.6 of the Section 11 Order); and
- undertake further consultations with First Nations as directed by the BC EAO (Sections 17.3 and 20.6 of the Section 11 Order) and CEA Agency.

Based on issues and concerns raised by First Nations during the Application/EIS review stage, and based on input from First Nations, Seabridge will consider other measures to respond to issues and concerns raised by First Nations, as well as identify methods to attempt to resolve outstanding issues.

3.4 Government Agency and Local Government Information Distribution and Consultation

3.4.1 Pre-Application Consultation with Government Agencies and Local Governments

This section outlines information distribution and consultation activities with government agencies and local governments to date. A detailed summary of communications with government agencies and local governments is included in [Appendix 3-P](#) (Tables P-1 and P-2). This section concludes with a proposed plan for consultation with government agencies and local governments during the Application/EIS review.

3.4.1.1 KSM Project Environmental Assessment Working Group

The BC EAO and CEA Agency invited representatives of government agencies and local government (Regional District of Kitimat-Stikine [RDKS] and District of Stewart) to participate on the KSM Project EA Working Group. Government agencies participating on the working group included Canadian federal and provincial agencies, United States federal and Alaska state agencies, and local governments. Working group meetings were held between 2008 and 2012. Table 3.4-1 lists working group meeting dates, meeting topics, and participants. Seabridge made best efforts to provide meeting materials to the working group in advance of meetings.

Seabridge has participated in working group meetings to:

- provide information on Project design, including the results of environmental baseline studies and the potential effects of the Project;
- present and seek comments on the draft AIR, annual environmental baseline study work plans, and proposed mitigation measures;
- provide written responses to comments from working group members; and
- present and seek comments on draft reports such as proposed fish habitat compensation plans, *Assessment of Alternatives for KSM Project Tailing Management Facility* ([Appendix 33-B](#)), and *Highways 37 and 37A Traffic Effects Assessment* ([Appendix 22-C](#)).

For example, the following agencies provided written comments on the following documents:

- 2008 Baseline Study Work Plan (BC Ministry of Environment [BC MOE], Natural Resources Canada [NRCan], Environment Canada, Alaska Department of Natural Resources [AK DNR], and NLG);
- 2008 Baseline Study Reports (US Department of the Interior, Canadian Wildlife Service, BC MOE, and NRCan);

Table 3.4-1. Summary of Working Group Meeting Dates, Locations, Topics, and Participants

Meeting Date	Topic	Location	Nisga'a Nation	Tahltan Nation	Gitanyow Nation	Gitxsan Nation	Skii km Lax Ha	Government	Local Government
								Agencies	
17-Jun-08	EA Process Overview Project Overview 2008 Baseline Study Work Plan	Smithers	X	X		X	X	BC EAO CEA Agency CWS DFO EC HC TC NRCan MPMO MEMNG MFLNRO MOE EPA DOI NMFS	RDKS
10-Jul-08	Surface and Groundwater Quality and Quantity	Vancouver	X	X			X	BC EAO CEA Agency EC MEMPR MOE DOI	
26-Aug-08	Surface Hydrology	Vancouver					X	BC EAO DFO MOE	
27-May-09	2008 Baseline Study Reports 2009 Baseline Work Plan	Terrace	X	X	X			BC EAO CEA Agency DFO EC TC NRCan MFLNRO MOE NOAA NMFS DOI EPA NMFS AK DNR	RDKS
3-Jun-09	Fisheries 2008 Fisheries Baseline Report 2009 Fisheries Baseline Work Plan	Vancouver	X	X	X			BC EAO CEA Agency DFO NRCan TC MOE NOAA	

(continued)

Table 3.4-1. Summary of Working Group Meeting Dates, Locations, Topics, and Participants (continued)

Meeting Date	Topic	Location	Nisga'a Nation	Tahltan Nation	Gitanyow Nation	Gitxsan Nation	Skiik'yaan	Lax Kw'adaams	Government	Local Government
									Agencies	
22-Jun-09	Geochemistry	Vancouver	X	X			X		BC EAO CEA Agency EC MPMO MEMNG MFLNRO MOE AK DNR	
25-Jan-10	Fisheries	Vancouver	X	X	X			X	BC EAO, CEA Agency DFO MOE NOAA AK DNR	
25-Jan-10	Wildlife	Vancouver	X	X	X			X	BC EAO, CEA Agency NRCan EC MOE	
26-Jan-10	Geochemistry	Vancouver	X	X	X			X	BC EAO EC CEA Agency TC NRCan MOE AK DNR	
8-Feb-11	Project Design and Status	Smithers	X	X	X				AK DNR BC EAO CEA Agency CWS DFO EC HC NRCan MPMO MEMNG MFLNRO MOE MOTI NMFS EPA	RDKS
8-Feb-11	Geochemistry	Smithers	X	X	X	X			AK DNR AK DFG BC EAO CEA Agency CWS DFO EC	RDKS

(continued)

Table 3.4-1. Summary of Working Group Meeting Dates, Locations, Topics, and Participants (continued)

Meeting Date	Topic	Location	Nisga'a Nation	Tahltan Nation	Gitanyow Nation	Gitxsan Nation	Skii km Lax Ha	Government	Local Government
								Agencies	
8-Feb-11	Geochemistry	Smithers	X	X	X	X		NRCan MPMO MEMNG MFLNRO MOE MOTI NMFS EPA	RDKS
9-Feb-11	Fisheries	Smithers	X	X	X			AK DFG BC EAO CEA Agency DFO EC MOE NMFS AK DNR	
9-Feb-11	Wildlife	Smithers	X	X	X	x		BC EAO CEA Agency DFO EC MOE AK DNR	
10-Feb-11	Wetlands	Smithers	X	X	X	X		BC EAO CEA Agency DFO EC MOE	
22-Jun-11	Water Quality Hydrology	Kamloops	X	X	X	X		BC EAO CEA Agency DFO EC TC HC NRCan EPA MEMNG	
14-Sep-11	Mine Site Water Quality	Smithers	X	X	X	X		BC EAO CEA Agency DFO EC MPMO MEMNG MFLNRO MOE NMFS	

(continued)

Table 3.4-1. Summary of Working Group Meeting Dates, Locations, Topics, and Participants (completed)

Meeting Date	Topic	Location	Nisga'a Nation	Tahltan Nation	Gitanyow Nation	Gitxsan Nation	Skii km Lax Ha	Government	Local Government
								Agencies	
15-Sep-11	Tailing Management Facility (TMF) Alternatives Assessment	Smithers	X		X	X		BC EAO CEA Agency DFO EC MPMO MEMNG MFLNRO MOE NMFS NRCan	
March 29-30, 2012	Tailing Management Facility (TMF) Alternatives Assessment	Smithers	X	X	X	X	(March 30 only)	BC EAO CEA Agency DFO EC HC MEMPR MOE MFLNRO NRCan EPA AK DNR	RDKS
9-Jul-12	Highway 37 and 37A Traffic Effects Assessment	Terrace	X	X	X	X		BC EAO CEA Agency EC MFLNR MOE MOTI	RDKS
13-Sep-12	Water Quality and Quantity	Smithers	X	X	X			BC EAO CEA Agency EC MEMNG MOE NRCan EPA	RDKS
14-Sep-12	Wildlife	Smithers	X	X	X			BC EAO CEA Agency EC MOE	

- 2009 Baseline Study Work Plan (AK DNR, BC MOE, Environment Canada, NRCan, Fisheries and Oceans Canada [DFO], National Oceanic and Atmospheric Administration, and NLG);
- 2010 Aquatic Resources Baseline Study Report (BC MOE); and
- 2012 Assessment of Alternatives for KSM Project Tailing Management Facility (Environment Canada).

3.4.1.2 Site Visits and Mine Tours

Seabridge has hosted about 20 separate helicopter trips to the Project site since 2008 (Table 3.4-2). All working group members were invited to visit the site.

Table 3.4-2. Government Agency and Local Government Site Visits

Date	Participants
July 29, 2008	BC EAO, British Columbia Ministry of Ministry of Energy, Mines, and Natural Gas (BC MEMNG), BC MOE, CEA Agency, Transport Canada, RDKS
June 10, 2008	BC MEMNG, Minister of State for Mining
August 26, 2009	DFO, BC MEMNG, BC EAO, Environment Canada, National Marine Fisheries Service, US Environmental Protection Agency, CEA Agency, RDKS, Health Canada, AK DNR
July 9, 2010	CEA Agency, BC EAO
September 13, 2011	CEA Agency, Environment Canada, AK DNR, BC MEMNG, British Columbia Ministry of Forests, Lands and Natural Resource Operations (BC MFLNRO), BC EAO
July 19, 2012	BC MEMNG, MLA Stikine
July 26, 2012	BC MFLNRO
August 22, 2012	BC MOE, BC EAO
August 23, 2012	Transport Canada, Environment Canada, BC MEMNG
September 19, 2012	BC MFLNRO, BC MOE

Seabridge also organized visits for working group members to the operating Highland Valley Copper Mine near Kamloops on June 23, 2011 and to the closed Brenda Mine near Penticton on June 24, 2011. Canadian and US agencies participated in the tours (DFO, BC MEMNG, Health Canada, Transport Canada, NRCan, and the US Environmental Protection Agency), as well as the Tahltan, Gitanyow, and Gitxsan. NLG was unable to participate.

3.4.1.3 Application Information Requirements

The BC EAO provided government agencies and local governments with the opportunity to review and comment on the draft AIR. The BC EAO received written comments on the draft AIR from the following government agencies in 2009 and 2010:

2009 Comments

- NRCan (June 25, 2009);
- Environment Canada (June 26, 2009);

- Canada Wildlife Service (June 26, 2009);
- Transport Canada (June 3, 2009);
- CEA Agency (June 30, 2009);
- Health Canada (June 29, 2009);
- DFO (June 15, 2009);
- US Department of the Interior (June 26, 2009);
- AK DNR (July 3, 2009);
- BC MOE (June 29, 2009; July 3, 2009; and July 6, 2009); and
- BC EAO (September 3, 2009).

2010 Comments

- BC MEMNG (April 20, 2010);
- US Department of the Interior (July 26, 2010);
- AK DNR (September 24, 2010);
- CEA Agency (September 15, 2010);
- DFO (July 27, 2010); and
- Transport Canada (June 23, 2010).

Seabridge provided formal responses to comments on the draft AIR in a tracking table provided to the BC EAO.

3.4.2 Issues Raised by Government Agencies and Local Governments and Responses

Tables Q-1 and Q-2 in [Appendix 3-Q](#) summarize the issues that have been raised by government agencies and local governments to date and responses to these issues. These issues were compiled from comments provided by government agencies and local governments at working group meetings; individual meetings between Seabridge and government representatives; written comments on the draft AIR, annual baseline study work plans, *Assessment of Alternatives for KSM Project Tailing Management Facility* ([Appendix 33-B](#)) and *Highways 37 and 37A Traffic Effects Assessment* ([Appendix 22-C](#)); and comments raised in correspondence.

Government agencies and local government sought clarification on Project design including water treatment, sludge management, tunnel construction, and drainage and open pit design. They also sought clarification on baseline studies related to geochemistry, air and water quality, fisheries, and wildlife. They posed specific questions related to potential effects on water quality and quantity; fish and fish habitat; wetlands and wildlife; and related monitoring, closure and reclamation, as well as assessment of effects predictions.

3.4.3 Proposed Plan for Consultation with Government Agencies and Local Government during the Application/EIS Review

The proposed consultation plan with government agencies and local governments during the Application/EIS review stage is intended to meet the requirements of the Section 11 Order and the CEAA (1992) requirements. During the Application/EIS review stage, Seabridge will:

- distribute copies of the Application/EIS to federal, provincial, and local government agencies for information and consultation purposes (Section 22.1 of Section 11 Order);
- write to local governments to identify the dates of the public comment period on the Application/EIS, and the dates, times and locations of BC EAO and CEA Agency open houses;
- within any time limits set by the BC EAO, respond to issues that are identified in comments submitted by federal, provincial, and local government agencies during the review of the Application/EIS (Section 23.1 of the Section 11 Order);
- where requested by, and within any time limits set by, the BC EAO, provide specified additional information in relation to, or to supplement, the information provided in the Application/EIS (Section 23.2 of the Section 11 Order);
- attend working group meetings organized by the BC EAO and CEA Agency to provide information related to the Application/EIS and respond to questions on the Application/EIS; and
- prepare a table that tracks issues raised by government agencies and local government on the Application/EIS and responses to those issues (see table provided in [Appendix 3-L](#)).

Based on issues and concerns raised by government agencies and local government during the Application/EIS review stage, and based on advice from the BC EAO, Seabridge will consider other measures to respond to issues and concerns raised by government agencies and local government. Further, Seabridge will identify methods to attempt to resolve outstanding issues.

3.5 Public and Stakeholder Information Distribution and Consultation

Seabridge conducted its engagement activities in concordance with the Public Consultation Policy Regulation (BC Reg. 373/2002) and in compliance with the privacy provisions of the *Freedom of Information and Protection of Privacy Act* (1996).

This section describes information distribution and consultation activities involving the public to date. A summary of communications with the public and stakeholders is provided in Table R-1 in [Appendix 3-R](#). This section concludes with a proposed plan for consultation with the public and stakeholders during the Application/EIS review stage.

Stakeholders are groups or individuals with interests that could be affected by the Project and its associated activities. Stakeholders do not include treaty and non-treaty First Nations of Canada, but generally include land-user groups with interests or tenures in the area of the Project;

however, Native American tribes in Alaska are considered stakeholders, within the context of this Application/EIS, and members of the public with interests in the Project. The “public” is a broad entity that includes people who are not necessarily affiliated with an interest group, although there is overlap between these groups. The public engagement program discussed here includes Alaska Aboriginal groups; however, these engagement activities did not specifically target these groups.

3.5.1 Pre-Application Consultation with the Public and Stakeholders

This section describes consultations with the public and stakeholders during the pre-Application stage of the EA process.

3.5.1.1 British Columbia Environmental Assessment Office Summer 2010 Open Houses

The BC EAO held open houses between June 25 and July 26, 2010. Open houses were held in Terrace (June 28, 2010), Smithers (June 29, 2010), Stewart (July 7, 2010), and Dease Lake (July 8, 2010).

The purpose of the open houses was to provide information on the Project and to obtain comments on the draft AIR and on the Project. Seabridge attended the open houses to provide information about the Project and to respond to questions and comments. Table 3.5-1 identifies the dates and locations of the open houses.

Table 3.5-1. Summary of Summer 2010 Open Houses

Date	Location	Venue	Time	Number of Attendees
June 28, 2010	Terrace	Best Western Inn	4:30 - 8:00 p.m.	13
June 29, 2010	Smithers	Hudson Bay Lodge	4:30 - 8:00 p.m.	14
July 7, 2010	Stewart	Al Lawrence Memorial Centre	4:30 - 8:00 p.m.	14
July 8, 2010	Dease Lake	Dease Lake Community Hall	4:30 - 8:00 p.m.	0

Each open house ran from 4:30 to 8:00 p.m., with presentations by the BC EAO and Seabridge scheduled to commence at 7:00 p.m. Attendees were asked to sign in as they entered, and were encouraged to fill out feedback forms as they departed ([Appendix 3-I](#)). Seabridge displayed eight large posters on stands (approximately 8 feet by 3 feet), which described the Project and the baseline studies at each open house ([Appendix 3-C](#)). Four factsheets discussing the Project, the EA process, and baseline studies were distributed ([Appendix 3-B](#)). Copies of the AIR were also on display with multiple hardcopies available for attendees to take away.

The BC EAO’s presentation covered the draft AIR, the dates and purpose of the public comment period, and the EA process. The CEA Agency attended the Stewart Open House, where they gave a presentation on the federal EA process, and Dease Lake Open House. Seabridge gave a presentation on the Project ([Appendix 3-F](#)).

3.5.1.2 Notification of Summer 2010 Open Houses

Seabridge placed notifications of the open houses and the dates of the public comment period ([Appendix 3-F](#)) in the following local newspapers two weeks prior to the date of the open house:

- *Terrace Standard* (ran week of June 16, 2010);
- *Smithers Interior News* (ran week of June 16, 2010);
- *Northern Connector* (ran week of June 18, 2010); and
- *Northern Daily* (ran on June 25, 2010).

3.5.1.3 Application Information Requirements

The public had an opportunity to review and comment on the draft AIR at open houses organized by the BC EAO and during the formal public comment period held between June 25, 2010, and July 26, 2010. During the public comment period, copies of the AIR were provided at the following locations:

- Smithers Public Library, Smithers, BC;
- Terrace Public Library, Terrace, BC;
- Stewart Public Library, Stewart, BC;
- Northern Light College, Dease Lake, BC; and
- Hazelton Public Library, Hazelton, BC.

Seabridge and the BC EAO advertised the availability of the draft AIR by publishing a public notice in four newspapers leading up to the public comment period (Section 3.5.2). Two comments were received during the public comment period: one from a member of the public and one from an interest group (Table 3.5-2). These comments are included in the public and stakeholder’s interests and responses table provided in [Appendix 3-S](#).

Table 3.5-2. Comments Received during the Public Comment Period on the Draft Application Information Requirements

Commenter	Comment
K.T. Industrial Development Society	<p>Concerned that 2006 Statistics Canada data does not accurately reflect the socio-economic baseline characteristics of the region</p> <p>Requested clarification on any local training programs intended to build the capacity of the local work force</p> <p>Concerned about socio-economic effects of the Project, and noted an interest in jobs and economic stimulus to the local economy and region (northwest BC)</p>
Terrace resident	<p>Indicated support for the Project and noted the need for the economic and employment benefits that would be provided by the Project</p>

3.5.1.4 Public Comment Period on Proposed Scope of the Comprehensive Study

The CEA Agency established a public comment period from June 1, 2010 to June 30, 2010, to obtain comments on the “the proposed scope of the environmental assessment, factors to be considered, scope of those factors, and the ability of the comprehensive study process to address issues related to the KSM Project in northwestern British Columbia” (CEA Agency 2010). The scoping document was made available for public viewing on the CEA Agency registry website.

3.5.1.5 Alaska October 2011 Open House

Seabridge held an open house in Ketchikan, Alaska, on October 5, 2011 from 5:00 to 9:00 p.m. to provide information and to obtain comments on the Project. Seabridge placed an ad in the Ketchikan Daily News on September 24 and October 1, 2011, notifying the public of the open house ([Appendix 3-G](#)). Information materials such as posters and Project factsheets were used to convey Project information. Seabridge gave a presentation on the Project and responded to questions and issues. Approximately 110 members of the public attended. The issues raised at the open house are documented in [Appendix 3-S](#).

3.5.1.6 British Columbia Fall 2012 Open Houses

During fall 2012, Seabridge held open houses to provide updated Project information prior to the submission of the Application/EIS. Information materials such as posters, Project factsheets, a video, and a model of the Project were used to convey Project information. Seabridge gave a presentation on the Project and responded to questions and issues. Table 3.5-3 provides details on the open houses.

Table 3.5-3. Summary of Seabridge Fall 2012 Open Houses

Date	Location	Venue	Time	Number of Attendees
September 11, 2012	Smithers	NWCC Campus	6:00 - 8:00 p.m.	30
September 18, 2012	Terrace	NWCC Campus	6:00 - 8:00 p.m.	35
October 18, 2012	Stewart	Stewart Community Arena	6:00 - 8:00 p.m.	15

3.5.1.7 Stakeholder Consultations

On September 18, 2008, Seabridge wrote to holders of Crown tenures within the vicinity of the Project (e.g., registered traplines, commercial recreation, guide outfitter and forest licences, and mineral tenures). Seabridge informed tenure holders about the Project and noted that someone would be contacting them to gather information related to their tenure and potential effects of the Project for incorporation into the Application/EIS. Follow-up letters were sent in 2010, which provided updated information on the Project, including a proposed schedule. Letters were sent to the following tenure holders:

- Bear Enterprises Ltd.;
- Bell 2 Lodge;
- Canada Resurgence Developments;

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- Chilliwack River Rafting Ltd.;
- Coast Mountain Outfitters;
- Dena Cho Industries;
- Holder of trapline TR0616T011;
- Holder of trapline TR0616T013;
- Holder of trapline TR0617T015;
- Holder of trapline TR0621T001;
- Holder of trapline TR0621T004;
- Holder of trapline TR0621T005;
- Last Frontier Heliskiing Ltd. and Bell 2 Lodge;
- M D & T Camp Service;
- Misty Mountain Outfitters;
- Northwest Ranching and Outfitting;
- Spey Lodge;
- Steelhead Heaven Holdings Inc.; and
- The Explorers League: World and Wilderness Rafting.

In December 2012, letters were sent to the following tenure holders to provide a Project update and timeline for the EA as well as to notify them of open houses following submission of the Application/EIS. A KSM Project factsheet was also included.

- Barrick Gold Inc.;
- Bear Enterprises;
- Brigade Holdings Canada Ltd.;
- Canarc Resource Corp.;
- Castle Resources;
- Cobra Exploration;
- Eilat Exploration Ltd.;
- Eskay Mining Corp. Ltd.;
- Holder of mineral tenures 593235 and 593236;
- Holder of mineral tenures 981670 and 981672;
- Holder of trapline TR0616T012;
- Holder of trapline TR0617T1015;
- Holder of trapline TR0621T001;

- Holder of trapline TR0621T003;
- Holder of trapline TR0621T004;
- Holder of trapline TR0621T005;
- Hunter Dickinson Ltd.;
- Last Frontier Heliskiing Ltd. and Bell 2 Lodge;
- Lyncorp Mining Services;
- McCowans Sales and Consulting;
- Milligan Outfitting;
- Misty Mountain Outfitters;
- Northwest Ranching and Outfitting;
- North Bay Resources;
- Pretium Exploration;
- Spey Lodge;
- St. Andrew Goldfields Ltd.; and
- Teuton Resources Corp.

Table 3.5-4 lists the dates of interviews with tenure holders. The primary purpose of the interviews was to obtain information about the nature of the tenure and potential impacts of the Project on their business interests. The results of these interviews are provided in Application/EIS Chapter 23, Land Use. Issues and concerns raised by interviewees are summarized and included in [Appendix 3-S](#).

Table 3.5-4. Summary of Interviews with Tenure Holders

Tenure Holder	Interview Date
Dena Cho Industries	July 30, 2008
Last Frontier Heliskiing	July 31, 2008; August 22, 2012
Misty Mountain Outfitters	May 3 and 4, 2009
Holder of Trapline TR0621T001	May 21, 2009; August 22, 2012
Coast Mountain Outfitters	July 9, 2009
Northwest Ranching and Outfitting	May 6, 2010
Holder of Trapline TR0621T004	May 14, 2010
Bear Mountaineering	May 17, 2010
Explorers League, Guided River Tours	May 19, 2010
Spey Lodge	June 22, 2012
Milligan Outfitting	August 24, 2012
Skeena Valley Expeditions	September 7, 2012

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Seabridge phoned Morice Lake Guiding on May 18, 2010, to arrange an interview regarding potential effects of the Project on its operations. The company declined as they did not anticipate the Project affecting its operations.

Seabridge held several meetings with representatives of Last Frontier Heliskiing Ltd. and Bell 2 Lodge between 2009 and 2012, since the business operates in the vicinity of the proposed Mine Site. Seabridge also provided a helicopter site tour for the company on August 16, 2010. Last Frontier Heliskiing is concerned about potential visual and noise impacts on their business activities and the loss of existing ski routes. Seabridge has developed a business relationship with Bell 2 Lodge since 2009, which includes purchasing some supplies required to run field programs.

3.5.1.8 Conferences and Panels

Table 3.5-5 summarizes Seabridge's participation in conferences and panels to date.

Table 3.5-5. Participation in Conferences and Panels

Date	Name of Conference/Event	Location	Description
January 19, 2010	Mineral Exploration Roundup (January 18-21, 2010)	Vancouver, BC	Seabridge hosted an open house with a poster display and Project video.
January 13, 2011	8th Annual BC Natural Resource Forum	Prince George, BC	Seabridge participated as a panellist on the "Panel on Mining: The Top Prospects" and gave a presentation on the KSM Project. The forum was open to the public (no registration fee).
January 24, 2011	Mineral Exploration Roundup (January 24-27, 2011)	Vancouver, BC	Seabridge hosted an open house with a poster display and Project video.
September 12, 2011	NWCC Field School	Smithers, BC	A Seabridge employee gave a talk about the KSM Project as well as her job responsibilities and educational background.
September 15, 2011	Seabridge office	Smithers, BC	Seabridge hosted a public open house at its newly opened Smithers office, including Project information posters, video, and handouts.
November 16, 2011	NWCC	Hazelton, BC	Seabridge attended Career Day and gave a presentation on employment and training in the mining industry.
December 15, 2011	Smithers Chamber of Commerce Luncheon	Smithers, BC	Seabridge gave a presentation on the Project at the Smithers Chamber of Commerce luncheon.
January 24, 2012	Mineral Exploration Roundup in Vancouver, BC (January 23-26, 2012).	Vancouver, BC	Seabridge hosted an open house with a poster display and Project video.
February 22, 2012	Smithers Exploration Group conference Rock Talk	Smithers, BC	Seabridge gave a presentation on the Project. Approximately 65 to 70 people were in attendance.
March 9, 2012	NWCC Skills Competition and Trade Fair	Terrace, BC	Seabridge staffed a booth and provided information on the Project.
October 17, 2012	Regional District of Bulkley-Nechako Business Forum	Smithers, BC	Seabridge gave a presentation on the Project.

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3.5.1.9 Media

Seabridge has conducted radio interviews and placed advertisements in newspapers to provide information on the Project. Tables 3.5-6, 3.5-7, and 3.5-8 list the media coverage up until December 31, 2012.

**Table 3.5-6. 2011 Advertorials, Notices, and Newspaper Articles
(Appendix 3-G)**

Ad	Placement	Date
Smithers Office Opening Announcement	Smithers Interior News	April 13
Advancing the KSM Project	Terrace Standard	April 13
	The Northern Connector	April 15
Minerals North	Smithers Interior News	April 22
Mining Week	Smithers Interior News	May 4
Media Planet Mining Week feature	Vancouver Sun	May 11
Nisga'a Community Meetings	Distribution in Nisga'a villages	Week prior
Bulkley Valley Fall Fair Guide	Fair program	August 25-28
Ketchikan Open House	Ketchikan Daily News	September 24; October 1
Nisga'a Nation Elder Youth Conference	Program ad	October 4-6

Table 3.5-7. 2012 Notices and Newspaper Articles (Appendix 3-H)

Ad	Placement	Date
BC Aboriginal Mine Training Association contribution (ad and editorial)	<i>Native Journal</i>	February
Economics Infographic	<i>Smithers Interior News</i> - Minerals North supplement	May 23
Smithers Golf Tournament	<i>Smithers Interior News</i>	June 15-16
Bulkley Valley Fall Fair Guide	Fair Program	August 23-26
Smithers Open House (September 11)	<i>Smithers Interior News</i>	September 5
	<i>Terrace Standard</i>	
	<i>The Northern Connector</i>	
Terrace Open House (September 18)	<i>Smithers Interior News</i>	September 12
	<i>Terrace Standard</i>	
	<i>The Northern Connector</i>	
Stewart Open House (October 18)	<i>Smithers Interior News</i>	October 10
	<i>Terrace Standard</i>	
	<i>The Northern Connector</i>	
Tahltan Community Meetings Ads	<i>Smithers Interior News</i>	October 10
	<i>Terrace Standard</i>	
CFNR Ad (Tahltan community meetings)	CFNR	October 9-15

Table 3.5-8. 2012 Advertorials (Appendix 3-H)

Advertorial	Smithers Interior News	Terrace Standard	The Northern Connector
Seabridge Gold Aims to Reduce KSM Project Footprint	January 25	January 25	January 27
Responsible Mining Development is about Investing in Local Communities	February 29	February 29	March 2
Developing a Mining Project of Merit	March 28	March 28	March 30
Local Communities Benefit from Mining	April 25	April 25	April 27
Taking the Time to Get it Right: Designing the KSM Project	May 23	May 23	May 25
Life in an Exploration Camp	June 27	June 27	June 29
Seabridge Targets Mid-November to Submit KSM EA Application	July 25	July 25	July 27
What Happens after an EA Application is Submitted	September 12	September 12	September 14
Hospitality Matters...Even in the Middle of Nowhere	October 10	October 10	October 12
On the Road Across the Northwest	November 28	November 28	November 30

3.5.1.10 Community Investments

Seabridge has made donations to local and provincial organizations and sponsored programs in local communities as summarized in Table 3.5-9.

Table 3.5-9. Summary of Seabridge's Community Investment

Date	Community Organization	Description
June 23, 2010	Sodexo Foundation	Donation to Sodexo Foundation Dinner (June 23, 2010)
August 13-14, 2010	Stewart Bear Arts Festival	Seabridge donation to Bear Fest (August 13-14, Stewart, BC)
April 12, 2011	Bulkley Valley Child Development Centre, Bulkley Valley Brain Injury Centre, and Bulkley Valley Hospice Society	Donation for community coupon book fundraiser
May 16, 2011	Smithers District Chamber of Commerce	Donation to Mining Week Luncheon
November 22, 2011	Living Water Christian Community	Donation to Stewart Christmas Hamper Program
December 7, 2011	BC Aboriginal Mine Training Association	\$100,000 contribution
March 9, 2012	NWCC	Premium Sponsor of Skills Canada Northwest BC Regional Skills Competition and Trade Fair
March 1, 2012	Smithers and Area Recycling Society	Donation of \$5,000 for recycling facility upgrades
April 14, 2012	Bear Valley School (Stewart, BC)	Donation to Ladies Gala event, a fundraiser for European tour for graduating class
May 18, 2012	Mining Week Chamber of Commerce Luncheon	Sponsorship
May 23-24, 2012	Minerals North Conference	Sponsored Student Participation Package and Community Booster Program
May 26, 2012	Dease Lake Spring Box Social Fundraiser	Donation
June 4, 2012	Ducks Unlimited Canada	Silver sponsor

(continued)

Table 3.5-9. Summary of Seabridge’s Community Investment (completed)

Date	Community Organization	Description
June 15-16, 2012	Smithers Charity Golf Tournament	Titanium sponsor
October 16-17, 2012	Regional District of Bulkley-Nechako	Sponsored the Regional District of Bulkley-Nechako Business Forum in Smithers
November 27, 2012	Bear Valley School (Stewart, BC)	Sponsorship of 17th Annual Toy Bingo
December 4, 2012	Stewart Christmas Hamper Program	Donation

3.5.1.11 Community Contact

Seabridge established an email account (community@seabridgegold.net) prior to the 2010 BC EAO open houses so that it could receive and respond to feedback from the public. Seabridge provided this email address on its public outreach materials. Approximately two dozen emails have been received since establishing the account in 2010. The majority of these emails have been expressions of interest in employment and business opportunities. Seabridge regularly monitors this email address and has responded to all inquiries.

Seabridge opened an office at 1235 Main Street, Smithers, BC, in March 2011 so that the public could obtain information on the Project and meet with Seabridge personnel. The office is staffed by three local residents.

3.5.2 Issues Raised by the Public and Stakeholders and Responses

Table S-1 in [Appendix 3-S](#) summarizes the issues that have been raised by the public and stakeholders to date and responses to these issues. The issues identified in Table S-1 were compiled from comments provided by the public and stakeholders at individual meetings between Seabridge and stakeholders representatives; written comments on the draft AIR; comments provided at community meetings; and comments raised in correspondence. The public and stakeholders sought clarification on the EA process, the implications of a change in Project ownership, and Project design. They raised concerns about potential effects of the Project on water quality and quantity, fisheries, and land use, as well as access to areas for hunting and fishing. They also expressed interest in Project benefits such as employment and economic development opportunities.

3.5.3 Proposed Plan for Consultation with Public and Stakeholders during the Application/EIS Review

Consultation planned with the public and stakeholders during the Application/EIS review stage is intended to meet the BC EAO Section 11 Order and the CEAA (1992) requirements. During the Application/EIS review stage, Seabridge will:

- advertise open houses and public comment periods a minimum of seven days in advance using local media;
- within time limits set by the BC EAO, respond to issues that are identified in comments submitted by the public during the formal public comment period for review of the Application/EIS (Section 13.3 of the Section 11 Order);

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- hold open houses in Terrace, Smithers, Stewart, and Gitlaxt'aamiks (Section 18.2 of the Section 11 Order);
- prepare a table that tracks issues raised by the public and stakeholders during the Application/EIS review and responses to those issues (see table using the table provided in [Appendix 3-L](#));
- prepare a report for the BC EAO and CEA Agency summarizing consultation during the Application/EIS review including the views, issues, and concerns raised by the public (Section 21.3 of the Section 11 Order).

Based on issues and concerns raised the public and stakeholders during the Application/EIS review stage, and based on advice from the BC EAO and CEA Agency, Seabridge will consider other measures to respond to issues and concerns raised by the public and stakeholders.

References

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