

Appendix 2.0-A

Tenas Project Valued Components Working Group Comment Tracker

Date: 20-Aug-19

Tenas Coal Valued Components Working Group Comment Tracker								
Tracking #	Date	Submitter	Subject	Source of comment	Document addressed	Comment	Proponent response	EAO comments
1	30-Jan-19	David de Wit (OW)	Fish	Jan 30 Water Meeting	N/A	David deWit was asked to share the Bustard map. David shared with EAO.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document.	The EAO distributed the map to TCL and the aquatics sub-WG on February 26, 2019. Addressed to EAO's satisfaction.
2	31-Jan-19	David de Wit (OW)	Fish	Jan 31 VC Meeting	N/A	David deWit was asked to share the Wild Salmon Policy Indicators Report.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document.	EAO to share report with TCL and WG
3	31-Jan-19	David de Wit (OW)	Water	Jan 31 VC Meeting	Memo produced by TCL and shared with the OW	David deWit asked for a schematic of the pit with monitoring wells and a map of groundwater wells and known fractures	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL is working on a technical memo for the OW (which can be shared with the whole WG). The memo will have draft answers based on current design/planning. TCL aims to have this complete in June.	Addressed to the EAO's satisfaction
4	31-Jan-19	Andrew Huang (ECCC)	Caribou	Jan 31 VC Meeting	N/A	ECCC to share new caribou data report	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. On March 15 2019, TCL reached out to ECCC to request the Caribou Data Report. We understand that the province and federal government are intending to meet on this in late June and TCL will receive the data/report after this. TCL would like to note that this item from ECCC is on critical path for the Tenas project schedule.	Addressed to the EAO's satisfaction. ECCC may be able to share unpublished caribou data with TCL via a Data Licensing/Sharing Agreement
5	31-Jan-19	AW (TCL)	Information Sharing	Jan 31 VC Meeting	N/A	TCL will set up data inventory and information sharing program with OW	TCL would like to note that this comment does not relate to the VC document. TCL sent an email to OW on March 7th to suggest regular meetings to discuss the Project with the formal commencement of the EA process and the potential of an information sharing program.	Addressed to the EAO's satisfaction
6	31-Jan-19	Jason Llewellyn (RDBN)	View	Jan 31 VC Meeting	EA Application - Visual Quality Assessment	RDBN asks if light pollution will be included in viewscape analysis.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Ambient Light will be included in the EA as a qualitative discussion within the Visual Quality assessment	To be addressed in the AIR
7	31-Jan-19	Brandy Hughes (FLNRORD)	View	Jan 31 VC Meeting	EA Application - Visual Quality Assessment	FLNR asks if there are opportunities for screening at mine site.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Screening depends on the viewpoint. Visual disturbances in areas of substantial topographic relief are typically only effective for viewpoints that are within just a few hundred metres. An analysis of the viewshed, photos, and simulations may reveal an opportunity for local screening.	To be addressed in the AIR
8	31-Jan-19	Jason Llewellyn (RDBN)	socio-economics	Jan 31 VC Meeting	EA Application - socio-economic Baseline Study	Regional study area should consider Houston especially for housing impacts as people may be commuting from there.	We appreciate your proactive comment. Thank you for your comment. The VC document has been revised to include Houston.	Addressed to the EAO's satisfaction
9	31-Jan-19	Gladys Atrill (TOS)	socio-economics	Jan 31 VC Meeting	EA Application - socio-economic Baseline Study	Where does Witset fit within the socio-economic LSA/RSA? In the broader areas, I tend to think of it as a community. David deWit (OW) - I agree this is a concern and we would like Witset to be included in the social RSA.	We appreciate your proactive comment. Thank you for your comment. The VC document has been revised to include Witset.	Addressed to the EAO's satisfaction
10	31-Jan-19	Stephen Sheehan (ECCC)	Water Quantity	Jan 31 VC Meeting	EA Application - Water Management Section	What's the volume of water you are anticipating discharging into the river? Have you got a sense of what volumes you're dealing with?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL is conducting water studies and modelling scenarios. Specific water information will be detailed in the EA, which TCL intends to submit in Q4 2019.	To be addressed in the EA
11	31-Jan-19	Paula Tait (Northern Health)	socio-economics	Jan 31 VC Meeting	EA Application - socio-economics Assessment	I'm considering the Health and Services management plan for the area. Even if it's 100 people, something needs to be planned that's scaled down to the size of the operations to help mitigate any potential effects. I can send a list of indicators (best management guide).	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL acknowledges that Northern Health sent TCLa the best management guide. This will be reviewed and noted for the socio-economic assessment and associated management plans.	Northern Health information provided to TCL and WG on February 21, 2019. To be addressed in the AIR.
12	31-Jan-19	Mike Ridsdale (OW)	Rail	Jan 31 VC Meeting	N/A	When we're looking at the rail loadout facility, there needs to be more information from CN about the effects of these 120 extra rail cars. There will be increased traffic, effects on humans and wildlife and noise impacts. Traffic will lead to wildlife mortality. More sightings are needed and CN needs to be on the working group.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. EAO has indicated they will contact CN to discuss the concerns listed	EAO will consider this for the AIR.
13	31-Jan-19	Mike Ridsdale (OW)	Aquatics	Jan 31 VC Meeting	N/A	DFO is aware of the working group. OW and EAO have sent a request from the for their participation in the working group.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. EAO and OW sent DFO a letter requesting their participation at the working group.	Addressed to the EAO's satisfaction
14	31-Jan-19	Terry Pratt (EAO)	socio-economics	Jan 31 VC Meeting	N/A	EAO to share the Teck SEEMP with the WG	We appreciate your proactive comment. This is not a VC document comment. EAO shared Teck's SEEMP with TCL.	Addressed to the EAO's satisfaction. EAO shared Teck's SEEMP with TCL.
15	13-Feb-19	Paula Tait (Northern Health)	socio-economics	Baseline Study	EA Application - socio-economic Baseline Study	This report details analyses for a number of biophysical programs. We recommend that Telkwa Coal Ltd. begin planning for baselines more directly related to community health and wellbeing. For instance, determinants of health (like access to housing, food security, community cohesion, income inequities, etc.) as well as more direct health impacts like mental health, drug and alcohol use, spread of communicable disease, environmental exposures, etc. can all be affected, depending on the specifics of the project and associated management strategies. See the Social Determinants of Health (SDOH) documents listed below.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The socio-economic baseline study will address social determinants of health and well-being that may be affected by the project, in order to provide the necessary baseline for the impact assessment. The socio-economic baseline study will review available data and gather qualitative information (e.g. through interviews) to gain an understanding of community health and wellbeing in the LSA.	To be addressed in the AIR

16	13-Feb-19	Paula Tait (Northern Health)	socio-economics	Project Description	EA Application - socio-economics Assessment	The project description is missing some key socio-economic information, including the expected construction workforce and where the workforce is expected to be housed (in community or in a camp). We are interested in how projects like this (even smaller projects) place pressures on our health service system and impact the socio-economic determinants of health in the community and how these can be managed. As discussed in the January 31st meeting, it is anticipated that there will be a construction and operations workforce of approximately 110 workers with no accommodation camp proposed. Please confirm as more information is available.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. We expect the construction workforce will be housed within the community. The number of jobs will be provided in the EA. Employment and Housing effects will be addressed in the socio-economic effects assessment section of the EA Application.	To be addressed in EA
17	13-Feb-19	Paula Tait (Northern Health)	Health	EA	EA Application - Human Health Risk Assessment	Human Health Risk Assessment (HHRA): For all projects requiring an EA, we expect that an HHRA approach is used to assess health impacts associated with biophysical exposures, in accordance with Health Canada's guidance documents (links below) and including the following key steps: problem formulation, toxicity (or hazard) assessment, exposure assessment and risk characterization (health-based indicators, guidelines and methodologies must be used). The HHRA technical report should be a stand-alone section of the Application. This should include a Screening Level Human Health Risk Assessment before any pathways and parameters are eliminated from the assessment. For exposure pathways to be deemed incomplete, a rationale for exclusion must be provided. Indicators should include the change in health risk due to changes in the biophysical environment. Please ensure that sampling protocols for environmental data intended to feed into the HHRA adhere to health-based guidance for sampling programs (e.g. Health Canada Federal Contaminated Sites Risk Assessment in Canada guidance for HHRA's), which may be quite different from sampling methodologies for assessing environmental VCs. We expect that the HHRA be conducted by a professional with expertise and experience conducting human health risk assessments, recognizing that health assessment principles and methodologies can be very different from those used to assess environmental effects. Please include a professional statement in the Application which includes demonstrable qualifications and experience in conducting HHRA's relevant to the purposes of supporting an EA.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL will undertake a HHRA as part of the EA. TCL will approach the HHRA in accordance with Health Canada guidance to assess potential health impacts and the assessment will be conducted by professionals with expertise and experience conducting human health risk assessments for EAs.	To be addressed in the EA
18	13-Feb-19	Paula Tait (Northern Health)	Atmospherics	EA	EA Application - Air Quality Assessment	Air Quality: Given the history of PM2.5 and PM10 exceedances in the region and the proximity of the project to Telkwa and Smithers, we recommend that Telkwa Coal Ltd. plan for a robust PM2.5 and PM10 monitoring and management program (including metals) that does not rely solely on provincial air quality monitors. This will help distinguish between existing air quality risks like residential wood smoke or road dust and any new emissions from the project. PM2.5 is the indicator that best informs potential health effects. Dustfall monitoring is not an indicator for health effects. There was more discussion regarding the PM2.5 monitoring (Kerr Farm) provided in the recent January 31st meeting vs. the information provided in the baseline report. Please advise as more information is available.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The Smithers-based, Ministry of Environment Meteorologist oversaw both the siting and the installation of the partisol sampler. We can provide a revised baseline report once ready. As discussed, PM2.5 monitoring is being conducted at the Kerr Farm and updates on this data will be provided in the air quality assessment report.	To be addressed in the EA
19	13-Feb-19	Paula Tait (Northern Health)	Noise	EA	EA Application - Noise Assessment	Please ensure that noise from the project is considered in in accordance with Health Canada's Guidance for Evaluating Human Health Impacts in Environmental Assessment	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Noise will be addressed in the noise effects assessment of the EA Application. TCL is also undertaking an HHRA as part of the EA Application	Addressed to the EAO's satisfaction
20	30-Jan-19	OW	Mine features	Jan 30 Water Meeting	EA Application - Mine Design	What is the proposed depth of each holding pond?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The final design depth will be detailed in the EA, which TCL intends to submit in Q4 2019.	To be addressed in the AIR
21	30-Jan-19	OW	Mine features	Jan 30 Water Meeting	EA Application - Mine Design	What is the proposed lowest depth of unit one mine cell?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The final design depth will be detailed in the EA, which TCL intends to submit in Q4 2019.	To be addressed in the AIR
22	30-Jan-19	OW	Water	Jan 30 Water Meeting	EA Application - Mine Design	What will the depth of groundwater wells be relative to the depth of the proposed mine pit?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL is working on a technical memo for the OW (which can be shared with the whole WG). The memo will have draft answers based on current design/planning. TCL aims to have this complete in June.	To be addressed in the AIR
23	30-Jan-19	EMPR	Mine features	Jan 30 Water Meeting	EA Application - Mine Design	What will the proposed height of overburden piles be?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The final design depth will be detailed in the EA, which TCL intends to submit in Q4 2019.	To be addressed in the AIR
24	31-Jan-19	Terry Pratt (EAO)	Water	Jan 31 VC Meeting	N/A	Where does Village of Telkwa get their water?	This is not a VC document comment. The EAO contacted Village of Telkwa and was informed that the Village's drinking water comes from the Bulkley River, specifically from an intake located just upstream (i.e. east) of the confluence of the Telkwa and Bulkley Rivers.	Addressed to the EAO's satisfaction

25	5-Mar-19	Stephen Sheehan (ECCC)	Water Quality	Email sent on March 5, 2019	N/A	Prior to the Coal Mining Effluent Regulation being finalized the general pollution prevention prohibitions of the Fisheries Act apply. If/when the Coal Mining Effluent Regulation come into force, the general pollution preventions of the Fisheries Act will continue to apply to those parameters for which a specific discharge level is not identified in applicable regulations.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This will be addressed in the EA, which TCL intends to submit in Q4 2019.	Will be addressed in EA
26	5-Mar-19	Stephen Sheehan (ECCC)	Water Quality	Email sent on March 5, 2019	EA Application - Water Quality Baseline Study	Should the EAO intend to further engage ECCC water quality experts in the review of the Tenas Application, ECCC recommends that EAO request that the proponent clearly describe all source terms and underlying assumptions in the water quality modelling report/water quality predictions.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment is for EAO. Source terms and the water quality model assumptions will be detailed in the EA, which TCL intends to submit in Q4 2019.	The EAO will follow-up with ECCC on this during the EA
27	5-Mar-19	Stephen Sheehan (ECCC)	Water Quality	Jan 30 Water Meeting, Slide 46-48	EA Application - Ground Water	The groundwater conceptual model shown on Slides 46-48 (Jan 30, 2019 presentation) is not clear on whether all groundwater from the Tenas project area is expected to report to Tenas Creek and Goathorn Creek, or if some groundwater from the Tenas project area could report directly to the Telkwa River. ECCC suggests that a clear understanding of groundwater flow in relation to the project may help to inform an understanding of potential effects to water quality in the receiving environment.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL is conducting studies and modelling scenarios for water flow to be detailed in the EA, which TCL intends to submit in Q4 2019.	Will be addressed in EA
28	5-Mar-19	Stephen Sheehan (ECCC)	Water Quality	Jan 30 Water Meeting, Slide 66	EA Application - Surface Water Monitoring	As per Slide 66 (Jan 30, 2019 presentation), surface water assessment nodes appear to be located at considerable distance from the proposed mine (e.g., the assessment node on Tenas Creek is located approx. 4km downstream of the mine site). ECCC typically recommends that assessment nodes for which water quality predictions are generated, are located in fish habitat immediately down gradient of the project, (i.e. at the nearest locations where water quality could be impacted by the project).	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. We will have assessment nodes at Tenas Creek, Four Creek, Goathorn Creek, Telkwa River and the Bulkley River as illustrated in slide #66. Please note that the Four Creek assessment node is immediately adjacent to the mine.	To be addressed in the EA
29	5-Mar-19	Stephen Sheehan (ECCC)	Water Quality	Project Description	EA Application - Water Quality Assessment	ECCC understands that dry stack disposal is planned for the Coarse and Fine Coal Rejects. The project descriptions states “The plant’s fine rock reject stream will be dewatered by the thickener, and a belt filter press will be used to produce a rock product with a moisture content of 20-22% and after combining with coarse rock is able to be stored in piles.” See also Figure 11 of the Project Description. The Project Description identifies the coarse and fine plant rock as potentially acid generating material (pg. 3-13). Further, ECCC understands that the coarse and fine plant rock will be disposed of in dry stack piles labelled as “Coal Waste” (as per Slides 17-19 of Jan 30, 2019 presentation). These piles are shown to drain into a coal waste pond, which in turn drains directly into a surface stream without any treatment. ECCC recommends that the EAO may wish to consider the quality of the effluent from the coal waste pond, taking into consideration the potentially acid generating material in the coal waste piles.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. These features will drain directly into the Tenas Pond or into the North Management Pond and then the Tenas Pond. TCL has a robust geochemistry characterization dataset. TCL is conducting studies and modelling scenarios for water quality to be detailed in the EA, which TCL intends to submit in Q4 2019.	To be addressed in the EA
30	5-Mar-19	Stephen Sheehan (ECCC)	Mine features	Project Description	EA Application - Mine Design	The figures in the Project Description include a discharge pipeline (Figures 3, 10, etc.). The pipeline is also listed in Table 3. This pipeline is neither included as a major project component (pg. 3-9), nor mentioned in Section 3.6.4 (Water Supply and Management) or Section 3.7 (Emission, Discharges, and Waste Management). As it is not clear what water the pipe will convey (e.g., drainage from dry stack piles, process water, pit overflow), ECCC suggests that the EAO may wish to request that water flow and water management be clearly described for all stages of the project, to assist in addressing potential uncertainties, such as this discharge pipeline.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL will ensure the water pipeline is added to the project component list in the EA. TCL will clearly describe, in detail, its water management plan for all phases of project activity. This will be described in the EA, which TCL intends to submit in Q4 2019.	The EAO will consider this for the AIR.
31	5-Mar-19	Stephen Sheehan (ECCC)	Geochemistry	Email sent on March 5, 2019	EA Application - Geochemistry Baseline	The ratio of waste rock to coal will inform an understanding of the amount of material that will be left on the site for construction and/or storage. Further, the characterization of the material and the runoff volumes from the waste rock piles provides insight as to potential impact to the receiving water quality. ECCC suggests the EAO may wish to request that the proponent provide the ratio of waste rock to coal, for purpose of assessing potential impacts to water quality.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Strip ratios will be provided in the EA application. TCL has a robust geochemistry characterization dataset. TCL is conducting studies and modelling scenarios for water quality at the minesite to be detailed in the EA, which TCL intends to submit in Q4 2019.	The EAO will consider this for the AIR.
32	5-Mar-19	Stephen Sheehan (ECCC)	Geochemistry	Email sent on March 5, 2019	EA Application - Geochemistry Baseline	The use of stripped overburden for dam construction can lead to potential water quality issues. ECCC recommends that the EAO ask the proponent to determine the chemical characteristics of the overburden that will be used for dam construction, as this may help to inform the EAO’s water quality assessment.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL has a robust geochemistry characterization program that includes overburden. TCL is conducting studies and modelling scenarios that will be detailed in the EA, which TCL intends to submit in Q4 2019.	The EAO will consider this for the AIR.

33	5-Mar-19	Stephen Sheehan (ECCC)	Water Quantity	Email sent on March 5, 2019	EA Application - Water Assessment	ECCC suggests that the EAO may wish to consider/assess seepage rates from the dam, the chemical characteristics of seepage that may come from the dam foundation, and the expected loss of seepage to the receiving environment, such that this information may aid in the assessment of potential impacts to water quality and further inform project	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL is conducting studies and modelling scenarios for water flow at the minesite that will be detailed in the EA, which TCL intends to submit in Q4 2019.	The EAO will consider this for the AIR.
34	5-Mar-19	Stephen Sheehan (ECCC)	Caribou	Email sent on March 5, 2019	EA Application - Caribou Assessment	Has the proponent considered reviewing Coastal GasLink, Pacific Trail, and PNG Looping pipeline projects as part of the assessment? All three pipelines intersect with the Telkwa Caribou Local Population Unit (LPU) and the project's regional study areas, and will also be important for the assessment of cumulative effects.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted and the portions of Coastal GasLink, Pacific Trail, and PNG that fall within the Regional Study Area applicable to each VC will be included in respective Cumulative Effects sections of the EA Application.	The EAO will consider this for the AIR.
35	5-Mar-19	Stephen Sheehan (ECCC)	Caribou	Email sent on March 5, 2019	EA Application - Wildlife Baseline Study	The Telkwa LPU has an estimated population of 16 and has recently undergone precipitous decline in numbers*. The Minister of Environment and Climate Change has determined that there are imminent threats to recovery of Southern Mountain Caribou, and that immediate intervention is required to allow for eventual recovery. The Minister's opinion noted particular concern in ten local population units, one of which is the Telkwa LPU*. The Proponent should ensure that this information is considered in all proceeding documents and discussions with respect to the Telkwa Caribou LPU. https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/related-information/southern-mountain-caribou-imminent-threat-assessment.html	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL will consider all information relevant to the Telkwa caribou herd in the EA.	The EAO will consider this for the AIR.
36	13-Feb-19	Paula Tait (Northern Health)	Health	VC, Table 3/pg 22	VC Document	Suggest adding the VC – “Health Services”. A specific social indicator for change to health service demands is recommended since health services would not all be covered by emergency services.	Community Infrastructure is meant to encompass Health Services. TCL will re-name the "Community Infrastructure" VC to "Community Infrastructure and Services" to be inclusive of Health Services.	Addressed to the EAO's satisfaction
37	5-Mar-19	Stephen Sheehan (ECCC)	VC	VC, Table 3	VC Document	In the ‘Represented by Another IC/VC’ column, can the proponent identify appropriate representatives for each subcomponent, even if likelihood of project effects is very low, particularly for species at risk?	This has been reviewed and completed for all subcomponents where there is an appropriate representative.	Addressed to the EAO's satisfaction
38	5-Mar-19	Stephen Sheehan (ECCC)	Caribou	VC, Table 3/pg 16	EA Application - Caribou Baseline Study	Rare plants and lichen – Did the baseline surveys include lichens important to caribou, in addition to listed species? Consideration of caribou forage species under this subcomponent will help inform the assessment of caribou under the wildlife VC.	Yes, baseline surveys included lichen surveys for caribou. These data were collected to support the caribou VC subcomponent. Species that meet the criteria of rare will be assessed under the rare plants and lichen subcomponent.	Addressed to the EAO's satisfaction
39	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 19	EA Application - Wildlife Baseline Study	Wolverine – Has the proponent considered the project's proximity to good quality high elevation habitat near the project? The proponent's project description indicates they are confirmed present in the project area and low elevation habitat within the project area, particularly along watercourses, can provide important movement corridors for wolverine. Given the species sensitivity to human disturbance, project activities have the potential to impact movement patterns. -- July 24, 2019 comment: It is ECCC's view that the limited abundance of wolverine increases the potential for adverse effects to the population in the event of a project-related interaction. ECCC recommends consideration of this species under the wide-ranging wildlife sub-component.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Yes, TCL has considered the project's proximity to ‘good quality high elevation habitat’ near the project. Wolverine are not included as a proposed VC subcomponent because they fail to meet several criteria in the EAO Guidelines for the Selection of Valued Components and Assessment of Potential Effects. -The project has limited overlap with important wolverine habitat (natal denning habitat at high elevation areas with deep snow packs). Further, the ability to model denning habitat is limited to very general types over broad areas, which limits the utility of the information in an assessment or to mitigate effects. -Wolverine are a low density, wide-ranging species and interactions with Project are likely to be limited to a small number of resident individuals (potentially <=3 based on typical home range sizes). -As a wide-ranging species, wolverine are expected to be able to travel east-west along the Telkwa River valley and make elevational movements within the Telkwa River valley, while avoiding the Project. -Potential effects of the Project on movement of other wide-ranging species (caribou and grizzly bears) will be examined in the EA. Based on these reasons, wolverine are not included as a proposed VC subcomponent. -- August 1, 2019 response: We agree that wolverine are of limited abundance and density in the region surrounding the Project. It is this limited density which reduces the chance of an interaction, and the lack of available data on habitat use patterns, their population and distribution in the region that has influenced our approach. The COSEWIC assessment and status report on wolverine characterizes mining as a threat with negligible impact and lists increased access as a factor that may lead to disturbance and mortality. Potential effects on wolverine are predicted to be: an alteration of habitat (specifically related to new access); disruption of movements; and increase in mortality risk. As surrogates for wolverine habitat use, alteration of habitat and movements will be	Addressed to the EAO's satisfaction

40	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 19	EA Application - Wildlife Baseline Study	Bats – What methods beyond the use of acoustic recording devices have been used, or are planned to be used, to identify and confirm roosts and hibernacula?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL is using the following methods: -Using VRI data, a 200m x 200m plot grid was created -Plots that fell within old growth/mature forest (80-200 years) were flagged for review -54 plots total were selected to sample snapshot of different ecosystems and tree types project boundaries and included proposed disturbed and undisturbed areas -At each plot the following were measured -Trees >15cm were measured and analyzed for bat potential -Information collected on each tree included: species, DBH (measured or estimated), % remaining bark, estimated height, crown class, height to live crown, and wildlife attributes (appearance rank, crown rank, bark rank, wood, lichen, wildlife use. -Each tree was then ranked 0-5 for bat potential (0=no potential, 1=potential for 0-5 bats, 2=potential for 5-20 bats, 3=20-50 bats, 4=50-100, 5=>100 bats) based on attributes such as loose bark and cavities. -Overall plot was later given a ranking for maternity potential, and night roost potential based on number and range of ranked trees with those plots containing higher potentials identified as maternity potential.	Addressed to the EAO's satisfaction
41	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 19	EA Application - Wildlife Baseline Study	Western toad – Did the baseline surveys consider seasonal breeding and migration periods/corridors?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Baseline assessment for seasonal breeding and migration periods/corridors was addressed through mapping supported by observations of toad breeding sites and toadlet movements collected during wildlife and wetland function surveys. Ecosystem mapping and the results of the seasonal breeding habitat assessments have been used to identify suitable mature forest and riparian types available as upland and/or migration corridors.	Addressed to the EAO's satisfaction
42	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 19	EA Application - Wildlife Baseline Study	Migratory birds – Has the proponent considered splitting this subcomponent into community groups, i.e., species guilds (e.g., woodpeckers, waterfowl) and/or habitat communities (e.g., old forest, young forest, wetland, riparian)?	The Migratory Breeding Birds subcomponent will be assessed using habitat guilds: wetlands, early seral and old/mature. This has been clarified in the VC document.	Addressed to the EAO's satisfaction
43	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 19	EA Application - Wildlife Baseline Study	Migratory birds – Has the proponent considered potential effects to migratory birds beyond the breeding season during spring and fall migration? For example, are there stopover sites within or near the project footprint, such as riparian habitat, wetlands, etc.? The Bulkley Valley Naturalists may be a good source of local information on migratory birds.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Yes TCL has considered potential effects to birds during migration. This was done as a two stage process: 1) assessment of candidate stopover habitats (e.g. riparian areas, ponds and large wetlands), 2) using available e-Bird data to identify and quantify candidate fall and spring migration areas and conducting spring migration surveys at candidate sites to document level of use.	To be addressed in the EA
44	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 19	EA Application - Wildlife Baseline Study	Migratory birds – Will the Proponent conduct analyses to identify biodiversity hotspots, areas with high bird usage, and/or areas with high density of birds? Will predictive modeling methods be used – e.g., distribution or occupancy models that incorporate habitat variables? What other data sources will be incorporated besides the proponent’s own point count data?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This will be addressed by methods described in the baseline reports and application requirements described in the dAIR. TCL will examine avian species occurrence in relation to TEM habitat types and will complete habitat mapping to quantify habitat-related indicators. Quantitative occupancy models are not planned because those analyses require large sample sizes, which are only available for common, generalist species. Historic Breeding Bird Survey data and local Christmas Bird Count data will be included in the avian baseline report, in addition to Project-related point counts.	To be addressed in the EA
45	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 19	EA Application - Wildlife Baseline Study	Migratory breeding birds – The Proponent may wish to consider following the document A Framework for the Scientific Assessment of Potential Project Impacts on Birds (http://www.publications.gc.ca/collections/collection_2010/ec/CW69-5-508-eng.pdf).	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted.	Addressed to the EAO's satisfaction
46	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 20	EA Application - Wildlife Baseline Study	Listed bird species – Has the Proponent determined whether potential suitable habitat for bank swallow (e.g., streams or river banks, road cuts, wetlands) and black swift (e.g., waterfalls) exist within the project area?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Yes, TCL has evaluated the potential for BANS and BLSW habitat to occur as part of avian baseline studies. No habitat for BLSW was detected. Very limited habitat for BANS was observed in the area, in the form of road cuts, and no evidence of use was detected.	Addressed to the EAO's satisfaction

47	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 20	EA Application - Wildlife Baseline Study	Listed bird species – The proponent may wish to address some inconsistencies between the project description and the VC scoping report. Bank swallow and western grebe are both federally-listed bird species, but have not been included under this subcomponent. Additionally, evening grosbeak (COSEWIC-assessed as Special Concern) is not included in listed bird species, only as represented by migratory birds; and short-eared owl is included in raptors rather than listed bird species.	There has been additional work on VC Selection since the Project Description was submitted that led to narrowing the species included in the VC document. Species that do not occur in the habitat that has potential for direct or indirect effects caused by the project were not included. Species with some potential for interaction were included but will not necessarily be carried through the effects assessment if they do not meet the criteria for assessment and that will be clearly documented. Avian species carried forward for assessment in the EA will be based on the results of the baseline studies and further consultation with stakeholders and regulators. For example, if habitat does not exist for certain listed species, there is no value in including them in the EA. Short-eared owl has been moved to the species at risk component based on this comment.	Addressed to the EAO's satisfaction
48	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3/pg 20	VC Document	Several birds are identified as being represented by the wetlands subcomponent; however, the proponent may wish to consider including these species under an applicable wildlife subcomponent due to the difficulties in assessing wildlife species under the vegetation VC.	Where species were not carried forward for assessment, it was done based on criteria for VC Selection. If a representative component is identified, that is secondary to the decision to carry over the species. In most cases, another component can only partly represent the species. In addition to the wetland subcomponent being representative, the wetland guild under the Migratory Breeding Birds subcomponent also represents the wetland associated avian species. These species are not proposed as a separate VC subcomponent because the extent of wetland habitats are very limited in the Project area, and no avian species of conservation concern were detected during baseline survey or expected to occur base on species ranges and habitat associations.	To be addressed in the AIR
49	5-Mar-19	Stephen Sheehan (ECCC)	Caribou	VC, Table 3/pg 17	EA Application - Wildlife Baseline Study	Can the proponent provide a rationale for the exclusion of parts of the Telkwa Caribou LPU boundaries?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The regional study area for caribou is under review. A determination on the final regional study area for caribou will be determined by discussions of the Caribou Sub-Working Group.	To be addressed in the AIR
50	5-Mar-19	Stephen Sheehan (ECCC)	Wildlife	VC, Table 3	EA Application - Wildlife Baseline Study	CWS requests high-level information on survey methods to assist with early identification of data gaps. In particular, for surveys targeting species at risk (e.g., bats, caribou, grizzly bear, amphibians) and those without standard survey methods (e.g., eDNA, acoustic recording units, remote cameras).	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. These detailed methods will be provided in baseline reporting.	To be addressed in the AIR
51	26-Mar-19	RDBN	Land Use	VC, pg. iv	EA - Land Use Baseline	Local Government Official Community Plans (OCPs) guide land use planning and development decisions that reflect the rural community's aspirations with respect to future character, function and form of the Plan Area. There is no mention of the Smithers Telkwa Rural OCP Bylaw No. 1704, 2014 under information sources Table 1. Project facilities are located within designated areas under the Area's OCP and should be considered during the EA review.	Relevant community and regional plans, including Smithers Telkwa Rural OCP and its bylaws, will be reviewed and considered in the socio-economic and/or land use baseline studies.	To be addressed in the AIR
52	26-Mar-19	RDBN	Land Use	VC, Table 3/pg 22	N/A	The Regional District of Bulkley-Nechako Zoning Bylaw No. 700, 1993 implements the policies and objectives of the Official Community Plan. Telkwa Coal Ltd. may require appropriate rezoning/ OCP amendment, and or/ approvals from the Agricultural Land Commission to facilitate the rail load out facility.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL is currently investigating the necessary approvals for the rail loadout and bypass road. TCL will continue to engage with the Regional District of Bulkley-Nechako to determine the zoning requirements and authorizations. TCL is also exploring three different application types available under the ALC for use of land in the ALR. These application options include 1) the Transportation, Utility or Recreational Trail Uses (TUR), 2) Non-Farm Use activity, and 3) as a last resort, excluding land from the ALR. The TUR is the ideal option as only the exact areas needed for the Bypass road and rail loadout would be temporarily withdrawn from the ALR, as opposed to removing the entire parcel of land. TCL would also consider the Non-Farm Use application for a temporary use of ALR land. The Exclusion application would be the last option.	To be addressed in the EA
53	26-Mar-19	RDBN	Land Use	VC, pg. iv	EA - Land Use Baseline	The Project activities and facilities are located within an active agricultural area. The Regional District of Bulkley-Nechako's Agricultural Plan should also be considered under Government Policies and Plan information sources.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted. Relevant community and regional plans, including the RDBN Agricultural Plan, will be reviewed and considered in the socio-economic and/or land use baseline studies. Potential effects on agricultural land use will be addressed by the Land and Resource Use VC (subcomponent: Commercial Land Use).	Addressed to the EAO's satisfaction
54	26-Mar-19	RDBN	Land Use	VC, Table 2/pg 5	AIR and EA Application	There is no mention of the RDBN Floodplain Management Bylaw in the Issues Scoping review. A mine component of notable concern is the rail loop and stockpile sites are found within a designated floodplain area under the RDBN Floodplain Management Bylaw.	TCL is aware of the Bylaw and will address Bylaw requirements as part of permitting and operational development stages of the project. Relevant community and regional plans, including RDBN plans and bylaws, will be reviewed and considered in the socio-economic and/or land use baseline studies. Potential risks to the project from extreme weather and other natural events will be evaluated in the "accidents/malfunctions" and/or "effects of the environment on the project" assessments of the EA.	Addressed to the EAO's satisfaction
55	26-Mar-19	RDBN	Land Use	VC, Table 3/pg 22	EA Application - socio-economic Baseline Study and/or Land Use Baseline Study	The proponent should include other local government's OCPs and related policies and plans where study areas for valued components overlap. For example, OCP's and housing studies for Telkwa, and Smithers.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Relevant community and regional plans, including OCP's and related policies, will be reviewed and considered in the socio-economic and/or land use baseline studies.	To be addressed in the AIR

56	26-Mar-19	RDBN	Atmospherics	VC, Table 3/pg 35	EA Application - Visual Quality	Project activities have the potential to change/increase light pollution around the existing and proposed roadways, mine site, and rail load out facility. Light may have adverse effects on wildlife, and nearby residents. The RDBN suggest that Light should be included as a subcomponent of the Atmospheric Environment Valued Component.	Potential light impacts with regards to light trespass, sky glow and glare are not expected due to new lighting designs including horizontal cut-off fixtures. Lighting will be controlled through a construction management plan and a well designed and efficient mine lighting plan. Ambient Light will be included in the EA as a qualitative discussion within the Visual Quality assessment. Results of this assessment will inform the assessment of the wildlife subcomponents under the indicator sensory disturbance.	To be addressed in the AIR
57	26-Mar-19	RDBN	Vibration	VC, Table 3/pg 14	EA Application - Human Health Risk Assessment	Project activities related to the rail loadout facility, haul route, and mine site will produce vibration. Two residences are 3.5 km from the mine plant and 0.5 km from the haul route. In addition, there are 29 residents found within 1 km from the rail load out facility. Increase in train traffic, and the potential for other users to use the rail loadout facility will increase vibration in the area relative to the project facilities. Vibration is a notable issue that should be monitored and mitigated during the Project's lifespan.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Mine site activities and haul road traffic are not expected to have vibration impacts on residences. A blast management plan will control blast vibration and will provide a robust communication and safety plan. Vibration levels near the rail loadout due to existing rail activity are not expected to increase with the Project given the low railcar speeds on site. There will be estimated 1% increase (to be confirmed by CNR) in railcar activity on the mainline but no increase in maximum vibration levels.	To be addressed in the AIR
58	26-Mar-19	RDBN	Aquatics	Jan 31 VC Meeting	EA Application - Aquatic Resources Baseline Study	The study area for Aquatic Resources should be redefined. The Regional Study area does not capture the haul route that crosses many tributaries that flow into the Bulkley River and does not capture the rail load out facility. Sedimentation generated from road and coal dust may impact nearby watercourses. RDBN suggest increasing the study area to capture all Project facilities, similar to the Fish and Fish Habitat Study Area.	The primary potential effect of construction and operation of the haul road is expected to be increased potential for sedimentation, notably during construction. Sedimentation generated by this activity is expected to be generally temporary in nature and limited in time provide the appropriate mitigation measures are implemented and maintained. Effects of short-term sedimentation from watercourse crossing construction on benthic invertebrates have been shown to be typically short-term and non-residual (Philip, Tsui, and McCart 1981). Fish, especially ova and pre-emergent fish, are the more sensitive receptor to increases in sedimentation, so the assessment focuses on potential effects to fish and fish habitat. Monitoring tools will be utilized, as required, at haul road watercourse crossings.	To be addressed in the AIR
59	26-Mar-19	RDBN	Water Quality, Water Quantity	Jan 31 VC Meeting	EA Application - Water Quality Baseline Study	The proposed haul road crosses Helps Creek Watershed. Helps Creek Watershed hydrology is connected to the wetland listed in the study area that is identified as a subcomponent under the Vegetation VC. Maintaining water quality is an important function in wildlife function and biodiversity in wetland habitats. Therefore, it is suggested that Helps Creek also be monitored for water quality and quantity at the Haul Road crossing.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Monitoring and follow up programs will be presented in the EA.	To be addressed in EA
60	26-Mar-19	RDBN	Vegetation	VC, Table 3/pg 16	VC Document	Since the Project area is found within a landscape corridor under the LRMP, and the project activities will essentially disperse animal movement, it may be worthwhile considering connectivity as a subcomponent of the Vegetation VC.	We acknowledge that connectivity for wildlife is a potential effect. This will be addressed in the effects assessment. Specifically, connectivity related to animal movements will be assessed within the Wildlife VCs.	To be addressed in the EA
61	26-Mar-19	RDBN	Wildlife	VC, Table 3/pg 17	EA Application - Human Health Risk Assessment, Land Use Assessment, socio-economic Assessment, Part C	The significant ecosystems and wildlife values identified by the Ministry of Environment and mentioned in Schedule C of the "Smithers Telkwa Official Community Plan, 1704, 2014" (OCP) include sensitive ecosystems of Black Cottonwood, White Spruce and Moose and Mule Deer habitat. Also, the area contains a Landscape Corridor designated to "maintain connectivity within the landscape, reduce habitat fragmentation, permit movement and dispersal of plant and animal species..." The scoping document does not include mule deer, yet the project activities have the potential to interact with the species and its habitat. Deer are a harvested species and an integral part to the sustenance foods/ country foods important to the local community. The Regional District supports and encourages development proponents to incorporate protection and enhancement of these values in the design of development within the Plan Area (OCP Policy 4.2.2).	Mule deer share many characteristics with moose, which are included as an Intermediate Component (IC) for the EA. Both species are valued sustenance and recreational hunting species, both have restricted winter range requirements, and both benefit from early seral habitats that result from human disturbance. Moose were selected as an IC over mule deer because they have higher likelihood to interact with the project and because moose are believed to be more significant in predator prey relationships between wolves, caribou, and secondary prey. Effects on wildlife will be considered in the EA for evaluating Hunting and Current Use of Land and Resources for Traditional Purposes which are considered under the Land and Resource Use VC, and other relevant sections.	To be addressed in the AIR
62	26-Mar-19	RDBN	socio-economics	Jan 31 VC Meeting	EA Application - socio-economic Baseline Study	The Local Study Area seems appropriate. However, the Regional Study Area should be extended to include the District of Houston and Witset (Moricetown), as well as rural Electoral Areas 'A' and a portion of Electoral Area 'G' to the Boundary of Houston municipality.	TCL will revise the RSA to include: • Witset • District of Houston • Adjacent to Highway 16 between Houston and Witset (i.e., this stretch of highway is approximately 10 km).	Addressed to the EAO's satisfaction.
63	26-Mar-19	Nicola Mak (ALC)	Land Use	VC, Table 2/pg 11	VC Document	I note that the potential effect on agricultural land, including the Agricultural Land Reserve (ALR) is discussed on page 11 (in table 2) as an issue. As such I would add the Agricultural Land Commission Act (2018) and its associated regulations to the Applicable Legislation chart on page 12.	Potential effects on agricultural land use are addressed by the Land and Resource Use VC (subcomponent: Commercial Land Use). Agricultural Land Commission Act has been added to the Applicable Legislation section of Table 1.	Addressed to the EAO's satisfaction

64	27-Mar-19	John Stevenson (MOA)	Atmospherics	Jan 31 VC Meeting	EA Application - Air Quality Assessment	Is there any consideration of (coal) dust accumulations on surrounding agriculture land parcels particularly adjacent to the proposed load out facility i.e.. adjacent and across the Bulkley River for example. From what I understand there has been several conversations regarding dust particulate monitoring related to human health in the study area and captured in Valued Component language, but what about outside of the study area?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted. Dust will be assessed within the Air Quality Study Area, which closely aligns with the Human Health LSA.	The EAO will consider this for the AIR
65	27-Mar-19	John Stevenson (MOA)	Vegetation	VC, Table 3/pg 14	EA Application - Air Quality Assessment	I feel there should be a statement as part of the “Soils Quality” Valued Component document that is related to the preservation of agriculture soil quality and soil capability for agriculture; specifically a requirement for potential coal dust / particulate modelling and monitoring given that historically it is known that weather “systems” come down the Telkwa Pass and River drainage, thus to me anyways it seems logical that if there was coal dust generated at the load out facility, there is potential then for it to travel and accumulate in a plume which may or may not be included in the current study area. I think this information should be captured somewhere in order to be included into the Application Information Requirements.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. More details will be provided in the dAIR. The assessment of Soil Quality will be under the context of land use such as agricultural capability. Measures of the physical and chemical properties of soil (soil quality) will be used to address potential project-related effects such as coal dust accumulation. Should the air quality modelling suggest the likelihood of effects, the results will be carried forward to the assessment of relevant VCs (i.e., vegetation and soils)	The EAO will consider this for the AIR
66	28-Mar-19	Liz Freyman (ENV)	Mine features	VC, pg. iv	VC Document	The following were added to the list of Project components: 1. Mine contact water (effluent) discharge pipe 2. Permanent PAG material management facilities (including above grade piles and flooded containment cells) 3. Onsite solid waste disposal facility including solid waste management systems for recycling and composting facilities 4. Treated effluent pipeline and outfall	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. These will be included in the Project Components list of the EA, however, please note there is only one pipeline, not two.	To be addressed in the EA
67	28-Mar-19	Liz Freyman (ENV)	EA	VC, Section 1.1/pg 1 and Table 1/pg 5	VC Document	Add "Water Sustainability Act" to list of required Project permits in Section 1.1 and Table 1 Information Sources Review	Reference to the Water Sustainability Act has been added to Table 1. The text in Section 1 is not intended to be an exhaustive list of permits and licenses required, but outline the two major permits required to develop and operate the mine.	Addressed to the EAO's satisfaction
68	28-Mar-19	Tarek Ayache (ENV)	Atmospherics	VC, Table 3/pg 14	VC Document	Comments to Air Quality Indicators: 1. TSP needs to be included as an indicator, which is typical for such mining projects. NOx: whereas NO and NO2 would be included for dispersion modelling, only NO2 needs to be included as an indicator given that there are 2. NO AQOs for NO. 3. CO: compared to AQOs, CO concentrations generally tend to be low. Its inclusion as an indicator might warrant some reconsideration. 4. It is recommended that relevant metals are included as indicators. Whereas there are no BC AQOs for metals, their assessment would be in reference to other objectives or for specific purposes (health, ecosystems, etc.)	TSP will be added to the indicators and NO2 will replace NOx. As noted, CO is expected to be quite low and will be removed from the indicator list. Metals will be included in the health section or other discipline sections as required since there are no BC AQOs for metals.	To be addressed in the AIR
69	28-Mar-19	Tarek Ayache (ENV)	Atmospherics	Jan 31 VC Meeting	EA Application - Atmospheric Baseline Study	Air quality study areas are not included in this document. In reference to the “Tenas Coal Jan 31 2019 VC Meeting – TCL Presentation”, the suggested Local Study Area (LSA) for air quality assessment is found to be reasonable with its proposed boundaries (35 km by 35 km). Regarding the Regional Study Area, is it not required (as suggested) or should it be set the same as the LSA?	The air quality LSA and RSA are the same. The LSA/RSA is large enough to include local and regional potential effects in areas such as Telkwa and Smithers.	LSA and RSA Mapping will be provided in the draft AIR.
70	28-Mar-19	Tarek Ayache (ENV)	Atmospherics	VC, Table 3/pg 14	VC Document	Updated original text (1) to (2) 1. GHG are linked to climate change which is a been raised a concern provincially. 2. GHG are linked to climate change which has been raised as a concern provincially.	Thank you for your comment. The VC document has been revised accordingly.	Addressed to the EAO's satisfaction
71	28-Mar-19	Liz Freyman (ENV)	Water Quality	VC, Table 3/pg 15	VC Document	Updated original text (1) to (2) 1. Surface water quality is protected under the Water Sustainability Act and regulated under the BC Approved Water Quality Guidelines. 2. Surface water quality is protected under the Environmental Management Act and screened against the BC Approved Water Quality Guidelines	Thank you for your comment. The VC document has been revised accordingly.	Addressed to the EAO's satisfaction
72	28-Mar-19	Carla Grimson (ENV)	Water Quality	VC, Table 3/pg 15	VC Document	Add Selenium, Nitrates, and metals to change in parameters of interest list in surface water quality indicators column. Selenium is typical of coal mines and the transport and fate of selenium in the system should be considered. The bioavailability and bioaccumulation varies among the forms of selenium. Will selenium chemical speciation be analyzed for?	Selenium, nitrate and other metals are already included in the categories of parameters of interest list. The full list is Total and dissolved metals, anions/nutrients, alkalinity/acidity, hardness, turbidity, TSS, pH, conductivity and temperature. Yes, we are conducting selenium speciation.	To be addressed in the AIR
73	28-Mar-19	Liz Freyman (ENV)	Water Quantity	VC, Table 3/pg 15	VC Document	Updated original text (1) to (2) 1. Groundwater is protected under the BC Water Sustainability Act. 2. Groundwater quantity is protected under the BC Water Sustainability Act.	Thank you for your comment. The VC document has been revised accordingly.	Addressed to the EAO's satisfaction

74	28-Mar-19	Rusto Martinka (ENV)	Water Quality	VC, Table 3/pg 15	VC Document	Updated original text (1) to (2) 1. Groundwater is protected under the BC Water Sustainability Act. 2. Groundwater quality is protected under the BC Environmental Management Act and screened against the BC Contaminated Sites Regulation groundwater standards.	Thank you for your comment. The VC document has been revised accordingly.	Addressed to the EAO's satisfaction
75	28-Mar-19	Rusto Martinka (ENV)	Water Quantity	VC, Table 3/pg 54	VC Document	1. Groundwater may be considered as VC, especially downslope from the mine where potential changes can occur under the following two scenarios. 2. Groundwater quantity - It is unclear where the groundwater supply wells for operational needs will be located. Based on the baseline, the bedrock may not be capable to produce high yields and therefore groundwater abstraction may be forced towards the valley aquifers (e.g. next to the Telkwa River). If so, abstraction from the valley aquifers may reduce water availability for the existing and future surface water and groundwater users. 3. Groundwater quantity - If the mine contact water is discharged to the Telkwa River, as suggested in Figure 2 above, the discharge has a potential to impact the downgradient aquifers used for domestic water supply.	1. Following the EAO guidelines for selection of valued components, groundwater was identified as a key pathway of effect on other VCs and was, therefore designated as an intermediate component (IC). Potential effects to groundwater will be fully characterised in the EAC, as well as the potential effects of changes in groundwater quality and quantity on downstream receptor VCs such as human health. 2. Thank you for your comment. TCL will refine its engineering design over the course of the project and work to mitigate any potential downstream effects. 3. Thank you for your comment. TCL will consider groundwater users downstream of the site and work to mitigate any potential downstream effects.	1. Addressed to the EAO's satisfaction 2. Location siting of wells to be addressed in the AIR 3. To be addressed in the AIR
76	28-Mar-19	Carla Grimson (ENV)	Aquatic Resources	VC, Table 3/pg 15	EA Application - Aquatic Resources Baseline Study	Will benthic invertebrate tissue metal concentrations be sampled for? Benthic tissue chemistry is also recommended.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted And will be resolved within the Aquatic sub-working group. TCL proposes to meet or teleconference with ENV/EAO regarding this matter.	To be addressed in the AIR
77	28-Mar-19	Leanne Helkenberg (MOTI)	Transportation	VC, Table 3/pg 22	N/A	Its my understanding that the company will be constructing their own haul road mostly over Crown Land. The haul road will cross over sections of public road, and at these locations a Highways Permit will be required. The proponent should contact the local MOTI office for more information.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL met with MOTI on March 27, 2019 to discuss transportation related permit requirements. TCL is waiting for details from MOTI for the intersection crossing at Lawson as well as a Road Use Permit template for Telkwa Coal mine Road from intersection down to Goathorn Creek. TCL has requested templates for permit applications for the use of the Telkwa CoalMine Road and a parking access permit.	To be addressed in EA and Permitting
78	28-Mar-19	Leanne Helkenberg (MOTI)	Transportation	VC, Table 3/pg 22	EA Application - Traffic Control Plan	Traffic Impact Assessments may be required based on the amount and type of traffic that will be expected.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted. TCL is happy to have discussions with MOTI regarding the potential need for a TIA.	The EAO will consider this for the AIR following further discussion with TCL and MOTI
79	28-Mar-19	Leanne Helkenberg (MOTI)	Transportation	VC, Table 3/pg 22	N/A	There is a short section of the haul road that is on the public road, Telkwa Coalmine Road. An agreement will have to be reached with the company and MOTI on the use and construction of this road as this is considered a public road and does provide access to lands beyond.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL met with MOTI on March 27, 2019 to discuss transportation related permit requirements. TCL is waiting for permit requirements from MOTI for the intersection crossing at Lawson as well as a Road Use Permit template for Telkwa Coal mine Road from intersection down to Goathorn Creek. TCL has requested templates for permit applications for the use of the Telkwa CoalMine Road and a parking access permit.	To be addressed in EA and Permitting
80	28-Mar-19	Leanne Helkenberg (MOTI)	Transportation	VC, Table 3/pg 22	N/A	During the construction phase the hauling of equipment to the site may require permits from the CVSE Permit Center, if any of the loads are oversize, overweight etc. (http://www.cvse.ca/permits/online_permits.htm).	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted and we will review those requirements to determine if additional permits are needed. TCL will also provide this information to logistics companies involved with the Project.	To be addressed in EA and Permitting
81	28-Mar-19	Leanne Helkenberg (MOTI)	Transportation	VC, Table 3/pg 22	N/A	The use of buses or vans to transport employees back and forth is encouraged to limit the amount of travelling workers, not sure where the employee parking will be but if adjacent to a highway, a permit will again be required.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. We agree that limiting the number of travelling workers is ideal. Current preferred option is a parking lot located east of the Bulkley River. Once selected, we will consult with MOTI on the required permits.	To be addressed in EA and Permitting
82	28-Mar-19	Leanne Helkenberg (MOTI)	Transportation	VC, Table 3/pg 22	N/A	Its also useful for the local District Office to be kept in the loop from a transportation perspective as we have various projects that could impact mining traffic, etc.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted and TCL will continue to engage with RDBN and MOTI.	Addressed to the EAO's satisfaction
83	28-Mar-19	Paula Tait (Northern Health)	socio-economics	VC, Table 1/pg 5	VC Document	Information sources to add to this list: Northern Health: 1. Health and Medical Services Plan Best Management Guide For Industrial Camps (which is also applicable when workers are housed in community and can be scaled to the size of the project) 2. Standard Working Group Comments for Environmental Assessments 3. The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring 4. Communicable Disease Control Plan - Best Management Guide for Industrial Camps June 2017 5. Health and Safety During the Opioid Overdose Emergency: Northern Health's Recommendations for Industrial Camps Bulkley Valley Lakes District Air Management Society: 1. BVLD AMS Clean Air Plan First Nations Health Council: 1. Social Determinants of Health Discussion Guide	Thank you for your comment. These information sources have been added to Table 1.	Addressed to the EAO's satisfaction

84	28-Mar-19	Paula Tait (Northern Health)	socio-economics	VC, Table 2/pg 10	VC Document	Issues to add to this list: 1. Potential impacts to health services 2. Potential effects post closure and potential economic downturn 3. Potential inequities related to income, cost of living, etc. 4. Potential impacts to childcare services	Thank you for your comment. These potential impacts have been added to Table 2.	Addressed to the EAO's satisfaction
85	28-Mar-19	Melissa Aalhus (Northern Health)	Health	VC, Table 2/pg 10	EA Application - Human Health Risk Assessment	Ensure that effects to plants and wildlife are carried forward to the human health assessment insofar as they are harvested as a food source or other cultural uses (such as medicinal plants).	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted. TCL will use a HHRA approach in accordance with Health Canada supplemental guidance for assessment of sustenance foods.	To be addressed in the AIR
86	28-Mar-19	Paula Tait (Northern Health)	socio-economics	VC, Table 3/pg 65	VC Document	Housing is a determinant of health and should be linked to the Health VC	Social determinants of health and potential effects on community well-being will be considered in the Social pillar, while the Health pillar will focus on biophysical pathways through the HHRA approach.	To be addressed in the AIR
87	28-Mar-19	Paula Tait (Northern Health)	Land Use	VC, Table 3/pg 66	VC Document	Agricultural land, including agricultural land reserve is also considered a food security/health issue	Potential effects related to food security and other socio-economic determinants of health and wellness will be considered in regard to the Community Well-being VC.	To be addressed in the AIR
88	28-Mar-19	Melissa Aalhus (Northern Health)	Health	VC, Table 3/pg 67	EA Application	The following should be linked to the health VC (given the linkages between cultural connectedness and community health): Potential effects on archaeological, historical and cultural sites	Social determinants of health and potential effects on community well-being will be considered in the Social pillar, while the Health pillar will focus on biophysical pathways through the HHRA approach. Where appropriate, this information will also be addressed in Part C.	To be addressed in the AIR
89	28-Mar-19	Paula Tait (Northern Health)	Health	VC, Table 2/pg 11	VC Document	The following should be linked to health outcomes: Indigenous interests, potential contamination, and country foods	Thank you for your comment. The VC document has been updated accordingly.	Addressed to the EAO's satisfaction
90	28-Mar-19	Melissa Aalhus (Northern Health)	Health		EA Application - Human Health Risk Assessment	Please ensure all potential contaminants that can be emitted from the project (including those used for mineral processing, etc.) are considered with a rationale provided for all COPCs not included. This should include metals in dust, PAHs, VOCs, etc.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. TCL would like to note that coal is not a mineral, it is organic. The assessment will use a HHRA approach in accordance with Health Canada guidance for COPC screening and to assess potential health impacts.	To be addressed in the EA
91	28-Mar-19	Paula Tait (Northern Health)	Atmospherics	VC, Table 2/pg 14	VC Document	Add BVLD AMS Clean Air Plan (as mentioned previously) to source of information for Atmospheric Environment VC	Thank you for your comment, it has been noted, the BLVD AMS Clean air plan will be added as a source of data to the VC Selection document.	Addressed to the EAO's satisfaction
92	28-Mar-19	Melissa Aalhus (Northern Health)	Health	VC, Table 2/pg 14	AIR	In regards to percent highly annoyed, we appreciate consideration of noise related health effects. Please see Health Canada's Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise which provides detailed guidance. Additional indicators of potential health effects relating to noise might include interference with speech comprehension, sleep disturbance, etc.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The comment has been noted and will be considered in the Application Information Requirements (AIR).	To be addressed in the AIR
93	28-Mar-19	Melissa Aalhus (Northern Health)	Water Quality	VC, Table 2/pg 15	VC Document	For surface water quality indicators, ensure all potential contaminants that can be emitted from the project are considered, including PAHs.	PAHs have been added to Table 2.	Addressed to the EAO's satisfaction
94	28-Mar-19	Paula Tait (Northern Health)	Vegetation	VC, Table 2/pg 16	EA Application - Vegetation Baseline Study	Please provide a scientifically based rationale for the selected LSA for soil and vegetation. For instance, how does the LSA overlap with areas of dust migration?	The soils and vegetation LSAs are designed to encompass the area within which indirect effects resulting from the construction, operation and decommissioning of the Project are reasonably expected to occur. The soils and vegetation LSAs are defined as a 250 m buffer around all roads and a 500 m buffer around other project infrastructure. Parameters likely to influence indirect effects to soils and vegetation include microclimatic changes, including greater solar penetration and risk of windthrow due to increased exposure to wind, as well as the potential for particulate matter emissions. Microclimatic changes and windthrow risk is generally limited to 65 m from the edge of a disturbance (e.g., Burton 2002, Chen et. al. 1992) but most effects are concentrated within the first 10 to 20 m from the forest edge (Strathers et al. 1994); thus, the LSA buffers of 250 and 500 m are considered very conservative with respect to the potential for indirect effects to vegetation and ecosystems. Particulate matter (PM) emissions are influenced by several factors that will be incorporated into project-specific modelling. This modelling will predict PM concentrations and dust deposition from Project operations. Experience with previous projects indicates that most of the dust deposition will be limited to 250 m from the Project Development Area; however, this cannot be confirmed until modelling is completed. Should the modelling indicate that predicted dust deposition is a concern beyond 250 m, the LSA may be increased to reflect these results.	To be addressed in the AIR
95	28-Mar-19	Melissa Aalhus (Northern Health)	socio-economics	VC, Table 2/pg 22	VC Document	Suggest that impacts to child care services are specifically captured in community infrastructure and services, given we understand there are some existing concerns about capacity and demand	Child care services have been added to the Rationale and Indicator columns for Community Infrastructure and Services subcomponent.	Addressed to the EAO's satisfaction
96	28-Mar-19	Paula Tait (Northern Health)	socio-economics	VC, Table 2/pg 22	N/A	In regards to Community infrastructure indicators, Information about NH services and capacity should be obtained from resource.development@northernhealth.ca, rather than from community/economic development representatives or local NH staff.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The comment has been noted.	Addressed to the EAO's satisfaction
97	28-Mar-19	Melissa Aalhus (Northern Health)	socio-economics	VC, Table 3/pg 76		We appreciate the consideration of rail and road traffic. We recommend that the potential for traffic related injuries is considered as part of the human health assessment. This should also include an assessment of risks to public health and safety associated with induced rail traffic.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The potential for traffic-related injuries (road and/or rail) will be addressed in the EA through the assessment of potential Accidents and Malfunctions and related management plans.	To be addressed in the EA

98	28-Mar-19	Paula Tait (Northern Health)	socio-economics	VC, Table 2/pg 22	N/A	We have heard that child care services is a very challenging issue in the area	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted.	Addressed to the EAO's satisfaction
99	28-Mar-19	Melissa Aalhus (Northern Health)	socio-economics	VC, Table 2/pg 24	VC Document	Given the small size of the Village of Telkwa and surrounding communities, we do not agree that changes in cost of living can be assumed to be negligible. Evidence from similarly sized communities suggests that even small demographic changes can cause rapid fluctuations in living and housing costs, and any changes to the cost of living will need to be carefully managed. We suggest either adding the cost of living below to the community wellbeing assessment (under the health VC), or providing a detailed rationale for excluding this.	Thank you for your comment. Cost of Living has been added to list of indicators for Community Well-Being VC.	Addressed to the EAO's satisfaction
100	28-Mar-19	Melissa Aalhus (Northern Health)	Land Use	VC, Table 2/pg 25	EA Assessment - Human Health Risk Assessment, Land Use Assessment, socio-economic Assessment, Part C	Will sustenance foods also capture potential effects to country food availability through potentially reduced access to harvesting sites and/or country food contamination – and the resulting impacts on food security, cultural cohesion, etc.?	The Land and Resource Use VC (Current use of land and resources for traditional purposes sub-component) will consider potential effects of reduced access or quality of harvests and/or harvesting sites. The Community Well-being VC will consider potential impacts on well-being, including determinants such as food security. The identification and assessment of sustenance foods will cross reference those of other VCs including land use, heritage resources, human health, etc.	Addressed to the EAO's satisfaction
101	28-Mar-19	Paula Tait (Northern Health)	Health	VC, Table 2/pg 25	VC Document	For Human Health VC, please add the additional sources: 1. Comparable EA – Red Mountain Underground Gold Mine 2. Documents listed on NH's Health and Resource Development website	Thank you for your comment. The VC document has been updated accordingly.	Addressed to the EAO's satisfaction
102	28-Mar-19	Melissa Aalhus (Northern Health)	socio-economics	VC, Table 2/pg 25	EA Application - socio-economic Assessment	Please ensure the community wellbeing assessment is prepared by qualified professionals in the field of health impact assessment. We suggest that the Application includes a professional statement, including descriptions of relevant qualifications and experience for the author(s) and reviewer(s) of this assessment.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The Community Wellbeing Assessment will be conducted by professionals with expertise and experience in social impact assessment	To be addressed in the AIR
103	28-Mar-19	Melissa Aalhus (Northern Health)	Health	VC, Table 2/pg 25	EA Application - Human Health Risk Assessment	Similarly, we expect that the HHRA is conducted by a professional with training/experience/qualifications in human health risk assessment. Please include a professional statement in the Application which includes demonstrable qualifications and experience in conducting HHRAs relevant to the purposes of supporting an EA.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted. The HHRA will be conducted by professionals with expertise and experience in human health risk assessments.	To be addressed in the AIR
104	28-Mar-19	Paula Tait (Northern Health)	socio-economics	VC, Table 2/pg 25	VC Document	Updated original text (1) to (2) 1. Change in social community determinants (e.g. crime rates, incidents) 2. Change in Social Determinants of Health (SDOHs)	Thank you for your comment. TCL has added the Social Determinants of Health as an indicator for Community Well-being VC.	Addressed to the EAO's satisfaction
105	28-Mar-19	Melissa Aalhus (Northern Health)	socio-economics	VC, Table 2/pg 25	EA Assessment - Human Health Risk Assessment, Land Use Assessment, socio-economic Assessment, Part C	In regards to community well-being subcomponent: In addition to linkage with the socio-economic VC (e.g. housing, etc.), please ensure the community wellbeing assessment is also informed by Land & Resource Use and Heritage Resources VCs as appropriate (recognizing important linkages between cultural connectedness, recreational activities, country food consumption and human health, etc.).	Community well-being has now been repositioned as a Social VC. The identification and assessment of potential effects on Community Well-being will cross reference those of other VCs including land use, heritage resources, human health, labour and economy, etc.	To be addressed in the EA
106	28-Mar-19	Paula Tait (Northern Health)	socio-economics	VC, Table 2/pg 25	EA Application - socio-economic Baseline Study	In regards to community well-being subcomponent: (also relating to 'Infrastructure and Services') Please ensure service centers and transit hubs are considered in the social and health study areas, as appropriate to the project. Accordingly, for Infrastructure/Services and Community Wellbeing, the LSA should include Smithers (as well as surrounding communities that rely on Smithers as a service hub). Note that many community and social services, including health services (e.g. Northern Health trauma services, public health services), are provided on a regional basis, with Terrace and Prince George as key service centers; a rationale for the selected study boundaries will be required.	The socio-economic LSA includes Smithers. The Study Areas will be rationalized in the Baseline studies and EA, and the role of Smithers and other regional service hubs will be duly considered in the assessment of potential impacts on service provision and well-being, and in associated management plans.	To be addressed in the AIR
107	28-Mar-19	Melissa Aalhus (Northern Health)	socio-economics	VC, Table 2/pg 25	EA Application - socio-economic Baseline Study	We greatly appreciate the inclusion of the community wellbeing subcomponent. Please see the report The Social Determinants of Health Impacts of Resource Extraction and Development in Rural and Northern Communities for guidance on social determinants to be considered. We advise that consideration is given to the availability/affordability of housing, food security, and community cohesion, mental health, etc. Please also ensure that specific impacts to vulnerable populations are considered, such as Indigenous communities, women and children, etc.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document, and is the same as Comment 16. Community Health and Wellbeing will be detailed in the socio-economic baseline study of the EA Application. The socio-economic baseline study will review available data and gather qualitative information (such as interviews) to gain an understanding of community health and wellbeing in the LSA. We will consider the determinants of health, as defined by Health Canada in the socio-economics Assessment.	Addressed to the EAO's satisfaction

108	28-Mar-19	Melissa Aalhus (Northern Health)	socio-economics	VC, Table 2/pg 25	VC Document	Please clarify what is meant by “incidents”. Note that our review under this VC (community well-being) will focus on impacts to social determinants of health. We suggest that incidence rates for specific health conditions are not used as a measurable parameter for this VC (given the multitude of factors that influence incidence rates, the time delay before illnesses would manifest, the temporal/spatial granularity at which this data is collected and the difficulty estimating how incidence rates will be impacted). That said, the discussion of incidence rates may be useful to identify existing population health status and vulnerabilities.	Thank you for your comment. TCL would like to note that this comment is the same as Comment 105. TCL has added the Social Determinants of Health as an indicator for Community Well-being VC.	To be addressed in the EA
109	21-Mar-19	Chris Schell (FLNRORD)	Caribou	March 21 Caribou Meeting	EA Application - Wildlife Baseline Study	In terms of trying to determine historical caribou use, FLNRORD recommends we go back to 10 years before current population decline.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted and will be resolved within the Caribou sub-working group.	To be addressed in the AIR following further discussion with Caribou Sub-working Group.
110	21-Mar-19	Chris Schell (FLNRORD)	Caribou	March 21 Caribou Meeting	EA Application - Wildlife Assessment	Ensure mining and potential pipeline are captured in cumulative effects assessment as related to caribou.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted and the portions of Coastal GasLink, Pacific Trail, and PNG that fall within the Regional Study Area applicable to Caribou VC will be included in Cumulative Effects section of the EA Application.	To be addressed in the AIR
111	21-Mar-19	Kathleen Belton (ECCC)	Caribou	March 21 Caribou Meeting	EA Application - Wildlife Baseline Study	Federal government recommends TCL uses the LPU boundaries as the main RSA boundaries.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted and will be resolved within the Caribou sub-working group. TCL proposes to reconvene the Caribou sub-working group as soon as possible to address this.	To be addressed in the AIR through further discussion with Caribou SubWorking Group
112	18-Apr-19	RDBN	Land Use	VC, Table 1/pg 5	VC Document	There is no mention of the Smithers Telkwa Rural OCP Bylaw No. 1704, 2014 under information sources Table 1 which is important as project facilities are located within designated areas under the OCP and should be considered in EA review. RDBN Bylaw No. 700, 1993 implements the policies and objectives of the official community plan. TCL may need rezoning/OCP amendment or approvals from the ALC to facilitate the rail infrastructure. The RDBN Agricultural Plan should be considered under Government Policies and Plans. There is no mention of the RDBN Floodplain Management bylaw in the Issues Scoping review which is important as the rail loop and stockpile sites are found within a designated floodplain area. TCL should include other local government's OCPs and related policies and plans where study areas overlap. For example, OCP's and housing studies for Telkwa and Smithers.	TCL would like to note this is the same as Comment 52. Relevant community and regional plans, including Smithers Telkwa Rural OCP and its bylaws, will be reviewed and considered in the socio-economic and/or land use baseline studies.	Will be addressed in the EA
113	18-Apr-19	RDBN	Atmospherics	VC, Table 3/pg 14	VC Document	Light should be included as a subcomponent of the Atmospheric Environment value component as it could have adverse effects on wildlife and nearby residents.	Potential light impacts with regards to light trespass, sky glow and glare are not expected due to new lighting designs including horizontal cut-off fixtures. Lighting will be controlled through a construction management plan and a well designed and efficient mine lighting plan. Ambient Light will be included in the EA as a qualitative discussion within the Visual Quality assessment. Results of this assessment will inform the assessment of the wildlife subcomponents under the indicator sensory disturbance.	To be addressed in the AIR
114	18-Apr-19	RDBN	Vibration	VC, Table 3/pg 14	EA Application - Management Plans	Vibration is a notable issue that should be monitored and mitigated during the project's lifespan due to resident's proximity to the mine.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Mine site activities and haul road traffic are not expected to have vibration impacts on residences. A blast management plan will control blast vibration and will provide a robust communication and safety plan. Vibration levels near the rail loadout due to existing rail activity are not expected to increase with the Project given the low railcar speeds on site. There will be estimated 1% increase (to be confirmed by CNR) in railcar activity on the mainline but no increase in maximum vibration levels.	To be addressed in the AIR
115	18-Apr-19	RDBN	Aquatic Resources	VC, Table 3/pg 15	EA Application - Aquatic Resources Baseline Study	Aquatic resources study area should be redefined as the RSA does not capture the haul road that crosses the tributaries that flow into the Bulkley River, as well as the rail load out. Sedimentation from the road and coal dust could impact the watercourses. RDBN suggests increasing the study area to capture all project facilities like the Fish and Fish habitat study area.	The primary potential effect of construction and operation of the haul road is expected to be increased potential for sedimentation, notably during construction. Sedimentation generated by this activity is expected to be generally temporary in nature and limited in time provide the appropriate mitigation measures are implemented and maintained. Effects of short-term sedimentation from watercourse crossing construction on benthic invertebrates have been shown to be typically short-term and non-residual (Philip, Tsui, and McCart 1981). Fish, especially ova and pre-emergent fish, are the more sensitive receptor to increases in sedimentation, so the assessment focuses on potential effects to fish and fish habitat. Monitoring tools will be utilized, as required, at haul road watercourse crossings.	To be addressed in the AIR through further discussion with Aquatic SubWorking Group
116	18-Apr-19	RDBN	Water Quality, Water Quantity	VC, Table 3/pg 16	EA Application - Mine Site Water Management Plan	The proposed haul road crosses Helps Creek watershed which is connected to the wetland listed under the vegetation VC as a subcomponent. Helps Creek should be monitored for water quality and quantity at the Haul Road crossing.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. Monitoring tools will be utilized as required, at crossings along the haul road.	To be addressed in AIR
117	18-Apr-19	RDBN	Vegetation	VC, Table 3/pg 16	EA Application - Wildlife Assessment	Since the project is found within the landscape corridor under the LRMP and the project activities disperse animal movement, it could be worthwhile to consider connectivity as a subcomponent of the vegetation VC.	Acknowledged that connectivity for wide-ranging wildlife species is a potential effect that will be addressed in the effects assessment. Connectivity related to animal movements will be assessed within the Wildlife VC subcomponents.	Will be addressed in EA

118	18-Apr-19	RDBN	Wildlife	VC, Table 3/pg 17	EA Application - Human Health Risk Assessment, Land Use Assessment, socio-economics Assessment, and Part C	The scoping document does not consider mule deer despite Schedule C of the Smithers Telkwa Official Community Plan, 1704, 2014 which includes sensitive ecosystems of Black Cottonwood, White Spruce and Moose and Mule Deer habitat. The area also contains a landscape corridor designated to maintain connectivity within the landscape, reduce fragmentation and permit movement/dispersal of plants and animals. Mule deer are a harvested species and an important country food. Project activities have the potential to interact with this species and its habitat. The RDBN encourages proponents to incorporate protection and enhancement of these values in design of the development.	Mule deer share many characteristics with moose, which are included as an Intermediate Component (IC) for the EA. Both species are valued sustenance and recreational hunting species, both have restricted winter range requirements, and both benefit from early seral habitats that result from human disturbance. Moose were selected as an IC over mule deer because they have higher likelihood to interact with the project and because moose are believed to be more significant in predator prey relationships between wolves, caribou, and secondary prey. Effects on wildlife will be considered in the EA for evaluating Hunting and Current Use of Land and Resources for Traditional Purposes which are considered under the Land and Resource Use VC, and well as other relevant sections.	To be addressed in the AIR through further discussion with Terrestrial SubWorking Group
119	18-Apr-19	RDBN	socio-economics	VC, Table 3/pg 25	EA Application - socio-economic Baseline Study	The study community local study area is appropriate. The regional study area should be extended to include the District of Houston and Witset (Moricetown) as well as rural Electoral Areas A and a portion of Electoral Area G to the boundary of the Houston municipality.	This comment has been noted. TCL will also revise the RSA to include: • Witset • District of Houston • Adjacent to Highway 16 between Houston and Witset (i.e., this stretch of highway is approximately 10 km).	Will be addressed in the EA
120	24-Apr-19	BVCRB	Aquatic Resources	VC, Table 3/pg 17	EA Application - Aquatic Resources Baseline Study	A member of the board who is very familiar with the area has noted that the proposed water discharge pipeline enters the Telkwa River at a back channel that contains highly sensitive ecosystems. This back channel is used by rearing salmon as well as breeding toads (a listed species) for refuge from high flows in the Telkwa River. The member would like to ensure that the EA process will be aware of this.	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This information will be used in determining the best location for water pipeline discharge location selection.	To be addressed in the AIR
121	24-Apr-19	BVCRB	Wildlife	VC, Table 3/pg 17	VC Document	One oversight of the VC document is the non-inclusion of wolverine. A member has noted many wolverine tracks and activities while skiing in the area of project along Goathorn Creek. This indicates that wolverines are not exclusively limited to higher elevations but will make use of the valley and could therefore be affected by the project.	TCL has considered the project's proximity to habitats used by wolverine near the project. Wolverine are not included as a proposed VC subcomponent because they fail to meet several criteria in the EAO Guidelines for the Selection of Valued Components and Assessment of Potential Effects. -The project has limited overlap with important wolverine habitat (natal denning habitat at high elevation areas with deep snow packs). Further, the ability to model denning habitat is limited to very general types over broad areas, which limits the utility of the information in an assessment or to mitigate effects. -Wolverine are a low density, wide-ranging species and interactions with Project are likely to be limited to a small number of resident individuals (potentially <=3 based on typical home range sizes). -As a wide-ranging species, wolverine are expected to be able to travel east-west along the Telkwa River valley and make elevational movements within the Telkwa River valley, while avoiding the Project. -Potential effects of the Project on movement of other wide-ranging species (caribou and grizzly bears) will be examined in the EA. Based on these reasons, wolverine are not included as a proposed VC subcomponent.	To be addressed in the AIR through further discussion with Terrestrial SubWorking Group
122	25-Apr-19	Sam Pittman(FLNRORD)	Water	VC, Table 2/pg 4	VC Document	The topic surface water should also have a checkmark under social as its on the same basis as groundwater which has social checked.	Thank you for your comment. TCL will update the VC Selection document accordingly.	Addressed to the EAO's satisfaction
123	25-Apr-19	Sam Pittman(FLNRORD)	Water Quantity	VC, Table 2/pg 14	EA Application - Water Baseline Study	The surface water quantity subcomponent IC says: The Project has the potential to interact with surface water quantity as a result of mining activities such as pit dewatering. Sam's comment is "A thorough understanding of the available resource must be obtained and compared against the needs of the proposal"	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted, and will be addressed in the EA, which TCL intends to submit in Q4 2019.	To be addressed in the AIR
124	25-Apr-19	Sam Pittman(FLNRORD)	Water Quantity	VC, Table 2/pg 14	AIR	The surface water quantity subcomponent IC indicator says: Change in surface water flow rates (m3/s). Sam's comment is "It needs to be temporally bounded – decadal, annually monthly, daily?"	Changes in streamflow at prediction nodes will be evaluated on a seasonal basis, comparing average seasonal flow pre-mining to post-development over the period of operations, early closure (during pit flooding) and long-term closure.	To be addressed in the AIR
125	25-Apr-19	Sam Pittman(FLNRORD)	Water Quality	VC, Table 2/pg 15	EA Application - Surface Water Baseline Study	The surface water quality subcomponent IC says: Surface water quality is protected under the Water Sustainability Act and regulated under the BC Approved Water Quality Guidelines. Sam's comment is "Also review the Environmental Management Act "	Thank you for your comment. This will be reflected in the VC document	Addressed to the EAO's satisfaction
126	25-Apr-19	Sam Pittman(FLNRORD)	Water Quantity	VC, Table 2/pg 15	EA Application - Ground Water Baseline Study	The ground water quantity subcomponent IC says: The Project has the potential to interact with groundwater quantity as a result of Project-related water management such as pit dewatering. Sam's comment is "A thorough understanding of the available resource must be obtained and compared against the needs of the proposal"	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted, and will be addressed in the EA, which TCL intends to submit in Q4 2019.	To be addressed in the AIR
127	1-May-19	Kimberly Dohms (ECCC)	Caribou	March 21 Caribou Meeting	EA Application - Wildlife Assessment	Is habitat alteration via indirect disturbance being considered? If habitat is the area that is used by an animal to have its essential needs met, and sensory disturbance in the LSA may create an inhospitable environment, does this meet the alteration criteria? Or is simply included in disturbance below? I think this could be argued either way and look forward to discussing it in the future.	Thank you for your comment. Sensory disturbance is an existing indicator that is already included in the VC document. This comment has been noted and will be discussed further at the Caribou sub-working group meeting.	Addressed to the EAO's satisfaction

128	1-May-19	Kimberly Dohms (ECCC)	Caribou	March 21 Caribou Meeting	EA Application - Wildlife Baseline Study	Does a buffer around the site intersect any range use areas? E.g. high elevation near the mine that’s currently used?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. The Local Study Area (LSA) includes all areas within a 5 km buffer around the Project Development Area. The LSA will be the area in which potential indirect effects to caribou will be assessed, including a description of all habitat types. As such, the LSA will fully encompass the 3 km buffer recommended by Johnson et al. (2015).	Addressed to the EAO's satisfaction
129	1-May-19	Jayne Brooks (ECCC)	Caribou	March 21 Caribou Meeting	EA Application - Wildlife Baseline Study	How are movement paths defined? There are telemetry data points in and around the project area	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted and will be resolved at the Caribou sub-working group meeting. We are currently waiting for the province to share the latest telemetry data.	To be addressed in the AIR
130	1-May-19	Kimberly Dohms (ECCC)	Caribou	March 21 Caribou Meeting	EA Application - Wildlife Assessment	How is “improve overall management” defined? What does that realistically look like and what are the specific steps and milestones by which this will be measured?	We appreciate your proactive comment. TCL would like to note that this comment does not relate to the VC document. This comment has been noted and will be discussed further at the Caribou sub-working group meeting.	To be addressed in EA
131	30-Apr-19	ECCC	Caribou	March 21 Caribou Meeting	EA Application - Caribou Baseline Study	Mortality has been a result of predator access via anthropogenic and other disturbance. It is a result of habitat alteration, so it could be seen as an “indirect” impact vs. “direct” impact from disturbance itself.	TCL acknowledges these issues and will consider both direct and indirect effects of disturbance within the mortality, habitat, and sensory disturbance indicators of the caribou VC.	To be addressed in AIR
132	30-Apr-19	ECCC	Caribou	March 21 Caribou Meeting	EA Application - Caribou Baseline Study	Range contraction is potentially very serious, particularly if animals are being forced out of areas by disturbance that they are currently using effectively in a highly disturbed landscape. Recovery would hope to see stabilization of populations and range expansion, thus ECCC considers range movement to have a higher level of severity on recovery of the TCH.	TCL will assess this issue in the Effects Assessment by examining (1) the extent of the Project and associated zone of influence relative to estimates of the TCH range (e.g. the Local Population Unit and/or other range estimates agreed upon by the Caribou sub-Working Group) and (2) potential effects of the Project on the amount and quality of caribou habitat (i.e. as a measure of effective habitat).	To be addressed in the AIR
133	30-Apr-19	ECCC	Caribou	March 21 Caribou Meeting	EA Application - Caribou Baseline Study	ECCC mapping is done based on a recovery framework and thus, this habitat would be that which is required to achieve a recovery scenario, taking into account historical, current, and future use cases	TCL welcomes the provision of Local Population Unit mapping and Critical Habitat mapping by ECCC in time that it can be incorporated into the Effects Assessment for caribou.	Will be addressed in the EA