

## Tenas - Draft Application Information Requirements Working Group Issues Tracking Table

January 20, 2022

| Tracking #        | Initial Comment Date | Commenter       | Subject               | Comment Reference                                                                                                        | Working Group Comment                                                                                                                                                                                                                                                                                                                                                                                                    | TCL response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Location of edit in dAIR                                                                      | EAO View                        |
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| IR-WG2-01         | 1-Jun-20             | FLNR Ecosystems | Caribou               | dAIR, Figure 11                                                                                                          | The broader study area that was discussed between ECCC, BC and the proponent to be used for the cumulative effects assessment for caribou is not shown.                                                                                                                                                                                                                                                                  | We appreciate your comment. The caribou study area with the 2019 BC core and matrix habitat was inadvertently excluded in the mapping. This has been corrected and the boundary has been added to Figure 11 in the AIR document, Section 4.8.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Section 4.8.1 Context and Boundaries                                                          | See Round 2                     |
| IR-WG2-01 Round 2 | 1-Jun-20             | FLNR Ecosystems | Caribou               | dAIR, Figure 11                                                                                                          | Not Resolved.<br>Please clarify in description (3rd bullet in Wildlife RSA section in 4.8.1) which RSA will be used for caribou RSA project assessment (2014 Critical habitat designated by ECCC) and which will be utilized for cumulative effects assessment (2019 provincial core and matrix habitats)                                                                                                                | All three RSAs will be used in the project effects assessment and the cumulative effects assessment: the 2014 ECCC critical habitat (Caribou RSA1) and the two RSAs based on the 2019 provincial Core (Caribou RSA2 Core) and Matrix habitat (Caribou RSA2 Matrix). See Section 4.8.1 for updated language regarding the three caribou RSAs that will be used in the project effects assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section 4.8.1 Context and Boundaries                                                          | See Round 3                     |
| IR-WG2-01 Round 3 | 1-Jun-20             | FLNR Ecosystems | Caribou               | dAIR, Figure 11                                                                                                          | The dAIR lists all the linework that will be used but does not clearly state which will be used for project effects/cumulative effects assessments.<br><br>It may be clearer to state in the dAIR that three project effects scenarios and three cumulative effects scenarios will be evaluated, with each scenario based on one of the RSAs.                                                                            | To clarify, we will analyze each residual effect as a separate scenario for each RSA (CRSA1 [ECCC 2014], CRSA2 Core and CRSA2 Matrix). The residual effects analysis includes analysis of past disturbance, in context of each RSA as a separate scenario.<br><br>For the CEA, the caribou assessment boundary will be the largest of the RSAs, which is the 2019 BC habitat mapping boundary, plus the northeastern portions of the Wildlife RSA that lies just outside the matrix boundary. The CEA will describe all current and reasonably foreseeable projects and activities in that area.                                                                                                                                                                                                                                                      | Section 4.8.1 Context and Boundaries                                                          | Response is satisfactory to EAO |
| IR-WG2-02         | 1-Jun-20             | FLNR Ecosystems | Caribou               | dAIR, Section 4.8.2 Existing Conditions                                                                                  | The 1998 Telkwa Caribou Recovery Plan is listed as a guidance document. Please note it is not up to date and should not be considered as relevant. The federal recovery strategy and provincial caribou recovery annual report (also listed), are up to date. Please be aware that the province will be undertaking herd recovery planning for the Telkwa herd. The start date is not confirmed, but could be late 2021. | We appreciate your comment. The 1998 document has been removed from the list under section 4.8.2 of the AIR document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Section 4.8.2 Existing Conditions                                                             | Response is satisfactory to EAO |
| IR-WG2-03         | 1-Jun-20             | FLNR Ecosystems | EA / Permitting       | dAIR, Section 3.8.1 Identifying Past, Present or Reasonably Foreseeable Projects and/or Activities                       | The preliminary list of projects and activities appears to be quite complete with respect to projects, but does not include more general activities or industries such as forestry, recreation, agriculture, etc. A commitment to appropriately include these impacts to the CE assessment for the landscape around the Tenas project should be included in the dAIR.                                                    | We appreciate your comment. General activities including forestry, recreation, and agriculture will be included. The language in the AIR document has been edited to clarify that these general activities are also included in the cumulative effects assessment (Section 3.8).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section 3.8.1 Identifying Past, Present, or Reasonably Foreseeable Projects and/or Activities | Response is satisfactory to EAO |
| IR-WG2-04         | 1-Jun-20             | FLNR Ecosystems | Fish and Fish Habitat | dAIR, Section 4.6 Fish and Fish Habitat Valued Component, page 68, Section 4.5 Aquatic Resources Intermediate Components | During the Q&A on the dAIR, I believe a consultant suggested that the RSA would change to include less of the Telkwa River watershed. If true, the updated map should be submitted for review as part of the dAIR review process.                                                                                                                                                                                        | We appreciate your comment. The Fish and Fish Habitat RSA, the Aquatic Resources RSA and their respective LSAs have been slightly enlarged upstream and downstream. The Fish and Fish Habitat RSA is now the same as the Aquatic Resources RSA. The LSAs are also the same. The LSA and RSA descriptions for Aquatic Resources have been updated on Figure 8 in Section 4.5.1 and as well as Fish and Fish Habitat RSA and LSA on Figure 9 in Section 4.6.1. The updated text is as follows:<br>LSA: Fish habitats within the Project footprint, Four Creek, and Tenas and Goathorn Creeks downstream of the mine footprint; and from 100 m upstream to 300-1000 m downstream on watercourses crossed by the Bypass Road.<br>RSA: Fish habitats in the Telkwa River watershed and in the tributaries to the Bulkley River crossed by the Bypass Road. | Section 4.5.1 Context and Boundaries                                                          | See Round 2                     |

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| IR-WG2-04<br>Round 2 | 1-Jun-20  | FLNR Ecosystems              | Fish and Fish Habitat | dAIR, Section 4.6 Fish and Fish Habitat Valued Component, page 68, Section 4.5 Aquatic Resources Intermediate Components | Resolved with comment:<br>Including the entire Telkwa River in the RSA risks diluting project effects to the point of being not significant, when key fisheries habitat values, First Nations' interests, commercial guiding and recreational angling use are all concentrated in the mainstem and lower watershed. We assume the EAO will appreciate this when drafting the project assessment report.                                               | Including the Telkwa River in the RSA will not risk diluting project effects as significance is assessed within the local study area (LSA) as well as within the RSA. The RSA is the area in which cumulative effects are assessed, therefore the Telkwa River watershed has been identified so that other projects occurring within the watershed will be considered in a cumulative effects assessment on fish and fish habitat.                                                                                                                | Section 4.5.1 Context and Boundaries  | Response is satisfactory to EAO |
| IR-WG2-05            | 1-Jun-20  | FLNR Ecosystems              | Fisher                | dAIR, Section 4.8 Wildlife Valued Component                                                                              | Fisher is a species of increasing concern in the province, with some indication that SARA and Provincial Red listing may be imminent for the Nechako sub-species. Habitat associations include riparian habitat adjacent to the project/project access road. I would recommend including it in the Furbearers subcomponent.                                                                                                                           | We appreciate your comment. The effect analysis of Furbearers will be based on marten habitat ratings and assessment of wolverine movement. Wolverine was added to this analysis during the VC selection process as a result of comment from ECCC. We acknowledge that fisher habitat interacts with the Project. To address this comment, we have added fisher within the Furbearers subcomponent in the table in Section 4.8, in terms of specifying mitigations that will specifically address fisher habitat that interacts with the Project. | Section 4.8 Wildlife Valued Component | Response is satisfactory to EAO |
| IR-WG2-06            | 8-Jun-20  | Agricultural Land Commission | EA / Permitting       | dAIR                                                                                                                     | I didn't see the ALR boundary included in any of the maps.                                                                                                                                                                                                                                                                                                                                                                                            | We appreciate your comment. We have added the ALR boundary to the land use figure 15 of the AIR document.                                                                                                                                                                                                                                                                                                                                                                                                                                         | Section 6.4.1 Context and Boundaries  | Response is satisfactory to EAO |
| IR-WG2-07            | 11-Jun-20 | FLNR Ecosystems              | Moose                 | dAIR, Section 4.8 Wildlife Valued Component                                                                              | Moose mortality along the rail line is an important demographic driver for the Bulkley Valley Lakes population. This is a key concern for the provincial population managers, local hunting groups, and First Nations. Tenas Coal will be increasing the traffic along the rail line, and therefor increasing moose mortality. Skeena Resource Management Division highly recommends scoping these effects in the effects assessment for the project. | We appreciate your comment. Please note that in Section 4.8 of the AIR document, mortality is one the assessment indicators for moose. We clarify that this means mortality through collisions will be part of the assessment.                                                                                                                                                                                                                                                                                                                    | N/A                                   | Response is satisfactory to EAO |
| IR-WG2-08            | 11-Jun-20 | Northern Health              | EA / Permitting       | dAIR, Section 1.2 Applicable Authorizations                                                                              | Please note that Northern Health permits can be listed here. See <a href="https://www.northernhealth.ca/services/environmental-health/applications-and-forms">https://www.northernhealth.ca/services/environmental-health/applications-and-forms</a>                                                                                                                                                                                                  | We appreciate your comment, we have noted this information. No changes to the AIR are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N/A                                   | Response is satisfactory to EAO |
| IR-WG2-09            | 11-Jun-20 | Northern Health              | Air Quality           | dAIR, Section 4.1 Atmospheric Environment Intermediate Component                                                         | Additional air quality parameters to include are metals, PAHs and VOCs. How will these parameters be assessed?                                                                                                                                                                                                                                                                                                                                        | We appreciate your comment. Metals, PAHs and VOCs will be included in the air dispersion modelling and results provided to the Health team for assessment. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                           | N/A                                   | Response is satisfactory to EAO |
| IR-WG2-10            | 11-Jun-20 | Northern Health              | Air Quality           | dAIR, Section 4.1.2 Existing Conditions / 4.1.4 Mitigation Measures                                                      | The BC 'Ministry of Energy, Mines and Petroleum Resources & Ministry of Environment and Climate Change Strategy, Developing a Fugitive Dust Management Plan' should be referenced when developing air quality mitigations. Will fugitive dust management be part of the air quality management plan referenced in section 13?                                                                                                                         | We appreciate your comment. Fugitive dust will be part of the air quality management plan. A reference to this has been added to the AIR document in Section 4.1.4.                                                                                                                                                                                                                                                                                                                                                                               | Section 4.1.4 Mitigation Measures     | Response is satisfactory to EAO |
| IR-WG2-11            | 15-Jun-20 | Northern Health              | Socio-economics       | dAIR, Section 6.1.2 Existing Conditions                                                                                  | "Interviews conducted during baseline data collection," please include "community consultation" as well as interviews.                                                                                                                                                                                                                                                                                                                                | We appreciate your comment. Reference to community engagement and interviews has been included in the AIR document. The text updated in Section 6.1.2 is as follows:<br>-Interviews and community consultation conducted during baseline data collection;                                                                                                                                                                                                                                                                                         | Section 6.1.2 Existing Conditions     | Response is satisfactory to EAO |

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| IR-WG2-12         | 11-Jun-20 | Northern Health | Socio-economics | dAIR, Section 6.3 Infrastructure and Services Valued Component | This section should be supported by the Demographic Intermediate Component. The change in traffic patterns (road and rail) should inform the Accidents and Malfunctions section, which will also inform the Human Health VC. Please indicate this in the document.                                                                                                                                                                                                                                                                                                                                                                                                                                         | We appreciate your comment. We agree that Demographics VC will support the Infrastructure and Services VC. This link was inadvertently missed and has now been added to the AIR document within Table 3 of Section 3.1. While changes to traffic patterns will be referred to in the Accidents and Malfunctions section of the EA, accidents and malfunctions are not considered in the human health effects assessment, as these are considered separately (Section 9.0 of the AIR document). Human health and other VC chapters assess anticipated potential effects during all Project phases. The Accidents and Malfunctions chapter considers these potential unexpected events and their interactions with and potential effects on VC receptors. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Section 3.1 Issues Scoping and Selection of Valued Components | See Round 2                     |
| IR-WG2-12 Round 2 | 11-Jun-20 | Northern Health | Socio-economics | dAIR, Section 6.3 Infrastructure and Services Valued Component | Thank you - partially resolved. We would like to note here that the accidents and malfunctions section should specify/quantify, as best as practically possible, the frequency, types and extent of different accidents and malfunctions scenarios (geographic scope, # injured/casualties, etc) to inform our review and understanding of mitigations for worst case scenarios, etc. Please describe the potential effects to infrastructure and services, community wellbeing and human health. Please describe commitments to fund post-accident/malfunction 'health impact assessments', which would help inform public health mitigations such as drinking water or food consumption advisories, etc. | The AIR requires that the Accidents and Malfunctions section describe the potential effects of a reasonable range of accidents or malfunctions on Valued Components, however the accidents and malfunctions are not presented as detailed scenarios. It is not practical nor meaningful to examine detailed traffic accident scenarios (e.g., by frequency, types and extent of different accidents) because transportation accidents can be highly complex and site specific, and development of detailed accident scenarios would be speculative. However, the frequency of each type of generic event will be considered through an assessment of the likelihood of the event, and the geographic extent through the “extent” characteristic. The evaluation for the Human Health VC will provide an evaluation of the potential for the event to affect public health, including injury or mortality, and the emergency response to the event. Details of the number of injuries in a specific event would be available to the emergency service providers under the Health Authority through the notification measures in the Mine Emergency Response Plan. TCL will be adhering to an Occupational Health and Safety Program required by the Mine Code. TCL has initiated discussion with emergency service providers in Telkwa and Smithers. As part of the contingency planning for a specific event following the emergency, TCL will consider the need for additional monitoring and the potential for longer terms effects to public health, and work with the Health Authority to determine potential mitigation measures including advisories. No changes to the AIR are required. | Section 3.1 Issues Scoping and Selection of Valued Components | See Round 3                     |
| IR-WG2-12 Round 3 | 11-Jun-20 | Northern Health | Socio-economics | dAIR, Section 6.3 Infrastructure and Services Valued Component | We are not asking for detailed scenarios, but request that reasonable estimates be identified regarding different accidents and malfunctions to inform NH preparedness discussions and management plan reviews.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Comment acknowledged, thank you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Section 3.1 Issues Scoping and Selection of Valued Components | Response is satisfactory to EAO |
| IR-WG2-13         | 11-Jun-20 | Northern Health | Socio-economics | dAIR, Section 6.3 Infrastructure and Services Valued Component | How will the regional nature of health services (Terrace and Prince George centers) inform the context and boundaries for the Infrastructure and Services VC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | We appreciate your comment. Selection of the socio-economic LSA/RSA boundaries were made in order to reasonably capture potential direct and indirect social, economic and health effects of the Project. It is understood that there may be a limited number of specialized medical services provided to residents within the LSA/RSA by regional health centres in Terrace and Prince George or the provincial centre in Vancouver. The potential change in demand for health and specialized medical services will be assessed, including a potential increase in demand beyond the selected spatial boundaries of the RSA. No updates to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N/A                                                           | See Round 2                     |

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| IR-WG2-13<br>(Round 2) | 11-Jun-20 | Northern Health | Socio-economics          | dAIR, Section 6.3<br>Infrastructure and<br>Services Valued<br>Component | Resolved if this will be assessed. Further, we note that in section 3.8.1 there are certain projects not listed which impact public health and health services capacity in the region such as, for example, the mines near Stewart, BC. The vast geographies serviced by our communities present unique challenges in service delivery and this has become even more apparent during COVID-19 response. | Comment noted. Note that assessment of the potential change in demand for health and specialized medical services beyond the selected spatial boundaries of the RSA will be determined in consideration of the characteristics of the Project and the identified potential effects, in keeping with the established methodology presented in the EA. | N/A                                                                 | See Round 3                           |
| IR-WG2-13<br>(Round 3) | 11-Jun-20 | Northern Health | Socio-economics          | dAIR, Section 6.3<br>Infrastructure and<br>Services Valued<br>Component | As described in the dAIR, identification of measures to mitigate the consequences to valued components should include all health-related VCs.                                                                                                                                                                                                                                                           | Comment acknowledged, thank you.                                                                                                                                                                                                                                                                                                                     | N/A                                                                 | Response is<br>satisfactory to<br>EAO |
| IR-WG2-14              | 15-Jun-20 | Northern Health | Land and Resource<br>Use | dAIR, Section 6.4.2<br>Existing Conditions                              | "Interviews conducted during baseline data collection;" please include "community consultation" as well as interviews.                                                                                                                                                                                                                                                                                  | We appreciate your comment. Reference to community engagement and interviews has been included in the AIR document. The text update in Section 6.4.2 is as follows:<br>-Interviews and community consultation conducted during baseline data collection;                                                                                             | Section 6.4.2 Existing<br>Conditions                                | Response is<br>satisfactory to<br>EAO |
| IR-WG2-15              | 11-Jun-20 | Northern Health | Socio-economics          | dAIR, Section 6.5<br>Community Well-<br>being Valued<br>Component       | Please indicate that the list of indicators is not an exhaustive list. Indicators such as vulnerable populations, income inequity, communicable disease, and sexual health are some examples.                                                                                                                                                                                                           | We appreciate your comment. The following edit has been made to the AIR document in Section 6.5:<br>"The community well-being VC will include the following...the list of indicators is not exhaustive."                                                                                                                                             | Section 6.5 Community<br>Well-Being Valued<br>Component             | See Round 2                           |
| IR-WG2-15<br>(Round 2) | 11-Jun-20 | Northern Health | Socio-economics          | dAIR, Section 6.5<br>Community Well-<br>being Valued<br>Component       | Resolved. Please also note that community well-being in relation to food security should discuss any impacts to locally harvested country foods (as informed by the human health assessment in the context of fish and fish habitat, vegetation and wildlife).                                                                                                                                          | Comment noted. For the community well-being VC, potential effects on food security will be assessed, focusing on changes to harvest of country foods. This assessment will also reference the results of the human health risk assessment, as applicable.<br><br>No changes to the AIR document are required.                                        | Section 6.5 Community<br>Well-Being Valued<br>Component             | Response is<br>satisfactory to<br>EAO |
| IR-WG2-16              | 11-Jun-20 | Northern Health | Socio-economics          | dAIR, Section 6.5<br>Community Well-<br>being Valued<br>Component       | "This VC assessment will be supported by the following IC and VC assessments:"<br>Also add Human Health and Heritage Resources.                                                                                                                                                                                                                                                                         | We appreciate your comment. These linkages were inadvertently missed and have been added to the AIR document in Table 3 of Section 3.1.                                                                                                                                                                                                              | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components | See Round 2                           |
| IR-WG2-16<br>(Round 2) | 11-Jun-20 | Northern Health | Socio-economics          | dAIR, Section 6.5<br>Community Well-<br>being Valued<br>Component       | Resolved. Please also note that community well-being in relation to food security should discuss any impacts to locally harvested country foods (as informed by the human health assessment in the context of fish and fish habitat, vegetation and wildlife).                                                                                                                                          | Comment noted. For the community well-being VC, potential effects on food security will be assessed, focusing on changes to harvest of country foods. This assessment will also reference the results of the human health risk assessment, as applicable.<br><br>No changes to the AIR document are required.                                        | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components | Response is<br>satisfactory to<br>EAO |
| IR-WG2-17              | 15-Jun-20 | Northern Health | Socio-economics          | dAIR, Section 6.5.2<br>Existing Conditions                              | "Interviews conducted during baseline data collection;" please include "community consultation" as well as interviews.                                                                                                                                                                                                                                                                                  | We appreciate your comment. Reference to community engagement and interviews has been included in the AIR document. The text update in Section 6.5.2 is as follows:<br>-Interviews and community consultation conducted during baseline data collection;                                                                                             | Section 6.5.2 Existing<br>Conditions                                | Response is<br>satisfactory to<br>EAO |
| IR-WG2-18              | 11-Jun-20 | Northern Health | Heritage                 | dAIR, Section 7.1<br>Heritage Resources<br>Valued Component             | This VC should support the Community Health and Well-being VC. Please indicate this in the document.                                                                                                                                                                                                                                                                                                    | We appreciate your comment. These linkages were inadvertently missed and have been added to the AIR document in Table 3 of Section 3.1.                                                                                                                                                                                                              | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components | Response is<br>satisfactory to<br>EAO |

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| IR-WG2-19              | 11-Jun-20 | Northern Health | Human Health | dAIR, Section 8.1<br>Human Health<br>Valued Component | This VC should be supported by many other VCs and ICs including those listed under the Environmental Effects Assessment and the Accident and Malfunctions section. Please indicate this in the document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | We appreciate your comment. Some of the linkages to the Human Health VC were inadvertently missed. These linkages have been updated in the AIR document in Table 3 of Section 3.1. The following VCs that "may support and be supported by" the human health VC have been added: atmospheric environment (which includes both air quality and noise); terrain and soils; surface water; groundwater; fish and fish habitat; vegetation; wildlife; and avian species. Accidents and malfunctions or effects of the environment on the Project are not considered in the human health effects assessment, as these are considered separately (Section 9.0 and 10.0 of the dAIR, respectively). In other words, human health and other VC effects assessment chapters do not consider unintended/unexpected events in their assessments. Rather, the accidents and malfunctions chapter considers these unexpected events and their interactions with and potential effects on VC receptors. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components | See Round 2                           |
| IR-WG2-19<br>(Round 2) | 11-Jun-20 | Northern Health | Human Health | dAIR, Section 8.1<br>Human Health<br>Valued Component | <p>Thank you - partially resolved. We would like to note here that the accidents and malfunctions section should specify/quantify, as best as practically possible, the frequency, types and extent of different accidents and malfunctions scenarios (geographic scope, # injured/casualties, etc) to inform our review and understanding of mitigations for worst case scenarios, etc. Please describe the potential effects to infrastructure and services, community well-being and human health. Please describe commitments to fund post-accident/malfunction 'health impact assessments', which would help inform public health mitigations such as drinking water or food consumption advisories, etc.</p> <p>For the Human Health Risk Assessment Report, we emphasize/ask that the methodology used be clearly articulated and include the details and/or cross-referencing needed for a transparent and efficient review ("showing the work" helps NH with the review).</p> | <p>The AIR requires that the Accidents and Malfunctions section describe the potential effects of a reasonable range of accidents or malfunctions on Valued Components, however the accidents and malfunctions are not presented as detailed scenarios. It is not practical nor meaningful to examine detailed traffic accident scenarios (e.g., by frequency, types and extent of different accidents) because transportation accidents can be highly complex and site specific, and development of detailed accident scenarios would be speculative. However, the frequency of each type of generic event will be considered through an assessment of the likelihood of the event, and the geographic extent through the “extent” characteristic.</p> <p>The evaluation for the Human Health VC will provide an evaluation of the potential for the event to affect public health, including injury or mortality, and the emergency response to the event. Details of the number of injuries in a specific event would be available to the emergency service providers under the Health Authority through the notification measures in the Mine Emergency Response Plan. TCL will be adhering to an Occupational Health and Safety Program required by the Mine Code. TCL has initiated discussion with emergency service providers in Telkwa and Smithers. As part of the contingency planning for a specific event following the emergency, TCL will consider the need for additional monitoring and the potential for longer terms effects to public health, and work with the Health Authority to determine potential mitigation measures including advisories. The Human Health Risk Assessment Report will describe the risk assessment methodology and provide cross-references to supporting data in the EA. No changes to the AIR document are required.</p> | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components |                                       |
| IR-WG2-19<br>(Round 3) | 11-Jun-20 | Northern Health | Human Health | dAIR, Section 8.1<br>Human Health<br>Valued Component | <p>We are not asking for detailed scenarios, but request that reasonable estimates be identified regarding different accidents and malfunctions to inform NH preparedness discussions and management plan reviews.</p> <p>As described in the dAIR, identification of measures to mitigate the consequences to valued components should include all health-related VCs.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Comment acknowledged, thank you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components | Response is<br>satisfactory to<br>EAO |

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| IR-WG2-20           | 11-Jun-20 | Northern Health                                                   | Human Health        | dAIR, Section 13.0 Management Plans                       | NH recommends that a Health and Medical Services Plan is prepared which goes beyond traditional Occupational Health and Safety Programming (scaled to the size and scope of the project). Even without a camp, the project can mitigate impacts to local health services by planning for issues such as communicable disease prevention and outbreak management (very timely in light of COVID 19), health promotion, disease prevention, and onsite wellness programs. See: <a href="https://www.northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/industrial-camps-BMG.pdf">https://www.northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/industrial-camps-BMG.pdf</a> and other guidance documents available on our website. You may also want to consult the WorkSafeBC COVID-19 Industry information available here: <a href="https://www.worksafebc.com/en/about-us/covid-19-updates/covid-19-industry-information">https://www.worksafebc.com/en/about-us/covid-19-updates/covid-19-industry-information</a> | We appreciate your comment. The reference documents have been noted. The Occupational Health and Safety Program will be included in the EA and will outline communicable disease prevention and outbreak management, health promotion, disease prevention, and onsite wellness programs. It is important for all health related items to be captured in one place, holistically, in the Occupational Health and Safety Program and not separate plans, so that the best possible outcomes for all the people involved are achieved. No changes to the AIR document are required.                                                                                                 | N/A                                   | See Round 2                     |
| IR-WG2-20 (Round 2) | 11-Jun-20 | Northern Health                                                   | Human Health        | dAIR, Section 13.0 Management Plans                       | We ask that delineations or distinctions be made between traditional OH&S, health and medical services, communicable disease prevention/control, and health promotion (wellbeing, mental health, opioid crisis response, etc). These are distinct and essential health topics. Northern Health (NH) management plan engagement and review capacity is under stress. The more organized, complete, transparent, and evidence-based assessments and plans are at the outset, the easier it is for NH to review. Our office engages with different departments within NH to review these documents. Please note: our website <a href="https://www.northernhealth.ca/services/programs/office-health-and-resource-development">https://www.northernhealth.ca/services/programs/office-health-and-resource-development</a> will be updated as guidance documents are updated or added (especially with respect to COVID-19 expectations).                                                                                                                                                                                    | The Occupational Health and Safety Program presented in the EA will provide the delineations and distinctions requested, within the single document. The OH&S Program will be broadly inclusive and describe, for example, communicable disease prevention and outbreak management, health promotion, disease prevention, and onsite wellness programs. These distinct, but related, health topics will be presented in a manner that can be readily reviewed and referenced.<br><br>TCL appreciates the reference provided to the NH website, and will look for new or updated guidance documents as they become available.<br><br>No changes to the AIR document are required. | N/A                                   | See Round 3                     |
| IR-WG2-20 (Round 3) | 11-Jun-20 | Northern Health                                                   | Human Health        | dAIR, Section 13.0 Management Plans                       | A camp is not proposed for this project. Please keep NH informed on any related changes or housing mitigations proposed. NH requests to be included as a reviewer on any related managmeent plans.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Comment acknowledged, thank you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | N/A                                   |                                 |
| IR-WG2-21           | 12-Jun-20 | Environment and Climate Change Canada (Canadian Wildlife Service) | Marten, Moose, Bats | dAIR, Section 4.8 Wildlife Valued Components Table, pg 80 | As advised during the Valued Component Selection process, the Project area occurs within a landscape corridor under the Land and Resource Management Plan (LRMP), and the Project activities have potential to affect wildlife movement. ECCC recommends that the dAIR include requirements for an assessment of change in movement of furbearers (American marten), moose, and bats (little brown myotis, northern myotis).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | We appreciate your comment. We intend to include assessments of effects on movement patterns for these species. This will be addressed based on information from habitat mapping (where available) and existing knowledge on wildlife movement patterns in context of Project components. The text update in Section 4.8 is as follows:<br>Movement (as an Indicator for Grizzly Bear, Caribou, Wolverine, and Western Toad; qualitative analysis for Marten, Moose and Bats based on available information)                                                                                                                                                                     | Section 4.8 Wildlife Valued Component | Response is satisfactory to EAO |
| IR-WG2-22           | 12-Jun-20 | Environment and Climate Change Canada (Canadian Wildlife Service) | Caribou             | dAIR, Section 4.8.1 Context and Boundaries                | ECCC notes that there are inconsistencies between the description of the Caribou Regional Study Area (RSA) in Section 4.8.1 and Figure 11. Figure 11 appears to show the 2014 recovery strategy critical habitat polygon, while Section 4.8.1 indicates the Caribou RSA will include: 2014 Environment and Climate Change Canada Critical Habitat and 2019 BC Critical Habitat. ECCC recommends the dAIR be revised to address these inconsistencies and to reflect that BC's core and matrix habitat mapping will be used as the cumulative effects assessment boundary for caribou and the 2014 recovery strategy critical habitat polygon as the Caribou RSA, as discussed in previous caribou sub-working group meetings and summarized in ECCC's advice dated December 5, 2019.                                                                                                                                                                                                                                                                                                                                    | We appreciate your comment. The caribou study area with the 2019 BC core and matrix habitat was inadvertently excluded in the mapping. This has been corrected and the boundary was added to the figure 11 in Section 4.8.1 of the AIR document and language was revised to clarify the RSA.                                                                                                                                                                                                                                                                                                                                                                                     | Section 4.8.1 Context and Boundaries  | See Round 2                     |

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| IR-WG2-22<br>(Round 2) | 12-Jun-20 | Environment and<br>Climate Change<br>Canada<br>(Canadian<br>Wildlife Service) | Caribou                                                                             | dAIR, Section 4.8.1<br>Context and<br>Boundaries | The revised dAIR describes two caribou RSAs, which is inconsistent with ECCC’s previous recommendation (dated December 5, 2019) that BC’s core and matrix habitat mapping should be used as the cumulative effects assessment boundary for caribou, and that the 2014 recovery strategy critical habitat (CH) polygon should be used as the Caribou RSA. ECCC requests that the Proponent clarify in Section 4.8.1 and Figure 11 that BC’s core and matrix habitat will be used as the cumulative effects assessment boundary for caribou, and that the 2014 recovery strategy CH polygon will be used as the Caribou RSA boundary.                                                                                                                                                                                                                                                                                                                                                                                                                      | While the wording in the Jan 2021 dAIR is correct, it is not obvious that it does describe three RSAs. The third bullet in Section 4.8.1 states that there are TWO RSAS but really describes all three RSAs: the 2014 ECCC critical habitat (Caribou RSA1) and the two RSAs based on the 2019 provincial Core (Caribou RSA2 Core) and Matrix habitat (Caribou RSA2 Matrix). All three RSAs will be used in the project effects assessment and in the cumulative effects assessment. See Section 4.8.1 for updated language regarding the three caribou RSAs that will be used in the project effects assessment. | Section 4.8.1 Context and<br>Boundaries                             | Response is<br>satisfactory to<br>EAO |
| IR-WG2-23              | 12-Jun-20 | Environment and<br>Climate Change<br>Canada<br>(Canadian<br>Wildlife Service) | Coast Tailed Frog,<br>Western Toad,<br>Western Grebe,<br>Avian Species,<br>Wildlife | dAIR, Section 4.8.3<br>Potential Effects         | Sedimentation generated from road and coal dust may impact wildlife habitat downstream, which is important for aquatic species at risk including coastal tailed frog, western toad, and western grebe. Additionally, changes in water quality due to releases of suspended sediment, mine contact water, blast residues, flow alterations, and potential groundwater seepage from tailings and other mine waste disposal facilities could affect wildlife health, particularly the potential risk of selenium toxicity on aquatic and avian wildlife species. ECCC notes that in the current dAIR, water quality and wildlife health will not be assessed under potential effects from change and alteration of habitat under the wildlife VC, despite its potential effects on amphibians and aquatic birds. ECCC recommends the Proponent clarify how water quality and its effect on wildlife and avian health will be assessed in the application, and how it will be incorporated in the existing VC indicators for Wildlife and Avian Species VCs. | We appreciate your comment. Generally, water quality objectives will be met (a permit obligation) and effects pathway(s) will be assessed and be addressed through mitigation. The AIR document was edited in Section 3.1 by identifying linkages among VCs in Table 3, and by stating that these linkages will be addressed within each VC assessment.                                                                                                                                                                                                                                                          | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components | See Round 2                           |

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| IR-WG2-23<br>(Round 2) | 12-Jun-20 | Environment and<br>Climate Change<br>Canada<br>(Canadian<br>Wildlife Service) | Coast Tailed Frog,<br>Western Toad,<br>Western Grebe,<br>Avian Species,<br>Wildlife | dAIR, Section 4.8.3<br>Potential Effects | <p>ECCC maintains that the Project may impact wildlife health due to releases of suspended sediment, mine contact water, blast residues, flow alterations, and potential groundwater seepage from tailings and other mine waste disposal facilities (particularly due to the potential risk of selenium toxicity). As such, a wildlife health assessment should be conducted to evaluate potential adverse effects to terrestrial wildlife, birds, and aquatic-feeding wildlife (e.g., amphibians and water birds) due to changes in air, soil, water, and sediment quality.</p> <p>ECCC recommends that the Proponent include wildlife health as a valued component in the health effects assessment (Section 8.0)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>We appreciate your comment. In British Columbia, water quality guidelines (WQGs) and water quality objectives (WQOs) are applied and derived, respectively, to assess potentially-adverse effects of chemical parameters or physical water conditions on aquatic life, wildlife, and birds. WQGs represent concentrations that, when met, provide confidence that specific water uses will not be adversely affected (MOE 2016). In the Tenas Project, Science-Based Environmental Benchmarks (SBEs) will also be derived, if required for certain parameters, and applied as quantifiable receiving environment benchmarks developed by Qualified Professionals, through a rigorous scientific process, with the intent to guide management decisions and mitigative actions for a regulated activity at a specific location. Therefore, adverse effects on the health of terrestrial wildlife, birds and aquatic biota-feeding wildlife are not expected to occur, since compliance with site-specific WQOs and/or SBEs and related regulations on the maintenance of water conditions to those guidelines/criteria (and similarly, air effluent regulations, as applicable). If exceedances occur, monitoring will be triggered to assess any implications on sediment, soil, and the wildlife receptors. In addition to the above rationale, related commitments will be provided under the Tenas Project Discharge Management Plan, which will be part of the EA Application.</p> <p>Citation: BC Ministry of Environment (MOE). 2016. Technical Guidance 8: A Framework for the Development and Use of Freshwater Science-Based Environmental Benchmarks for Aquatic Life in Environmental Management Act Permitting for Mines. Version 1.0, March 2016. Environmental Protection Division, Regional Operations Branch. Accessed May 18, 2021 at: <a href="https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-energy/guidance-documents/tg8_framework_for_sbebs.pdf">https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-energy/guidance-documents/tg8_framework_for_sbebs.pdf</a></p> | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components | See Round 3                           |
| IR-WG2-23<br>(Round 3) | 12-Jun-20 | Environment and<br>Climate Change<br>Canada<br>(Canadian<br>Wildlife Service) | Coast Tailed Frog,<br>Western Toad,<br>Western Grebe,<br>Avian Species,<br>Wildlife | dAIR, Section 4.8.3<br>Potential Effects | <p>Unresolved. ECCC maintains that the release of mine-generated contaminants into the receiving environment has the potential to result in adverse impacts to wildlife health, especially in regions already impacted by current and historic industrial activity. Of particular concern is the potential for selenium toxicity to aquatic-feeding wildlife species (e.g., amphibians and water birds).</p> <p>To assess whether predicted water quality in the receiving environment has the potential to result in adverse impacts to wildlife, ECCC recommends evaluating whether contaminants of potential concern (COPCs) may be present at concentrations that could result in toxicological effects to wildlife species. <b>Should the water quality model predict concentrations in the receiving environment at or above concentrations that may result in toxicological effects to wildlife species, then ECCC recommends that further evaluation (e.g., a wildlife health assessment) should be conducted to assess the potential impacts to wildlife health from the Project.</b> ECCC would be happy to meet with the Proponent to further discuss COPC screening for wildlife.</p> <p>Please note that ECCC will not be reviewing the water quality model or assessing impacts to fish and fish habitat from changes in water quality, as ECCC’s participation in the provincial review of the Project is limited to species at risk and migratory birds.</p> | <p>The wildlife and avian chapters of the EA will include an evaluation of whether contaminants of potential concern (COPCs) may be present at concentrations that could result in adverse effects or impacts on wildlife or avian species/populations. To establish the latter, we will screen against applicable Wildlife, Livestock and Freshwater Aquatic Life WQGs (e.g., BCMOECCS, CCME, USEPA). If there are exceedances of the WQGs based on this screening exercise, a wildlife health assessment will be conducted.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components | Response is<br>satisfactory to<br>EAO |

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| IR-WG2-24 | 12-Jun-20 | Environment and Climate Change Canada<br>(Canadian Wildlife Service) | Avian Species | dAIR, Section 4.9 Avian Species Valued Component Table | As advised during the Valued Component Selection process, the Project area occurs within a landscape corridor under the LRMP, and the Project activities will disperse animal movement, therefore connectivity should be explicitly assessed. ECCC recommends that " <i>Change in: <b>Movement</b></i> " be included in the list of indicators of potential effects to avian species as a result of Project construction, operation and decommissioning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | We appreciate your comment. We intend to include assessments of effects on movement patterns for these species. We have made editorial changes to Section 4.9 in the AIR document to reflect this.                                                                                                                                                                                                      | Section 4.9 Avian Species Valued Component | Response is satisfactory to EAO |
| IR-WG2-25 | 12-Jun-20 | Environment and Climate Change Canada<br>(Canadian Wildlife Service) | Avian Species | dAIR, Section 4.9.2 Existing Conditions                | ECCC notes that the Proponent's response to ECCC's comment regarding migratory birds (comment 42 in the Valued Components Working Group Comment Tracker) stated "The Migratory Breeding Birds subcomponent will be assessed using habitat guilds: wetlands, early seral and old/mature", which has not been included in the dAIR. ECCC recommends this commitment be incorporated into the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | We appreciate your comment. We agree that this is the commitment. It was inadvertently missed from the AIR document. We have clarified the language in the AIR document in Section 4.9.2 as follows:<br>-Modelling of habitat suitability for migratory breeding birds using the habitat guild approach. Wetland, Open, and Forest guilds will be used.                                                 | Section 4.9.2 Existing Conditions          | Response is satisfactory to EAO |
| IR-WG2-26 | 11-May-20 | ENV Mining Operations                                                | Groundwater   | dAIR, Section 4.4.2 Existing Conditions                | " <i>Groundwater is protected under the BC Water Sustainability Act .</i> " Groundwater is actually protected by whichever regulatory agency with jurisdiction to do so. The WSA aims to protect and manage groundwater quantity only. The Ministry of Environment, under the Environmental Management Act, aims to protect its quality and users. The Ministry of Mines also has an interest and jurisdiction to protect groundwater. Hence, I would suggest removing that sentence from the AIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | We appreciate your comment. We agree that groundwater is protected under various legislation in addition to the <i>BC Water Sustainability Act</i> . Therefore, we have inserted both the <i>BC Environmental Management Act</i> and the <i>BC Mines Act</i> and have noted that this is not an exhaustive list in Section 4.4.2 of the AIR. We believe the public would be interested in knowing this. | Section 4.4.2 Existing Conditions          | Response is satisfactory to EAO |
| IR-WG2-27 | 11-May-20 | ENV Mining Operations                                                | Groundwater   | dAIR, Section 4.4 Groundwater Intermediate Component   | " <i>The proposed LSA and RSA for the <b>Surface Water IC</b> are described below and are illustrated in Figure 7 .</i> " That should be changed to <b>Groundwater IC</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | We appreciate your comment in Section 4.4.1, it has been corrected in the AIR document as follows:<br>The proposed LSA and RSA for the Groundwater VC are described below and are illustrated in Figure 7.                                                                                                                                                                                              | Section 4.4.1 Context and Boundaries       | Response is satisfactory to EAO |
| IR-WG2-28 | 11-May-20 | ENV Mining Operations                                                | Groundwater   | dAIR, Section 4.4.2 Existing Conditions                | The following document should be included under the list of references: Water and Air Baseline Monitoring Guidance Document for Mine Proponents and Operators, Version 2 - 2016                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | We appreciate your comment. This document has been added in the AIR document in Section 4.4.2.                                                                                                                                                                                                                                                                                                          | Section 4.4.2 Existing Conditions          | Response is satisfactory to EAO |
| IR-WG2-29 | 11-May-20 | ENV Mining Operations                                                | Groundwater   | dAIR, Section 4.4.2 Existing Conditions                | The information specific to the Project should consider:<br>- interpretations of the various groundwater investigations with the focus on conceptual understanding of the groundwater system (recharge/discharge boundaries, hydro stratigraphy, groundwater divides, unconfined/confined/permeable unconsolidated and bedrock formations, hydraulic conductivities, horizontal and vertical flow gradients) and its interactions with surface water<br>- development, simulations and predictions from a numerical 3D groundwater flow model, as described in the May 6 2020 dAIR (Presentation Outline by Allegiance Coal Limited)<br><br>Comparisons of groundwater quality should be benchmarked to the <i>Contaminated Sites Regulation</i> groundwater standards (Schedule 3.2, aquatic life and drinking water), unless the water quality data is collected from monitoring wells that are located next to aquatic environments. For more information on this please consult Technical Guidance 15 on Contaminated Sites. | We appreciate your comment. These points are acknowledged and are planned to be incorporated in the Groundwater Technical Assessment Report. Background groundwater quality will be compared to the appropriate standards or guidelines as outlined in the referenced Technical Guidance 15. No changes to the AIR document are required.                                                               | N/A                                        | Response is satisfactory to EAO |

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| IR-WG2-30 | 11-May-20 | ENV Mining Operations | Groundwater | dAIR, Section 4.4.3 Potential Effects   | <p>This section should clarify how the numerical groundwater flow model will be used to assess the mine water load into the receiving environment. Will this be completed within the groundwater model (e.g. solute transport model) or will the load be estimated under a different modelling effort (e.g. mass balance model).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>We appreciate your comment. The water and load balance model (WLBM) is currently planned to ultimately assess mine water load into the receiving environment. Load transported via groundwater will be accounted for by utilizing the numerical groundwater flow model results with an appropriate source term applied. Solute transport modelling is not considered valuable at this time. The following edit has been made to the AIR document in Section 4.4.3:</p> <p>Potential groundwater quantity effects will be assessed using numerical groundwater flow models that follow the Guidelines for Groundwater Modelling to Assess Impacts of Proposed Natural Resource Development Activities, prepared by BC Ministry of Environment (2012). The models will be calibrated to groundwater levels and baseflow estimates and the sensitivity of model parameters will be tested. Model results will be provided in the Groundwater Assessment Technical Report included as an appendix to the Application. Potential effects related to groundwater quality will be assessed with the site-wide water and load balance model utilizing results from the numerical groundwater flow models. All primary effects pathways will be carried forward for further evaluation of the residual effects.</p> | Section 4.4.3 Potential Effects | Response is satisfactory to EAO |
| IR-WG2-31 | 25-May-20 | ENV Air Quality       | Air Quality | dAIR, Section 4.1.2 Existing Conditions | <p>Under applicable regulations and guidance documents to be used for the project there is no mention of the ENV/EMLI guidance for creating a fugitive dust management plan. A detailed and robust fugitive dust management plan will be essential for this project. A detailed fugitive dust management plan will include:</p> <ul style="list-style-type: none"><li>• identification and detailed descriptions of project and dust-emitting sources;</li><li>• tracking and monitoring of sources, including methods and approaches;</li><li>• identification of sensitive receptors and potential effects;</li><li>• methods and approaches for controlling/minimizing the production of fugitive dust;</li><li>• dust response triggers and contingency plans;</li><li>• monitoring of sensitive receptors as appropriate;</li><li>• training for staff and assignment of responsibilities;</li><li>• record keeping and reporting; and,</li><li>• adaptive management process for updating the plan.</li></ul> <p>The guidance document can be found here:<br/><a href="https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-energy/guidance-documents/dust_management_plan_guidance.pdf">https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-energy/guidance-documents/dust_management_plan_guidance.pdf</a></p> | <p>We appreciate your comment. We confirm that a detailed air quality, GHG and fugitive dust management plan will be provided that will include the following:</p> <ul style="list-style-type: none"><li>• identification and detailed descriptions of project, CAC, GHG and dust-emitting sources;</li><li>• tracking and monitoring of sources, including methods and approaches;</li><li>• identification of sensitive receptors and potential effects;</li><li>• methods and approaches for controlling/minimizing the production of fugitive dust;</li><li>• dust response triggers and contingency plans;</li><li>• monitoring of sensitive receptors as appropriate;</li><li>• training for staff and assignment of responsibilities;</li><li>• record keeping and reporting; and,</li><li>• adaptive management process for updating the plan.</li></ul> <p>The latest guidance documents from ENV and EMLI will be used and referenced. No changes to the AIR document are required.</p>                                                                                                                                                                                                                                                                                                             | N/A                             | Response is satisfactory to EAO |

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| IR-WG2-32 | 25-May-20 | ENV Air Quality                        | Air Quality   | dAIR, Section 4.1.2<br>Existing Conditions | <p>Dustfall is no longer supported by the BC Ministry of Environment and Climate Change Strategy (ENV) to determine total particulate levels or establish a baseline. Regarding particulate concentrations dustfall monitoring is only supported to determine potential nuisance concerns.</p> <p>The following is pulled from page 13 in the ENV/EMLI guidance on developing a fugitive dust management plan (linked in the comment above):</p> <p>“A note of caution regarding dustfall sampling (passive open canister exposure): while it has been common practice to use this sampling methodology in many industrial situations, it has its limitations and is no longer recommended by ENV, except in specific limited circumstances (i.e. for management of aesthetic or dust nuisance concerns). It should also be noted that the former BC Pollution Control Objectives (PCO’s) for Dustfall were rescinded in 2006 and, moreover, were not developed with the intention of being protective of human or environmental health.”</p> <p>Further details, including recommended practices, can be found on page 13.</p> | <p>We appreciate your comment. We acknowledge that passive sampling of dustfall is no longer recommended. Dust is one of the top concerns of the local community and therefore we conducted dustfall sample monitoring to provide information on potential nuisance concerns only. No changes to the AIR document are required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N/A                             | Response is satisfactory to EAO |
| IR-WG2-33 | 25-May-20 | ENV Air Quality                        | Air Quality   | dAIR, Section 4.1.3<br>Potential Effects   | <p>As part of the process for identifying potential effects a detailed air emissions inventory will be needed. A detailed emissions inventory will contain (but not be limited to) a characterization of all emissions sources related to the project from construction through to remediation. Estimations of cumulative emissions from each source detailing any methods/calculations/parameters/equations/emissions factors used along with scientific references to support the results. It should also contain a description of the project and any associated figures showing the site layout, haul routes, etc.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>We appreciate your comment. We can confirm that a detailed emission inventory will be provided in the EA that characterizes emissions from all emission sources from project construction through to remediation. Supporting documentation that provides methods for calculating the emissions will be provided together with a description of all project activities at the mine, haul road and loadout sites. No changes to the AIR document are required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N/A                             | Response is satisfactory to EAO |
| IR-WG2-34 | 27-May-20 | ENV<br>Environmental<br>Impact Biology | Surface Water | dAIR, Section 4.3.3<br>Potential Effects   | <p>Ensure the assessment compares surface water quality to Water Quality Objectives, Provincial WQ Guidelines as well as with baseline conditions. Ensure to include whether there are any predicted exceedances of the above benchmarks.</p> <p>Link WQ data with sediment &amp; tissue chemistry and BI community structure data</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>We appreciate your comment. We confirm that the results from water quality predictions will be screened against provincial guidelines and baseline conditions (i.e., background concentrations). Exceedances will be identified and discussed in the context of potential risk in terms of biological effects. These results will also be evaluated in relation to sediment and fish tissue concentrations (as appropriate for elevated parameters—for example, evaluation of fish tissue concentrations is relevant for an element such as selenium, but not for many other elements such as divalent metals), as well as benthic invertebrate community metrics. The text update in Section 4.3.3 includes the following:</p> <p>Results from water quality predictions will be screened against provincial guidelines and background concentrations. Exceedances will be identified and discussed in the context of potential risk for biological effects.</p> | Section 4.3.3 Potential Effects | Response is satisfactory to EAO |

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| IR-WG2-35              | 27-May-20 | ENV<br>Environmental<br>Impact Biology | Surface Water     | dAIR, Section 4.3.4<br>Mitigation Measures | One mitigation measure for poor water quality due to mine contact water is for waste water treatment. The application needs to include proposed treatment as part of a response/contingency plan.                                                                                                                                                                                                                                                                                | We appreciate your comment. We have included water treatment under Alternative Means in the AIR document. While we agree that water treatment can potentially be a mitigation measure for poor water quality due to mine contact water, this should be considered a ‘last resort’. Our approach in the mitigation-by-design of the Project is proactive source control measures such as placing PAG material underwater within 12 months, non-contact water diversions, and covering pit walls with overburden to prevent pit walls from going acidic. Preliminary water quality predictions do not indicate the need for water treatment, and, as a result, it would be inappropriate to include a proposed water treatment plant to address hypothetical situations. A water treatment plant will not be included with the application. A rationale will be included in the report. No changes to the AIR document are required.                                                                                                        | N/A                                        | See Round 2                           |
| IR-WG2-35<br>(Round 2) | 27-May-20 | ENV<br>Environmental<br>Impact Biology | Surface Water     | dAIR, Section 4.3.4<br>Mitigation Measures | Answer acknowledged. However, since we have not yet seen the source term and effluent predictions. Contingency mitigation plans should be included into the application, should water quality exceed water quality guidelines in the receiving waters.                                                                                                                                                                                                                           | We acknowledge the ENV’s comment. We would like to clarify that we plan to utilize standardized regulatory protocols for the development of site-specific objectives, which “replace” water quality guidelines as benchmarks downstream of the mine, during and after operation. For any water quality parameters that are potentially predicted - based on (inherently conservative) modelling - to exceed BC aquatic life guidelines, we plan to derive and apply site performance objectives, based on the ENV process outlined in Technical Guidance 8 re: Science-Based Environmental Benchmarks (SBEBs). Aquatic effects monitoring will be conducted during the operational phase to confirm the protectiveness of these objectives/benchmarks. Further to this, mitigation measures will be proposed and applied, integrated into an adaptive management approach, for any exceedances of the established SBEBs, which result in measurable adverse effects to downstream receptors (e.g., fish population metrics, fish health). | N/A                                        | See Round 3                           |
| IR-WG2-35<br>(Round 3) | 27-May-20 | ENV<br>Environmental<br>Impact Biology | Surface Water     | dAIR, Section 4.3.4<br>Mitigation Measures | ENV is not satisfied with this response and requests further discussion.                                                                                                                                                                                                                                                                                                                                                                                                         | Added text in Section 4.3.4 Mitigation Measures to clarify when site performance objectives and/or specific contingency measures will be proposed in the Application.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | dAIR, Section 4.3.4<br>Mitigation Measures | Response is<br>satisfactory to<br>EAO |
| IR-WG2-36              | 27-May-20 | ENV<br>Environmental<br>Impact Biology | Surface Water     | dAIR, Section 4.3.4<br>Mitigation Measures | The dAIR did not mention the tailings pond that will be used to store mine contact water prior to discharge. It is strongly recommended that mine contact water handling be investigated further to prevent the conditions for selenium speciation to bio accumulative forms. There has been a lot of learning very recently from eastern BC coal mining that should be applied to new projects so that past practises that led to impacts can be avoided rather than mitigated. | We appreciate your comment. The water management system for the mine includes the Tenas Control pond (a sedimentation pond downstream of the mine) to intercept all contact water from the Project. This Pond is not a tailings pond, but rather a conventional sedimentation pond facility. TCL is incorporating learnings from southeastern BC coal mines and other recent Projects, specifically, storing considerable volumes of material underwater to prevent oxidization, which prevents ARD, and limits the releases of other parameters of concern, such as selenium. If ENV has specific information regarding the "water handling...to prevent...conditions for selenium speciation to bio accumulative forms", please provide. No changes to the AIR document are required.                                                                                                                                                                                                                                                   | N/A                                        | Response is<br>satisfactory to<br>EAO |
| IR-WG2-37              | 27-May-20 | ENV<br>Environmental<br>Impact Biology | Surface Water     | dAIR                                       | The mine contact water discharge location is proposed in a very dynamic river environment where sediment bedload moves seasonally which is not normally appropriate for a waste discharge outfall. Ensure a geomorphological suitability assessment is conducted to determine outfall suitability.                                                                                                                                                                               | We appreciate your comment. This point is acknowledged and suitable information will be incorporated in the Discharge Management Plan. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                        | Response is<br>satisfactory to<br>EAO |
| IR-WG2-38              | 27-May-20 | ENV<br>Environmental<br>Impact Biology | Aquatic Resources | dAIR, Section 4.5.2<br>Existing Conditions | Need to identify benthic invertebrate sampling and assessment methodology that will be followed.                                                                                                                                                                                                                                                                                                                                                                                 | We appreciate your comment. The CABIN model was used for comparing relative stream health based on benthic invertebrate density and diversity. The text update in Section 4.5.2 is as follows:<br>The CABIN model was used for comparing relative stream health based on benthic invertebrate density and diversity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section 4.5.2 Existing<br>Conditions       | Response is<br>satisfactory to<br>EAO |

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| IR-WG2-39              | 27-May-20 | ENV<br>Environmental<br>Impact Biology | Aquatic Resources | dAIR, Section 4.5.3<br>Potential Effects                        | Include changes in aquatic benthic invertebrate tissue chemistry.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | We appreciate your comment. Changes in benthic invertebrate tissue chemistry will be relevant during the Environmental Effects Monitoring program (to meet proposed federal effluent regulation requirements), not in support of the aquatic effects assessment in the EA. We do plan on modelling Se concentrations in benthic invertebrates and fish as part of our Se effects assessment and water quality objective development, but we are not predicting tissue concentrations of other metals/elements because tissue concentrations are generally not a strong line of evidence for those. We will be relying on water chemistry predictions for the other metals/elements, as a result. No changes to the AIR document are required. | N/A | Response is<br>satisfactory to<br>EAO |
| IR-WG2-40              | 15-Jun-20 | ENV<br>Environmental<br>Impact Biology | Surface Water     | dAIR, Section 4.3<br>Surface Water<br>Intermediate<br>Component | Please confirm that changes in surface water flow will be estimated and presented on monthly basis for each year of the proposed mine life from construction through to post-closure phases.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | We appreciate your comment. We confirm that changes in surface water flow will be estimated and presented on monthly basis for each year of the proposed mine life from construction through to post-closure phases. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N/A | Response is<br>satisfactory to<br>EAO |
| IR-WG2-41              | 15-Jun-20 | ENV Hydrology                          | Surface Water     | dAIR, Section 4.3.2<br>Existing Conditions                      | Please refer the most recent version of the Manual of British Columbia Hydrometric Standards (ENV, 2018) for analysis and review standards of hydrometric data to presented in the application.<br><a href="https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/nr-laws-policy/risc/man_bc_hydrometric_stand_v2.pdf">https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/nr-laws-policy/risc/man_bc_hydrometric_stand_v2.pdf</a>                                                                                                                                                                                                                                                                                                                                                                                                | We appreciate your comment. The hydrotechnical standards and methods employed on the Project are consistent with standards published by the British Columbia Ministry of Environment entitled “Manual of British Columbia Hydrometric Standards”, prepared by Ministry of Environment and Climate Change Strategy Knowledge Management Branch for the Resources Information Standards Committee (ENV 2018), referenced as RISC 2018 in the hydrology baseline report. Note that data collected prior to January 2019 references standards of the previous "Manual of British Columbia Hydrometric Standards' (RISC 2009). No changes to the AIR document are required.                                                                        | N/A | Response is<br>satisfactory to<br>EAO |
| IR-WG2-42              | 15-Jun-20 | ENV Hydrology                          | Surface Water     | dAIR, Section 4.3.2<br>Existing Conditions                      | Please confirm that the hydrology baseline information will include all data collected in 2017 to 2019. At least 2 years of baseline streamflow data should be presented in order to support the application.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | We appreciate your comment. We confirm that we have two or more years of data for Tenas Creek, Goathorn Creek, the Telkwa River and the Bulkley River. This baseline data will be presented as a part of the EA Application. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N/A | Response is<br>satisfactory to<br>EAO |
| IR-WG2-43              | 15-Jun-20 | ENV Hydrology                          | Surface Water     | dAIR, Section 4.3.3<br>Potential Effects                        | Please provide a description, methodology and approach for calibration/validation of the surface water modelling (water quantity and quality) to be developed in order to characterize existing conditions and future predictions for the proposed mine.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | We appreciate your comment. The streamflow model has been developed using local and regional flow datasets. Reporting will present calibration results. Differences in background water quality are significant enough to validate the water predictions by mass balance. Water quality predictions can only be validated when the mine is operational and loading sources are present. The predictive water quality model will be updated and validated annually after two years of operational data is gathered and if the actual values measured are 20% above predicted values. No changes to the AIR document are required.                                                                                                              | N/A | See Round 2                           |
| IR-WG2-43<br>(Round 2) | 15-Jun-20 | ENV Hydrology                          | Surface Water     | dAIR, Section 4.3.3<br>Potential Effects                        | <ul style="list-style-type: none"> <li>• I still expect that effort would be made to validate the surface water model for baseline conditions (i.e. current conditions).</li> <li>• For example, a comparison should be presented of the modelled baseline water quantity (streamflow) and water quality to measured baseline data used to calibrate the model in order to demonstrate the performance of the model.</li> <li>• In particular, quantitative statistics should be used to evaluate model performance for streamflow such as the Nash-Sutcliffe efficiency (NSE) or root mean square error (RSR).</li> <li>• It is understood that the future conditions post-mine development cannot be validated at this time until measured data is available. The proposed plan to update and validate the model after 2 years of mine operations is reasonable.</li> </ul> | The surface water quantity modeling will be calibrated to local and regional streamflow datasets. Calibrated parameters include runoff coefficients and baseflow contributions. Calibration results will include comparison plots of modelled versus measured baseline water quantity, along with representative statistics for model performance.                                                                                                                                                                                                                                                                                                                                                                                            | N/A | Response is<br>satisfactory to<br>EAO |

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| IR-WG2-44 | 15-Jun-20 | ENV Mining Operations | EA / Permitting       | dAIR, Section 1.2<br>Applicable Authorizations                                           | The proponent has indicated that they will be seeking concurrent permitting under the 2002 EA Act. If that is the case, they are advised that the requirements for the permitting applications are different and often more comprehensive than some EA application requirements and they are encouraged to engage with the Province, First Nations and others to ensure that they understand the requirements and the process. | We appreciate your comment. We note that this comment does not relate to the AIR document. TCL will continue to engage with Province, Indigenous nations, and others to ensure we fully understand the requirements and process. Please advise when we can meet with ENV to discuss permitting.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | N/A                                     | Response is satisfactory to EAO |
| IR-WG2-45 | 15-Jun-20 | ENV Mining Operations | EA / Permitting       | dAIR, Section 1.3<br>Project Design and/or Alternative Means of Carrying out the Project | Alternative means of carrying out the proposed Project should include alternative assessments for water management and treatment technologies, since water quality and quantity are expected to be impacted by the Project.                                                                                                                                                                                                    | We appreciate your comment. We have included water treatment under Alternative Means in the AIR document. While we agree that water treatment can potentially be a mitigation measure for poor water quality due to mine contact water, this should be considered a 'last resort'. Our approach in the mitigation-by-design of the Project is proactive source control measures such as placing PAG material underwater within 12 months, non-contact water diversions, and covering pit walls with overburden to prevent pit walls from going acidic. Preliminary water quality predictions do not indicate the need for water treatment, and, as a result, it would be inappropriate to include a proposed water treatment plant to address hypothetical situations. A water treatment plant will not be included with the application. A rationale will be included in the report. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N/A                                     | Response is satisfactory to EAO |
| IR-WG2-46 | 15-Jun-20 | ENV Mining Operations | EA / Permitting       | dAIR, Section 1.4<br>Alternatives to the Proposed Project                                | Please provide details regarding the assertion that "...based on the overall result of the effects assessment not highlighting and [any] significant impacts due the Project...". Where is the information that supports this statement?                                                                                                                                                                                       | We appreciate your comment. We based the comment on preliminary assessments, but we have removed this statement from the AIR document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Section 1.4 Alternatives to the Project | Response is satisfactory to EAO |
| IR-WG2-47 | 15-Jun-20 | ENV Mining Operations | Fish and Fish Habitat | dAIR, Section 3.1<br>Issues Scoping and Selection of Valued Components                   | Subcomponents of VC 'Fish and fish habitat' should include surface and groundwater quality and quantity.                                                                                                                                                                                                                                                                                                                       | <p>TCL considers that additional subcomponents for the Fish and Fish Habitat VC are not necessary, as water quality and quantity are sufficiently addressed through the indicators for the VC. The focus of the VC, per the name, is habitat and fish health, abundance and condition, reflected in the two subcomponents fish habitat and fish, and their indicators (see s4.6 for full list of indicators). Determination of the changes in the areal extent of fish habitat indicator (permanently altered, destroyed or made inaccessible) will include alterations due to changes in water quality/quantity, as well as other factors such as direct losses. The indicator for the change in fish health will also consider water quality. The Surface Water and Groundwater VC assessments are important components of the effects pathways to the VC, and will support the determination of the habitat disturbance and fish health. They are included in the list of linked VCs for the Fish and Fish Habitat assessment (s4.6).</p> <p>Surface water and groundwater are assessed separately as VCs, as their assessment is linked to several VCs (e.g. Aquatic Resources, Wildlife, Land and Resource Use and Human Health) rather than being solely relevant to the Fish and Fish Habitat VC. These separate assessments will provide substantial analyses in the effects pathways for all the VCs. Please refer to Table 3 in Section 3.1 stating that 'linkage VCs' will be addressed in each of the VC effects assessments.</p> | N/A                                     | Response is satisfactory to EAO |

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| IR-WG2-48 | 15-Jun-20 | ENV Mining Operations | Surface Water         | dAIR, Section 4.3.2 Existing Conditions                                               | The proponent lists surface water sampling locations, but does not discuss the purpose of choosing those locations. Sampling locations should include reference/background locations and also potential locations influenced by current or historical activities in order to assess cumulative affects.                                                                                                                                                                                                                                                                                                                                                                     | We appreciate your comment. The surface water quality program sampled both upstream reference locations and downstream monitoring locations in Tenas Creek, Four Creek, Goathorn Creek, Helps Creek, the Telkwa River, and the Bulkley River. Further, Tenas Creek, Goathorn Creek, and the Telkwa River have multiple downstream monitoring locations. We agree that the rationale for sampling locations should be and will be included in the application. Details will be provided describing the selection of sampling locations, which will include reference locations and locations with potential influence from planned mining activities. No changes to the AIR document are required. | N/A                                                           | Response is satisfactory to EAO |
| IR-WG2-49 | 15-Jun-20 | ENV Mining Operations | Fish and Fish Habitat | dAIR, Section 4.6 Fish and Fish Habitat Valued Component                              | As per comment 22 above, Fish and Fish Habitat VC is affected by surface and groundwater quality and quantity, and those should be added to the IC assessments listed for this VC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | We appreciate your comment. These links were inadvertently missed and we have now added them in the AIR document in Table 3, Section 3.1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Section 3.1 Issues Scoping and Selection of Valued Components | Response is satisfactory to EAO |
| IR-WG2-50 | 15-Jun-20 | ENV Mining Operations | Human Health          | dAIR, Section 8.1 Human Health Valued Component                                       | The Human Health VC is affected by the surface and groundwater assessments and also the air quality assessment. These should be added to the assessments listed as supporting this VC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | We appreciate your comment. The following VCs that "may support and be supported by" the human health VC have been added: atmospheric environment (which includes both air quality and noise); terrain and soils; surface water; groundwater; fish and fish habitat; vegetation; wildlife; and avian species.                                                                                                                                                                                                                                                                                                                                                                                     | Section 8.1 Human Health Valued Component                     | Response is satisfactory to EAO |
| IR-WG2-51 | 16-Jun-20 | EMLI Geotechnical     | EA / Permitting       | dAIR, Section 1.3 Project Design and/or Alternative Means of Carrying out the Project | EMLI expects that Section 1.3, Project Design and/or Alternative Means of Carrying out the Project, will include presentation of a waste management alternatives assessment that considers technology, siting and water balance. This includes the identification and consideration of best practices and Best Available Technologies (BATs) for waste (CCR, FCR and/or tailings) management. The "Application Information Requirement Template Tailings Management Requirements for Mining Projects undergoing an Environmental Assessment" provides details for mining projects undergoing Environmental Assessments.                                                     | We appreciate your comment. We will include a description of waste management alternatives in the EA. We have added language and note the reference document in the AIR document in Section 1.3 as follows:<br>This includes an alternative means assessment for waste management of both Potentially Acid Generating (PAG) and non-PAG materials. PAG materials include processed rock (coarse coal rejects, fine coal rejects, and tailings) and mine generated PAG material (EAO 2015).                                                                                                                                                                                                        | Section 1.3 Alternative Means of Carrying out the Project     | Response is satisfactory to EAO |
| IR-WG2-52 | 16-Jun-20 | EMLI Geotechnical     | Engineering           | dAIR, Section 10.0 Effects of the Environment on the Project                          | Section 10.0, Effects of the Environment on the Project, provides a list of items for the proponent to address describing potential impacts or changes to the project, mitigation measures and potential risks. The bullet for geohazard states "Geo-hazard including slope stability (debris torrents, rock fall and avalanche)." The parentheses seem to limit the geohazard assessment to slope stability concerns specific to debris torrents, rock fall and avalanches. EMLI expects the geohazard assessment will include identification and assessment of all geohazards that could potentially influence the mine site and discuss any planned mitigation measures. | We appreciate your comment. We have edited the AIR document in Section 10 as follows: Geohazards, including slope stability (prefaced by the phrase, "not necessarily limited to...")                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Section 10.0 Effects of the Environment On the Project        | Response is satisfactory to EAO |
| IR-WG2-53 | 16-Jun-20 | EMLI Geotechnical     | Surface Water         | dAIR, Section 13.0 Management Plans                                                   | Section 13.0, Management Plans, provides a list of required plans including a Minesite Water Management Plan. The application should include a waste storage facility (CCR, FCR and/or tailings, as required) specific water balance; the waste storage facility specific water balance should be integrated into the site-wide water balance.                                                                                                                                                                                                                                                                                                                              | We appreciate your comment. We confirm that this information will be included in the application. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N/A                                                           | Response is satisfactory to EAO |
| IR-WG2-54 | 16-Jun-20 | EMLI Geotechnical     | EA / Permitting       | dAIR                                                                                  | Please identify the level of study/design (e.g. feasibility, detailed design) for the geotechnical studies and infrastructure to be included in the EAC application. For reference, <i>Mines Act</i> permit applications are required to provide detailed designs for all geotechnical infrastructure and, considering the EAC application and <i>Mines Act</i> application will be reviewed concurrently, it would be prudent to proactively identify the level of study/design for each geotechnical component submitted within the application(s).                                                                                                                       | We appreciate your comment. The geotechnical studies will be at a feasibility design stage and infrastructure will be at a feasibility level of design including foundations for the EA. For the permit application, there will be further optimization of the plan. This was discussed with EMLI representatives in January and October 2020. The pit and dump areas already have sufficient drilling to satisfy the designs provided. The bridges and proposed Tenas Access Corridor will be at an IFC level. Additional assessment of the embankment design will be undertaken to support the permit application. No changes to the AIR document are required.                                 | N/A                                                           | Response is satisfactory to EAO |

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| IR-WG2-55           | 26-Jun-20 | Regional District of Bulkley Nechako | Vibration       | dAIR | The proponent should provide a description of the proposed qualitative review of the vibration impacts in the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | We appreciate your comment. Please refer to separate technical memo "Telkwa Coal Limited Memo on Vibration" which was posted to the EPIC website on August 26, 2020.<br><a href="https://projects.eao.gov.bc.ca/api/public/document/5f497609dc3ea30022f72173/download/200826_Vibration%20Memo_Final.pdf">https://projects.eao.gov.bc.ca/api/public/document/5f497609dc3ea30022f72173/download/200826_Vibration%20Memo_Final.pdf</a><br>No changes to the AIR document are required.                                                                                                                                                                                                                                                      | N/A | See Round 2                     |
| IR-WG2-55 (Round 2) | 26-Jun-20 | Regional District of Bulkley Nechako | Vibration       | dAIR | Resolved - as long as comment is carried forward and addressed during Application Development                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | We appreciate your comment. Please refer to separate technical memo "Telkwa Coal Limited Memo on Vibration" which was posted to the EPIC website on August 26, 2020. A qualitative review of the vibration impacts will be included in the EA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | N/A | Response is satisfactory to EAO |
| IR-WG2-56           | 26-Jun-20 | Regional District of Bulkley Nechako | EA / Permitting | dAIR | Specific mitigation actions need to be developed, evaluated, and discussed during the Environmental Assessment application review process. The development of mitigation plans and strategies should not be deferred to the Socio-Economic and Environment Management Planning process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | We appreciate your comment. Specific social and economic mitigations will be developed and discussed in the EA. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N/A | See Round 2                     |
| IR-WG2-56 (Round 2) | 26-Jun-20 | Regional District of Bulkley Nechako | EA / Permitting | dAIR | Resolved - as long as comment is carried forward and addressed during Application Development                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | We appreciate your comment. Please refer to separate technical memo "Telkwa Coal Limited Memo on Vibration" which was posted to the EPIC website on August 26, 2020. A qualitative review of the vibration impacts will be included in the EA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | N/A | Response is satisfactory to EAO |
| IR-WG2-57           | 8-Jun-20  | Agricultural Land Commission         | EA / Permitting | dAIR | Any non-farm use in the ALR, including the rail loadout area, requires an application to the ALC and is not guaranteed to be approved. There a number of possible outcomes to an application including a refusal, a modified proposal, or a conditional approval. I recommend the ALR be considered early in the project planning and risk planning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | We appreciate your comment. We are aware of this requirement and are preparing an application to ALC. We provided an initial draft application for ALC's review and input this autumn, prior to the formal submission. Based on this preview, ALC input has been reflected in the application. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                              | N/A | Response is satisfactory to EAO |
| IR-WG2-58           | 8-Jun-20  | Agricultural Land Commission         | EA / Permitting | dAIR | <p>Section 4.2.2 of the report mentions soil surveys within the ALR. Here are some of the recommended requirements for the parts of the project area that are located in the ALR:</p> <ul style="list-style-type: none"> <li>• An inventory of agricultural capability/suitability within the project area conducted at a Survey Intensity Level 1 (as per the ALC's Policy P-10).</li> <li>• An inventory of the type of farming occurring in the project area, including any crown range lease.</li> <li>• An estimate of agricultural area of land lost (in hectares) due to the project.</li> <li>• An assessment of the potential impacts to agricultural production, operations and infrastructure during the construction and operation phases, including but not limited to the following: <ul style="list-style-type: none"> <li>o parcel fragmentation;</li> <li>o removal or damage to agricultural fencing;</li> <li>o farm access;</li> <li>o shared roads (movement of farm equipment);</li> <li>o introduction of noxious weeds;</li> <li>o damage to irrigation and drainage infrastructure; and</li> <li>o degradation of soils.</li> </ul> </li> <li>• Part of this assessment must include consultation with farmers located within the project area to determine any farm specific impacts.</li> <li>• Measures to mitigate impacts identified during the assessment and consultation.</li> </ul> | We appreciate your comment and summary of data recommendations. Consideration of land use including ALR will be part of the assessment. An inventory of the type of farming occurring in the project area has been undertaken as a part of the requirements for the ALR Non-Farm Use Application. Through the Non-Traditional Land Use baseline, we have compiled information on the range tenures found in the General Wildlife RSA. Per the ALC requirements, we have already engaged with farmers in the Project area to gather land use information. We plan further engagement with these farmers as a part of our on going engagement strategy. This work will be included in the EA. No changes to the AIR document are required. | N/A | Response is satisfactory to EAO |
| IR-WG2-59           | 17-Apr-20 | EAO                                  | EA / Permitting | dAIR | "Coal" to be added in title of document                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | We appreciate your comment. EAO later stated that this proposed change is acceptable to the EAO and all future EAO documents will reference 'Tenas Project'. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N/A | Response is satisfactory to EAO |

**Tenas - Draft Application Information Requirements Working Group Issues Tracking Table**

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| IR-WG2-60           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Preface to the dAIR                         | Necessary to differentiate the 2002 EA Act from new 2018 Act                                                                                                       | We appreciate your comment. TCL has made this update on page 1 as follows:<br>The Application Information Requirements (AIR) specifies the information that Telkwa Coal Limited (the Proponent) is required to provide in their Application for an Environmental Assessment Certificate (Application) under section 16(2) of the British Columbia (BC) Environmental Assessment Act, 2002 (Act).                                                                                                                                                                                                                                                                                                  | Preface to the AIR                                                       | Response is satisfactory to EAO    |
| IR-WG2-61           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Preface to the dAIR                         | Please change references to Tenas Coal                                                                                                                             | We appreciate your comment. EAO later stated that this proposed change is acceptable to the EAO and all future EAO documents will reference 'Tenas Project'. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | N/A                                                                      | Response is satisfactory to EAO    |
| IR-WG2-62           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Preface to the dAIR                         | CEAA 2012 references may need to change as a result of the change to the new federal Impact Assessment Act                                                         | We appreciate your comment. TCL has made this update in the AIR document on page 1 and page 17 as follows:<br>On August 28, 2019, the IAA 2019 came into force. The IAA 2019 creates the new Impact Assessment Agency of Canada and repeals the CEAA 2012. Environmental Assessment under the IAA is not required for the proposed Project because the proposed production capacity is well under the 5,000 tonnes per day coal production threshold for the construction, operation, decommissioning and abandonment of a new coal mine as defined in 16(d) of the Regulations Designating Physical Activities. IAAC confirmed on June 1, 2020 that the Project is not reviewable under the IAA. | Preface to the AIR, Section 2.2 Federal Environmental Assessment Process | Response is satisfactory to EAO    |
| IR-WG2-63           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Preface to the dAIR                         | Please provide a link to the VC doc on the EAO's website under "List of Reviewing Agencies"                                                                        | The link to the VC document has been added to the dAIR.<br><a href="https://projects.eao.gov.bc.ca/api/public/document/5f08a0159e70cd00219b9cb3/download/190918_Telkwa_VC_Scoping_Doc_FINAL.pdf">https://projects.eao.gov.bc.ca/api/public/document/5f08a0159e70cd00219b9cb3/download/190918_Telkwa_VC_Scoping_Doc_FINAL.pdf</a>                                                                                                                                                                                                                                                                                                                                                                  | Preface to the AIR                                                       | Response is satisfactory to EAO    |
| IR-WG2-64           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Preface to the dAIR                         | Suggest taking out acronyms under "Provincial Agencies" as they are listed below, or include for all reviewing agencies, for consistency                           | We appreciate your comment. TCL has made this update on page 3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Preface to the AIR                                                       | Response is satisfactory to EAO    |
| IR-WG2-65           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Preface to the dAIR                         | NRCan is not on the WG for Tenas Coal. Did they review the VC doc or the dAIR?                                                                                     | We appreciate your comment. TCL has removed NRCan from the list of reviewing agencies on page 3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Preface to the AIR                                                       | Response is satisfactory to EAO    |
| IR-WG2-66           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Preface to the dAIR                         | Please remove Provincial Member of the Legislative Assembly for Stikine under "Municipal and Regional Agencies", as they are not an agency                         | We appreciate your comment. TCL has removed Provincial Member of the Legislative Assembly for Stikine on page 3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Preface to the AIR                                                       | Response is satisfactory to EAO    |
| IR-WG2-67           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Preface to the dAIR                         | "Indigenous Groups identified in the Section 11 Order issued June 25, 2011" changed to "Indigenous Groups identified in the Section 11 Order issued June 25, 2019" | We appreciate your comment. TCL has made this update on page 3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Preface to the AIR                                                       | Response is satisfactory to EAO    |
| IR-WG2-68           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Abbreviations and Acronyms                  | Some of the abbreviations and acronyms listed are not found in document, i.e. FLNRORD, OW                                                                          | We appreciate your comment. TCL has updated the list of abbreviations and acronyms on page 9.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Abbreviations and Acronyms                                               | Response is satisfactory to EAO    |
| IR-WG2-69           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Abbreviations and Acronyms                  | Please clarify which Act the AIR is under                                                                                                                          | We appreciate your comment. TCL has updated page 9 as follows:<br>Application Information Requirements, reviewed under Environmental Assessment Act 2002                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Abbreviations and Acronyms                                               | Response is satisfactory to EAO    |
| IR-WG2-70           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 1.1 Description of Proposed Project | Text edits: Summarize existing and planned land and marine use that overlaps or may be potentially impacted by the proposed Project components and activities      | We appreciate your comment. TCL has updated section 1.1. to include land and water use.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Section 1.1 Description of Project                                       | See Round 2                        |
| IR-WG2-70 (Round 2) | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 1.1 Description of Proposed Project | Not Resolved - Please update TCL's response to indicate the specific change made in the AIR (e.g. "land and water use")                                            | Change made.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section 1.1 Description of Project                                       | Section 1.1 Description of Project |
| IR-WG2-71           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 1.1 Description of Proposed Project | Text edits: Current and planned marine (land) use plans                                                                                                            | We appreciate your comment. TCL has made this update on page 13.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Section 1.1 Description of Project                                       | Response is satisfactory to EAO    |

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| IR-WG2-72           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 1.3 Project Design and/or Alternative Means of Carrying out the Project | Please split these two topics out to avoid confusion.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | The dAIR applies the heading provided in the AIR template, which includes Project design in relation to alternative means for the Project. Per the template guidance, section 1.3 will address alternatives means for the listed Project components. Detailed information on Project design is provided in Section 1.1 of the dAIR. The heading for this section has been edited for clarity to “Alternative Means of Carrying Out the Project”                                                                                                                                                                                                                                                                                   | Section 1.3 Alternative Means of Carrying out the Project     | Response is satisfactory to EAO |
| IR-WG2-73           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 1.3 Project Design and/or Alternative Means of Carrying out the Project | It is anticipated that the WG will want significantly more detail in this section in terms of mine components and operational activities that will be described in the Application                                                                                                                                                                                                                                                                                                                                                   | As per Section 1.1 of the dAIR, detail on the chosen project design will be provided. Section 1.3 will detail alternative means considered.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Section 1.1 Description of Project                            | Response is satisfactory to EAO |
| IR-WG2-74           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 1.4 Alternatives to the Proposed Project                                | The bullets in Section 1.3 above outline which project components have had preliminary alternative assessments conducted. This section needs to specify the alternatives to the proposed Project that will be considered in the Application. This information is missing and needs to be included in the dAIR.                                                                                                                                                                                                                       | Section 1.3 will address alternative means of carrying out the Project, whereas Section 1.4 will address alternatives to the Project. TCL has considered alternatives to the Project that would meet the purpose to provide steel-making coal to global markets. TCL will provide a rationale in the Application for the preferred option, which has been selected and is assessed in the Application, based on an assessment of the following alternatives:<br><ul style="list-style-type: none"> <li>• No Project</li> <li>• Proposed Project</li> <li>• Development of other steel quality coal resources in BC</li> </ul> Text in the dAIR has been revised to provide additional clarity on the alternatives to the Project. | Section 1.3 Alternative Means of Carrying out the Project     | Response is satisfactory to EAO |
| IR-WG2-75           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 2.2 Federal EA Process                                                  | As per above, reference updates required to Canadian Environmental Assessment Act, 2012 (CEAA 2012)                                                                                                                                                                                                                                                                                                                                                                                                                                  | We appreciate your comment. TCL has made this update in section 2.2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Section 2.2 Federal Environmental Assessment Process          | Response is satisfactory to EAO |
| IR-WG2-76           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 3.0 Assessment Methodology                                              | The link doesn’t work to EAO’s Guideline for the Selection of Valued Components and Assessment of Potential Effects. Please use <a href="https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/environmental-assessments">https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/environmental-assessments</a>                                                                                                                                                                            | We appreciate your comment. TCL has made this update on section 3.0.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Section 3.0 Assessment Methodology                            | Response is satisfactory to EAO |
| IR-WG2-77           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 3.0 Assessment Methodology                                              | What methodology was followed? Link to methodology is missing here and a short description would be helpful                                                                                                                                                                                                                                                                                                                                                                                                                          | We appreciate your comment. Refer to Sections 3.1 through 3.9 for an overview of the methodology that will be followed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | N/A                                                           | Response is satisfactory to EAO |
| IR-WG2-78           | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 3.1 Issues Scoping and Selection of Valued Components                   | In reference to Table 3: Valued Components and Subcomponents for the Tenas Project: We note that Table 3 in TCL’s VC document includes VCs, Subcomponents AND indicators. Please include indicators or receptors here for clarity.                                                                                                                                                                                                                                                                                                   | We appreciate your comment. TCL has updated Table 3 to include Valued Component indicators.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Section 3.1 Issues Scoping and Selection of Valued Components | See Round 2                     |
| IR-WG2-78 (Round 2) | 17-Apr-20 | EAO | EA / Permitting | dAIR, Section 3.1 Issues Scoping and Selection of Valued Components                   | Not Resolved - Please remove reference to table 4 in TCL's response as update only applies to table 3.                                                                                                                                                                                                                                                                                                                                                                                                                               | Change made.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section 3.1 Issues Scoping and Selection of Valued Components | Response is satisfactory to EAO |
| IR-WG2-79           | 17-Apr-20 | EAO | Atmospherics    | dAIR, Section 3.1 Issues Scoping and Selection of Valued Components                   | In reference to Table 3: Valued Components and Subcomponents for the Tenas Project: Regional District of Bulkley Nechako has raised vibration concerns from rail loading, the haul road and the mine site. In addition, they requested that Ambient Light be included as a subcomponent of Atmospheric Environment. TCL has responded that Ambient Light will be included in the EA as a qualitative discussion within the Visual Quality assessment. EAO notes that there may be further discussion on this during the dAIR review. | Regarding the vibration topic, Hemmera technical memo, August 26, 2020 has been provided.<br><a href="https://projects.eao.gov.bc.ca/api/public/document/5f497609dc3ea30022f72173/download/200826_Vibration%20Memo_Final.pdf">https://projects.eao.gov.bc.ca/api/public/document/5f497609dc3ea30022f72173/download/200826_Vibration%20Memo_Final.pdf</a><br><br>Regarding ambient light, we acknowledge your comment.                                                                                                                                                                                                                                                                                                             | N/A                                                           | Response is satisfactory to EAO |
| IR-WG2-80           | 17-Apr-20 | EAO | Atmospherics    | dAIR, Section 3.1 Issues Scoping and Selection of Valued Components                   | In reference to Table 3: Valued Components and Subcomponents for the Tenas Project: Atmospheric Environment is listed as an IC in the VC scoping document and a VC in the dAIR. Please revise.                                                                                                                                                                                                                                                                                                                                       | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Section 3.1 Issues Scoping and Selection of Valued Components | Response is satisfactory to EAO |

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| IR-WG2-81 | 17-Apr-20               | EAO | EA / Permitting | dAIR, Section 3.1<br>Issues Scoping and<br>Selection of Valued<br>Components                                      | Please clarify how this public engagement was done and if it was a TCL-led initiative instead of an EAO-led initiative.                                                                                                                                                                                                                                                                                                                          | We appreciate your comment. TCL has made updates to Section 3.1 which removed the previous language indicated by EAO.                                                                                                                                                                                                                                                                                              | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components                                                                                    | Response is<br>satisfactory to<br>EAO |
| IR-WG2-82 | 17-Apr-20               | EAO | EA / Permitting | dAIR, Section 3.3<br>Existing Conditions                                                                          | Please include a section on Cumulative Effects in the area including a qualitative description of values that are of interest from a cumulative effects perspective ie. Caribou.<br>EAO's current cumulative effects assessment guidance, which applies to projects being assessed under the Act (2002), states that the cumulative effects discussion should begin at the earliest stages of the EA including the Project Description and dAIR. | We appreciate your comment. The third bullet point in Section 3.3 discusses how past and present projects and activities will be considered for each VC. We added a reference to the Cumulative Effects Assessment (Section 3.8) and stated that the assessment follows the Guideline for the Selection of Valued Components and Assessment of Potential Effects (BCEAO 2013).                                     | Section 3.8 Cumulative<br>Effects Assessment                                                                                                           | Response is<br>satisfactory to<br>EAO |
| IR-WG2-83 | 17-Apr-20               | EAO | EA / Permitting | dAIR, Section 3.8<br>Cumulative Effects<br>Assessment                                                             | To help the public understand these comments, it would be helpful if there could be a short paragraph describing a CE assessment                                                                                                                                                                                                                                                                                                                 | We appreciate your comment. We added a short paragraph to the dAIR describing the CEA with reference to the Guideline for the Selection of Valued Components and Assessment of Potential Effects (BCEAO 2013). A preliminary list of projects and activities to be considered in the CEA was included in the dAIR. This list has been expanded based on comments from the WG and OW.                               | Section 3.8 Cumulative<br>Effects Assessment,<br>Section 3.8.1 Identifying<br>Past, Present or<br>Reasonably Foreseeable<br>Projects and/or Activities | Response is<br>satisfactory to<br>EAO |
| IR-WG2-84 | 17-Apr-20               | EAO | EA / Permitting | dAIR, Section 3.8.1<br>Identifying Past,<br>Present or<br>Reasonably<br>Foreseeable Projects<br>and/or Activities | Link doesn't work in "The Application will determine residual project and cumulative effects using the steps identified in...". Please update.                                                                                                                                                                                                                                                                                                   | We appreciate your comment. TCL has made this update in Section 3.8.1.                                                                                                                                                                                                                                                                                                                                             | Section 3.8.1 Identifying<br>Past, Present or<br>Reasonably Foreseeable<br>Projects and/or Activities                                                  | Response is<br>satisfactory to<br>EAO |
| IR-WG2-85 | 17-Apr-20               | EAO | EA / Permitting | dAIR, Section 4.0<br>Environmental<br>Effects Assessment                                                          | Again, for the public, it would be good to have a short, high level description of the assessment methodology                                                                                                                                                                                                                                                                                                                                    | We appreciate your comment. Refer to Section 3 for an overview of the methodology that will be followed.                                                                                                                                                                                                                                                                                                           | N/A                                                                                                                                                    | Response is<br>satisfactory to<br>EAO |
| IR-WG2-86 | 17-Apr-20               | EAO | Atmospherics    | dAIR, Section 4.1<br>Atmospheric<br>Environment<br>Intermediate<br>Component                                      | Atmospheric Environment is listed as a VC in Table 3 above. Please clarify.                                                                                                                                                                                                                                                                                                                                                                      | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.                                                                                                                                                                                                                                                                         | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components                                                                                    | Response is<br>satisfactory to<br>EAO |
| IR-WG2-87 | 17-Apr-20               | EAO | Atmospherics    | dAIR, Section 4.1<br>Atmospheric<br>Environment<br>Intermediate<br>Component                                      | It would be helpful if you added a column on the right showing the receptors for which the IC is the primary pathway to potential effects of the project ie. Names of plants for AQ                                                                                                                                                                                                                                                              | We appreciate your comment. We have assessed all linked components together using an effects pathway approach. Linkages among VCs will be identified for each VC (added to Table 3, Section 3.1 of the AIR), and changes in one VC that may affect another VC will be described within the receptor VCs (e.g., water quality linkages will be discussed in fish / fish habitat as one of its linked/receptor VCs). | Section 3.1 Issues<br>Scoping and Selection of<br>Valued Components                                                                                    | Response is<br>satisfactory to<br>EAO |
| IR-WG2-88 | 17-Apr-20               | EAO | EA / Permitting | dAIR, Section 4.1<br>Atmospheric<br>Environment<br>Intermediate<br>Component                                      | Please include maps of the assessment boundaries for each VC/IC under the relevant VC/IC's section, not at the bottom of the document. This will make them easier to reference.                                                                                                                                                                                                                                                                  | We appreciate your comment. TCL has made this update to Figures 3 to 17.                                                                                                                                                                                                                                                                                                                                           | This is a global edit in the<br>dAIR. It is impractical to<br>list all sections that have<br>been updated.                                             | Response is<br>satisfactory to<br>EAO |
| IR-WG2-89 | 4/17/2020,<br>4/24/2020 | EAO | EA / Permitting | dAIR, Section 4.1<br>Atmospheric<br>Environment<br>Intermediate<br>Component                                      | Where historic technical reports from unrelated projects will be reviewed as a part of the Application are used as supporting information in the Application please include context relevant to Tenas Coal project ie. Location, dates, differences in data collection methods. Please reference in the AIR that this will be done in the Application                                                                                            | We appreciate your comment. No changes to the AIR document are required, however the language confirming your comment can be found in Section 4.1.2 as follows:<br>The following technical reports will be reviewed as part of the Application. Where historic technical reports from unrelated projects are used as supporting information, the Application will include context relevant to the Project:         | N/A                                                                                                                                                    | Response is<br>satisfactory to<br>EAO |

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| IR-WG2-90 | 4/17/2020,<br>4/24/2020 | EAO | Surface Water         | dAIR, Section 4.3<br>Surface Water<br>Intermediate<br>Component              | For water quality, will there be post-closure monitoring? Please note in the AIR that this is part of the monitoring program                                                                                                                                                                                                                                                                                                                                                                                                                                 | We appreciate your comment. No changes to the AIR document are required, however the language confirming your comment can be found in Section 4.3.1 as follows:<br>The Application will include analyses for the Construction, Operation, Decommissioning and Reclamation and Post-Closure phases of the Project, including a Post-Closure monitoring plan. If applicable, other boundaries may be described in the Application. These may include temporal, administrative, and technical boundaries. If there are no other relevant boundaries, this will be stated. | N/A                                                                                               | Response is satisfactory to EAO |
| IR-WG2-91 | 17-Apr-20               | EAO | Groundwater           | dAIR, Section 4.4<br>Groundwater<br>Intermediate<br>Component                | For Groundwater quality, will there be post-closure monitoring of the project?                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | We appreciate your comment. No changes to the AIR document are required, however the language confirming your comment can be found in Section 4.4.1 :<br>The Application will include analyses for the Construction, Operation, Decommissioning and Reclamation and Post-Closure phases of the Project, including a Post-Closure monitoring plan. If applicable, other boundaries may be described in the Application. These may include temporal, administrative, and technical boundaries. If there are no other relevant boundaries, this will be stated.           | N/A                                                                                               | Response is satisfactory to EAO |
| IR-WG2-92 | 17-Apr-20               | EAO | Aquatic Resources     | dAIR, Section 4.5<br>Aquatic Resources<br>Intermediate<br>Component, page 62 | Text edits: Construction and operation of the mine may have <del>adverse effects</del> adverse effects                                                                                                                                                                                                                                                                                                                                                                                                                                                       | We appreciate your comment. TCL has made this update in the AIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Section 4.5 Aquatic Resources Valued Component                                                    | Response is satisfactory to EAO |
| IR-WG2-93 | 17-Apr-20               | EAO | Aquatic Resources     | dAIR, Section 4.5<br>Aquatic Resources<br>Intermediate<br>Component          | Text edit: Where an adverse residual effect is identified, the Application will characterize the residual effect based on the context, magnitude, extent, duration, reversibility, and frequency as described in Section 3.6 Characterization of Residual Effects of this Where an adverse residual effect is identified, the Application will characterize the residual effect based on the context, magnitude, extent, duration, reversibility, and frequency as described in Section 3.6 Characterization of Residual Effects of this <del>AIR</del> AIR. | We appreciate your comment. TCL has made this update in the AIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Section 4.5.5 Residual Effects                                                                    | Response is satisfactory to EAO |
| IR-WG2-94 | 17-Apr-20               | EAO | Fish and Fish Habitat | dAIR, Section 4.6<br>Fish and Fish Habitat<br>Valued Component               | Text edit: Construction and operation of the mine may have <del>adverse effects</del> adverse effects on fish and fish habitat...                                                                                                                                                                                                                                                                                                                                                                                                                            | We appreciate your comment. TCL has made this update in Section 4.6.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Section 4.6 Fish and Fish Habitat Valued Component                                                | Response is satisfactory to EAO |
| IR-WG2-95 | 17-Apr-20               | EAO | Heritage              | dAIR, Section 7.1<br>Heritage Resources<br>Valued Component                  | Heritage Resources Review of the Bulkley Timber Supply Area (Rabnett, 200) is missing the year                                                                                                                                                                                                                                                                                                                                                                                                                                                               | We appreciate your comment. TCL has updated this section of the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N/A                                                                                               | Response is satisfactory to EAO |
| IR-WG2-96 | 17-Apr-20               | EAO | Heritage              | dAIR, Section 11.1<br>Indigenous Interests                                   | Text edit: A summary of <del>publicly</del> publicly available arrangements or agreements reached between the proponent and Indigenous Groups.                                                                                                                                                                                                                                                                                                                                                                                                               | We appreciate your comment. The text has been edited in Section 11.1, with the original sentence being removed.                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Section 11.1 Introduction                                                                         | Response is satisfactory to EAO |
| IR-WG2-97 | 17-Apr-20               | EAO | EA / Permitting       | dAIR, Section 13.0<br>Management Plans                                       | Other typical plans include:<br>-Blasting and Vibration                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | We appreciate your comment. Vibration as a result of blasting will be covered in the Explosives Management Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                                                                               | Response is satisfactory to EAO |
| IR-WG2-98 | 17-Apr-20               | EAO | EA / Permitting       | dAIR, Section 13.0<br>Management Plans                                       | Text Edit: Spill (Prevention and) Response Plan;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | We appreciate your comment. TCL has updated the text to Fuel Management and Spill Control Plan in Section 13.0.                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Section 13.0 Management Plans                                                                     | Response is satisfactory to EAO |
| IR-WG2-99 | 8-Sep-20                | EAO | EA / Permitting       | dAIR, Preface to the AIR                                                     | Proposed is struck out in the defined term but only removed within this paragraph and no where else in the dAIR. Please review and revise.                                                                                                                                                                                                                                                                                                                                                                                                                   | We appreciate your comment. TCL has made this update throughout the AIR document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |

**Tenas - Draft Application Information Requirements Working Group Issues Tracking Table**

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| IR-WG2-100           | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Text Edit: ...November 6, 2018, confirming that...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | We appreciate your comment. TCL has updated the text on page 1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Preface to the AIR                                                                                | Response is satisfactory to EAO |
| IR-WG2-101           | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Text Edit (changed to not italic): (Act) and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | We appreciate your comment. TCL has updated the text on page 1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Preface to the AIR                                                                                | Response is satisfactory to EAO |
| IR-WG2-102           | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Text Edit: On November 27, 2018, the Province of BC passed a new Environmental Assessment Act, 2018 (Act) and, <del>...This Act</del> was brought into force on December 16, 2019. Proponents with a Section 11 Order under the 2002 Act <del>may</del> could specify whether they wish to continue their EA under the former Act or transition the EA proceedings to the new Act. Notice <del>must</del> was to be provided by June 16, 2020. On March 4, 2020, the Proponent submitted a letter to the EAO specifying its intent to continue under the <del>previous</del> 2002 Act. | We appreciate your comment. TCL has updated the text on page 1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Preface to the AIR                                                                                | Response is satisfactory to EAO |
| IR-WG2-103           | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Can update if TCL has received information from IAA: The Proponent contacted IAAC to confirm that the Project is not reviewable under the IAA and was informed on April 23, 2020, that comments will be received in a few weeks.                                                                                                                                                                                                                                                                                                                                                       | We appreciate your comment. TCL has updated the text on page 1 as follows:<br>On August 28, 2019, the IAA 2019 came into force. The IAA 2019 creates the new Impact Assessment Agency of Canada and repeals the CEAA 2012. Environmental Assessment under the IAA is not required for the proposed Project because the proposed production capacity is well under the 5,000 tonnes per day coal production threshold for the construction, operation, decommissioning and abandonment of a new coal mine as defined in 16(d) of the Regulations Designating Physical Activities. IAAC confirmed on June 1, 2020 that the Project is not reviewable under the IAA.  | Preface to the AIR                                                                                | Response is satisfactory to EAO |
| IR-WG2-104           | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Related to map above (Figure 1), is there a way to add a smaller map of BC in the corner, so when it is posted publicly it can provide people with a better sense of the location.                                                                                                                                                                                                                                                                                                                                                                                                     | We appreciate your comment. TCL has updated Figure 1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Preface to the AIR                                                                                | Response is satisfactory to EAO |
| IR-WG2-105           | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Text Edit: BC Ministry of Jobs, Trades and Technology;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | We appreciate your comment. TCL has updated the text on page 3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Preface to the AIR                                                                                | Response is satisfactory to EAO |
| IR-WG2-106           | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Text Edit: Telkwa Coal has evaluated several Projects in Canada such as which included three properties in northeast BC                                                                                                                                                                                                                                                                                                                                                                                                                                                                | We appreciate your comment. TCL has re-written this section and removed this language from the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Section 1.4 Alternatives to the Proposed Project                                                  | See Round 2                     |
| IR-WG2-106 (Round 2) | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Not Resolved - Cannot find where this change has been made in the AIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | The language was completely overhauled in this section and we no longer refer to specific projects in the northeast.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Section 1.4 Alternatives to the Proposed Project                                                  | See Round 3                     |
| IR-WG2-107           | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Can update if TCL has received information from IAA: The Proponent contacted IAAC to confirm that the Project is not reviewable under the IAA and was informed on April 23, 2020, that comments will be received in a few weeks.                                                                                                                                                                                                                                                                                                                                                       | We appreciate your comment. TCL has updated the text on page 18 as follows:<br>On August 28, 2019, the IAA 2019 came into force. The IAA 2019 creates the new Impact Assessment Agency of Canada and repeals the CEAA 2012. Environmental Assessment under the IAA is not required for the proposed Project because the proposed production capacity is well under the 5,000 tonnes per day coal production threshold for the construction, operation, decommissioning and abandonment of a new coal mine as defined in 16(d) of the Regulations Designating Physical Activities. IAAC confirmed on June 1, 2020 that the Project is not reviewable under the IAA. | Preface to the AIR                                                                                | Response is satisfactory to EAO |
| IR-WG2-108           | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Please revise "Issues Scoping and Selection of Valued Components" to include ICs where applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |

**Tenas - Draft Application Information Requirements Working Group Issues Tracking Table**

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| IR-WG2-109 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | "Because an assessment is completed for a VC, the receptor for the effects, an assessment of an IC is not completed to avoid redundancy in the assessments" - This is not correct-an assessment of an IC is required as noted below. Significance is not required for an IC. | TCL's original approach of identifying Valued Components (VCs) and Intermediate Components (ICs) followed the BC EAO Guideline for the Selection of Valued Components and Assessment of Potential Effects (2013). ICs were identified for this Project as components along an effect pathway between the Project and the ultimate receptor VC. This often used concept is focusing on identifying VCs as the ultimate receptor or component that is of concern, and differentiates VCs from ICs which are not considered endpoints. The effects assessment for VCs and ICs is very similar, with the exception of the significance determination which is limited to the ultimate receptor VC assessment. However, TCL has decided to simplify the approach and only use the concept of VCs to assess Project effects (including significance determination) on all important components that were identified collaboratively through the VC/IC selection process. With this change, all components will now be considered endpoints of the Project effect pathway. Linkages among VCs will be identified for each VC, and changes in one VC that may affect another VC will be described within the receptor VCs (e.g., water quality linkages will be discussed in fish / fish habitat as one of its linked/receptor VCs). | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-WG2-110 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | "Table 4: Intermediate Components and Subcomponents for the Tenas Project" - Are you able to provide a table that shows the pathway from ICs to VCs?                                                                                                                         | TCL's original approach of identifying Valued Components (VCs) and Intermediate Components (ICs) followed the BC EAO Guideline for the Selection of Valued Components and Assessment of Potential Effects (2013). ICs were identified for this Project as components along an effect pathway between the Project and the ultimate receptor VC. This often used concept is focusing on identifying VCs as the ultimate receptor or component that is of concern, and differentiates VCs from ICs which are not considered endpoints. The effects assessment for VCs and ICs is very similar, with the exception of the significance determination which is limited to the ultimate receptor VC assessment. However, TCL has decided to simplify the approach and only use the concept of VCs to assess Project effects (including significance determination) on all important components that were identified collaboratively through the VC/IC selection process. With this change, all components will now be considered endpoints of the Project effect pathway. Linkages among VCs will be identified for each VC, and changes in one VC that may affect another VC will be described within the receptor VCs (e.g., water quality linkages will be discussed in fish / fish habitat as one of its linked/receptor VCs). | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-WG2-111 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Text Edit: Changes were made based on EAO input and the revised draft was distributed to the Advisory Working Group members on February 26, 2019, for review and comment.                                                                                                    | We appreciate your comment. TCL has updated the text in Section 3.1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 3.1 Issues Scoping and Selection of Valued Components                                             | Response is satisfactory to EAO |
| IR-WG2-112 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Please revise to include IC. I have included this comment for each section. I recognize the black writing is from our template and the blue is TCL. However, it is confusing to not have the IC referenced in the black and therefore should also reflect VC/IC.             | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment. There are no longer references to ICs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-WG2-113 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Please revise to include IC                                                                                                                                                                                                                                                  | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-WG2-114 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Please revise to include IC                                                                                                                                                                                                                                                  | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |

Tenas - Draft Application Information Requirements Working Group Issues Tracking Table

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| IR-WG2-115 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Please revise to include IC                                                                                                                                                                                                                                                                      | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment. No update has been made to the dAIR on page 27 and page 28.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-WG2-116 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Please revise to include IC                                                                                                                                                                                                                                                                      | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-WG2-117 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Please revise so it is clear this applies to VCs and ICs                                                                                                                                                                                                                                         | TCL’s original approach of identifying Valued Components (VCs) and Intermediate Components (ICs) followed the BC EAO Guideline for the Selection of Valued Components and Assessment of Potential Effects (2013). ICs were identified for this Project as components along an effect pathway between the Project and the ultimate receptor VC. This often used concept is focusing on identifying VCs as the ultimate receptor or component that is of concern, and differentiates VCs from ICs which are not considered endpoints. The effects assessment for VCs and ICs is very similar, with the exception of the significance determination which is limited to the ultimate receptor VC assessment. However, TCL has decided to simplify the approach and only use the concept of VCs to assess Project effects (including significance determination) on all important components that were identified collaboratively through the VC/IC selection process. With this change, all components will now be considered endpoints of the Project effect pathway. Linkages among VCs will be identified for each VC, and changes in one VC that may affect another VC will be described within the receptor VCs (e.g., water quality linkages will be discussed in fish / fish habitat as one of its linked/receptor VCs). | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-WG2-118 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Please revise to include IC                                                                                                                                                                                                                                                                      | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-WG2-119 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Text Edit: The following major Projects and activities have been preliminarily identified as possible candidates for inclusion in the assessment of cumulative effects-effects in consideration of the potential for their residual effects to interact with the residual effects of the Project | We appreciate your comment. TCL has updated the text in Section 3.8.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Section 3.8.1 Identifying Past, Present or Reasonably Foreseeable Projects and/or Activities      | Response is satisfactory to EAO |
| IR-WG2-120 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Text Edit: Prince Rupert Gas Transmission;Transmission;                                                                                                                                                                                                                                          | We appreciate your comment. TCL has updated the text in Section 3.8.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Section 3.8.1 Identifying Past, Present or Reasonably Foreseeable Projects and/or Activities      | Response is satisfactory to EAO |
| IR-WG2-121 | 8-Sep-20 | EAO | EA / Permitting | dAIR, Preface to the AIR | Please revise to include IC                                                                                                                                                                                                                                                                      | We appreciate your comment. The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |

**Tenas - Draft Application Information Requirements Working Group Issues Tracking Table**

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| IR-WG2-122           | 8-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Previous comment: It would be helpful if you added a column on the right showing the receptors for which the IC is the primary pathway to potential effects of the project ie. Names of plants for AQ                                                                                                                        | We appreciate your comment. We have assessed all linked components together using an effects pathway approach. Linkages among VCs will be identified for each VC, and changes in one VC that may affect another VC will be described within the receptor VCs (e.g., water quality linkages will be discussed in fish / fish habitat as one of its linked/receptor VCs). A column was added in Table 3 to identify VC linkages and text was provided in Section 3.1 to describe how linkages will be addressed.                                                                                     | Section 3.1 Issues Scoping and Selection of Valued Components              | Response is satisfactory to EAO |
| IR-WG2-123           | 8-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Can we put this in a table instead? The way it is presented in TCL ppt on May 6, easier to read and to compare between the LSA and the RSA.                                                                                                                                                                                  | We appreciate your comment. None of the other LSA/RSA descriptions use a table format. All use a bullet format. This one is the longest description but for consistency we suggest to use bullet lists throughout.                                                                                                                                                                                                                                                                                                                                                                                 | N/A                                                                        | Response is satisfactory to EAO |
| IR-WG2-124           | 8-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | "This VC assessment may support and be supported by the following IC and VC assessments" - Water? This is why it will be important to have a table to show the pathway of the IC and VC so we can confirm if this section is complete.                                                                                       | We appreciate your comment. We have assessed all linked components together using an effects pathway approach. Linkages among VCs will be identified for each VC, and changes in one VC that may affect another VC will be described within the receptor VCs (e.g., water quality linkages will be discussed in fish / fish habitat as one of its linked/receptor VCs). Surface and groundwater are now VCs. They also are included as linkages. A column was added in Table 3 of the AIR to identify VC linkages and text was provided in Section 3.1 to describe how linkages will be addressed. | Section 3.1 Issues Scoping and Selection of Valued Components              | Response is satisfactory to EAO |
| IR-WG2-125           | 8-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Text Edit: Weed Control Act. RSBC 1996. Chapter 487 (Province of BC 1996) and Weed Control Regulations (Province of BC 2011)                                                                                                                                                                                                 | We appreciate your comment. TCL has updated the text in Section 4.7.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Section 4.7.2 Existing Conditions                                          | Response is satisfactory to EAO |
| IR-WG2-126           | 8-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Text Edit:...sites connected with important names, legends, and stories, and teaching and learning sites -(resulting from site clearing, infrastructure, roads).                                                                                                                                                             | We appreciate your comment. TCL has updated the text in Section 11.4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Section 11.4 Potential Effects on the Wet'suwet'en Rights and Interests    | Response is satisfactory to EAO |
| IR-WG2-127           | 8-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Text size edit (12pt): Due to the unique nature of Indigenous rights, the Application will make no determination of the significance of residual adverse effects on Wet'suwet'en interests.                                                                                                                                  | We appreciate your comment. TCL has updated the text in Section 11.6.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Section 11.6 Scope of Assessment of Wet'suwet'en Rights and Interests      | Response is satisfactory to EAO |
| IR-WG2-128           | 8-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Suggest if you want to add the word accommodation include in the title for 11.9 as it speaks to proposed measures and which could include the development of accommodation measures<br>Text Edit: Consultation and Accommodation                                                                                             | We appreciate your comment. TCL has updated the heading to read <b>11.10 Consultation</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Section 11.10 Consultation                                                 | Response is satisfactory to EAO |
| IR-WG2-129           | 3-Sep-20 | EAO | Aquatic Resources | dAIR, Preface to the AIR | Addition comment on IR-WG2-04: Descriptions of the Fish & Fish Habitat VC and Aquatic Resources IC LSAs and RSAs do not match in the dAIR as indicated in the tracking table. If both have the same LSAs and RSAs, please ensure the spatial study area boundary descriptions match in Sections 4.5.1 and 4.6.1 of the dAIR. | We appreciate your comment. TCL has updated the text section 4.5.1 and 4.6.1 to match as follows:<br><ul style="list-style-type: none"> <li>• LSA: Fish habitats within the Project footprint, Four Creek, and Tenas and Goathorn Creeks downstream of the mine footprint; and from 100 m upstream to 300-1000 m downstream on watercourses crossed by the Bypass Road.</li> <li>• RSA: Fish habitats in the Telkwa River watershed and in the tributaries to the Bulkley River crossed by the Bypass Road.</li> </ul>                                                                             | Section 4.5.1 Context and Boundaries, Section 4.6.1 Context and Boundaries | Response is satisfactory to EAO |
| IR-WG2-130           | 3-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Addition comment on IR-WG2-18: Linkages to the Community Health and Well-being VC are not included in the dAIR (section 7.1, page 121). Please revise accordingly.                                                                                                                                                           | We appreciate your comment. TCL has updated the text in Section 7.1 to include the community well-being VC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Section 7.1 Heritage Resources Valued Component                            | See Round 2                     |
| IR-WG2-130 (Round 2) | 3-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Not Resolved - In TCL's response, please remove Human Health VC as it is not a link to the Heritage Resources VC.                                                                                                                                                                                                            | Change made.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Section 7.1 Heritage Resources Valued Component                            | Response is satisfactory to EAO |
| IR-WG2-131           | 3-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Addition comment on IR-WG2-19: Accidents and malfunctions (Section 9.0) does not include any linkage to VCs/ICs. As with Effects of the Environment on the Project, please include "A conclusion about the potential risk" of Accidents and Malfunctions on relevant VCs/ICs.                                                | Thank you for your comment. This text has been added to Section 9.0 of the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Section 9.0 Accidents and Malfunctions                                     | Response is satisfactory to EAO |
| IR-WG2-132           | 3-Sep-20 | EAO | EA / Permitting   | dAIR, Preface to the AIR | Addition comment on IR-WG2-25: TCL notes that the dAIR has been revised to address this comment from ECCC but the EAO cannot find where this change has been made. Please specify in the tracking table.                                                                                                                     | We appreciate your comment. We agree that this is the commitment. It was inadvertently missed from the dAIR. We have clarified the language in the AIR document in Section 4.9.2 as follows:<br>-Modelling of habitat suitability for migratory breeding birds using the habitat guild approach. Wetland, Open, and Forest guilds will be used.                                                                                                                                                                                                                                                    | Section 4.9.2 Existing Conditions                                          | Response is satisfactory to EAO |

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| IR-WG2-133 | 3-Sep-20  | EAO             | EA / Permitting   | dAIR, Preface to the AIR | Addition comment on IR-WG2-26: TCL notes that they have indicated “this is not an exhaustive list” in the dAIR but the EAO cannot find where this change has been made. Please specify in the tracking table.                                                                                                                                                    | We appreciate your comment. We agree that groundwater is protected under various legislation in addition to the BC <i>Water Sustainability Act</i> . Therefore, we have inserted both the BC <i>Environmental Management Act</i> and the BC <i>Mines Act</i> and have noted that this is not an exhaustive list in setion 4.4.2. We believe the public would be interested in knowing this.                                                                                                                                                                             | Section 4.4.2 Existing Conditions                                          | Response is satisfactory to EAO |
| IR-WG2-134 | 3-Sep-20  | EAO             | EA / Permitting   | dAIR, Preface to the AIR | Addition comment on IR-WG2-47: TCL notes that an update has been made to the dAIR but the EAO cannot find where this change has been made in section 3.1. Please specify in the tracking table.                                                                                                                                                                  | We appreciate your comment. These links were inadvertently missed and we have now added them in the AIR document, in Table 3 of Section 3.1                                                                                                                                                                                                                                                                                                                                                                                                                             | Section 3.1 Issues Scoping and Selection of Valued Components              | Response is satisfactory to EAO |
| IR-WG2-135 | 3-Sep-20  | EAO             | EA / Permitting   | dAIR, Preface to the AIR | Please provide a clean PDF version of the dAIR without any marks ups or <del>strike through</del> included. If providing a Word version of the dAIR please ensure it includes track changes to show where TCL has made edits to address WG comments                                                                                                              | We appreciate your comment. TCL has not created a track changes version containing WG comments. Instead, TCL will provide more detail in WG responses as discussed with EAO.                                                                                                                                                                                                                                                                                                                                                                                            | N/A                                                                        | Response is satisfactory to EAO |
| IR-WG2-136 | 3-Sep-20  | EAO             | EA / Permitting   | dAIR, Preface to the AIR | Table 3 and 4 - Include a column for all indicators related to each VC/IC subcomponent. Table 3 of the final Tenas VC scoping document is a good example to use.                                                                                                                                                                                                 | We appreciate your comment. TCL has added indicators and updated the text in Table 3, Section 3.1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section 3.1 Issues Scoping and Selection of Valued Components              | Response is satisfactory to EAO |
| IR-WG2-137 | 3-Sep-20  | EAO             | Aquatic Resources | dAIR, Preface to the AIR | Table 4: For clarity, the EAO suggests that “benthic invertebrates, periphyton and sediment quality” be added after the Aquatic Resources IC in the table or in the subcomponents column of the table to ensure there is clear distinction from the Fish and Fish Habitat VC. For other EAs, Aquatic Resources often includes Fish and Fish Habitat in the dAIR. | We appreciate your comment. TCL has updated the text in Table 3 (Section 3.1) to include benthic invertebrates, periphyton and sediment quality as a description of the Aquatic Resources Valued Component.                                                                                                                                                                                                                                                                                                                                                             | Section 3.1 Issues Scoping and Selection of Valued Components              | Response is satisfactory to EAO |
| IR-WG2-138 | 3-Sep-20  | EAO             | Aquatic Resources | dAIR, Preface to the AIR | Please revise as either Figure 8 or Figure 9, not both.                                                                                                                                                                                                                                                                                                          | Thank you for your comment. The figure has been updated .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Section 4.5.1 Context and Boundaries, Section 4.6.1 Context and Boundaries | Response is satisfactory to EAO |
| IR-WG2-139 | 3-Sep-20  | EAO             | Human Health      | dAIR, Preface to the AIR | Figure 17: Please note that <b>all</b> relevant study area boundaries (e.g. spatial, temporal, administrative and technical) are required to be established prior to the EAO finalizing the AIR. The EAO encourages TCL to work with ENV as soon as possible to determine the appropriate spatial study area boundaries for the Health VC.                       | Thank you for your comment. ENV has confirmed TCL's approach (LSA) and stated the risk: The modelling domain needs to include the areas where the modelled concentrations reach 10% of the applicable Air Quality Objective (AQO). If this condition isn’t met in the model results with the reduced domain size then the domain may need to be larger to accommodate this condition and could result in a need to remodel. TCL believes that the LSA is sufficient for concentrations to not reach 10% of the objectives. No changes to the AIR document are required. | N/A                                                                        | Response is satisfactory to EAO |
| IR-WG2-140 | 3-Sep-20  | EAO             | EA / Permitting   | dAIR, Preface to the AIR | A hazard identification and risk assessment is required in the Accidents and Malfunction section. Please include in Section 9.0 of the dAIR.                                                                                                                                                                                                                     | As per correspondence sent by the EAO on September 11, 2020 - "Further to the EAO comment provided in my September 3, 2020 email below regarding section 9.0 Accidents and Malfunctions of the Tenas dAIR, the EAO would like to clarify that a hazard identification and risk assessment is a federal dAIR requirement for coordinated or substituted EAs and does not apply to the Tenas Project. Please disregard this EAO comment." No changes to the AIR document are required.                                                                                    | N/A                                                                        | Response is satisfactory to EAO |
| IR-WG2-141 | 3-Sep-20  | EAO             | Wet'suwet'en      | dAIR, Preface to the AIR | The EAO suggests revising the heading to “Part C - Wet’suwet’en <b>Title</b> , Rights and Interests” as title will be an important topic to the Wet’suwet’en.                                                                                                                                                                                                    | This comment has been noted. As discussed, TCL is of the understanding that land title is a matter between the Wet'suwet'en and the Crown. No change has been made to the dAIR.                                                                                                                                                                                                                                                                                                                                                                                         | N/A                                                                        | Response is satisfactory to EAO |
| IR-WG2-142 | 3-Sep-20  | EAO             | Wet'suwet'en      | dAIR, Preface to the AIR | Please work with Office of the Wet’suwet’en during AIR development to determine any Wet’suwet’en-specific VCs.                                                                                                                                                                                                                                                   | Thank you for your comment. The Office of Wet'suwet'en provided comments to our dAIR on September 2, 2020 and we have provided responses. We will continue to work with the Wet’suwet’en based on the work plan which they provided to us and our project assessment agreement. No changes to the AIR document are required.                                                                                                                                                                                                                                            | N/A                                                                        | Response is satisfactory to EAO |
| IR-WG2-143 | 11-Sep-20 | EAO             | EA / Permitting   | dAIR, Preface to the AIR | Please include a list of potential accidents and malfunctions for the Tenas Project.                                                                                                                                                                                                                                                                             | Thank you for your comment. A list of potential accidents and malfunctions is provided in Section 9.0.                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Section 9.0 Accidents and Malfunctions                                     | Response is satisfactory to EAO |
| IR-WG2-144 | 5-Feb-21  | EMLI Geoscience | EA / Permitting   | dAIR, Preface to the AIR | Please note that the correct agency name is the BC Ministry of Energy, Mines and Low Carbon Innovation                                                                                                                                                                                                                                                           | Noted, change to the dAIR has been made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | dAIR, Preface to the AIR                                                   | Response is satisfactory to EAO |

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| IR-WG2-145 | 5-Feb-21  | EMLI Geoscience | Surface Water            | dAIR, Section 4.3.3<br>Potential Effects | EMLI expects that the site-wide water balance and water quality models incorporate the results of the groundwater numerical flow model(s) in order to delineate surface water-groundwater interactions and potential effects to both surface water quantity and surface water quality.                                                                                             | A site-wide water balance and water quality model which incorporates the results of the groundwater numerical flow model to delineate surface water-groundwater interactions and potential effects to both surface water quantity and surface water quality will be included in the EA. This is covered in sections 4.3 and 4.4 of the dAIR. An additional sentence will be included in the dAIR to make this clear.                                                                                         | dAIR, Section 4.3.3<br>Potential Effects | Response is<br>satisfactory to<br>EAO |
| IR-WG2-146 | 5-Feb-21  | EMLI Geoscience | Surface Water            | dAIR, Section 4.3.3<br>Potential Effects | EMLI expects that the site-wide water balance and water quality models incorporate appropriate sensitivity analyses and contingencies for water sources and discharges.                                                                                                                                                                                                            | The EA will include appropriate sensitivity analyses of model inputs and assumptions and will be used to identify contingencies for water sources and discharge, presented in sections 1.3 and 4.3 of the dAIR and the corresponding technical report in appendices. In other words, we have tested the model under a range of conditions, such as wet and dry years, high source terms, high or low groundwater flow rates, etc. All of these will be incorporated in the water and load balance reporting. | N/A                                      | Response is<br>satisfactory to<br>EAO |
| IR-WG2-147 | 12-Feb-21 | FLNR Recreation | Land and Resource<br>Use | dAIR                                     | In consideration of the Telkwa FSR being an extremely popular area for motorizing recreation – mainly snowmobiling and off-road vehicle – there could be an impact to local business if unacceptable noise or visuals result in decreased use. “Economic Development” is listed as one of the VC’s. Is this the correct value for describing my concern?                           | Economic development is one several VCs which support assessment of the Land and Resource Use VC. A potential impact to local business will be supported by the Economic Development value. However, your concern also references a potential change in existing public use of the Telkwa FSR due to sensory disturbance, a Land and Resource Use VC subcomponent. This assessment will supported of the Atmospheric Environment and Visual Resources VCs.                                                   | N/A                                      | Response is<br>satisfactory to<br>EAO |
| IR-WG2-148 | 12-Feb-21 | FLNR Recreation | Land and Resource<br>Use | dAIR                                     | The master plan references “Management Plans” as the place to find mitigation strategies. This is what I’m most interested in. Are these plans available for review?                                                                                                                                                                                                               | We appreciate your comment. We confirm that this information will be included in the application. No changes to the AIR document are required.                                                                                                                                                                                                                                                                                                                                                               | N/A                                      | Response is<br>satisfactory to<br>EAO |
| IR-WG2-149 | 12-Feb-21 | FLNR Recreation | Land and Resource<br>Use | dAIR                                     | I do not see the recreation mapping layers – there are two: one for polygons and one for linear features – included on any of the maps. However, the BC Parks layer is included. These layers are included in the BCGW database. As well, I sent the kmls to Dan Farmer. Can these layers be added to the applicable maps, please, under Visuals, Noise and Land and Resource Use? | Thank you for your comment. We confirm the requested recreation mapping layers (polygons and linear features) can be added to the applicable maps for the Visual Resources, Atmospheric Environment and Land Resource Use VC assessments.                                                                                                                                                                                                                                                                    | N/A                                      | See Round 2                           |

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| IR-WG2-149<br>(Round 2) | 12-Feb-21 | FLNR Recreation | Land and Resource Use | dAIR | Not resolved - checking the d-AIR today, June 8, 2021, the recreation layers are not included on any of the maps.                                                                                                                                                                                                                                                                                                                                                      | <p>We confirm the requested recreation mapping layers (polygons and linear features) will be added to the applicable maps for the Visual Resources and Land Resource Use VC assessments in the EA Application.</p> <p>We would also like to take this opportunity to make a correction to our original response to this request. The recreation mapping layers will not be added to the figures associated with the Atmospheric VC-chapter. The Atmospheric VC (noise and air quality subcomponents) considers sensitive receptors. Sensitive receptors were selected in accordance with standard practice, the BC Air Quality Dispersion Modelling Guidelines, and the BC Noise Control Best Practices Guideline. For AQ - Sensitive receptors were defined at locations where sensitive individuals may be present and exposed to ambient concentrations. These include private residences outside of Telkwa, cabins, schools, and childcare facilities. The Backcountry Horsemen of BC's camp (the horsemen camp) located within Telkwa Coal property, just off the Tenas Access Corridor, was also included for community interest and due diligence. For noise - Sensitive receptor points include permanently or seasonally occupied structures used for habitation purposes, including private residences, cabins, and the Backcountry Horsemen of BC's camp (the horsemen camp) where noise limits (i.e., BC Oil and Gas Commission permissible sound levels) apply. Schools and childcare facilities were also included for consistency with air quality modelling and to consider exposure to potentially sensitive individuals.</p> <p>Potential effects to recreation will be assessed in the Land and Resource Use VC-chapter. And potential effects to visual quality will be assessed in the Visual Resources VC-chapter, by assessing potential project-related effects to 18 representative viewpoints, seven of which are recreational-type (sites or trails).</p> | N/A | Response is satisfactory to EAO |
| IR-WG2-150              | 12-Feb-21 | FLNR Recreation | Land and Resource Use | dAIR | I would prefer to see a heading titled "public recreation" if possible.                                                                                                                                                                                                                                                                                                                                                                                                | Public Recreation Use will be assessed in the EA and is included as a subcomponent for the Land and Resource Use VC in Table 3 of the dAIR. No changes to the dAIR are required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N/A | Response is satisfactory to EAO |
| IR-WG2-151              | 24-Feb-21 | FLNR Recreation | Atmospherics          | dAIR | <p>Impact of dust</p> <ol style="list-style-type: none"> <li>1. In visual quality.</li> <li>2. How far will dust travel?</li> <li>3. How will that affect other VC's?</li> <li>4. Dust in water (fish?)</li> <li>5. Dust in the air? (avian species)</li> <li>6. Dust on nearby glaciers?</li> <li>7. Accelerate affects of climate change in terms of melting glacial ice?</li> <li>8. Dust transported to community public spaces on vehicles and people.</li> </ol> | A baseline air quality monitoring program (dAIR Section 4.1.2) has been conducted to monitor representative dustfall and particulate matter conditions at the Project Area. The Air Dispersion Model and Report considers baseline data results and predictions for dustfall and particulate matter resulting from the Project. The model results will inform the Air Quality VC assessment (dAIR Section 4.1), as well as other VCs including, but not limited to, Human Health, Surface Water, Wildlife, Avian Species, Aquatic Resources, Fish and Fish Habitat, and Visual Resources (dAIR sections 8.0, 4.3, 4.8, 4.9, 4.5 and 4.6). Mitigation measures will be applied (e.g., proven dust suppression techniques will be implemented) during all phases of the Project to meet permit requirements, which are guided by BC Air Quality Objectives (dAIR sections 1, 3.5, 4.1, and 15)+M156. An Air Quality Management Plan (including dust management) will be provided with the Application (dAIR Section 13), and will include details for the monitoring and adaptive management strategy procedures (dAIR Section 14) related to air quality and dustfall. The monitoring and adaptive management strategy (dAIR Section 14) will be designed to address dust management issues that may arise during the Project phases (e.g., whether there is potential for dust to be transported to communities or nearby glaciers).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | N/A | Response is satisfactory to EAO |

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| IR-WG2-152 | 24-Feb-21 | FLNR Recreation | Atmospherics          | dAIR                    | Noise - it travels and does affect mental health. Blasting will happen and will affect, negatively I think, people and wildlife, and so needs to be clearly presented.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The Noise Baseline Report (dAIR Section 4.1) includes monitoring data from existing conditions, which is considered in the Noise Model, which predicts the noise disturbance resulting from two Project scenarios: operations and blasting. Noise is accounted for as a sensory disturbance when assessing changes for Wildlife, Avian Species, and Human Health VCs (dAIR sections 4.8, 4.9 and 8.1).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N/A | Response is satisfactory to EAO |
| IR-WG2-153 | 24-Feb-21 | FLNR Recreation | Socio-economics       | dAIR                    | Social effects as a result of possible cultural change with a large industrial project - an open pit coal mine - does the community which is very mixed economically shift to more of an industrial or mining town? How could that affect the cultural identity of a recreation hub? or the tourism vibe? (I accept with COVID that is very challenged, but it is a key sector here). Any negative impact on water, fish, or wildlife will have negative impact on our community culture too. People live here to be on the water and on the land. Fish are important here. They are important to residents and to the angling guide business.                                                                                                                                                                                                                                 | We recognize the amenity features that make the Bulkley Valley a desirable place to live for current and potential future residents, including many of the natural and cultural amenities identified by the comment. The purpose of the draft AIR is to identify the information that is to be included in the Application. As described in the draft AIR (sections 4.0 to 14.0), the environmental assessment will address natural and amenity features valued in Telkwa and the Bulkley Valley, including visual quality, noise, effects on fish and wildlife, opportunities for (and quality of) recreation and other land uses, and overall sense of community well-being.                                                                                                                                                                                                                                                                                        | N/A | Response is satisfactory to EAO |
| IR-WG2-154 | 24-Feb-21 | FLNR Recreation | Community Well-Being  | dAIR                    | Community Well Being - It is noted but the current labour and housing shortages cannot be overstated. The housing shortage puts increased pressure on those or lower incomes. While a project like this will pay its employees well and they may find appropriate housing it will put increased pressure on those struggling now. I am only too aware in our community that housing shortages lead to serious social ills too. That can't be ignored. How people will be housed, or where the housing stock is anticipated to be needs to be determined.                                                                                                                                                                                                                                                                                                                       | Social and economic effects of the Project on a range of economic opportunities in the Local and Regional Study areas will be assessed as part of the Economic Development VC, Infrastructure and Services VC and Community Well-Being VC effects assessments (sections 5.2, 6.3, and 6.5 of the draft AIR). Property values, housing prices, the demand for, and the availability of housing are considered in relation to the cost of living in assessment of the Community Well-Being VC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N/A | Response is satisfactory to EAO |
| IR-WG2-155 | 8-Jun-21  | FLNR Recreation | Recreation and trails | dAIR (May 2021 version) | <p>The following established Recreation Sites and Trails are potentially impacted by the proposal:</p> <p>1) Microwave – Sinclair &amp; Telkwa Pass Motorized Trails – high use sled / ORV trail system across the valley from the proposed mine. Impacts: noise; visuals; economic; access.</p> <p>2) Hunter's Basin, Hankin Plateau, Webster Lake Hiking Trails – three popular trails accessed by way of the FSR proposed for inclusion in the mine. Access needs to be maintained to these trails and non in a challenging way that requires radios or check-ins with the mine. Impacts: noise; visuals, access.</p> <p>3) Jonas Creek and Telkwa River campgrounds – moderate use campgrounds, mainly used by motorized users, anglers or hunters. Impacts: noise; access.</p> <p>4) Non-legal / un-managed motorized use. Impacts: noise; visuals, economic, access.</p> | <p>Thank you for the comment. Potential project-related effects to recreation sites and trails will be considered in the Land and Resource Use VC-chapter in the EA application.</p> <p>The Atmospheric VC (which includes air quality and noise subcomponents) considers sensitive receptors which were selected in accordance with standard practice, the BC Air Quality Dispersion Modelling Guidelines, and the BC Noise Control Best Practices Guideline.</p> <p>The Economic Development VC-chapter will consider potential change in local or regional tourism as a result of the Project.</p> <p>Except for a portion of one of the Microwave Access routes (the route that connects to Pine Creek connector Snowmobile Trail REC168829), the Microwave-Sinclair &amp; Telkwa Pass Motorized Trails are outside of the Study Areas for the Atmospherics VC. The Project will not be visible from Microwave – Sinclair &amp; Telkwa Pass Motorized Trails.</p> | N/A | Response is satisfactory to EAO |

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|          |          |                            |               |                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Hunter’s Basin, Hankin Plateau, Webster Lake Hiking Trails - The current plan is that the public will be allowed access to recreation and hunting areas beyond the Project Area during the life of the project. The details will be outlined in the Public Access Management Plan, and will describe the processes and procedures to facilitate public access around and through the Project Area.</p> <p>The Webster Lake Trail was selected as a viewpoint that is representative of the Hunter Basin/Webster Plateau. Potential effects to this viewpoint will be assessed the EA Application.</p> <p>Access to the Jonas Creek and two Telkwa River rec sites will not be affected by the Project.</p> <p>TCL has no control over, nor supports, non-legal/un-managed motorized activity and cannot conduct an assessment of such.</p> |     |                                 |
| IR-OW-01 | 1-Oct-20 | Office of the Wet'suwet'en | EA/Permitting | dAIR                                                                                     | The Office of the Wet’suwet’en (OW) has completed a technical review of the draft Application Information Requirements (d-AIR) provided. Through this review we have identified several areas of concern with the d-AIR. We believe these areas of concern have the potential to hinder the Environmental Assessment (EA) process and should be addressed as early as possible. We appreciate the consideration and responsiveness Telkwa Coal Ltd. has shown to our previous interactions and hope to continue to maintain an open and cooperative relationship on this project going forward. For clarity, we have grouped our comments by topic. | Thank you. We appreciate and acknowledge this comment. We are committed to continuing to work with the OW to understand these concerns and resolve these together.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N/A | Response is satisfactory to EAO |
| IR-OW-02 | 1-Oct-20 | Office of the Wet'suwet'en | EA/Permitting | dAIR                                                                                     | The Wet’suwet’en reinforces the importance of clearly identifying issues and concerns up front, and expressing them in a consistent and thorough manner as the EA consultation process unfolds. This does not have to occur immediately. Indeed, there is some benefit to waiting until further information is provided before taking a position. However, as the process unfolds the OW’s position will be clearly and consistently articulated in a manner that is supported by the evidence.                                                                                                                                                     | Thank you, we acknowledge this comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A | Response is satisfactory to EAO |
| IR-OW-03 | 1-Oct-20 | Office of the Wet'suwet'en | EA/Permitting | dAIR                                                                                     | The Office of the Wet’suwet’en is in the initial stages of retaining some consultants to prepare reports and accumulate relevant data. As discussed, we think it would be most productive if we were involved in identifying the type of work required, and the scope and timing for the work. The purpose of this review is to establish the information that Telkwa Coal (Tenas Coal Project) is required to provide in the environmental effect’s evaluation, and the EAC Application, to be submitted to EAO for the EA review.                                                                                                                 | Thank you, we acknowledge this comment. We are happy to provide further detail on the studies we have conducted and present the information we have collected at the earliest convenience for the OW.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | N/A | Response is satisfactory to EAO |
| IR-OW-04 | 1-Oct-20 | Office of the Wet'suwet'en | EA/Permitting | Section 1.3 Project Design and/or Alternative Means of Carrying out the Project, page 15 | An assessment of the alternative means of carrying out the proposed Project that are technically and economically feasible including, but not limited to, the alternatives identified in the AIR; (P.16 of 135). The project description and potential alternatives considered are important for maintaining a mutual understanding of the project and its future and for guiding discussions during the EA.                                                                                                                                                                                                                                        | Thank you, we acknowledge this comment. The project description will be clearly described in the EA and alternative means detailed in section 1.3 of the EA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N/A | Response is satisfactory to EAO |
| IR-OW-05 | 1-Oct-20 | Office of the Wet'suwet'en | EA/Permitting | PROJECT DESCRIPTION AND ALTERNATIVES (P.22 of 135)                                       | The Application will include the rationale for any differences in boundaries from those presented in the final AIR. (P.22 of 135)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The study areas proposed in the final AIR are intended to be carried forward into the Environmental Assessment. If revisions are required, the rationale will be provided.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N/A | Response is satisfactory to EAO |

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| IR-OW-06 | 1-Oct-20 | Office of the Wet'suwet'en | EA/Permitting | PROJECT DESCRIPTION AND ALTERNATIVES               | <p>Unfortunately, it does not appear that the basic details like the size and production capacity of the project are still unclear. In particular, we are unclear of the plans for the Telkwa North and Goathorn deposits adjacent to the Tenas Project and also owned by Telkwa Coal Ltd.(Shapefiles of the sites were utilized for the determination of EA Process; and Shareholder information on the Project), but not mentioned in the Project Description or in the list of reasonably foreseeable projects proposed for the cumulative effects assessment. This suggests that Telkwa Coal does not intend to develop these deposits within the 25-year life of the project, but this point requires specific clarification from Telkwa Coal. Similarly, while Allegiance Coal Ltd. has indicated previously that the Tenas Project mine size may be increased to 1.35 million clean tonnes per year, the Project Description does not indicate this possibility as a potential alternative and therefore requires further clarification.</p> <p>Regardless of what Telkwa Coal Ltd. plans for the additional deposits and production potential, they must be addressed. Otherwise, uncertainties about these potential future developments are likely to continue to derail discussion of the Tenas Project throughout the EA process. It is imperative that the project development avoid the worst-case scenario: one in which it is assumed by all other parties that the Project Description accurately describes the future project, only for the project to alter drastically post-EA with the addition of more pits or coal production. Such a scenario could seriously impact the relationship and trust between Telkwa Coal LTD, and the OW and the Wet'suwet'en people.</p> | <p>We have no plans to develop either the Goathorn or Telkwa North deposits, or any other coal deposits, within our tenure across the Telkwa coalfield, during the mine life of the Tenas Project.</p> <p>Furthermore, following the series of economic studies undertaken in relation to the development of the coal resources within the Tenas deposit, the annual production rate as it will appear in its application for an environmental certificate will be in the range of 775,000 to 825,000 tonnes.</p> <p>If we decide to either develop another coal resource in the Telkwa coalfield, or increase the rate of production of its Tenas Project, those initiatives will be the subject of further regulatory review.</p>                                                                           | N/A                                                                                           | Response is satisfactory to EAO |
| IR-OW-07 | 1-Oct-20 | Office of the Wet'suwet'en | EA/Permitting | PROJECT DESCRIPTION AND ALTERNATIVES (P.26 of 135) | The following major projects have been preliminary identified as possible candidates for inclusion in the assessment of cumulative effects. The list will be further refined based on input from the Working Group and EAO. (P.26 of 135)<br>Missing: Pacific Northern Gas (Alta-Gas pipeline); BC Hydro-Bulbous Toe; BC Hydro PGTC; TC Expansion(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | It appears that the comment may be related to the September 2019 version of the dAIR and not the May 2020 version of the dAIR. Pacific Northern Gas (Alta-Gas pipeline) and the BC Hydro PGTC; TC Expansion(s) projects were included in the May 2020 dAIR. BC Hydro-Bulbous Toe has been added to the most up to date version of the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Section 3.8.1 Identifying Past, Present, or Reasonably Foreseeable Projects and/or Activities | Response is satisfactory to EAO |
| IR-OW-08 | 1-Oct-20 | Office of the Wet'suwet'en | Noise         | (P.28 of 135)                                      | MISSING: Change in noise levels: Increased Traffic; Increased Train coupling; whistling. (P.28 of 135)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | We confirm that increased traffic, increased train coupling, and whistling will be accounted for in the noise modelling assessment and factored within the existing noise indicators.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | N/A                                                                                           | Response is satisfactory to EAO |
| IR-OW-09 | 1-Oct-20 | Office of the Wet'suwet'en | Soils/Terrain | (P.35 of 135)                                      | Tenas Coal Project: Terrestrial Baseline Studies (pending) (P.35 of 135) Has this been supplied?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Final Terrestrial baseline reports are still being drafted but we invite the OW to attend a wildlife baseline workshop at the OW's earliest convenience to review the studies completed to date.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | N/A                                                                                           | Response is satisfactory to EAO |
| IR-OW-10 | 1-Oct-20 | Office of the Wet'suwet'en | Soils/Terrain | (P.36 of 135)                                      | Require: Mitigation Measures; Residual Effects; Cumulative Effects (If Identified). Are there any identified? Otherwise this will remain empty of assessment. (P.36 of 135)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Residual effects assessment has not yet been completed. If there are residual effects these will be carried through to the cumulative effects assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N/A                                                                                           | Response is satisfactory to EAO |
| IR-OW-11 | 1-Oct-20 | Office of the Wet'suwet'en | Surface Water | (P.37 of 135)                                      | Missing: Heavy Metals as an indicator, what are the Dissolved elements? Request: e-DNA sampling to connect with species within system. Genetic markers will be valuable for future monitoring.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>The aquatic effects assessment includes consideration of water quality parameters assessed in the surface water component, including total and dissolved metal concentrations, as an indicator of surface water quality. The dissolved elements that will be considered are aluminum, antimony, arsenic, barium, beryllium, boron, cadmium, calcium, chromium, cobalt, copper, iron, lead, lithium, magnesium, manganese, mercury, molybdenum, nickel, potassium, selenium, silica, silver, sodium, strontium, tin, uranium, vanadium and zinc.</p> <p>While eDNA analyses and genetic markers - which are relatively new monitoring parameters used in aquatic monitoring programs - are not routinely required for baseline studies, they may be considered as appropriate tools for future studies.</p> | N/A                                                                                           | Response is satisfactory to EAO |

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| IR-OW-12 | 1-Oct-20 | Office of the Wet'suwet'en | Surface Water     | (P.37 of 135) | <p>The OW are concerned that some components we consider important VCs have been identified as Intermediate Components (ICs) instead. In particular, we disagree that Water Quality and Aquatic Resources are best characterized as ICs, as impacts to ICs are only evaluated to the extent that it will also impact a VC under an assumption that their only value is to the VCs.</p> <p>Water Quality and Aquatic Resources should be assessed as VCs. Our view that healthy aquatic ecosystems and clean water have value outside of their contribution to the production of fish and as drinking water is based on both our cultural ways of being as Wet'suwet'en people and on our scientific understanding of ecology. As Wet'suwet'en people, we have a cultural obligation to respect and care for the lands and waters within our territory, and to maintain them for future generations. As such, clean water and healthy aquatic ecosystems have value to us beyond their current use by fish, wildlife, and as drinking water.</p> | <p>The original approach of identifying Valued Components (VCs) and Intermediate Components (ICs) followed the BC EAO Guideline for the Selection of Valued Components and Assessment of Potential Effects (2013). Both ICs and VCs are important components. ICs were identified for this Project as components along an effect pathway between the Project and the ultimate receptor VC. This often used concept is focusing on identifying VCs as the ultimate receptor or component that is of concern, and differentiates VCs from ICs which are not considered endpoints. The effects assessment for VCs and ICs is very similar, with the exception of the significance determination which is limited to the ultimate receptor VC assessment.</p> <p>Nevertheless, we have decided to simplify the approach and only use the concept of VCs to assess Project effects (including significance determination) on all important components that were identified collaboratively through the VC/IC selection process. With this change, all components will now be considered endpoints of the Project effect pathway. Linkages among VCs will be identified for each VC, and changes in one VC that may affect another VC will be described within the receptor VCs (e.g., water quality linkages will be discussed in fish / fish habitat as one of its linked/receptor VCs).</p> | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-OW-13 | 1-Oct-20 | Office of the Wet'suwet'en | Surface Water     | (P.37 of 135) | <p>Likewise, current scientific understanding does not support the idea that individual components of an ecosystem (such as fish) can be maintained without maintaining the ecosystem itself. Ecosystems and the species in them are connected through complicated and interactive networks of impact pathways and feedback loops. It is impossible for Telkwa Coal to accurately assess all of these pathways and their interactions within the limits of an EA in order to accurately assess impacts on fish and wildlife without assessing impacts on aquatic ecosystems. Rather than attempt that, it is far more feasible to assess impacts to aquatic resources and water quality directly and use maintenance of a healthy ecosystem as a proxy for maintaining all services provided by that ecosystem.</p>                                                                                                                                                                                                                             | <p>We have assessed all linked components together using an effects pathway approach. Linkages among VCs will be identified for each VC, and changes in one VC that may affect another VC will be described within the receptor VCs (e.g., water quality linkages will be discussed in fish / fish habitat as one of its linked/receptor VCs).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Section 3.1 Issues Scoping and Selection of Valued Components                                     | Response is satisfactory to EAO |
| IR-OW-14 | 1-Oct-20 | Office of the Wet'suwet'en | Surface Water     | (P.38 of 135) | <p>The water study boundaries are selected to account for near and far-field changes to surface water quantity and quality:</p> <p>-LSA: is defined where direct discharges occur to water courses within the vicinity of the mine (e.g., Tenas Creek, Four Creek, and Goathorn Creek), to the edge of the mixing zone in the Telkwa River, and downstream of the rail loadout in the Bulkley River</p> <p>-RSA: is assumed to extend to monitoring location WQS-12 in the Bulkley River, downstream of the confluence with the Telkwa River. The extent of the RSA will be confirmed through modelling. (P.38 of 135) Question: Has this (extent of the RSA) been supplied for review?</p>                                                                                                                                                                                                                                                                                                                                                     | <p>We intended for the RSA to include the furthest water quality monitoring station we have on the Bulkley River near Telkwa. We did notice errors in the dAIR figures and those will be corrected. Specifically, the regional study area will be slightly extended to ensure we include our furthest monitoring location on the Bulkley River as well as around the rail infrastructure area. The updated extent of the RSA will be provided in the next version of the dAIR.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Section 4.3.1 Context and Boundaries                                                              | Response is satisfactory to EAO |
| IR-OW-15 | 1-Oct-20 | Office of the Wet'suwet'en | VC vs IC question | (P.38 of 135) | <p>4.3.2 States: "This section of the Application will describe the approach taken to characterize the existing conditions of the VC" then says: "The Application will describe available traditional ecological or community knowledge related to the Surface Water IC". Explain how the VC, became IC? (P.38 of 135)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-OW-16 | 1-Oct-20 | Office of the Wet'suwet'en | VC vs IC question | (P.47 of 135) | <p>4.5.2. This section of the Application will describe the approach taken to characterize the existing conditions of the IC. The Application will describe available traditional ecological or community knowledge related to the Aquatic Resources IC. (P.47 of 135) Explain how the Aquatic Resources is a IC?</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>The dAIR is being revised to reflect that all ICs have been changed to VCs for the purpose of this assessment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |

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| IR-OW-17 | 1-Oct-20 | Office of the Wet'suwet'en | VC vs IC question | (P.52 of 135) | 4.6.2 This section of the Application will describe the approach taken to characterize the existing conditions of the VC, The Application will describe available traditional ecological or community knowledge related to the Fish and Fish Habitat VC. (P.52 of 135) This illustrates how a VC stays VC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Your comment is noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | N/A                                                                                                                                                                                                                   | Response is satisfactory to EAO |
| IR-OW-18 | 1-Oct-20 | Office of the Wet'suwet'en | VC vs IC question | (P.40 of 135) | <e.g. modelling etc.> EXPLAIN the example? (P.40 of 135)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | It appears that the comment may be related to the September 2019 version of the dAIR and not the May 2020 version of the dAIR. This language has been removed from the May 2020 dAIR and subsequent versions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Section 4.3.2 Existing Conditions                                                                                                                                                                                     | Response is satisfactory to EAO |
| IR-OW-19 | 1-Oct-20 | Office of the Wet'suwet'en | VC vs IC question | (P.46 of 135) | "The Project has the potential to affect aquatic resources in sub basins of the Telkwa River over which the Project is located (i.e., Tenas Creek, Goathorn Creek, and Four Creek), and in aquatic habitats downstream of proposed diversions and contact water discharge locations". (P.46 of 135) PLEASE EXPLAIN: proposed diversions and extent? Volumes?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | We have analyzed numerous water management scenarios and conducted extensive modeling to minimize effects to water quantity and quality in watercourses potentially affected by the Project. Proposed diversions (volumes and timing) will be presented in the assessment along with the modeled and predicted effects of changes in water quality and quantity on fish, fish habitat, and aquatic resources.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | N/A                                                                                                                                                                                                                   | Response is satisfactory to EAO |
| IR-OW-20 | 1-Oct-20 | Office of the Wet'suwet'en | Aquatic Resources | (P.47 of 135) | Air Quality and Groundwater VCs have the potential to be impacted in ways that will affect Aquatic Resources (such as dust deposition into aquatic habitats or changes to groundwater flow into waterbodies). The proposed spatial boundaries for the Aquatic Resources VC indicate an assumption that all impacts will follow the surface water flow, as they only include waters downstream of mine infrastructure. Air pollution and groundwater may move in ways not predicted by surface water flow patterns, and therefore the spatial boundaries for Aquatic Resources should be expanded to include the areas within the Air Quality and Groundwater VC spatial boundaries. (P.47 of 135)<br>- The benthic invertebrate community is an important part of aquatic habitats, as it is both a large ecosystem component and a source of food for fish. It is also easily surveyed and is a good indicator of overall ecosystem health. Benthic invertebrate community composition and diversity should be added as an indicator for the Aquatic Resources VC. | We have assessed all linked components together using an effects pathway approach. Linkages among VCs will be identified for each VC (added to Table 3, Section 3.1 of the dAIR), and changes in one VC that may affect another VC will be described within the receptor VCs (e.g., water quality linkages will be discussed in fish / fish habitat as one of its linked/receptor VCs).<br>A groundwater model has been prepared in order to evaluate effects. Interactions of groundwater with surface water environment (where benthic invertebrates reside) are accounted for in the water and load balance. Changes in the composition, abundance, and diversity of benthic invertebrates has already been listed as an indicator for the Aquatic Resources component. Prediction nodes from discharges of mine contact water are situated at locations where there may be potential effects to water quality and quantity, the modeling of which includes considerations for flows of groundwater. Water quality in Helps Creek is not expected to be affected by mining operations due to its distance from the minesite and the implementation of sediment and erosion control measures around the Bypass Road. Nevertheless, a sensitivity analysis will be prepared to evaluate the potential impact of dust from the access road into Helps Creek. The fish and fish habitat, aquatic resources, surface water and groundwater RSAs and LSAs have been revised (enlarged) compared to the mapping in the initial dAIR. | Section 3.1 Issues Scoping and Selection of Valued Components, Section 4.3.1 Context and Boundaries, Section 4.4.1 Context and Boundaries, Section 4.5.1 Context and Boundaries, Section 4.6.1 Context and Boundaries | Response is satisfactory to EAO |
| IR-OW-21 | 1-Oct-20 | Office of the Wet'suwet'en | Aquatic Resources |               | Missing: Helps Creek; Hubert Creek for haul road. Flow and Discharge in relationship with species availability.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Fish and fish habitat surveys have been completed at watercourses along the proposed Bypass Road (including Helps Creek, which is connected to Hubert Creek). Water quality and aquatic surveys have also been completed for watercourses that provide habitat for fish. Potential changes to fish and fish habitat will be assessed for watercourses potentially affected by construction and operation of the Bypass Road. There are no predicted changes to flows or discharge in any of the watercourses along the Bypass Road.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | N/A                                                                                                                                                                                                                   | Response is satisfactory to EAO |
| IR-OW-22 | 1-Oct-20 | Office of the Wet'suwet'en | Aquatic Resources | (P.47 of 135) | RSA should include portion of Bulkley River for reason above. (P.47 of 135)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The updated dAIR lists "Fish habitats in the Telkwa River watershed and in the tributaries to the Bulkley River crossed by the Bypass road" as the RSA for the Aquatic Resources VC. Part of the Bulkley River was always intended to be included, but was inadvertently left out in mapping. This has been corrected.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Section 4.5.1 Context and Boundaries, Section 4.6.1 Context and Boundaries                                                                                                                                            | Response is satisfactory to EAO |
| IR-OW-23 | 1-Oct-20 | Office of the Wet'suwet'en | Aquatic Resources | (P.50 of 135) | "The Application will describe the analysis, methodology and standards used to determine the potential effects on the Aquatic Resources IC resulting from Project activities within each phase of the Project". (P.50 of 135) Please name each phase for this section.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | We will name each activity phase in the revised dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | This is a global edit in the dAIR. It is impractical to list all sections that have been updated.                                                                                                                     | Response is satisfactory to EAO |

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| IR-OW-24 | 1-Oct-20 | Office of the Wet'suwet'en | Aquatic Resources     | (P.50 of 135) | 4.5.3. Start of Potential Effects to aquatic resources (P.50 of 135)<br>The previous sections did not have these Potential effects written within them.                                                                                                                                                                                                                                                                                                                                                                                                                   | Potential effects sections are included for every component in the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | This is a global edit in the dAIR. It is impractical to list all sections that have been updated. | Response is satisfactory to EAO |
| IR-OW-25 | 1-Oct-20 | Office of the Wet'suwet'en | Aquatic Resources     |               | Additionally require:<br>-Identification of potential cumulative effects, i.e., cumulative interactions between residual effects of the Project and the potential residual effects of other foreseeable developments or currently operating facilities;<br>-Identification of additional mitigation measures; and<br>-Description and evaluation of (residual) cumulative effects of the selected VC.                                                                                                                                                                     | Mitigation Measures are described in Section 4.5.4. Cumulative Effects are described in Section 4.5.6 of the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Section 4.5.4 Mitigation Measures, Section 4.5.6 Cumulative Effects                               | Response is satisfactory to EAO |
| IR-OW-26 | 1-Oct-20 | Office of the Wet'suwet'en | Fish and Fish Habitat |               | For the reasons outlined for the Aquatic Resources VC, the spatial boundaries of the Fish and Fish Habitat VC should be expanded to include all areas within the Air Quality and Groundwater VC spatial boundaries, and include all Fish Habitat near roads, storage areas, and transmission lines.                                                                                                                                                                                                                                                                       | The spatial boundaries for aquatic resources include fish habitat near roads, storage areas, and any proposed mine infrastructure as well as in areas upstream and downstream to account for construction and operation activity. For the purposes of cumulative effects assessment, the boundaries also extend upstream to include those freshwater aquatic areas in which Project-related effects may interact with effect from other past, present, or reasonably foreseeable future projects. The mapping has been expanded and corrected to include the Bypass Road (LSA) and part of the Bulkley River potentially affected by the Project (LSA and RSA). | Section 4.6.1 Context and Boundaries                                                              | Response is satisfactory to EAO |
| IR-OW-27 | 1-Oct-20 | Office of the Wet'suwet'en | Fish and Fish Habitat |               | The context description for the Vegetation VC describes a wetland complex that may be potentially impacted by the project. It is unclear if this complex is Fish Habitat or if It provides water and ecosystem services to downstream Fish Habitat, but due to the importance of wetlands in providing and maintaining high quality Fish Habitat, the potential value of wetlands in the project area to Fish, Habitat for other aquatic species and wildlife, and its function with regards to important ecosystem services within the watershed should be investigated. | Potentially affected freshwater aquatic habitats will be included in the assessment of fish and fish habitat, including wetland complexes. Wetlands will be assessed as a subcomponent of the Vegetation Valued Component (Section 4.7 of the draft AIR). The Vegetation Local Study Area (LSA) has been delineated to include a large wetland complex located downgradient from Helps Creek to encompass potential indirect Project effects including alteration / loss of wetlands, and trace metals deposition on plants and soil.                                                                                                                           | Section 4.7.1 Context and Boundaries                                                              | Response is satisfactory to EAO |
| IR-OW-28 | 1-Oct-20 | Office of the Wet'suwet'en | Fish and Fish Habitat |               | The indicators chosen for the Fish and Fish Habitat VC do not accurately capture potential impacts to fish through impacts to fish habitat. It is insufficient to use only the quantity of fish habitat as an indicator, the quality of fish habitat must also be used as an indicator. The area of good and excellent quality fish habitat units for each life stage of indicator fish species should be added as an indicator for the Fish and Fish Habitat VC.                                                                                                         | The quality of fish habitat will be assessed in the chapter on fish and fish habitat. The defined indicator includes the areal extent of fish habitat permanently altered, destroyed, or made inaccessible to fish. The term “altered” includes for changes in habitat quality. By accounting for the areal extent of habitat in which fish habitat quality has changed, the potential effects to fish habitat productivity and any offsetting that may be required can be quantified.                                                                                                                                                                          | N/A                                                                                               | Response is satisfactory to EAO |
| IR-OW-29 | 1-Oct-20 | Office of the Wet'suwet'en | Fish and Fish Habitat |               | MISSING: Load-out area; is there storage of stock pile at load-out next to Bulkley River? If so, require Fish and Fish Habitat Valued Component for section of Bulkley River. Is it contained (closed/open) or uncontained storage?                                                                                                                                                                                                                                                                                                                                       | To avoid potential effects on the Bulkley River, stockpiles and storage areas that may be associated with the rail loadout area will be located outside of the riparian area of the Bulkley River. The stock piles are not expected to be covered.                                                                                                                                                                                                                                                                                                                                                                                                              | N/A                                                                                               | Response is satisfactory to EAO |
| IR-OW-30 | 1-Oct-20 | Office of the Wet'suwet'en | Fish and Fish Habitat |               | Missing: Classify habitat for lifecycles, and associated regulation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | The assessment on fish habitat potentially affected by the Project will include potential changes in fish habitat quality for specific life-stages (e.g., rearing, spawning, overwintering) of fish species in Project area watercourses.                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                                                                               | Response is satisfactory to EAO |

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| IR-OW-31 | 1-Oct-20 | Office of the Wet'suwet'en | Fish and Fish Habitat |               | While the dAIR mentions “indicator fish species”, those indicator species are not described. The list of indicator species should be developed in consultation with OW.                                                                                                                                                                                                                                                                                                                                           | The project team has invested many hours characterizing fish habitat and identifying fish use of aquatic habitats within, adjacent to and downstream of the proposed mine site. These efforts enable a thorough assessment of the potential effects of the project on aquatic ecosystems and their inhabitants.<br>Rainbow trout were selected as the key indicator fish species for water quality assessments as they were the only species with sufficient numbers throughout potentially affected watercourses to serve as an indicator fish species and they are the least migratory of the species that are present. There were no populations of resident sculpin or other less migratory species in Tenas, Goathorn, Four, or Helps Creek. All species present are serving as indicator species for the fish and fish habitat assessment. Relative abundance, densities, and fish condition will be used to assess potential effects on fish health and habitat quality/productivity. We look forward to further discussing the fish assessment with the Wet'suwet'en.                                                                                                                                                                                                                                                                             | N/A | Response is satisfactory to EAO |
| IR-OW-32 | 1-Oct-20 | Office of the Wet'suwet'en | Fish and Fish Habitat |               | Changes to fish community composition or species presence should be added as an indicator, as changes to community composition can indicate habitat degradation and cause ecosystem dysfunction.                                                                                                                                                                                                                                                                                                                  | Changes in fish species composition will be addressed under the indicator of fish abundance. Baseline data has been gathered on the abundance of total fish as well as abundance of fish by species. Changes in fish species composition will be reflected in changes in abundance of individual fish species.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N/A | Response is satisfactory to EAO |
| IR-OW-33 | 1-Oct-20 | Office of the Wet'suwet'en | Fish and Fish Habitat |               | The removal of riparian vegetation adjacent to fish-bearing waterbodies has important implications for fish habitat quality, especially as it buffers against increases in water temperature. As waterbodies in the region are increasingly impacted by high water temperature due to climate change, changes to riparian vegetation cover due to project infrastructure should be included as an indicator.                                                                                                      | We agree that riparian vegetation is an important component of fish habitat. The indicator of changes to the areal extent of fish habitat includes all components of fish habitat (e.g., instream fish habitat, water quality, riparian fish habitat, etc.). Changes in the quality or extent of riparian habitats will be included in the quantification of fish habitat potentially affected by the Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N/A | Response is satisfactory to EAO |
| IR-OW-34 | 1-Oct-20 | Office of the Wet'suwet'en | Vegetation            | (P.54 of 135) | “Several culturally important plant species used for food such as huckleberries and blueberries (Vaccinium spp.), along with medicinal plants such as Devil’s club (Oplopanax horridus) and stinging nettle (Urtica dioica) were found within the Project area”. (P.54 of 135)<br>Missing - uncommon ecosystems; medicinal/food plants as per Wet’suwet’en VEC information, rare plant communities for other species are key to their ability to forage, shelter, and feed the Wet’suwet’en. They must be listed. | We have compiled the following list of prominent plant species harvested by the Wet'suwet'en for sustenance and medicinal purposes that are relevant to the local study area. Alaskan blueberry (Vaccinium alaskaense), black huckleberry (Vaccinium membranaceum), buckbean (Menyanthes trifoliata), common mountain ash (Sorbus scopulina), cow parsnip (Heracleum lanatum), Devil's club (Oplopanax horridus), fireweed (Epilobium angustifolium), highbush cranberry (Viburnum edule), indian hellebore (Veratrum viride), kinnikinnick (Arctostaphylos uva-ursi), labrador tea (Rhododendrum groenlandicum), lady fern fiddleheads (Athyrium felix-femina), oval-leaved blueberry (Vaccinium ovalifolium), red raspberry (Rubus idaeus), saskatoon (Amelanchier alnifolia), soapberry (Shepherdia canadensis), willow (Salix spp).<br><br>We ask that the Wet'suwet'en please confirm that this list is appropriate. It was compiled based on current, available information. This list of Culturally Important Species and related information that will be used in the effects assessment will be provided to Wet'suwet'en within the baseline studies summary report on the Vegetatoin VC, once that report is complete. The Culturally Important Species will be addressed in the EA under Vegetation VC, as identified as required in the dAIR. | N/A | Response is satisfactory to EAO |

**Tenas - Draft Application Information Requirements Working Group Issues Tracking Table**

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| IR-OW-35 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.59 of 135), (P.60 of 135) | <p>“Wildlife species identified as having historic or current use in the Project area, include ungulates (caribou, moose, mule deer, white-tailed deer and elk), bears (black and grizzly), furbearers (wolf, lynx, coyote, fisher, marten, ermine), small mammals (squirrels, voles, mice), bats, reptiles (common garter snake) and amphibians (western toad, Columbia spotted frog, long-toed salamander)”. (P.59 of 135)</p> <p>Several of these species are at high concern levels-Caribou Protected (under 30 animals); Grizzly Bear-534 BLGBU (FLGBU-54 animals) Provincial stop on Grizzly Bear Hunt due to lack of population estimates/Accuracy. (P.60 of 135)</p> | We are including representatives of most of these groups as VC subcomponents in the EA, as defined by VC selection criteria in the dAIR.                                                                                                                                                                                                                                                                                                                                                                                     | N/A                                               | Response is satisfactory to EAO |
| IR-OW-36 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.61 of 135)                | Missing: Grizzly Bear Population Surveys                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | The effect assessment is habitat focussed, as populations are linked to regional factors beyond the potential effects of construction/ operation of a mine. Monitoring grizzly bear population is not within the authority of Telkwa Coal or the scope of an effects assessment.                                                                                                                                                                                                                                             | N/A                                               | Response is satisfactory to EAO |
| IR-OW-37 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.61 of 135)                | <p>Grizzly and moose RSA: Bulkley watershed excluding biogeoclimatic zones that are not similar to those of the Project (P.61 of 135)</p> <p>-Moose: lack of population estimates/Accuracy. Need update surveys since last done for Telkwa Coal Project-determine loss of population. Loss of Habitat.</p>                                                                                                                                                                                                                                                                                                                                                                   | Monitoring population trends of wildlife is done at a scale much larger and longer-term than the scope of an effects assessment for a project. The baseline report will summarize moose population as existing conditions based on 7 surveys completed in the Bulkley Valley Lakes District survey area between 1983 and 2018. The effects assessment will assess changes to and/or loss of moose habitat.                                                                                                                   | N/A                                               | Response is satisfactory to EAO |
| IR-OW-38 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.61 of 135)                | -Habitat Utilization; Browse Intensity by Species.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | The effects assessment will be habitat focussed, and forage is included as a life requisite using standard wildlife habitat ratings methodologies in the baseline studies.                                                                                                                                                                                                                                                                                                                                                   | N/A                                               | Response is satisfactory to EAO |
| IR-OW-39 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.61 of 135)                | Missing Mountain Goats-travel corridor through project area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | While mountain goat may occur in the Project Area; it is not identified as a VC or subcomponent following the process of VC selection under the criteria summarized in the dAIR. There will be rationale for species selection (and those that were not selected) within the Application.                                                                                                                                                                                                                                    | N/A                                               | Response is satisfactory to EAO |
| IR-OW-40 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.61 of 135)                | Cumulative effects analysis should take into account more site-specific information on sensitive habitats that are within the influence of the project footprint. Habitat utilization by species, life stage and season are fundamental.                                                                                                                                                                                                                                                                                                                                                                                                                                     | The effects assessment will be habitat focussed, and habitat by species including consideration of life stages, life requisites, and season will be followed using standard wildlife habitat ratings methodologies in the baseline studies. These focused habitat based assessments will form the basis of the Cumulative Effects Assessment for each VC and subcomponent through the potential residual effects.                                                                                                            | Section 4.8.6 Cumulative Effects and Significance | Response is satisfactory to EAO |
| IR-OW-41 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.61 of 135)                | Baseline information or data collection will give the most available information towards a comprehensive study process for the project review.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | This is in progress, data is being shared at interim stages, and this will continue through to completion of reporting on the baseline studies.                                                                                                                                                                                                                                                                                                                                                                              | N/A                                               | Response is satisfactory to EAO |
| IR-OW-42 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.61 of 135)                | Resilience and Thresholds of population inventories are important to Wet'suwet'en in determining availability of Food, Social, Ceremonial, and medicinal sources.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The effect assessment is habitat focussed, as many populations are typically cyclical and linked to regional factors beyond the potential effects of construction/operation of a mine. Monitoring population trends of wildlife is done at a scale much larger and longer-term than the scope of an effects assessment for a project. Wildlife research/inventory work is currently being completed through the Environmental Stewardship Initiative as a collaboration among Indigenous governments and the Province of BC. | N/A                                               | Response is satisfactory to EAO |
| IR-OW-43 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.61 of 135)                | Error! Reference source not found. (P.61 of 135)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | It appears that the comment may be related to the September 2019 version of the dAIR and not the May 2020 version of the dAIR. The language has been updated in the May 2020 dAIR and all subsequent versions.                                                                                                                                                                                                                                                                                                               | Section 4.8.1 Context and Boundaries              | Response is satisfactory to EAO |

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| IR-OW-44 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.63 of 135) | <p>Grizzly Bears in British Columbia: Ecology, Conservation and Management (Ministry of Environment, Lands and Parks 2002) (P.63 of 135)</p> <p>Please Include Auditor General Report 2017 on Grizzly Bears, and recommendations. Here's an exert.</p> <p>"Forest stewardship plans MFLNRO's Forest and Range Evaluation Program has not provided an overall evaluation as to whether the forest stewardship plans have been effective in achieving their objective of protecting wildlife, and specifically, grizzly bears (which the program lists as a high priority)".</p> <p>"Currently, there is no organized inventory and limited monitoring of grizzly bears".</p> <p>"MoE's oversight of the Oil and Gas Commission (OGC) MoE, under the Oil and Gas Activities Act, has the power to order an independent audit of the performance of the oil and gas commission to ensure the protection and effective management of the environment. However, to date, MoE has not carried out an independent audit of the OGC, nor are staff clear as to how such an audit would be triggered". Has MEMPR conducted an independent audit to ensure the protection and effective management of the environment for Grizzly Bears?</p> <p>WE RECOMMEND THAT THE MINISTRY OF ENERGY, MINES, PETROLEUM, AND NATURAL RESOURCE:</p> <p>Create and implement a grizzly bear management plan that includes:</p> <ul style="list-style-type: none"><li>-clear indication of how the plan fits into the ministries' overall wildlife management planning</li><li>-clear goals and targets.</li><li>-prioritized activities and timelines, including accountabilities for those activities' resources and</li><li>-expertise required to undertake the activities in the plan.</li><li>-requirement for monitoring of program effectiveness.</li><li>-a process for evaluating and adjusting activities as needed.</li><li>-develop and implement an adequately resourced inventory and monitoring strategy for grizzly bears.</li></ul> | <p>We note that this comment is addressed to the BC government.</p> <p>All the same, we offer the following:</p> <p>Not all references are included in the dAIR, only a small list of examples are included. The baseline reports and the Application will provide a full list of references.</p> <p>Auditor General: Noted, the list in the dAIR are examples and the full summary of existing information review will include this report.</p> <p>Recommendation to MEM: The wildlife management plan, which will be developed and included in the EA Application, will include any mitigation strategies/measures that are found necessary through the assessment of the potential effects of the Project on grizzly bear. Mitigation measures will be aligned with current regulatory policy and best practice.</p> | Section 4.8.2 Existing Conditions          | Response is satisfactory to EAO |
| IR-OW-45 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.63 of 135) | <p>The Province is also committed to a collaborative process with First Nations, stakeholders and the public to improving wildlife management and habitat conservation for all species. A public consultation period will help inform the content of a renewed wildlife management strategy and will provide overall context to link species-specific management plans and their priority.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>We note that this comment is addressed to the BC government</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | N/A                                        | Response is satisfactory to EAO |
| IR-OW-46 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.63 of 135) | <p>"A Strategy to Help Restore Moose Populations in British Columbia (Ministry of Forests, Lands and Natural Resource Operations 2016)" (P.63 of 135)</p> <p>How is this strategy being implemented into this Project; Key findings?</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>The assessment and the mitigation measures that will be committed to within the Application will draw from current data and best practices available in publications such as the Gorley (2016) report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Section 4.8.2 Existing Conditions          | Response is satisfactory to EAO |
| IR-OW-47 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.63 of 135) | <p>Many referenced materials are outdated. Ex. Moose Habitat Capability/Suitability Mapping. Telkwa Coal Project. 1998 (22 years old) (P.63 of 135) Does not give current state values. (See paragraphs 74-77)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>The citations listed in the dAIR do not represent the full existing conditions summary that will be in baseline and referred to in EA</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Section 4.8.2 Existing Conditions          | Response is satisfactory to EAO |
| IR-OW-48 | 1-Oct-20 | Office of the Wet'suwet'en | Wildlife | (P.65 of 135) | <p>Avian Species Valued Component (P.65 of 135)</p> <p>Missing is species: Goshawk require 2400ha for habitat</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>Northern goshawk are included in the Avian Species VC subcomponent "Raptors". Due to their habitat requirements, a northern goshawk habitat suitability model was developed and added as baseline information for the Avian Species VC (as an appendix to the baseline report). This is not mentioned in the dAIR because only high level information is provided for each VC and subcomponent and none of the other subcomponents are described in more detail.</p>                                                                                                                                                                                                                                                                                                                                                 | Section 4.9 Avian Species Valued Component | Response is satisfactory to EAO |

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| IR-OW-49 | 1-Oct-20  | Office of the Wet'suwet'en | SOCIAL EFFECTS ASSESSMENT               | (P.78 of 135) | Demographic IC (P.78 of 135)<br>Subcomponent (NA) ??<br>Review and integration of any relevant demographic data on affected Indigenous communities with the RSA (P.79 of 135)                                                                                                                                                                                                                                                                                         | Section 11 (Part C) directs the assessment to include the most recently available Wet'suwet'en census data. Assessment of the Demographics VC does not require separation into subcomponents. The Demographic VC will assess potential effects of a change in population and demographic factors in affected LSA or RSA communities, which in turn, supports the effects assessments for infrastructure and services, land and resource use, community well-being, labour market and economic development.                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Part C Wet'suwet'en Rights and Interests, Section 6.1 Demographics Valued Component                                                                                          | Response is satisfactory to EAO |
| IR-OW-50 | 1-Oct-20  | Office of the Wet'suwet'en | SOCIAL EFFECTS ASSESSMENT               | (P.79 of 135) | -A list of other matters of concern raised by Wet'suwet'en with respect to potential environmental, economic, social, heritage and health effects of the proposed Project, which have not already been considered in the discussion about Aboriginal Interests or in the statutory requirements under BC EAO 2012 where applicable;<br>-A description of how these matters of concern have been addressed from the perspective of the Wet'suwet'en and the Proponent. | Part C of the dAIR directs the Application to include a list of other matters of concern raised by the Wet'suwet'en with respect to potential environmental, economic, social, heritage and health effects of the proposed Project which have not already been considered, and to provide a description of how matters of concern have been addressed from the perspective of the Wet'suwet'en and the Proponent. Part C also directs the assessment to include the potential for adverse effects from the Project on Wet'suwet'en interests, including current use of land and resources for traditional purposes. In addition, this section also directs the Application to consider other matters of concern raised by the Wet'suwet'en, including social effects of the proposed Project which have not already been assessed. Description of mitigation measures to avoid or reduce potential adverse effects is required in section 3.5 of the draft AIR. | Part C Wet'suwet'en Rights and Interests, Section 3.5 Mitigation Measures                                                                                                    | Response is satisfactory to EAO |
| IR-OW-51 | 1-Oct-20  | Office of the Wet'suwet'en | Visual Resources Intermediate Component | (P.81 of 135) | Visual-Reclamation (What's left behind): ARD Ponds-Monitoring Buildings /Lime Plant & Storage                                                                                                                                                                                                                                                                                                                                                                         | The Visual Resources assessment will consider all phases of the Project, including post-closure. Note that a more recent version of the draft AIR specifies that post-closure will be included in the assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Section 6.2 Visual Resources Valued Component                                                                                                                                | Response is satisfactory to EAO |
| IR-OW-52 | 1-Oct-20  | Office of the Wet'suwet'en | Visual Resources Intermediate Component | (P.81 of 135) | ARD -monitoring (This needs more discussion if Telkwa Coal Ltd. has plans for ARD Ponding.)                                                                                                                                                                                                                                                                                                                                                                           | The Visual Resources assessment will include all mine components in all phases of the Project. The management ponds will remain at closure so that PAG rock will remain saturated, minimizing oxidation and acid production. The ponds will be monitored during operations and in closure to confirm the efficacy of the proposed ARD management strategy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section 6.2 Visual Resources Valued Component                                                                                                                                | Response is satisfactory to EAO |
| IR-OW-53 | 01-Oct-20 | Office of the Wet'suwet'en | Community Well-Being Valued Component   | (P.85 of 135) | Community Well-Being Valued Component - Subcomponent (NA)??                                                                                                                                                                                                                                                                                                                                                                                                           | The current version of the draft AIR (Section 11 - Part C) directs the assessment to include potential adverse effects from the Project on Wet'suwet'en interests. Part C also directs the assessment to consider other matters of concern raised by the Wet'suwet'en, including social effects of the proposed Project which have not already been assessed. Particular to community well-being, Section 11 directs the Application to identify potential effects from the Project on the "change in confidence in community well-being as a result of social and economic changes in the territory."                                                                                                                                                                                                                                                                                                                                                          | Part C Wet'suwet'en Rights and Interests, Section 11.0 Wet'suwet'en Rights and Interests Assessment, Section 11.4 Potential Effects on the Wet'suwet'en Rights and Interests | Response is satisfactory to EAO |
| IR-OW-54 | 01-Oct-20 | Office of the Wet'suwet'en | Community Well-Being Valued Component   | (P.85 of 135) | Current use? House Group VEC availability? House territory Spatial size loss of use/food/gathering/habitat (Update House with loss of values) Discuss with Wet'suwet'en on values.                                                                                                                                                                                                                                                                                    | These concerns are to be treated in Part C, Indigenous Consultation. Part C, Section 11.0, directs the Application to include a list of other matters of concern raised by the Wet'suwet'en, including social effects of the proposed Project which have not already been assessed. Boundaries for land use are established to be large enough to handle the loss of use/food/gathering/habitat.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Part C Wet'suwet'en Rights and Interests, Section 11.0 Wet'suwet'en Rights and Interests Assessment                                                                          | Response is satisfactory to EAO |

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| IR-OW-55 | 01-Oct-20 | Office of the Wet'suwet'en | ECONOMIC EFFECTS ASSESSMENT     | (P.90 of 135)  | ECONOMIC EFFECTS ASSESSMENT - Subcomponent (NA)?? (P.90 of 135)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | For the Economic Effects Assessment, the draft AIR identifies two Valued Components: Labour Market and Economic Development. It was not deemed necessary to break Labour Market into subcomponents. Assessment of both economic VCs will be supported by assessment of the other economic VC, as well as the Community Well-Being VC and Demographics VC. Wet'suwet'en interests are directed to be addressed in Section 11.0 of the draft AIR, including potential adverse effects from the Project on Wet'suwet'en interests. This section also directs the Application to consider other matters of concern raised by the Wet'suwet'en, including economic effects of the proposed Project, which have not already been assessed. | Part C Wet'suwet'en Rights and Interests, Section 11.0 Wet'suwet'en Rights and Interests Assessment | Response is satisfactory to EAO |
| IR-OW-56 | 01-Oct-20 | Office of the Wet'suwet'en | Human Health Valued Component   | (P.105 of 135) | The following Human Health VC technical reports will be provided with the Application:<br>-Baseline Human Health Risk Assessment Report (P.105 of 135) Require report review for input??                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Since the publication of the draft AIR referenced in your comment, the Baseline Human Health Risk Assessment Report (Section 8.1.2) has been updated to the Human Health Risk Assessment Report. This report will be provided as part of the Application. The report will include both a baseline human health risk assessment and a Project human health risk assessment, and will be available for review as part of the EA submission.                                                                                                                                                                                                                                                                                            | Section 8.1.2 Existing Conditions                                                                   | Response is satisfactory to EAO |
| IR-OW-57 | 01-Oct-20 | Office of the Wet'suwet'en | ACCIDENTS AND MALFUNCTIONS      | (P.108 of 135) | Wildlife interactions (vehicle Kills; operations interactions) CN interaction information required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | At the working group meeting on May 27, 2020, Heidi Schindler, Wildlife Biologist, BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development indicated she is part of the Moose Mortality Working Group and suggested that we use the most current and relevant data for the assessment of interactions of wildlife (moose specifically) with rail traffic as related to this Project. We have since received data from H.Schindler and we will use these data assess the risk of moose mortality as discussed in that meeting.                                                                                                                                                                               | N/A                                                                                                 | Response is satisfactory to EAO |
| IR-OW-58 | 01-Oct-20 | Office of the Wet'suwet'en | ACCIDENTS AND MALFUNCTIONS      | (P.108 of 135) | The overall methodology for assessing the potential risk of an event (likelihood and consequence);<br>-Definitions of each category of likelihood;<br>-Definitions for each category of consequence;<br>-An assessment of the likelihood of the event occurring, based on historical trends and predictive models;<br>-Describe proposed reasonable and feasible mitigation to prevent accidents and malfunctions, to minimize consequences and likelihood of accidents and malfunctions, including environmental management planning, emergency preparedness and response, and spill prevention and response.<br>-Assessment of consequence and likelihood of the event, in a manner consistent with the direct effects assessment, and Conclusions on the potential risk (likelihood multiplied by consequence) of the accident or malfunction. | The dAIR has been updated with these descriptions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Section 9.0 Accidents and Malfunctions                                                              | Response is satisfactory to EAO |
| IR-OW-59 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | Missing: Need to add.<br>-Where a residual adverse effect and/or cumulative effect has been identified for a specific VC/IC, the d-AIR will include a description of a follow-up strategy, where appropriate, that:<br>-Identifies the measures to evaluate the accuracy of the original effects prediction;<br>-Identifies the measures to evaluate the effectiveness of proposed mitigation measures; and<br>-Proposes an appropriate strategy to apply in the event that original predictions of effects and mitigation effectiveness are not as expected.<br>This includes reference to further mitigation, involvement of key stakeholders, Aboriginal groups, government agencies and any other measures deemed necessary to manage the issue.                                                                                              | It appears that the comment may be related to the September 2019 version of the dAIR and not the May 2020 version of the dAIR. This language has been included in subsequent versions of the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Section 3.9 Follow-up Strategy                                                                      | Response is satisfactory to EAO |

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| IR-OW-60 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | <p>Sufficiency within the EA requires Benchmarks-Factors really important; this has the ability to alter the quality of information; The OW request BC EAO comments on Sufficiency of data supplied for review towards the d-AIR.</p> <p>The BCEAO has provided no guidance to date as to how it will determine if the proponent's d-AIR has presented information that is sufficient for the EAO to meet its terms of reference (as issued by the EAO and MEMP); if so, please provide the rational.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>We note that this comment is addressed to the BC EAO.</p> <p>All the same, we note that the AIR is not intended to address the sufficiency of data that is collected, rather to identify the data that must be collected.</p>                                                                                                                                                                                                                                                                                                                                                                                                         | N/A | Response is satisfactory to EAO |
| IR-OW-61 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | Address the "Scope of Factors" to guide the environmental assessment (issued by BC EAO Please provide DATE??                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | It appears that the comment may be related to the September 2019 version of the dAIR and not the May 2020 version of the dAIR. This phrase no longer appears in the updated dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                        | N/A | Response is satisfactory to EAO |
| IR-OW-62 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | We need to establish that the d-AIR and information provided to-date by the proponent is completely equate to serving the Wet'suwet'en interest in being fully informed about the proposed project and its impacts in order to determine whether or not it will leave the region in better or worse condition. The dAIR may inform Wet'suwet'en decisions on this Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Thank you, we acknowledge this comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N/A | Response is satisfactory to EAO |
| IR-OW-63 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | We need the assurance that the EA Process is utilizing and optimizing the Working Group to not debate basic matters of fact and the completeness of the EA, but to focus properly on the evidence and best available information and whether they support the predictions, conclusions and judgments of the proponents, and on what grounds they can be managed for.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Under the EA process, administered by the BCEAO, the working group has, so far, reviewed the Valued Component selection document rationale and we have responded to comments and utilized input to refine the list of VCs and subcomponents. The working group has reviewed the dAIR. We have received comments from the working group, the public, and OW and we are in the process of utilizing this valued input to refine the requirements for the application.                                                                                                                                                                      | N/A | Response is satisfactory to EAO |
| IR-OW-64 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | While the dAIR does not provide details on baseline data that will inform the EA, we have identified some areas that are likely to require additional baseline data from what is described in the dAIR. These comments should not be taken as a complete review of baseline data sufficiency, as the lack of details in the dAIR prevents a full review of the data that will inform the analysis. However, due to the importance of sufficient baseline data as the base of an EA, and the difficulty of obtaining seasonal field data after the EA is complete, we highly recommend that Telkwa Coal Ltd. collaborate with the OW as soon as possible to undertake a complete technical evaluation of baseline data sufficiency prior to completing the EA.                                                                                                                                                                                                                                                                                                                                                | We look forward to continuing to work with the OW on the environmental assessment. In 2017 and 2018, we hosted baseline data workshops for the OW, where the consultant team outlined the existing data on fish, water, wildlife, vegetation, soils, birds and atmospherics, and presented the new baseline programs in progress. We provided additional data at the various EAO working group meetings in 2019. While we have submitted preliminary baseline reports based on work in progress, we look forward to connecting with the OW as soon as practical, so that we may present the scope and findings of our completed studies. | N/A | Response is satisfactory to EAO |
| IR-OW-65 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | <p>In general, we are concerned that the dAIR suggests an over-reliance on historical data from more than 25 years ago to describe the current environment. Over the last few decades, the environment in the project area has changed drastically as the result of increased population, changes in land use, and climate change.</p> <p>Due to these factors, environments and natural resources are under significant additional pressures that decrease their resiliency to impacts from projects like the Tenas Project. For example, droughts and heatwaves from shifts in the climate have increased the importance of maintaining water flows in aquatic habitats, populations of fish and wildlife have decreased, and the population of people relying on these natural resources (from both First Nations and other communities) have increased.</p> <p>These are far from the only changes that have occurred in the project area since the 1980's and 1990's, but they show that the EA must be based on modern data, with historical data used primarily for identifying trends over time.</p> | We agree that the EA must be based on current data that is supplemented by historical data to identifying trends over time. That is why, in addition to decades of historical data, we have established an extensive baseline program based on data collection by local consultants over the past four years. It should be noted that all of our baseline programs adhere to the technical guidance documents established by various government ministries.                                                                                                                                                                              | N/A | Response is satisfactory to EAO |

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| IR-OW-66 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | This is particularly noticeable with the Fish and Fish Habitat VC, where it appears that the information on fish distribution and species composition is heavily based on historical records. From Figure 13 (page 6-7 of the dAIR) it appears that no data on fish, fish habitat, aquatics, or hydrology were collected from most of the fish-bearing waterbodies most likely to be impacted by the project (namely, Four Creek, upper Goathorn Creek, Helps Creek, or from the Bulkley River adjacent to the Proposed Rail Infrastructure). It is imperative that baseline data be collected for these areas in order to understand potential impacts to fish and aquatic resources from the proposed project.                                                                                                                                              | Understanding the fish and fish habitat present within the study area and the value of that habitat prior to construction is highly important to meeting project commitments related to minimizing effects on the natural environment. Baseline information on waterbodies within the Local Study Area was conducted at a desktop (historical) and then field assessment levels. Please refer to the baseline field program figure, which shows the water quality, fish and aquatics sampling nodes on each of the waterbodies (both upstream and downstream of the anticipated project footprint). Fish distribution, composition, and habitat baseline data was collected from all watercourses potentially affected by the Project from 2017 through 2020. Additional fish habitat assessment, hydrology, and flow modelling work has been conducted on Four and Tenas Creeks to help determine the potential effects on these watercourses from changes in seasonal flow generated from predictive modelling. | Section 4.5.1 Context and Boundaries | Response is satisfactory to EAO |
| IR-OW-67 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | Although, Fish and Fish Habitat studies may be ongoing, we do not have the privilege to review as part of the d-AIR. The methodology and information collected to support the assessments of project impacts to aquatic resources and fish and fish habitat is unclear from the dAIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | We confirm that baseline data will conform to all industry standards including CABIN, RISC, and FHAP and will be fully outlined in the EA. Per our invitation extended on October 13, 2020, we would be pleased to host additional baseline workshops for the OW with our technical team on water, fish, and wildlife and other subject matters by request. This would provide additional opportunity for the OW to review information collected and ask questions. We understand that it has been a challenging couple of years with the OW work on the title discussions with government and then with the COVID pandemic interruptions. We were happy to be responsive to OW's request for the 8-month EA process suspension in 2019/2020. We look forward to continuing our work with the Wet'suwet'en on the Tenas Project.                                                                                                                                                                                  | N/A                                  | Response is satisfactory to EAO |
| IR-OW-68 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | OW expects this baseline data to conform to minimum industry standards, including CABIN (Canadian Aquatic Biomonitoring Network) protocols for aquatic resources and RISC (Resource Information Standards Committee) and FHAP (Fish Habitat Assessment Procedures) protocols for fish and fish habitat. More detailed methodology may be required where impacts are expected or for particularly important or sensitive habitat. OW highly recommends Telkwa Coal Ltd discuss this further with OW technical representatives and other technical representatives at the earliest opportunity.                                                                                                                                                                                                                                                                 | We confirm that baseline data will conform to all industry standards including CABIN, RISC, and FHAP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N/A                                  | Response is satisfactory to EAO |
| IR-OW-69 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | The Wet'suwet'en expect that the Data requests be in deliverable format as; digital files, spatial formats for map integration, and supplied photos of the data as it was collected. i.e. CABIN requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | From the start of our relationship in 2016 and formalized in 2017 when we signed the Communication and Engagement Agreement with the OW, we have been committed to sharing project information with the OW. We stand by this commitment and will respond to all data requests as they are received.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | N/A                                  | Response is satisfactory to EAO |
| IR-OW-70 | 01-Oct-20 | Office of the Wet'suwet'en | MONITORING & FOLLOW-UP PROGRAMS | (P.116 of 135) | Our feedback on the dAIR represents an initial step in a collaborative approach to the development of the EA. We believe our recommendations must be enacted if the EA is to adequately assess potential impacts of the project on the environment and on Wet'suwet'en title, rights, interests, and culture. We also believe that the OW must be involved further in the development of the EA. We have found that early discussion and identification of data gaps and issues with assessment methodology is more productive than attempting to address these issues after the EA has been prepared. With early engagement, we believe an effective, reliable EA can be produced that will provide a mutually acceptable foundation for discussing the impacts of the project. We look forward to engaging in further work on this EA with Telkwa Coal Ltd. | Our relationship with the Wet'suwet'en is of great importance to us, and we are committed to maintaining the collaborative approach we've established since 2016 and formalized in 2017 when we signed the Communication and Engagement Agreement with the OW. We are also committed to transparency in early information sharing as demonstrated by our baseline workshops for OW in 2017 and 2018 and multiple working group meetings in 2019. Although the pandemic has interrupted 2020, we are happy to expand our engagement with the OW in 2021 and continue working on the EA in collaboration with the OW.                                                                                                                                                                                                                                                                                                                                                                                               | N/A                                  | Response is satisfactory to EAO |

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| IR-OW-71 | 30-Nov-21 | Office of the Wet'suwet'en | EA/Permitting    | N/A | The Office of the Wet'suwet'en (OW) has completed a technical review of the Part C Wet'suwet'en Rights and Interests section within the draft Application Information Requirements (d-AIR) provided. Through this review we have identified several areas of interests for input with the d-AIR. We believe these areas of interest have the potential to hinder the Environmental Assessment (EA) process and should be addressed as early as possible. We appreciate the consideration and responsiveness Telkwa Coal Ltd. has shown to our previous interactions and hope to continue to maintain an open and cooperative relationship on this project going forward. | Thank you, comment acknowledged.  | N/A | Response is satisfactory to EAO                                                          |
| IR-OW-72 | 30-Nov-21 | Office of the Wet'suwet'en | EA/Permitting    |     | The Wet'suwet'en reinforces the importance of clearly identifying issues and concerns up front, and expressing them in a consistent and thorough manner as the EA consultation process unfolds. The OW would like to take this opportunity to reinforce the statement that the review of the Project itself is part of the tasks that the OW Natural Resource Department does for our Clans and affected House groups.                                                                                                                                                                                                                                                   | Thank you, comment acknowledged.  | N/A | Response is satisfactory to EAO                                                          |
| IR-OW-73 | 30-Nov-21 | Office of the Wet'suwet'en | EA/Permitting    |     | At the onset of the EA review process for the Telkwa Coal: Tenas Coal project, We spoke of the role that is our function at the Office of the Wet'suwet'en, and that we do not make decisions for the affected Wet'suwet'en Houses, our responsibilities were to review the scientific aspects of the Project, and bring this to the attention of the affected Houses. I (Mike Ridsdale) am not a decision-maker for the House groups that has to occur directly with the Hereditary. True consultation has to occur with the affected House groups, and must be a consideration for the Section 11 Order.                                                               | This comment directed to the EAO. | N/A | The EAO has responded to OW by letter. This comment addressed to the EAO's satisfaction. |
| IR-OW-74 | 30-Nov-21 | Office of the Wet'suwet'en | Governance       |     | This follows what we've said during the Delgamuukw/Gisdaywa Court case, and the Canadian Forest Products Inc. v. Sam BCSC 676 case. Additionally, it is also what the Canadian Supreme courts have also stated on Wet'suwet'en decision-making. Ex. The Office of the Wet'suwet'en is recognized as a distinct society as per Delgamuukw/Gisdaywa Court case, and is one of three Hereditary Governance systems in British Columbia.                                                                                                                                                                                                                                     | This comment directed to the EAO. | N/A | The EAO has responded to OW by letter. This comment addressed to the EAO's satisfaction. |
| IR-OW-75 | 30-Nov-21 | Office of the Wet'suwet'en | Scope of dAIR    |     | Scope: This Project needs to be elaborated to reflect what has been actually stated in case law. It is incorrect to just state consideration of potential adverse effects on aboriginal interests. Must include the process to identify potential adverse effects, to determine significance, to consider the infringements, and Wet'suwet'en perspective on significance of infringements (i.e. Haida) This follows the consultative criteria as per Sparrow; Delgamuukw/Gisdaywa; Haida.                                                                                                                                                                               | This comment directed to the EAO. | N/A | The EAO has responded to OW by letter. This comment addressed to the EAO's satisfaction. |
| IR-OW-76 | 30-Nov-21 | Office of the Wet'suwet'en | Title and Rights |     | Has the Crown assessed the strength of Wet'suwet'en case for title and rights? If not, The OW is requesting an assessment of the strength of Wet'suwet'en prima facie evidence of aboriginal title and rights from the Ministry. If completed, please share this assessment, and level ofconsultation will be pursued?                                                                                                                                                                                                                                                                                                                                                   | This comment directed to the EAO. | N/A | The EAO has responded to OW by letter. This comment addressed to the EAO's satisfaction. |
| IR-OW-77 | 30-Nov-21 | Office of the Wet'suwet'en | Consultation     |     | The crown needs to distinguish between crown and proponent consultation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | This comment directed to the EAO. | N/A | The EAO has responded to OW by letter. This comment addressed to the EAO's satisfaction. |

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| IR-OW-78 | 30-Nov-21 | Office of the Wet'suwet'en | EA methodology                   |  | The EA Application has to describe how the analysis results for each criterion used in combination to determine significance of adverse Project effects for clarity and reasonableness.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | We appreciate your comment. The Application will present the process and methodology used to define and evaluate the significance of residual effects, including how the term “significance” has been used in relation to each VC using quantitative and qualitative thresholds.                                                                                                                                                                                                                                                                                                                    | N/A | Response is satisfactory to EAO |
| IR-OW-79 | 30-Nov-21 | Office of the Wet'suwet'en | Project Description              |  | The basic details of the size and production capacity of the project are still unclear. In particular, we are unclear of the plans for the Telkwa North and Goathorn deposits adjacent to the Tenas Project and also owned by Telkwa Coal Ltd.(Shapefiles of the sites were utilized for the determination of EA Process; and Shareholder information on the Project), but not mentioned in the Project Description or in the list of reasonably foreseeable projects proposed for the cumulative effects assessment. This Project Description does not indicate this possibility as a potential alternative and therefore requires further clarification. Any proposed additional amendments to the Project have to be included on a Cumulative Assessment approach. | <p>We appreciate your comment. We have no plans to develop either the Goathorn or Telkwa North deposits, or any other coal deposits, within our tenure across the Telkwa coalfield, during the mine life of the Tenas Project, which is why these deposits are not included in the list of foreseeable future projects in the cumulative effects assessment.</p> <p>If we decide to either develop another coal resource in the Telkwa coalfield, or increase the rate of production of the Tenas Project, those initiatives will be the subject of further regulatory and Wet'suwet'en review.</p> | N/A | Response is satisfactory to EAO |
| IR-OW-80 | 30-Nov-21 | Office of the Wet'suwet'en | Project Description              |  | The OW feels this must be restated: Regardless of what Telkwa Coal Ltd. plans for the additional deposits and production potential, they must be addressed. Otherwise, uncertainties about these potential future developments are likely to continue to derail discussion of the Tenas Project throughout the EA process. It is imperative that the project development avoid the worst-case scenario: one in which it is assumed by all other parties that the Project Description accurately describes the future project, only for the project to alter drastically post-EA with the addition of more pits or coal production. Such a scenario could seriously impact the relationship and trust between Telkwa Coal Ltd, and the OW and the Wet’suwet’en people. | We appreciate your comment. TCL has no plans to alter the Project by adding further pits or increasing production post-EAC. Should an EAC be issued based on the Tenas EAC Application, any future expansions or increase in production would require an amendment or a separate EA, depending on the proposed scope of the expansion.                                                                                                                                                                                                                                                              | N/A | Response is satisfactory to EAO |
| IR-OW-81 | 30-Nov-21 | Office of the Wet'suwet'en | Traditional Ecological Knowledge |  | Traditional Ecological Knowledge (TEK), the work completed during the Delgamuukw/Gisdaywa court case has a lot of good information regarding the House territories. Each House on Wet'suwet'en territories have been fully described in Delgamuukw/Gisdaywa. The EA Process, and Telkwa Coal need to review the Transcripts, and show this in terms of a review of information accumulated from their review of the Court case transcripts for the affected House groups. This will show the level of understanding on the affected House territories.                                                                                                                                                                                                                | We appreciate your comment. The Delgamuukw/Gisdaywa transcripts have been reviewed and new information obtained. This information will be included in the EA.                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A | Response is satisfactory to EAO |
| IR-OW-82 | 30-Nov-21 | Office of the Wet'suwet'en | Land and resource use            |  | Seasonal Round of gathering in proximity of the proposed development, and possible impact to the traditional harvesting, and cultural practices requires input as well as the spiritual connection to their Houses needs to be taken into consideration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | We appreciate your comment. The EA will consider potential effects to land use and resource harvesting. TCL is committed to working with the Office of the Wet’suwet’en (OW) to provide access beyond, and within the Project Area limits, during the life of the Project to allow for traditional harvesting and cultural practices, provided these can be done safely.                                                                                                                                                                                                                            | N/A | Response is satisfactory to EAO |
| IR-OW-83 | 30-Nov-21 | Office of the Wet'suwet'en | Governance                       |  | Our structure of governance is our feast system, the feast essential to Wet’suwet’en society and government. Territories are important to the feast as the host Clan gathers goods and food for the feast from their house territories.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | We appreciate your comment. The EAC Application will consider potential effects to the Wet’suwet’en System of Governance. Additionally, as noted above, TCL is committed to working with the OW to provide access beyond, and within the Project Area limits, during the life of the Project to allow for traditional harvesting and cultural practices, provided these can be done safely.                                                                                                                                                                                                         | N/A | Response is satisfactory to EAO |

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| IR-OW-84 | 30-Nov-21 | Office of the Wet'suwet'en | EA/Permitting         |  | The land-society connection for the Wet'suwet'en is embodied in the Wet'suwet'en term "Yintah" which is used, ...as a guiding principle in the daily lives of the Wet'suwet'en. Yintah is based on the reciprocal stewardship of the land and all the life and spiritual energies it contains. As a culture that relies on the resources gathered from the territories, the principles of Yintah serve to instill a world view that strives to avoid the damaging forms of territorial resource exploitation. Obviously, damage to the territorial resources not only harms the land, it is counterproductive to the social, cultural, economic and physical well-being of each and every Wet'suwet'en member, and will be viewed as an infringement to Wet'suwet'en title, rights, and culture. | We appreciate your comment. TCL acknowledges the importance of Yintah and an assessment of Wet'sutwet'en Rights and Interests will be provided in Part C of the EA Application.                                                                                                                                                                                                                                                                            | N/A | Response is satisfactory to EAO |
| IR-OW-85 | 30-Nov-21 | Office of the Wet'suwet'en | EA/Permitting         |  | In Wet'suwet'en, Yintah incorporates not only the physical environment, animals, plants, water, geography, but the human world as well. Yintah understands all parts of the territories as interconnected and related to a greater whole. If the physical territories are harmed, then the social world of the Wet'suwet'en is irreversibly and significantly harmed as well. "Our territory is our livelihood, we live off our land, we survive on the wildlife on our land. Laws, language, land, connection of the land and animals. Our elders require this connection, as does our youth. Our territory is our livelihood". Song Translation: Sue Alfred, Hereditary Elder.                                                                                                                 | Thank you. We acknowledge your comment. Section 11 of the EAC Application will include an assessment of Wet'suwet'en Community Well-being, Health, and Wet'suwet'en Cultural Heritage.                                                                                                                                                                                                                                                                     | N/A | Response is satisfactory to EAO |
| IR-OW-86 | 30-Nov-21 | Office of the Wet'suwet'en | ML/ARD                |  | Any ML/ARD generation by development in Wet'suwet'en territory is unacceptable, and carries significant risk, and the likelihood of negative impacts to Wet'suwet'en house territories. The Telkwa Coal project is expected to have several ARD ponding sites within the Application.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | We appreciate your comment. This will be addressed in the EA Application. TCL is aligned with the Wet'suwet'en on preventing ARD generation that will have a measureable effect on the surrounding environment.                                                                                                                                                                                                                                            | N/A | Response is satisfactory to EAO |
| IR-OW-87 | 30-Nov-21 | Office of the Wet'suwet'en |                       |  | The Wet'suwet'en would like to know how changes to the environment from the project might impact their socio-economic conditions, culture, and functioning of Wet'suwet'en society. The cumulative effects assessment has to be conducted per affected Wet'suwet'en House territory. (Cas Yex & Kwen Bea Yex)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Thank you. We acknowledge your comment. Section 11 of the EAC Application will include an assessment of Wet'suwet'en Community Well-being, Health, and Wet'suwet'en Cultural Heritage. Section 11 of the EAC Application will describe Wet'suwet'en Perspectives on Cumulative Effects, as documented in existing publicly available resources which is currently only available for the broader Wet'suwet'en nation, and not for individual House Groups. | N/A | Response is satisfactory to EAO |
| IR-OW-88 | 30-Nov-21 | Office of the Wet'suwet'en | Land and resource use |  | The loss of access to House territory for food resources, loss of wildlife corridors, habitat. Worry of the animals going elsewhere out of House territory. Our cultural ways of being as Wet'suwet'en people, we have a cultural obligation to respect and care for the lands and waters within our territory, and to maintain them for future generations. As such, clean water and healthy aquatic ecosystems have value to us for use by fish, wildlife, and as drinking water.                                                                                                                                                                                                                                                                                                              | We appreciate your comment. This will be addressed in the EAC Application.                                                                                                                                                                                                                                                                                                                                                                                 | N/A | Response is satisfactory to EAO |
| IR-OW-89 | 30-Nov-21 | Office of the Wet'suwet'en | Moose                 |  | Missing CN, CN will be contributing to the mortality of food resource animals with the increased rail traffic, this is significant as the population of certain food animals are in decline. A determination has to be supplied as to What is the current mortality estimates? And; How will CN rail traffic increase cause an increase of additional deaths?                                                                                                                                                                                                                                                                                                                                                                                                                                    | Thank you, we appreciate your comment. This will be addressed in the Wildlife Valued Component (VC) chapter of the EAC Application, which uses recent data from the Moose Rail Mortality Working Group.                                                                                                                                                                                                                                                    | N/A | Response is satisfactory to EAO |

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| IR-OW-90 | 30-Nov-21 | Office of the Wet'suwet'en | Wildlife      |  | Changes to Wildlife community composition or species presence should be added as an indicator, as changes to community composition can indicate habitat degradation and cause ecosystem dysfunction. (tied to paragraph 19)<br>Missing: Grizzly Bear Surveys                                                                                                                                                                                            | We appreciate your comment. Indicators are required to be measurable to inform understanding of the potential effect on the VC and must be responsive to the potential effects of the project, per BCEAO (2013) guidance. Change in grizzly bear population or level of presence in relation to the Project area are not measurable in context of the scale that occurrences and population are measured per accepted inventory methodology. Observations of grizzly bear presence will be monitoring under the Wildlife Management Plan commitments and denning habitat will be addressed through pre-construction surveys and chance find protocols. | N/A | Response is satisfactory to EAO |
| IR-OW-91 | 30-Nov-21 | Office of the Wet'suwet'en | Grizzly bear  |  | Grizzly Bears that frequent the Telkwa Coal area come over the Telkwa mountain range, including Dennis Mountain which contain quite unique, core, high quality Grizzly Bear (GB) habitat. A study may be required to determine the extent of the Grizzly Bear range by conducting one or more Bear-hair DNA studies. The OW has completed several GB studies (Morice Lake & Francois Lake regions) and are compiling DNA evidence of the Grizzly Bears. | We appreciate your comment. The interactions and potential project effects do not warrant a population study or range delineation, which are regional level management responsibilities of the Provincial government. The RSA for Grizzly Bear is within range delineated by the BC Grizzly Bear Population Units. The legal mechanism for conserving unique high quality Grizzly Bear habitat such as that described in OW's enquiry is through establishment of Wildlife Habitat Areas.                                                                                                                                                              | N/A | Response is satisfactory to EAO |
| IR-OW-92 | 30-Nov-21 | Office of the Wet'suwet'en | Wildlife      |  | As stated previously, Cumulative effects analysis should take into account these more site-specific information on sensitive habitats that are within the influence of the project footprint. Habitat utilization by species, life stage and season are all fundamental for a good review.                                                                                                                                                              | We appreciate your comment. A cumulative effects analysis including grizzly bear as a VC will be part of the EAC Application.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | N/A | Response is satisfactory to EAO |
| IR-OW-93 | 30-Nov-21 | Office of the Wet'suwet'en | EA/Permitting |  | These are far from the only changes that have occurred in the project area since the 1980's and 1990's, but they show that the EA must be based on modern data, with historical data used primarily for identifying trends over time.                                                                                                                                                                                                                   | We appreciate your comment. This will be addressed in the EAC Application.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N/A | Response is satisfactory to EAO |
| IR-OW-94 | 30-Nov-21 | Office of the Wet'suwet'en | EA/Permitting |  | The OW must be involved further in the development of the EA. We have found that early discussion and identification of data gaps and issues with assessment methodology is more productive for bringing the materials to the affected House groups for their decision making processes.                                                                                                                                                                | Thank you. We appreciate and acknowledge this comment. We are committed to continuing to work with the OW to understand these concerns and resolve these together.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N/A | Response is satisfactory to EAO |
| IR-OW-95 | 30-Nov-21 | Office of the Wet'suwet'en | EA/Permitting |  | We look forward to expanding these discussions during the review of the Telkwa Coal Project.                                                                                                                                                                                                                                                                                                                                                            | Thank you, comment acknowledged.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A | Response is satisfactory to EAO |