

MINISTRY OF ENVIRONMENT

*ENVIRONMENTAL MANAGEMENT &
ENVIRONMENTAL QUALITY SECTION
PRELIMINARY COMMENTS*

WITH RESPECT TO

*BLUE PEARL MINING
DAVIDSON PROJECT*

*APPLICATION FOR ENVIRONMENTAL
ASSESSMENT CERTIFICATE*

November 17, 2008

DOCUMENT HEADING	PRELIMINARY COMMENT
<i>Preface</i>	<i>No comment</i>
<i>Table of Contents</i>	<i>No comment</i>
<i>Table of Concordance</i>	<i>No comment</i>
1. INTRODUCTION	<i>Refer to detailed sections for specific comments.</i>
<i>1.1 Proponent Identification</i>	<i>No comment</i>
1.1.1 Management Personnel	<i>No comment</i>
1.1.2 Environmental Policy	<i>No comment</i>
1.1.3 Environmental Stewardship	<i>No comment</i>
1.1.3.1 Endako Mine	<i>No comment</i>
1.1.3.2 Thompson Creek Mine	<i>No comment</i>
1.1.3.3 Langeloth Metallurgical Facility	<i>No comment</i>
1.1.4 Contact Information	<i>No comment</i>
1.1.5 Primary Contractor and Consultants	<i>No comment</i>
1.1.5.1 Rescan	<i>No comment</i>
1.1.5.2 Hatch	<i>No comment</i>
<i>1.2 Project Overview</i>	<i>No comment</i>
1.2.1 Project History	<i>No comment</i>
1.2.2 Project Features	<i>No comment</i>
<i>1.3 Land Use</i>	<i>No comment</i>
1.3.1 Crown Land Tenures	<i>No comment</i>
1.3.2 Private Land	<i>No comment</i>
1.3.3 Agriculture Land Reserve	<i>No comment</i>
1.3.4 First Nations	<i>No comment</i>
<i>1.4 Planning Context</i>	<i>No comment</i>
1.4.1 Regional Land Management	<i>No comment</i>
1.4.1.1 Bulkley LRMP	<i>No comment</i>
1.4.1.2 Landscape Unit Plans	<i>No comment</i>
1.4.2 Community Planning	<i>No comment</i>
1.4.2.1 Smithers/Telkwa Rural Official Community Plan	<i>No comment</i>
1.4.2.2 Smithers Official Community Plans	<i>No comment</i>
1.4.3 Wet'suwet'en Territory	<i>No comment</i>
<i>1.5 Need for and Purpose of the Project</i>	<i>No comment</i>
1.5.1 Molybdenum Market	<i>No comment</i>
1.5.2 Implication for Regional, Provincial and National Economies	<i>No comment</i>
1.5.3 Economic Feasibility	<i>No comment</i>
<i>1.6 Regulatory Framework</i>	<i>No comment</i>
1.6.1 British Columbia Environmental Assessment Process	<i>No comment</i>

1.6.1.1 British Columbia Environmental Assessment Act	<i>No comment</i>
1.6.1.2 Project BCEAA History	<i>No comment</i>
1.6.2 Federal Environmental Assessment Process	<i>No comment</i>
1.6.2.1 Canadian Environmental Assessment Act	<i>No comment</i>
1.6.2.2 Federal Review Process	<i>No comment</i>
1.6.2.3 Project CEAA History	<i>No comment</i>
1.6.2.4 Metal Mining Effluent Regulations	<i>No comment</i>
1.6.3 Canada-British Columbia Agreement for Environmental Assessment Cooperation	<i>No comment</i>
1.6.4 Licences, Permits, and Approvals	<i>No comment</i>
1.6.5 Regulatory Schedule	<i>No comment</i>
2. INFORMATION DISTRIBUTION AND CONSULTATION	<i>No comment</i>
2.1 Consultation Requirements	<i>No comment</i>
2.2 Overview	<i>No comment</i>
2.2.1 Objectives	<i>No comment</i>
2.2.2 Participants	<i>No comment</i>
2.2.3 Outcomes	<i>No comment</i>
2.3 Approach	<i>No comment</i>
2.3.1 Local Office	<i>No comment</i>
2.3.2 Community Support	<i>No comment</i>
2.3.3 Media	<i>No comment</i>
2.3.4 Consultation Events	<i>No comment</i>
2.3.5 Focus Groups	<i>No comment</i>
2.4 Consultation Activities	<i>No comment</i>
2.4.1 Key Dates	<i>No comment</i>
2.5 Public Consultation	<i>No comment</i>
2.5.1 Objectives	<i>No comment</i>
2.5.2 Activities to Date	<i>No comment</i>
2.5.3 Introduction to Blue Pearl And the Proposal Project	<i>No comment</i>
2.5.4 Presentation of the Baseline Programs	<i>No comment</i>
2.5.5 Presentation of the Draft TOR	<i>No comment</i>
2.5.6 February 21, 2007	<i>No comment</i>
2.5.7 Additional Public Comments	<i>No comment</i>
2.6 Special Interest Groups	<i>No comment</i>
2.6.1 Objectives	<i>No comment</i>
2.6.2 Activities to Date	<i>No comment</i>
2.7 Wet'suwet'en	<i>No comment</i>
2.7.1 Objectives	<i>No comment</i>
2.7.2 Activities to Date	<i>No comment</i>
2.8 Government	<i>No comment</i>

2.8.1 Working Group	No comment
2.8.2 Additional Comments	No comment
2.8.3 Government Comments	No comment
2.9 Issues Identification and Status	No comment
2.9.1 Public	No comment
2.9.1.1 Water Quality Issue	No comment
2.9.1.2 Discharge of Mine Wastewater into the Bulkley River Issue	No comment
2.9.1.3 Haul Traffic Issue	No comment
2.9.1.4 Visual Quality Issue	No comment
2.9.1.5 Recreation Issue	No comment
2.9.1.6 Migratory Fish Issue	No comment
2.9.2 First Nations	No comment
2.9.2.1 Employment Issue	No comment
2.9.2.2 Training and Education Issue	No comment
2.9.2.3 Boom and Bust Issue	No comment
2.9.2.4 Input of First Nations to the EA Process Issue	No comment
2.10 Future Consultation Programs	No comment
2.10.1 Comment Period on the EA Application	No comment
2.10.1.1 Public and Special Interest Groups	No comment
2.10.1.2 Wet'suwet'en	No comment
2.10.1.3 Government	No comment
2.10.2 Project Construction	No comment
3. PROJECT DESCRIPTION AND SCOPE	
3.1 Introduction	No comment
3.2 Project Scope	No comment
3.2.1 Underground Mine	Page 3-4, Waste Rock Dump Liners; As noted in the text, waste rock from both the 1066 and 700m adits will require storage on liners. Due to the sensitivity of the watershed and concurrent permitting application for the collection, treatment and release of project impacted water, the specifics of the lining and collection system are required for construction prior to underground development work proceeding. (Strategic, Concurrent Permitting, C. Stewart) Action: Provide the technical details of the waste rock storage liner collection system as part of the discharge permit application.
3.2.2 Mine Site and Loadout	Refer to section 3.8 for comments regarding water management. (C. Stewart)
3.2.3 Ore Hauling	Page 3.12, Ore Hauling; Although not explicitly stated in this section, it is assumed that the ore haul trucks will be securely tarped/covered, to ensure minimal loss of material during transport. Note that it is recognized in Appendix M1, HAZOP meeting minutes. (Permitting, C. Stewart) Action: Ensure that the appropriate covers are used for the hauling of all materials to and from the mine site.
3.2.4 Utilities	No comment
3.3 Geology and Mineralization	-
3.3.1 Regional Geology	No comment
3.3.2 Property Geology	Page 3-19, para 3; In the description of the granodiorite, it is noted that the "calcite and other carbonate minerals commonly occur in late fracture fillings w/ or w/o quartz and/or pyrite" ... whereas the pyrite may be found as disseminations and fracture fillings. These occurrence modes must be considered in assessing the ML/ARD characteristics of the granodiorite as it speaks to weathering and exposure issues which may influence reactivity of the minerals of

	<i>concern. Further discussion on this point may be found in the Appendix C4 comments. (Comment, C. Stewart)</i>
3.3.3 Davidson Mineralization	<i>Refer to comments in section 3.6.2.3 (Mineralogy) and Appendix C4 (ML/ARD). (C. Stewart)</i>
3.3.4 Metallurgical Studies	<i>Refer to comments on the concurrent permit application and a review of the Endako Mine effluent permit which will require an assessment of the implications the additional ore will have on the Endako Mine milling processes, tailings disposal, geochemistry, tailings supernatant chemistry and tailings discharge chemistry. (Permitting, C. Stewart). Action: During final permitting, and prior to the haulage of ore to the Endako Mine, a complete characterization of the impacts that the Davidson Ore will have on the Endako site will be required. In addition, the appropriate Endako MoE permits will require amendments.</i>
3.4 Mineral Resources and Reserves	-
3.4.1 Data Analysis	<i>Refer to comments on Appendix A1, Cross Sections. (C. Stewart)</i>
3.4.2 Three Dimensional Model	<i>No comment</i>
3.4.3 Composites	<i>No comment</i>
3.4.4 Semivariogram Analysis	<i>No comment</i>
3.4.5 Block Model Estimations	<i>No comment</i>
3.4.6 Bulk Density	<i>No comment</i>
3.4.7 Results	<i>No comment</i>
3.4.8 Classification	<i>Page 3-31, Figure 3.4-2, Grade Tonnage Curves; Unsure that the axis/scale of this diagram is correct. (Comment, C. Stewart) Action: Please check figure and provide any corrections as necessary.</i>
3.4.9 Block Model Validation	<i>No comment</i>
3.5 Underground Mine Development and Operations	-
3.5.1 Mine Plan	<i>Page 3-33, para. 2; The mining plan discusses the CRF methodology for ore removal, but with secondary pillars not being backfilled after their removal. These large void spaces may result in subsidence, and given the proximity to the retreating glacier, water quality and quantity concerns, and the overall hydraulic connectedness of the workings with the surface, there are concerns regarding the long-term state of the mine workings, flooding and capability of maintaining the flooded conditions without substantial leakage. (Strategic, C. Stewart Further comments are provided in section 3.5.5 and Appendices A1 and C1.)</i>
3.5.2 Underground Layout, Design, and Operations	-
3.5.2.1 Underground Workings	<i>No comment.</i>
3.5.2.2 Ventilation and Air Quality	<i>No comment.</i>
3.5.2.3 Power	<i>No comment.</i>
3.5.2.4 Blasting	<i>No comment.</i>
3.5.2.5 Water Requirements	<i>No comment.</i>
3.5.2.6 Water Management	<i>Detailed concerns on water management are discussed in other sections of the application. (C. Stewart)</i>
3.5.2.7 Underground Equipment	<i>No comment.</i>
3.5.2.8 Fuel and Fuelling	<i>No comment.</i>
3.5.2.9 Worker Facilities	<i>No comment.</i>
3.5.3 Development Rock Disposal Plan	<i>Page 3-42, para. 2; It is proposed that the development rock will be returned underground once there is sufficient room to do so. Will this be in the form of cemented backfill for support or will it just be unconsolidated fill in void spaces? If this material is to be used for cemented backfill, has it been evaluated for its structural integrity? Perhaps this is more of an issue for the sediments and volcanics rather than the intrusive. Minewater quality may be affected depending upon how the waste rock is replaced underground, especially given the characterization of the sedimentary package. (Permitting, C. Stewart) Action: Provide details on the use of the development rock for backfill purposes, and evaluate the potential impact to the minewater quality based on how the material is returned underground.</i>
3.5.4 Stope Backfilling	<i>Page 3-43, para. 3; Discusses the volume of material required to backfill the stopes. It is apparent that there will be a major backhaul of fill material required for the underground development. To date there is no source identification and the volumes estimated assume that only the primary stopes require backfilling</i>

	<i>and that all of the development rock may be used as backfill. If the secondary stopes require backfilling (all or in part) and the development rock (all or in part) cannot be used for backfill due to structural concerns, this significantly changes the volume of backhauled fill material required. (Strategic, C. Stewart) Require details on the sourcing, volumes and characterization of backfill material, ability to utilize the development material as backfill (cemented or loose) and the implications of the various scenarios on the short and long-term water quality from the underground workings and any storage of material on surface. Consideration for the return of the existing 1066 level waste rock underground is to be part of the backfilling assessment.</i>
3.5.5 Underground Geotechnical Studies	<i>Refer to 3.5.4 above and to comments for Appendix C1, (C. Stewart).</i>
3.6 Geochemistry	<i>No comment.</i>
3.6.1 Introduction	<i>No comment.</i>
3.6.2 Geochemical Analyses	<i>No comment</i>
3.6.2.1 Results of Acid-Base Accounting	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.2.2 Total Metal Contents	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.2.3 Minerology	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.2.4 Variation of Solid-Phase Geochemistry with Grain Size	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.2.5 Datasets to Determine Representative Geochemical Ranges In Granodiorite	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.2.6 Lateral Drill Hole Through Bowser Metasedimentary Rock At 700 m Elevation	<i>Page 3-48, para 2; Discussion related to the AP potential of the Bowser Metasediments and the lack of large scale acidic conditions as being representative of contradictory conditions relative to predictive work. Perhaps another explanation would be that over-riding circumstances masks the effect of the acidic reactions. Large scale issues such as limited exposure, glacial overburden, dilution due to precipitation, cool climate, limited bacterial activity, small waste dump, relative rates of mineral weathering, etc. all may result in the lack of obvious signs of acid generation; which is not a contradiction to the predictive work, but rather represents mitigative effects.. (Comments, C. Stewart) Refer to Appendix C4 for more detailed comments.</i>
3.6.2.7 Laboratory-Scale 1-kg Humidity Cells	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.3 On-site 20 tonne ML/ARD Bin	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.4 Past and Recent Chemical Analyses of Drainage Waters from the 1066 Adit And Portal	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.5 Weathered Ditch Sediments And Wall Precipitants in The 1066 Adit	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.6 Chemical Analyses of Drainage waters from the 1066 WRD	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.7 Prediction of Drainage Chemistry	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.7.1 Mine Stopes and 1066 Adit	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.7.2 700 Adit	<i>Refer to detailed comments for Appendix C4, (C. Stewart)</i>
3.6.7.3 70 and 1066 DRSP's	<i>Page 3-58, 3.6.7.3 700 and 1066 DSRPs; It is understood that due to the potential for acid generation from the waste rock storage piles, lime will be added during their construction. (Permitting, C. Stewart) As part of the mitigation strategy provide the details on lime addition requirement calculations, application rate and application methodology.</i>
3.7 Mine Site and Layout	-
3.7.1 Overview	<i>No comment.</i>
3.7.2 Ancillary Facilities	<i>No comment.</i>
3.7.2.1 Office/Mine Rescue/Dry	<i>No comment.</i>
3.7.2.2 Assay Office	<i>No comment.</i>
3.7.2.3 Parking Lot and Site Roads	<i>Refer to sections 11, 14 and concurrent permitting comments regarding the parking lot run-off. (C. Stewart)</i>
3.7.2.4 Refuse Materials Handling	<i>Refer to section 11 for comments. (C. Stewart)</i>

3.7.2.5 Maintenance Shop and Warehouse	No comment.
3.7.2.6 Temporary Explosive Storage	No comment.
3.7.2.7 Outdoor Lighting	No comment.
3.7.3 Mine Site and Loadout Roads	No comment.
3.7.4 Power Supply	-
3.7.4.1 Electrical Power	No comment.
3.7.4.2 Natural Gas	No comment.
3.7.4.3 Diesel Fuel Storage and Dispensing	Refer also to the Provincial MoE "A Field Guide to Fuel Handling, Transportation and Storage, Ed 3, 2002", Note that edition 4 is currently being reviewed prior to publication. (Permitting, C. Stewart)
3.7.5 Loadout	No comment.
3.7.6 Development Rock Storage Piles	Refer to previous comments regarding lime addition. Note that due to the lime addition, reliance on NP weathering will not be required. (Comment, C. Stewart)
3.7.7 1066 Waste Rock Dump	As mentioned in comments for 4.5.4.1, the existing 1066 adit waste rock dump should be considered for underground disposal, especially if it reduces the need for far-field backfill acquisition. (Permitting, C. Stewart)
3.7.8 Backfill Mixing Plant	No comment.
3.7.9 Water Management Facilities	Refer to comments in section 3.8 n chapter 11, 14, the appendices and the concurrent permitting comments (C. Stewart)
3.7.10 Soil Stock Piles	No comment.
3.7.11 Geotechnical Investigation Of Mine Site and Loadout	No comment.
3.8 Mine Site and Loadout Water Management Plan	-
3.8.1 Water Supply	-
3.8.1.1 Potable Water	No comment.
3.8.1.2 Underground Operations Water	No comment.
3.8.1.3 Dust Management Water	No comment.
3.8.2 Discharge/Runoff Management	Refer to MoE concurrent permitting comments; "Environmental Management Act Permit Application , November 17, 2008" (C. Stewart)
3.8.2.1 Operational Water	Refer to MoE concurrent permitting comments; "Environmental Management Act Permit Application , November 17, 2008" (C. Stewart)
3.8.2.2 Non-Operational Mine Site Runoff	The water from the parking lot and office complex will need to be treated to drinking water standards prior to release. This component of the mine site runoff needs to be included in the capture and treat area. Please revise this section. (Comment:Hudson)
3.8.2.3 Diversion Ditching	All diversion ditching will need the capacity for settling and sampling. The water Management Plan will need to include design parameters for settling ponds and diversion channels. Please include these details in the next version of the Plan. (Comment: Hudson)
3.8.2.4 General Water Management	Runoff from the switchback road will need to be monitored closely and managed carefully as there are drinking water users immediately downstream. This will include having the capacity to settle out suspended sediments prior to discharge into the source area for the community watershed. There will need to be an environmental management plan for the construction phase that includes water handling \ settling and quality monitoring for all construction areas including the loadout, switchback road, adit, effluent and waste rock pipelines and the gas pipeline to the 1066 adit. I do not see a snow handling plan for the mine site and haul road. Snow from clearing activities will have entrained sediment and other contaminants and must be stored and handled in a manner that prevents pollution when it melts. There needs to be a snow handling plan that details the management, disposal and potential treatment of operational snow water equivalent. (Comments: Hudson)
3.8.3 Water Treatment Facility	Refer to MoE concurrent permitting comments; "Environmental Management Act Permit Application, November 17, 2008 (C. Stewart)
3.8.3.1 Suspended Sediment	Refer to MoE concurrent permitting comments; "Environmental Management Act Permit Application, November 17, 2008 (C. Stewart)
3.8.3.2 Dissolved Molybdenum And Arsenic	Refer to MoE concurrent permitting comments; "Environmental Management Act Permit Application , November 17, 2008 (C. Stewart)
3.8.3.4 Sludge Management	Refer to MoE concurrent permitting comments; "Environmental Management Act Permit Application , November 17, 2008 (C. Stewart)

3.8.3.5 Sewage Management And treatment	<i>Refer to MoE concurrent permitting comments; “Environmental Management Act Permit Application , November 17, 2008” (C. Stewart)</i>
3.8.4 Mine Site Water Balance	The water balance needs to include the construction period as well as the operational period. There needs to be a construction water balance that looks at water volumes generated during construction. This would include discussion and estimates of initial drain down from adit construction and groundwater inputs from surface / subsurface interactions. Hydrologic estimates for the water balance need to be updated with all of the available data, please refer to comments provided with respect to “ Appendix F-1:Hydrology Baseline Study,” and “Appendix C6: Groundwater Modelling of the Hudson Bay Mountain Area”. (Comment: Hudson)
3.8.4.1 Water Inputs	Please refer to comments provided with respect to “ Appendix F-1:Hydrology Baseline Study,” and “Appendix C6: Groundwater Modelling of the Hudson Bay Mountain Area”. (Comment: Hudson)
3.8.4.2 Water Outputs	Please refer to comments under sections 3.8.2.2 Non-Operational Mine Site Runoff and 3.8.2.4 General Water Management.
<i>3.9 Ore Hauling</i>	-
3.9.1 New Haul Road	<i>No comment.</i>
3.9.1.1 Road Tenure	<i>No comment.</i>
3.9.1.2 Haul Road Design	<i>No comment.</i>
3.9.1.3 Stream Crossings	<i>No comment.</i>
3.9.1.4 Hauling Schedule	<i>No comment.</i>
3.9.1.5 Use Restrictions	<i>No comment.</i>
3.9.1.6 Highway 16 Junction	<i>No comment.</i>
3.9.1.7 Glacier Gultch Road Junction	<i>No comment.</i>
3.9.1.8 Silvern Lakes Trail Crossing	<i>No comment.</i>
3.9.1.9 Road Maintenance	<i>No comment.</i>
3.9.1.10 Geotechnical Investigations	<i>No comment.</i>
3.9.2 Existing Haul Roads	<i>No comment.</i>
3.9.2.1 Existing Traffic Patterns	<i>No comment.</i>
3.9.2.2 Safety Issues	<i>No comment.</i>
<i>3.10 Mine Sit Access</i>	-
3.10.1 Haul Trucks	<i>No comment.</i>
3.10.2 Employees and Sevice Vehicles	<i>No comment.</i>
<i>3.11 Utilities</i>	<i>No comment.</i>
3.11.1 Utilities Corridor Land Tenure, Authorizations, And Permits	<i>No comment.</i>
3.11.2 Mine Water Discharge Pipeline and Diffuser	<i>Refer to MoE concurrent permitting comments; “Environmental Management Act Permit Application , November 17, 2008” (C. Stewart)</i>
3.11.3 Natural Gas Supply	<i>No comment.</i>
3.11.4 Power Supply	<i>No comment.</i>
3.11.5 Pipeline Installation at Obstacle Crossings	<i>No comment.</i>
<i>3.12 Project Development Schedule</i>	<i>No comment.</i>
3.12.1 Construction	<i>No comment.</i>
3.12.1.1 Water Management Facilities and Utilities	<i>No comment.</i>
3.12.1.2 Ancillary Facilities	<i>No comment.</i>
3.12.1.3 Underground Mine Construction	<i>No comment.</i>
3.12.1.4 New Haul Road Powerline	<i>No comment.</i>
3.12.2 Operation	<i>No comment.</i>

3.12.3 Closure, Decommissioning And Reclamation		No comment.
3.13 Hazardous Materials		No comment.
3.14 Project Design Mitigation Measures		No comment.
3.15 Alternative Means of carrying Out the Project		No comment.
3.15.1 Mine Location Alternatives		No comment.
3.15.1.1 Alternative 1: Mine Site on the West Side Of Hudson Bay Mtn ,No Processing Facility		No comment.
3.15.1.2 Alternative 2: MineSite on the West Side Of Hudson Bay Mtn With processing plant		No comment.
3.15.2 Location of Lower Adit And Mine Site and Loadout Facility		No comment.
3.15.3 Ore/Development Rock Storage and Mangement		No comment.
3.15.4 Mine Production Rates And development sched.		No comment.
3.15.5 Power Supply		No comment.
3.15.6 Underground Equipment		No comment.
3.15.7 Location for Ore Processing		No comment.
3.15.8 Employee Work Schedule		No comment.
3.15.9 Ore Hauling Schedule		No comment.
3.15.10 Ore Transport Alternatives		No comment.
3.15.11 Access Route Alternative For Employees and Services		No comment.
3.15.12 Public Access Mgmt		No comment.
3.15.12.1 Access Mgmt to Mine Site and Loadout Facility		No comment.
3.15.12.2 Access Mgmt to Haul Road		No comment.
3.15.13 Water Management		No comment.
3.15.13.1 Water Supply		No comment.
3.15.13.2 Mine Water Discharge		No comment.
3.15.14 Decommissioning, Closure, and Reclamation		No comment.
4. CLOSURE, DECOMMISSIONING, AND RECLAMATION		No comment.
4.1 Introduction		No comment.
4.2 Regulatory Framework and Requirements	-	
4.2.1 Reclamation Plan Requirement		No comment.
4.2.2 Permit Amendments		No comment.
4.2.3 Reclamation Costing		No comment.
4.3 Closure and Reclamation Objectives		No comment.
4.4 Closure of Underground Workings		No comment.
4.4.1 Bulkhead Designs		No comment.
4.4.1.1 Pressure Bulkhead – Punching Shear Failure		No comment.
4.1.2 Pressure Bulkhead – Deep Beam Failure		No comment.
4.4.1.3 Pressure Bulkhead – Hydrojacking and Hydro Fracturing		No comment.

4.4.1.4 Hydraulic Gradient		No comment.
4.4.1.5 Design Parameters for the Bulkheads		No comment.
4.4.2 10656 Adit Bulkhead		No comment.
4.4.3 700 Adit Bulkhead		No comment.
4.4.3.12 High Pressure (Primary) Bulkhead		No comment.
4.4.3.2 Low Pressure (Secondary) Bulkhead		No comment.
4.4.4 Bulkhead Construction		No comment.
4.4.5 Post Closure Water Quality		<i>The final closure monitoring requirements will be incorporated into the MoE effluent permit and will be determined using the characteristics of the mine site at the time of closure, the water quality data that has been accrued over the life of the mine, and any on-going concerns regarding the site. This will include reporting and review requirements. (Permitting, C. Stewart)</i>
4.4.6 Post-Closure Monitoring		<i>As per comments in 4.4.5 above. (C. Stewart)</i>
4.5 Closure and Reclamation of Surface Infrastructure		No comment
4.5.1 Reclamation Planning		No comment.
4.5.1.1 Properties of Project Soils		No comment.
4.5.2 Soil Handling		No comment.
4.5.3 Closure and Reclamation at the Mine site and Loadout		No comment.
4.5.3.1 700 and 1066 DRSPs		No comment.
4.5.3.2 Loadout Facility		No comment.
4.5.3.3 Mine Site Buildings and Structures		No comment.
4.5.3.4 Sedimentation Pond		<i>Refer to MoE concurrent permitting comments; "Environmental Management Act Permit Application , November 17, 2008" (C. Stewart)</i>
4.5.3.5 Water Treatment Plant		<i>Refer to MoE concurrent permitting comments; "Environmental Management Act Permit Application , November 17, 2008" (C. Stewart)</i>
4.5.3.6 Reclamation Activities		No comment.
4.5.4 Upper Adit Closure		No comment.
4.5.4.1 1066 Waste Rock Dump		<i>Page 4-17, para. 2; Given the large volume of backfill material required and the fact that the majority of it will require trucking from an off-site source, it may be appropriate that the current 1066 waste rock pile be utilized in the backfilling operation. This would have the benefit of decreasing the amount of material brought in from another site, removing the existing waste rock dump, and decreasing the area of run-off impact to the receiving environment. (Permitting, C. Stewart) Action: Evaluate the use of the existing 1066 waste rock dump for use in the backfill.</i>
4.5.5 Utilities Corridor		No comment.
4.5.6 Switchback Road		No comment.
4.5.7 Water and Natural Gas Pipelines		No comment.
4.5.8 Haul Road		No comment.
4.6 Temporary and Premature Closure	-	
4.6.1 Temporary Closure		No comment.
4.6.2 Premature Closure		No comment.
4.7 Closure and Cost Estimate		No comment.
4.8 Implementation		No comment.
4.9 Post-Closure Monitoring		<i>As per 4.4.5 above. (C. Stewart)</i>
4.10 Reporting	-	
4.10.1 Closure Activities		<i>As per 4.4.5 above. (C. Stewart)</i>
4.10.2 Environmental Monitor		<i>As per 4.4.5 above. (C. Stewart)</i>
4.10.3 Closure Report		<i>As per 4.4.5 above. (C. Stewart)</i>

5. Effects Assessment Methods	-
5.1 Introduction	No comment.
5.2 Effects Assessment Methodology	No comment.
5.2.1 Environmental Setting and Baseline Conditions	No comment.
5.2.2 Selection of Valued Ecosystem Components	No comment.
5.2.3 Spatial Boundaries	No comment.
5.2.4 Identification and Description of Potential Project Effects	No comment.
5.2.5 Mitigation Measures and Identification of the Potential for Residual Adverse Effects	No comment.
5.2.6 Assessment of the Significance of Residual Adverse Effects	No comment.
5.2.7 Deciding Whether the Residual Adverse Effects are Likely	No comment.
5.2.7.1 Probability of Occurrence	No comment.
5.2.7.2 Scientific Uncertainty	No comment.
6. Environmental Assessment	
6.1 Air Quality Climate	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.1 Air Quality	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.1.1 Environmental Setting and Baseline Conditions	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.1.2 Selection of Valued Ecosystem Components (VECs)	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.1.3 Spatial Boundaries	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21, 2008</i>
6.1.1.4 Identification and Description of Potential Project Effects	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.1.5 Mitigation Measures and Identification of the Potential Residual Adverse Effects	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.1.6 Assessment of the Significance of Residual Adverse Effects	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.2 Climate	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.2.1 Environmental Setting and Baseline Conditions	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.2.2 Selection of Valued Ecosystem Components (VECs)	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.2.3 Spatial Boundaries	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.2.4 Identification and Description of Potential Project Effects	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.2.5 Mitigation Measures and Identification of the Potential Residual Adverse Effects	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.2.6 Assessment of the Significance of Residual Adverse Effects	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.1.2.7 Deciding Whether the Residual Adverse Effects are Likely	<i>Ben Weinstein will comment on all 6.1 sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008</i>
6.2 Terrain, Surficial Geology, and Soils	No comment.

6.2.1 Environmental Setting and Baseline Conditions	<i>No comment.</i>
6.2.1.1 Methodology	<i>No comment.</i>
6.2.1.2 Project Area Landscape	<i>No comment.</i>
6.2.1.3 Surficial Geology	<i>No comment.</i>
6.2.1.4 Terrain	<i>No comment.</i>
6.2.1.5 Soils	<i>No comment.</i>
6.2.1.6 Chemical Analysis	<i>No comment.</i>
6.2.2 Selection of Valued Ecosystems Components	<i>No comment.</i>
6.2.3 Spatial Boundaries	<i>No comment.</i>
6.2.4 Identification and Description of Potential Project Effects	<i>No comment.</i>
6.2.4.1 Project Area	<i>No comment.</i>
6.2.4.2 Mine site and Loadout Facility	<i>No comment.</i>
6.2.4.3 Utilities	<i>No comment.</i>
6.2.4.4 Haul Road	<i>No comment.</i>
6.2.4.5 Agriculture Land	<i>No comment.</i>
6.2.5 Mitigation Measures and Identification of the Potential Residual Adverse Effects	<i>No comment.</i>
6.2.5.1 Mine Site and Loadout Facility	<i>No comment.</i>
6.2.5.2 Utility Corridor	<i>No comment.</i>
6.2.5.3 Haul Road	<i>No comment.</i>
6.2.5.4 Agriculture Land	<i>No comment.</i>
6.2.6 Assessment of the Significance of Residual Adverse Effects	<i>No comment.</i>
6.2.6.1 Mine Site and Loadout Facility	<i>No comment.</i>
6.2.6.2 Utility Corridor	<i>No comment.</i>
6.2.6.3 Haul Road	<i>No comment.</i>
6.2.6.4 Scientific Uncertainty of Significant Adverse Effects	<i>No comment.</i>
<i>6.3 Surface Water Quantity</i>	Please refer to comments with respect to “ Appendix F-1:Hydrology Baseline Study, (Hudson: Comment). The EA Terms of Reference Section 4. Project Effects Assessment Methodology, paragraph 3 , page 22 states that “All available data will be presented and analyzed.”. This means that all of the hydrologic data from 2005 to present must be included in the EA assessment. (Hudson)
6.3.1 Environmental Setting and baseline conditions	Paragraph 1 of this section states that an impermeable layer isolates the surface water hydro-system from the bedrock hydro-system. This is a highly subjective statement that is not supportable by the baseline data provided. While there are likely areas where the till overburden isolates components of the surface hydro-system there are numerous potential links between the two hydro-systems. Please see comments with respect to “ Appendix F-1:Hydrology Baseline Study,” and “Appendix C6: Groundwater Modeling of the Hudson Bay Mountain Area”. (Comment: Hudson).
6.3.1.1 Annual Runoff	Please refer to comments with respect to “ Appendix F-1:Hydrology Baseline Study, (Hudson: Comment)
6.3.1.2 Monthly Flow Distribution	Please refer to comments with respect to “ Appendix F-1:Hydrology Baseline Study, (Hudson: Comment)
6.3.1.3 Flood Flows	Please refer to comments with respect to “ Appendix F-1:Hydrology Baseline Study, (Hudson: Comment)
6.3.1.4 Low Flows	Please refer to comments with respect to “ Appendix F-1:Hydrology Baseline Study, (Hudson: Comment)
6.3.2 Selection of Valued Ecosystem Components	
6.3.3 Spatial Boundaries	The spatial boundaries of the water quantity effects assessment need to include the Club Creek watershed since the infrastructure will likely divert flows out of

	that watershed or may contribute to changes in peak and / or low flows. Kathlyn Lake itself has the potential for operational water quantity effects through changes to the same factors and also through changes to potential groundwater effects. Kathlyn Lake is currently experiencing adverse water quantity effects that could be exacerbated by changes to inflows from development of the mine. The EA needs to address these issues and include the lake and perhaps the mainstem down to the Bulkley River in the spatial boundaries of the study area (Comment : Hudson).
6.3.4 Identification of Potential Effects	Glacial hydrology is a major component of the local hydro-system. Why is it not included in the effects assessment? Since surface / subsurface interactions have not been addressed numerous associated Potential Effects are also not addressed. The assessment of potential project effects to water quantity is therefore incomplete.(Hudson)
6.3.4.1 Mine Site and Loadout Facility	Please refer to comments under sections 3.8.2.2 Non-Operational Mine Site Runoff and 3.8.2.4 General Water Management.
6.3.4.2 Underground Mine	
6.3.4.3 Utilities	
6.3.4.4 Haul Road	
6.3.5 Description of the Nature of the Extent of Potential Effects	Since surface / subsurface interactions have not been addressed and as a result numerous associated Potential Effects are also not addressed. The assessment of potential project effects to water quantity is therefore incomplete.(Hudson)
6.3.5.1 Mine Site and Loadout Facility	The baseline studies and EA reports do not provide enough information to adequately address the potential for environmental effects so a determination of negligible effects is not warranted. (Hudson).
6.3.5.2 Underground Mine	
6.3.5.3 Utilities	
6.3.5.4 Haul Road	Potential effects related to road construction on
6.3.6 Mitigation Measures and Identification of the Potential Residual Adverse Effects	
6.3.6.1 Mine Site and Loadout Facility	
6.3.6.2 Underground Mine	
6.3.6.3 Utilities	
6.3.6.4 Haul Road	
6.3.7 Assessment of the Significance of the Residual Adverse Effects	
6.3.7.1 Development of the Underground Mine	
6.3.7.2 Installation of the Pipeline	
6.3.7.3 Haul Road Stream Crossings	
6.4 Surface Water Quality	
6.4.1 Environmental Setting and Baseline Conditions	Additional comments can be found in November 17, 2008 letter from Jack Love to EAO RE: <i>Ministry of Environment, Environmental Quality Section Comments on Davidson Project Application for Environmental Assessment Certificate August, 2008</i>
6.4.1.1 Overview	
6.4.1.2 Water Chemistry	6.4.1.2 Water Chemistry A review of the data suggest the selenium guideline (0.002 mg/l) and the Chromium IV guideline (0.001 mg/l) has also been exceeded at site A1, provide clarification. (Love) Table 6.4-1, this table must include calculated guidelines, stating the guideline depends on hardness does not allow for interpretation. An appropriate hardness should be selected for guideline calculation. The text discussing these data would then include an interpretation of the significance of concentrations that exceed the guidelines in baseline conditions. (Love)

	This Section mentions water flows sub-surface from A1 to A5 this was no longer the situation, the water was flowing overland. (Love)
6.4.1.3 Principal Component Analysis	
6.4.1.4 Toxicity	6.4.1.4 Toxicity the raw data for this section needs to be included in the appendices, no reference is included (Love)
6.4.2 Selction of Valued Ecosystem Components	
6.4.3 Spatial Boundaries	6.4.3 Spatial; Boundaries. The reach downstream of the proposed discharge location is not defined. Reaches in stream assessments are based on habitat characteristics not on mixing conditions. The reach characteristics, length and mixing ratios within this reach must be clearly outlined. (Love)
6.4.4 Identification and Description of Potential Effects	Table 6.4.2 describes potential effects on surface water quality. It would be assumed and impact or spill in toboggan or Kathlyn Creeks would also have the potential to impact the Bulkley River. (Love) Section 6.4.4.pg 6-129 indicates the proposed permit limits were based on contents of rock units, precedent at other mines and water quality modelling. Identify which of the three methods were used to develop the individual permit limits and provide details. (Love)
6.4.4.1 Identification of Potential Effects	
6.4.4.2 Description of the Nature and Extent of Potential Effects	Section 6.4.4.2 notes that the discharge to Kathlyn Trib A3a will represent 1 percent of the flow for drinking water users 1.2 km downstream. This may pose a significant chronic health risk and potential effects could be high. At what time of year is the 1 percent of flow for the downstream drinking water user calculated – is this an average value, or a worst-case scenario? This section also does not mention the risk of contamination from air borne particles from the loading facilities, nor contamination from other operational areas. The mitigation proposed to collect hydrocarbons is absorbent booms which may only absorb a fraction of the total. More details about, effectiveness and operations of the absorbent booms are required and additional mitigation options, is required. (Love)
6.4.4.3 Mitigation Measures and Identification of the Potential Residual adverse Effects	Table 6.4-4 and 6.4-5 what is meant by upper and lower bound? (Love)
6.4.4.4 Assessment of the Significance of Residual Adverse Effects	
6.4.4.5 Deciding whether the Residual Adverse Effects are Likely	Table 6.4-7 must present the hardness that was used to calculate guidelines. (Love) The discussion listing parameters exceeding background and guidelines is incompletes. All end of the pipe parameters that exceed the most sensitive guideline need to be listed. The factors by which these parameters exceed the guideline and background levels needs to be listed to fully understand the effects assessment. . Cadmium for instance is four times above the guideline in the Bulkley River and the proposed discharge is 370 times above the guideline simply stating the background is above the guideline does not full quantify the risk. (Love) Table 6.4-7 Antimony exceeds the guideline listed and is not bolded. (Love)
6.5 Groundwater Quantity	Comments forthcoming – Dave Tamblyn
6.5.1 Introduction	
6.5.2 Bedrock Geology	
6.5.3 Structure and Faulting	
6.5.4 Hydrostratigraphy	
6.5.5 Groundwater Recharge, Discharge, and Flow Directions	
6.5.5.1 Recharge to Overburden Groundwater	
6.5.5.2 Recharge to Rock Groundwater	
6.5.5.3 Discharge Surface Water	
6.5.5.4 Groundwater Flow	
6.5.6 Selection of Valued Ecosystem Components	

6.5.7 Spatial Boundaries	
6.5.8 Identification and Description of Potential Project Effects	
6.5.8.1 Introduction	
6.5.8.2 Construction and Operation Phases	
6.5.8.3 Closure and Post-Closure Phases	
6.5.8.4 Mitigation Measures and Identification of the Potential Residual Adverse Effects	
6.5.8.5 Assessment of the significance of Residual Adverse Effects	
6.5.8.6 Probability of Occurrence	
6.5.8.7 Scientific Uncertainty of Significant Adverse Effects	
<i>6.6 Ground Water Quality</i>	
6.6.1 Introduction	
6.6.2 General Chemistry of Groundwater	
6.6.3 Selection of Valued Ecosystems Components	
6.6.4 Spatial Boundaries	
6.6.5 Identification and Description of Potential Project Effects	
6.6.6 Mitigation Measures and Identification of the Potential Residual Adverse Effects	
6.6.7 Assessment of the significance of Residual Adverse Effects	
6.6.8 Probability of Occurrence	
6.6.9 Scientific Uncertainty of Significant Adverse Effects	
<i>6.7 Aquatic Environment</i>	Provide details as to how the hazard quotients were calculated. (Love)
6.7.1 Environmental Setting and Baseline Conditions	
6.7.1.1 Physical Limnology	When collecting a sample for sediment chemistry the grain size does not represent the dominant substrate at the site. The text on the bottom of page 6-180 is misleading as several of these sites are cobble or boulder dominated and definitely not sand or gravel dominant, this error needs to be corrected. (Love)
6.7.1.2 Sediment Quality	
6.7.1.3 Primary Producers	
6.7.1.4 Secondary Producers	
6.7.1.5 Fish Community	
6.7.1.6 Fish Habitat	
6.7.2 Selection of Valued Ecosystem Components	
6.7.2.1 Aquatic Resources	
6.7.2.2 Fish Community and Fish Habitat	
6.7.2.3 Effects Assessment Scope	
6.7.2.4 VEC Selection	
6.7.3 Spatial Boundaries	

6.7.4 Identification and Description of Potential Project Effects	
6.7.4.1 Methodology and Process	
6.7.4.2 Identification of Potential Effects	
6.7.4.3 Description of Nature and Extent of Potential Effects	
6.7.5 Mitigation Measures and Identification and Potential Residual Adverse Effects	
6.7.5.1 Mitigation Measures	
6.7.5.2 Potential Residual Effects	
6.7.6 Assessment of the Significance of Residual Adverse Effects	
6.7.7 Deciding Whether the Residual Adverse Effects are Likely	
6.7.7.1 Probability of Occurance	
6.7.7.2 Scientific Uncertainty of Significant Adverse Effects	
<i>6.11 Land and Resource Use</i>	<i>No comment.</i>
6.11.1 Environmental Setting and Baseline Conditions	<i>No comment.</i>
6.11.1.1 Approach and Methods	<i>No comment.</i>
6.11.1.2 Land and Resource Management	<i>No comment.</i>
6.11.1.3 Land Tenure	<i>No comment.</i>
6.11.1.4 Land Use	<i>No comment.</i>
6.11.2 Selection of Valued Ecosystem Components	<i>No comment.</i>
6.11.3 Spatial Boundaries	<i>No comment.</i>
6.11.4 Identification of Potential Effects	<i>No comment.</i>
6.11.4.1 VEC: Recreational Use	<i>No comment.</i>
6.11.4.2 VEC: Crown Land Tenures	<i>No comment.</i>
6.11.4.3 VEC: Residential and Private Land Use	<i>No comment.</i>
6.11.4.4 VEC: Agriculture Use	<i>No comment.</i>
6.11.5 Description of Potential Effects	<i>No comment.</i>
6.11.5.1 VEC: Recreational Use	<i>No comment.</i>
6.11.5.2 VEC: Crown Land Tenures	<i>No comment.</i>
6.11.5.3 VEC: Residential and Private Land Use	<i>No comment.</i>
6.11.5.4 VEC: Agriculture Use	<i>No comment.</i>
6.11.6 Mitigation Measure and Identification of the Potential Residual Adverse Effects	<i>No comment.</i>
6.11.6.1 Mitigation Measures	<i>No comment.</i>
6.11.6.2 Potential Residual Adverse Effects	<i>No comment.</i>
6.11.7 Assessment of the Significance of Residual Adverse Effects	<i>No comment.</i>
6.11.7.1 Construction	<i>No comment.</i>
6.11.7.2 Operations	<i>No comment.</i>
6.11.7.3 Closure/Decommissioning	<i>No comment.</i>

6.11.8 Deciding Whether the Residual Adverse Effects are Likely	<i>No comment.</i>
6.11.8.1 Probability of Occurrence	<i>No comment.</i>
6.11.8.2 Scientific Uncertainty of Significant Adverse Effects	<i>No comment.</i>
6.11.9 Summary of Assessment Tables	<i>No comment.</i>
6.12 Visual Quality	<i>No comment.</i>
6.13 Socio-economic and Community Conditions	<i>No comment.</i>
6.14 Wet'suwet'en	<i>No comment.</i>
6.15 Noise	<i>No comment.</i>
6.15.1 Environmental Setting and Baseline Conditions	<i>No comment.</i>
6.15.2 Selection of Valued Ecosystems Components (VECs)	<i>No comment.</i>
6.15.3 Spatial Boundaries	<i>No comment.</i>
6.15.4 Identification and Description of Potential Project Effects	<i>No comment.</i>
6.15.5 Mitigation Measures and Identification of the Potential Residual Adverse Effects	<i>No comment.</i>
6.15.6 Assessment of the Significance of Residual Adverse Effects	<i>No comment.</i>
6.16 Health Effects	
6.16.1 Environmental Setting and Baseline Conditions	Ben Weinstein will comment on all 6.16 <i>Air</i> sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008
6.16.1.2 Noise	
6.16.1.3 Drinking Water	
6.16.1.4 Country Foods	
6.16.2 Selection of Valued Ecosystem Components	
6.16.2.1 Air	Ben Weinstein will comment on all 6.16 <i>Air</i> sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008
6.16.2.2 Noise	
6.16.2.3 Drinking Water and Country Foods	
6.16.3 Spatial Boundaries	
6.16.3.1 Air	Ben Weinstein will comment on all 6.16 <i>Air</i> sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008
6.16.3.2 Noise	
6.16.3.3 Drinking Water	
6.16.3.4 Country Foods	
6.16.5 Mitigation Measures and Identification of the Potential Residual Adverse Effects	
6.16.5.1 Air	Ben Weinstein will comment on all 6.16 <i>Air</i> sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008
6.16.5.2 Noise	
6.16.5.3 Drinking Water	
6.16.5.4 Country Foods	
6.16.6 Assessment of the Significance of Residual Adverse Effects	
6.16.6.1 Air	Ben Weinstein will comment on all 6.16 <i>Air</i> sections. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008

6.16.6.2 Noise	
6.16.6.3 Drinking Water	
6.16.6.4 Country Foods	
6.16.7 Deciding Whether the Residual Adverse Affects are Likely	
6.16.7.1 Probability Occurrence	
6.16.7.2 Scientific Uncertainty of Significant Adverse Effects	
<i>6.17 Transportation</i>	
6.17.1 Environmental Settling and Baseline Conditions	
6.17.1.1 Overview	
6.17.1.2 MOT Traffic Count Data	
6.17.1.3 Summer 2006 Traffic Survey	
6.17.1.4 Projected Traffic Growth Rates	
6.17.2 Selection of Valued Ecosystem Components	
6.17.3 Spatial Boundaries	
6.17.4 Identification and Description of Potential Effects	
6.17.4.1 Construction	
6.17.4.2 Operation and Maintenance	
6.17.4.3 Closure	
6.17.4.4 Post-Closure	
6.17.5 Mitigation Measures and Identification of the Potential Residual Adverse Effects	
6.17.6 Assessment of the Significance of Residual Adverse Effects	
6.17.6.1 Construction	
6.17.6.2 Operation: Effect of Shift Change Traffic on Local Roads	
6.17.6.3 Operation: Effect of Project Generated Haul on Traffic on Highway 16	
6.17.6.4 Closure	
6.17.7 Deciding whether the residual adverse effects are likely	
6.17.7.1 Construction	
6.17.7.2 Operation and Maintenance	
6.17.7.3 Closure	
<i>6.20 First Nations Interests</i>	-
6.20.1 Introduction	<i>No comment.</i>
6.20.1.1 First Nation Setting	<i>No comment.</i>
6.20.1.2 Approach and Methods	<i>No comment.</i>
6.20.2 Consultation Summary	<i>No comment.</i>

6.20.2.1 Activities to Date	No comment.
6.20.2 Commitment to Development	No comment.
6.20.3 Traditional Use, Traditional Knowledge, and Cultural Heritage	No comment.
6.20.4 Selection of Wet'suwet'en Ecosystem Components	No comment.
6.20.4.1 Soils	No comment.
6.20.4.2 Water Quality	No comment.
6.20.4.3 Aquatics and Fisheries	No comment.
6.20.4.4 Vegetation and Plant Communities	No comment.
6.20.5 Incorporation of Wet'suwet'en Interests	No comment.
6.20.5.1 Air Quality and Climate	No comment.
6.20.5.2 Surface Water and Groundwater Quality	No comment.
6.20.5.3 Aquatics and Fisheries	No comment.
6.20.5.4 Heritage and Cultural Resources	No comment.
6.20.5.5 Land Resource Use	No comment.
6.20.5.6 Socio-Economic Use	No comment.
6.20.5.7 Culture	No comment.
6.20.5.8 Health	No comment.
7. ACCIDENTS AND MALFUNCTIONS	-
7.1 Introduction	No comment.
7.2 Risk Assessment Methodology	No comment.
7.2.1 Project Component	No comment.
7.2.2 I.D.	No comment.
7.2.3 Failure Mode	No comment.
7.2.4 Effects	No comment.
7.2.5 Project Stage	No comment.
7.2.6 Mitigation/Comments	No comment.
7.2.7 Likelihood of Occurrence	No comment.
7.2.8 Consequences	No comment.
7.2.9 Level of Confidence	No comment.
7.2.10 Risk Assessment Ranking	No comment.
7.3 Results	<p>Tables 7.3.1 – 7.3.4 and Figures 7.3.1 – 7.3.4 Environmental Impact Concerns with Risk Rankings (C. Stewart) A.1 Tunnels and Stope Failure. Rapid inflow of water would likely overwhelm the proposed treatment facility resulting in an uncontrolled release to the environment. Depending upon the scale of failure and connection to the surface, impacts may be high with a low to moderate likelihood. A.7, A.8, A.9: Blasting residue and u/g diesel/oil/hydraulic spillage would be EXPECTED to occur and therefore this should be reflected in the likelihood ranking. A.13 Excessive mine water volume as per A.1 would likely overwhelm the collection/treatment system due to its limited capacity. Impact may be significantly higher than the assessment depending upon the volume of water released. There are overall concerns regarding the capacity of the treatment plant storage pond. B6, B7, B.8, B.9, D.2, D.3, D.5 has similar capacity concerns. Likelihood and Environmental Impact ratings appear to be optimistic as in this</p>

	<p>geoclimatic area, water balance issues are a common problem and the environmental impacts of unscheduled releases may be significant. Based on past experiences at mine sites, the likelihood of a water balance issue based on the current proposal and the uncertainties with the work to date, the likelihood rating is more appropriately HIGH while the impact would be MODERATE to HIGH.</p> <p>B.13 Fuel spillage would be EXPECTED, based on previous experiences at mining operations, regardless of the management plans in place.</p> <p>C.6, C.11 Given the volume of traffic through the life of mine, and based on experience with other operations, haul truck accidents would be EXPECTED.</p> <p>Overall, it would appear that the environmental impact ratings are on the low side. One of the major concerns is the capacity issue of the water treatment plant storage pond. (Strategic, Concurrent permitting, C. Stewart) Action: Re-evaluation of the EI risk assessment based on regulatory experiences at operating mine sites and re-evaluate mitigation strategies to address the identified concerns.</p>
7.4 Management Plans	Refer to chapter 11 Environmental Management System for detailed comments. (C. Stewart)
7.5 Summary of Conclusions	Refer to 7.3 comments above. (C. Stewart)
8. EFFECTS OF THE ENVIRONMENT ON THE PROJECT	
8.1 Extremes in Current Climate	
8.1.1 Drought	
8.1.1.1 Effects on the Project	
8.1.1.2 Mitigation Measures	
8.1.2 Storms	
Overall, there is a major concern regarding the design capacity for the WTP storage pond. Refer to comments for sections 6.4 and 6.6 (surface and groundwater quantity).	
8.1.2.1 Severe Rainstorms	As per 8.1.2
8.1.2.2 Thunderstorms	As per 8.1.2
8.1.2.3 Snowstorms	Page 8-4; Icing and high/rapid snowfall will decrease (or eliminate) the effective storage capacity of the treatment storage pond. (Permitting, C. Stewart) Action: Detail the strategies to be invoked to ensure that the effective storage capacity of the treatment plant storage pond is maintained at all times.
8.1.3 Temperature Extremes	
8.1.3.1 Extended periods of Higher Temperatures	
8.1.3.2 Extended periods of Lower Temperatures	
8.2 Climate Change	
8.2.1 Climate Change Projections	
8.2.2 Effects on the Project	
8.2.2.1 Adit and Underground Mine	
8.2.2.2 Haul Road	
8.2.2.3 Waste Management	
8.2.3 Mitigation Measures	
8.3 Floods	
8.3.1 Effects on Project	
8.3.1.1 Haul Road	
8.3.2.2 Bulkley River Diffuser	
8.4 Forest Fires	
8.4.1 Susceptibility of the Project Area to Fires	
8.4.1.1 Mine Site	
8.4.1.2 Haul Road	

8.4.1.3 Pipeline Route		<i>No comment.</i>
8.4.2 Effects on the Project		<i>No comment.</i>
8.4.2.1 Mine Site		<i>No comment.</i>
8.4.2.2 Haul Road		<i>No comment.</i>
8.4.2.3 Pipeline		<i>No comment.</i>
8.4.3 Mitigation Measures		<i>No comment.</i>
8.5 <i>Seismic Activity</i>		<i>No comment.</i>
8.5.1 Effects on the Project		<i>No comment.</i>
8.5.2 Mitigation Measures		<i>No comment.</i>
8.5.2.1 Underground Workings		<i>No comment.</i>
8.5.2.2 Surface Infrastructure		<i>No comment.</i>
8.6 <i>Avalanches, Landslides and Debris Flows</i>		<i>No comment.</i>
8.6.1 Effects on the Project		<i>No comment.</i>
8.6.1.1 Mine Site		<i>No comment.</i>
8.6.1.2 Haul Road		<i>No comment.</i>
8.6.2 Mitigation Measures		<i>No comment.</i>
8.6.2.1 Mine Site		<i>No comment.</i>
8.6.2.2 Haul Road		<i>No comment.</i>
9. CUMULATIVE ENVIRONMENTAL EFFECTS		<i>No comment.</i>
9.1 <i>Introduction</i>	-	
9.1.1 Cumulative Effects and Regulatory Requirements		<i>No comments.</i>
9.1.2 Objective		<i>No comments.</i>
9.2 <i>Methodology</i>		<i>No comments.</i>
9.2.1 Outline of Assessment Process		<i>No comments.</i>
9.2.2 Scoping		<i>No comments.</i>
9.2.2.1 Residual Adverse Effects and Valued Ecosystem Components		<i>No comments.</i>
9.2.2.2 Study Area		<i>No comments.</i>
9.2.2.3 Human Actions Considered		<i>No comments.</i>
9.2.2.4 Establishing the Future Scenario		<i>No comments.</i>
9.2.3 Analysis of Effects		<i>No comments.</i>
9.2.3.1 Interaction with Future Human Actions		<i>No comments.</i>
9.2.3.2 Combined Effects of Human Actions		<i>No comments.</i>
9.2.3.3 Mitigation, Monitoring and Adaptive Management		<i>No comments.</i>
9.2.3.4 Residual Cumulative Effects		<i>No comments.</i>
9.2.3.5 Assessment of Significance		<i>No comments.</i>
9.3 <i>Scoping Results</i>		<i>No comments.</i>
9.3.1 Residual Adverse Effects and Valued Ecosystem components		<i>No comments.</i>
9.3.2 Cumulative Effects Assessment Study Area		<i>No comments.</i>

9.3.3 Human Actions Considered	<i>No comments.</i>
9.3.3.1 Past Industrial Projects	<i>No comments.</i>
9.3.3.2 Existing Projects	<i>No comments.</i>
9.3.3.3 Land Use Activities	<i>No comments.</i>
9.3.3.4 Energy and Mineral Exploration	<i>No comments.</i>
9.3.3.5 Reasonably Foreseeable Future Projects	<i>No comments.</i>
9.3.4 Future Scenario	<i>No comments.</i>
<i>9.4 Transportation</i>	<i>No comments.</i>
9.4.1 Residual Effects of the Project	<i>No comments.</i>
9.4.2 Interaction with Future Human Actions	<i>No comments.</i>
9.4.3 Combined Effects of Human Actions	<i>No comments.</i>
9.4.4 Mitigation, Monitoring and Adaptive Management	<i>No comments.</i>
9.4.5 Significance of Residual Cumulative Effects	<i>No comments.</i>
<i>9.5 Air Quality and Human Health</i>	<i>Ben Weinstein will comment on section 9.5. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE Nov 21 2008</i>
9.5.1 Residual Effects of the Project	<i>Ben Weinstein will comment on section 9.5. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE Nov 21 2008</i>
9.5.2 Interaction with Future Human Actions	<i>Ben Weinstein will comment on section 9.5. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE Nov 21 2008</i>
9.5.3 Combined Effects of Human Actions	<i>Ben Weinstein will comment on section 9.5. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE Nov 21 2008</i>
9.5.4 Mitigation, Monitoring and Adaptive Management	<i>Ben Weinstein will comment on section 9.5. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE Nov 21 2008</i>
9.5.5 Significance of Residual Cumulative Effects	<i>Ben Weinstein will comment on section 9.5. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE Nov 21 2008</i>
<i>9.6 Terrain, Surficial Geology, and Soils</i>	<i>No comments.</i>
9.6.1 Residual Effects of the Project	<i>No comments.</i>
9.6.2 Interaction with Future Human Actions	<i>No comments.</i>
9.6.3 Combined Effects of Human Actions	<i>No comments.</i>
9.6.4 Mitigation, Monitoring and Adaptive Management	<i>No comments.</i>
9.6.5 Significance of Residual Cumulative Effects	<i>No comments.</i>
<i>9.7 Aquatic Environment</i>	<p>This section indicates that the release of mine water and sewage has the potential to cause the degradation of stream habitat, loss of productive capacity, mortality, and sub-lethal effects due to increased metal toxicity and nutrient levels. The significance of these effects was listed as low. With this of potential consequences to the receiving environment a significance level of high seems more appropriate. The assignment of low appears arbitrary more details are required to assign this low significance factor. (Love)</p> <p>The discussion of the cumulative effects of the municipal sewage discharge is absent. The mixture of two discharges has to potential to cause adverse impacts to the aquatic environment. There is no discussion as to where the high level of scientific uncertainty is arising. For example the mixture of nutrient rich organic discharge with a discharge high in metals and inorganic building blocks. The cumulative effect of the discharges requires more detail including: inventory of potential chemical impact-causing pathways, identifying the degree to which receiving environment receptors are exposed to the proposed discharges and a cumulative/synergistic effects assessment (Love)</p>
9.7.1 Residual Effects of the Project	
9.7.2 Interaction with Future Human Actions	
9.7.3 Combined Effects of Human Actions	
9.7.3.1 Direct Mortality	
9.7.3.2 Habitat Alteration	

9.7.4 Mitigation, Monitoring and Adaptive Management	
9.7.5 Significance of Residual Cumulative Effects	
<i>9.8 Vegetation and Plant Communities</i>	<i>No comment.</i>
9.8.1 Residual Effects of the Project	<i>No comment.</i>
9.8.2 Interaction with Future Human Actions	<i>No comment.</i>
9.8.3 Combined Effects of Human Actions	<i>No comment.</i>
9.8.4 Mitigation, Monitoring and Adaptive Management	<i>No comment.</i>
9.8.5 Significance of Residual Cumulative Effects	<i>No comment.</i>
<i>9.9 Wildlife and Wildlife Habitat</i>	<i>No comment.</i>
9.9.1 Valued Ecosystem Components	<i>No comment.</i>
9.9.2 Moose	<i>No comment.</i>
9.9.2.1 Residual Effects of the Project	<i>No comment.</i>
9.9.2.2 Interaction with Future Human Actions	<i>No comment.</i>
9.9.2.3 Combined Effects of Human Actions	<i>No comment.</i>
9.9.2.4 Mitigation, Monitoring and Adaptive Management	<i>No comment.</i>
9.9.2.5 Significance of Residual Cumulative Effects	<i>No comment.</i>
9.9.3 Black Bear	<i>No comment.</i>
9.9.3.1 Residual Effects of the Project	<i>No comment.</i>
9.9.3.2 Interaction with Future Human Actions	<i>No comment.</i>
9.9.3.3 Combined Effects of Human Actions	<i>No comment.</i>
9.9.3.4 Mitigation, Monitoring and Adaptive Management	<i>No comment.</i>
9.9.3.5 Significance of Residual Cumulative Effects	<i>No comment.</i>
<i>9.10 Land and Resource Use</i>	<i>No comment.</i>
9.10.1 Residual Effects of the Project	<i>No comment.</i>
9.10.2 Interaction with Future Human Actions	<i>No comment.</i>
9.10.3 Combined Effects of Human Actions	<i>No comment.</i>
9.10.4 Mitigation, Monitoring and Adaptive Management	<i>No comment.</i>
9.10.5 Significance of Residual Cumulative Effects	<i>No comment.</i>
<i>9.11 Noise and Human Health</i>	<i>No comment.</i>
9.11.1 Residual Effects of the Project	<i>No comment.</i>
9.11.2 Interaction with Future Human Actions	<i>No comment.</i>
9.11.3 Combined Effects of Human Actions	<i>No comment.</i>
9.11.4 Mitigation, Monitoring and Adaptive Management	<i>No comment.</i>
9.11.5 Significance of Residual Cumulative Effects	<i>No comment.</i>
<i>9.12 Summary and Conclusions</i>	<i>No comment.</i>
10. SUSTAINABILITY	
<i>10.1 Introduction</i>	<i>No comment.</i>
<i>10.2 Environmental Sustainability</i>	-
10.2.1 Renewable Resources	<i>No comment.</i>
10.2.2 Non-Renewable Resources	<i>No comment.</i>

10.3 Economic Sustainability	No comment.
10.4 Social Sustainability	No comment.
10.5 Cultural Sustainability	No comment.
10.6 Conclusion	
11. ENVIRONMENTAL MANAGEMENT SYSTEM	
11.1 Introduction	No Comment
11.1.1 Blue Pearl Environmental, Health and Safety Policy	No Comment
11.1.2 Commitment to Continual Improvement	No Comment
11.1.3 Agency Reporting and Plans for Environmental Monitoring	No Comment
11.2 Air Emissions and Dust	Ben Weinstein will comment on section 11.2. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008
11.2.1 Mitigation and Management	“
11.2.2 Monitoring and Implementation	“
11.3 Water Quantity and Quality	No Comment
11.3.1 Mine Site and Loadout	How will diverting water away from KC16 into KC3 via tributary KC A3a affect water quantity for downstream drinking water users? (Love)
11.3.1.1 Construction	The construction period is often the most problematic in controlling the discharges as there are no established containment structures to speak of. Given the sensitivity of the downstream receptors, this is a critical phase of the project, warranting extra care and attention. Prior to disturbance, a well-mapped out, to-be-built must be formulated and reviewed to ensure that impacts are minimal. (Comments, Permitting, C. Stewart) Action: Refer to MoE concurrent permitting comments; “Environmental Management Act Permit Application , November 17, 2008”
11.3.1.2 Operation and Maintenance	Para 1, Surface Run-off Parking Lot and Office Area: The passive collection and “treatment” of run-off from these areas is likely insufficient to ensure protection of drinking water downstream from the pond discharge. In order to ensure downstream protection, the drainage from these areas are to be collected and routed through the treatment plant. (Permitting, C. Stewart) Para 2, Treatment Plant; The actual parameters that will require evaluation and treatment may be significantly greater depending upon the contaminants encountered. Note that ARD generation from the 700 level waste rock pad may result in other metals being released. Further evaluation of all of the test-work will assist in determining the monitoring and discharge requirements. (Permitting, C. Stewart)
11.3.1.3 Closure	No Comment
11.3.2 Haul Route	No Comment
11.3.2.1 Construction	No Comment
11.3.2.2 Operation and Maintenance	No Comment
11.3.2.3 Closure	No Comment
11.3.3 Utilities	No Comment
11.3.3.1 Construction	No Comment
11.3.3.2 Operation and Maintenance	No Comment
11.3.3.3 Closure	No Comment
11.4 ML/ARD	Refer to detailed comments for Appendix C4 (C. Stewart)
11.4.1 DRSP Management	Key will be the containment, collection and treatment of waste rock dump run-off. Refer to detailed comments for Appendix C4 (C. Stewart)
11.4.2 Haul Road	A robust management plan is required for the construction of the haul road which identifies the volumes and characteristics of the bedrock material to be disturbed. Once the materials are characterized, a management plan is required, which would include the removal of material back to the mine site for storage and disposal if necessary. (Permitting, C. Stewart) Prior to the initiation of haul road construction, provide a management plan for the

	characterization and mitigation strategies for haul road material.
<i>11.5 Utilities</i>	-
11.5.1 Construction	No comment.
11.5.2 Operation and Maintenance	Note that the effluent pipeline will be described as part of the works in the EMA effluent permit and will be subject to monitoring and maintenance requirements. (Permitting, C. Stewart) Action: Refer to detailed comments provided for the concurrent permit application.
<i>11.6 Transportation and Traffic Management</i>	No comment.
11.6.1 Haul Trucks	Although it is not mentioned, it is assumed that the haul trucks would be appropriately covered to eliminate the dispersion of dust from the vehicles. (Permitting, C. Stewart)
11.6.2 Employee Vehicles	No comment.
11.6.3 Service Vehicles	No comment.
<i>11.7 Public Access</i>	No comment.
<i>11.8 Material Storage and Handling</i>	-
11.8.1 Purpose and Overview	No comment.
11.8.2 Design Consideration	No comment.
11.8.3 Materials Transportation	No comment.
11.8.4 Hazardous Materials Management Plan	Norm Fallows, EERO, will review at permitting stage.
11.8.4.1 Purpose and Scope	No comment.
11.8.4.2 Hazardous Substance Inventory	No comment.
11.8.4.3 Handling and Storage of Hazardous Materials	No comment.
11.8.5 Petroleum Products Management Plan	As previously noted, refer to the provincial fuel handling guidelines. (Permitting, C. Stewart) Note that in order to maintain containment capacity, open sided covers to prevent snow/rain water build-up within the containment structures may be required.
11.8.6 Water Treatment Plant Reagent Management Plan	No comment.
11.8.7 Explosives Management Plan	No comment.
11.8.4.1 Type/Volume of Explosives	No comment.
11.8.7.2 Explosives Transportation and Storage	No comment.
11.8.7.3 Best Management Practices	Note that nitrogen species will be monitored as part of the effluent permit. (Permitting, C. Stewart)
11.8.7.4 Safety	No comment.
11.8.7.5 Monitoring and Reporting	No comment.
<i>11.9 Waste Recycling and Disposal</i>	Note that waste handling and disposal will be a component of the EMA permitting (Permitting, C. Stewart)
11.9.1 Resource Use	No comment.
11.9.1.1 Waste Reduction	No comment.
11.9.1.2 Reusing Material	No comment.
11.9.1.3 Recycling	No comment.
11.9.1.4 Recover	No comment.
11.9.2 Tracking and Enforcement	No comment.
11.9.2.1 Tracking	No comment.
11.9.2.1 Audit Program	No Comment.
11.9.3 Procedures for Managing Specific Wastes	Norm Fallows, EERO, will review at permitting stage.
11.9.3.1 Hazardous Waste	Norm Fallows, EERO, will review at permitting stage.
11.9.3.2 Non-Hazardous Waste	Note that waste handling and disposal will be a component of the EMA permitting (Permitting, C. Stewart)
11.9.3.3 Sewage Treatment	Note that sewage treatment and disposal will be a component of the EMA effluent permitting (Permitting, C. Stewart)

11.9.3.4 Transporting Wastes	<i>Norm Fallows, EERO, will review at permitting stage</i>
11.9.4 Closure and Decommissioning	<i>Note that waste handling and disposal will be a component of the EMA permitting (Permitting, C. Stewart)</i>
11.9.4.1 Waste Management During Closure	<i>Note that waste handling and disposal will be a component of the EMA permitting (Permitting, C. Stewart)</i>
<i>11.10 Spill and Emergency Response</i>	<i>Norm Fallows, EERO, will review at permitting stage.</i>
11.10.1 Purpose and Scope	
11.10.2 Pre-Emergency Planning	
11.10.2.1 Organizational Structure	
11.10.2.2 Communications Plan	
11.10.2.3 Spill Definitions and Descriptions	
11.10.2.4 Hazard Recognition	
11.10.2.5 Spill Prevention	
11.10.2.6 Risk Analysis and Management	
11.10.3 Emergency Response	
11.10.3.1 Spill Response Procedures	
11.10.3.2 Safety Assessment	
11.10.3.3 Spill Assessment	
11.10.3.4 Environmental Impact Assessment	
11.10.4 Training	
11.10.5 Evaluation and Continual Improvement	
<i>11.11 Erosion and Sediment Control</i>	
11.11.1 Construction	
11.11.1.1 Monitoring and Reporting	
11.11.2 Operations and Maintenance	
11.11.2.1 Monitoring and Reporting	
<i>11.12 Soils</i>	<i>No comment.</i>
<i>11.13 Fish and Fish Habitat</i>	<i>No comment.</i>
11.13.1 Introduction	<i>No comment.</i>
11.13.3 Fisheries and Protection Methods	<i>No comment.</i>
11.13.4 Mine Site and Loadout	<i>No comment.</i>
11.13.5 Haul Road	<i>No comment.</i>
11.13.5.1 Construction	<i>No comment.</i>
11.13.5.2 Operation	<i>No comment.</i>
11.13.5.3 Decommission/Closure	<i>No comment.</i>
11.13.6 Utilities <i>No Comment.</i>	<i>No comment.</i>
11.13.6.1 Construction	<i>No comment.</i>
11.13.6.2 Operation	<i>No comment.</i>
11.13.6.3 Decommission/Closure	<i>No comment.</i>
11.13.7 Fish Habitat Compensation	<i>No comment.</i>
11.13.7.1 Residual HADD of Fish Habitat	<i>No comment.</i>
11.13.7.2 General Approach to Compensation Planning	<i>No comment.</i>
11.13.7.3 Site Selection	<i>No comment.</i>

11.13.7.4 Potential Compensation Methods		No comment.
11.13.7.5 Monitoring of Compensation Projects		No comment.
<i>11.14 Wildlife and Wildlife Habitat</i>		No comment.
11.14.1 Objectives		No comment.
11.14. 2 Adaptive Management Approach		No comment.
11.14.3 Land Resource management Plan		No comment.
11.14.3.1 General Management Direction		No comment.
11.14.3.2 Resource Management Direction		No comment.
11.14.3.3 Ecosystem network and Enhancement timber Development Areas		No comment.
11.14.3.4 Planning Unit Management Directions		No comment.
11.14.4 Mitigation and Management Strategies		No comment.
11.14.4.1 Avoidance of Wildlife Sensitive Periods		No comment.
11.14.4. 2 Wildlife Habitat Management		No comment.
11.14.4.3 Habitat Connectivity		No comment.
11.14.4.4 Noise Control		No comment.
11.14.4.5 Avalanche Control Mitigation		No comment.
11.14.4.6 Lighting at Mine Facilities		No comment.
11.14.4.7 Waste Management	<i>Note that the handling of putrescibles and the prevention of human-wildlife interaction will be a component of the EMA permitting. (Permitting, C. Stewart)</i>	
11.14.4.8 Haul Road Corridor Management		No comment.
11.14.4.9 Employee Education Program		No comment.
<i>11.15 Vegetation and Noxious Weeds</i>		No comment.
11.15.1 Objective		No comment.
11.15.2 Activities		No comment.
11.15.2.1 Construction		No comment.
11.15.2.2 Operation and Maintenance		No comment.
11.15.2.3 Closure		No comment.
11.15.3 Responsibility and Reporting		No comment.
<i>11.16 Noise</i>		No comment.
11.16.1 Construction Activity		No comment.
11.16.2 Adit Blasting		No comment.
11.16.3 Avalanche Control blasting		No comment.
11.16.4 Ventilation fans		No comment.
11.16.5 Loadout Ore Transfer		No comment.
11.16.6 Haul Trucks		No comment.
<i>11.17 Archaeology</i>		No comment.
11.17.1 Management and Mitigation		No comment.
12. SOCIAL MANAGEMENT PLAN	-	
<i>12.1 Introduction</i>		No comment.
12.1.1 Stakeholders and Special Interest groups		No comment.

12.1.2 Community values and Vision	<i>No comment.</i>
12.1.3 Guiding Principles and Objectives	<i>No comment.</i>
<i>12.2 Management Plans</i>	<i>No comment.</i>
12.2.1 Communication and Consultation Plan	<i>No comment.</i>
12.2.1.1 Purpose	<i>No comment.</i>
12.2.1.2 Objectives	<i>No comment.</i>
12.2.1.3 Management	<i>No comment.</i>
12.2.1.4 Effects Addressed	<i>No comment.</i>
12.2.1.5 Proposed Activities	<i>No comment.</i>
12.2.2 Employment Plan	<i>No comment.</i>
12.2.2.1 Objectives	<i>No comment.</i>
12.2.2.2 Anti-Discrimination Policy	<i>No comment.</i>
12.2.3 Skills development and Training Plan	<i>No comment.</i>
12.2.3.1 Objectives	<i>No comment.</i>
12.2.3.2 Cross-Cultural training	<i>No comment.</i>
12.2.3.3 Life Skills Training and Services	<i>No comment.</i>
12.2.3.4 Stay in School Project	<i>No comment.</i>
12.2.4 Suppliers and Contractors Plan	<i>No comment.</i>
12.2.4.1 Objectives	<i>No comment.</i>
12.2.4.2 Management	<i>No comment.</i>
12.2.4.3 Effects Addressed	<i>No comment.</i>
12.2.4.4 Proposed Activities	<i>No comment.</i>
12.2.5 Community Development Plan	<i>No comment.</i>
12.2.5.1 Objectives	<i>No comment.</i>
12.2.5.2 Community Advisory Panel	<i>No comment.</i>
12.2.5.3 Effects Addressed	<i>No comment.</i>
12.2.5.4 Management	<i>No comment.</i>
12.2.6 Community health and Safety Plan	<i>No comment.</i>
12.2.6.1 objectives	<i>No comment.</i>
13. ENVIRONMENTAL EFFECTS MONITORING AND FOLLOW-UP PROGRAMS	Additional comments can be found in November 17, 2008 letter from Jack Love to EAO RE: <i>Ministry of Environment, Environmental Quality Section Comments on Davidson Project Application for Environmental Assessment Certificate August, 2008</i>
<i>13.1 Overview</i>	
<i>13.2 Air Quality and Noise Monitoring Program</i>	Ben Weinstein will comment on section 13.2. Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008
13.2.1 Air Quality	
13.2.2 Noise	
13.2.3 Reporting	
<i>13.3 Terrestrial Effects Monitoring Program</i>	
13.3.1 Plant Trace Element Monitoring	
13.3.2 Vegetation and Plant Communities	

13.3.3 Wildlife and Wildlife Habitat	
13.3.4 Reporting	
<i>13.4 Aquatic Effects Monitoring Program</i>	
13.4.1 Hydrology	
13.4.2 Groundwater Levels and Quality	
13.4.3 Surface Water Quality	<p>Table 13.4-1 shows site KC A3a as a reference site, it is unclear how this can be a reference site, as it is consistently described as a discharge point throughout the application (clarification is required). This site is also not on figure 13.4-1. (Love)</p> <p>Figure 13.4-1 and table 13.4-1 presents the proposed locations for the aquatic effects monitoring locations, these sites were not appropriate to conduct standard biological sampling. In September, 2008 two new sites were established this figure and table should reflect the modifications to the study design. (Love)</p>
13.4.4 Toxicity	
13.4.5 Sediment Quality	
13.4.6 Benthic Invertebrates	
13.4.7 Fish	
13.4.8 Reporting	
14. SUMMARY OF PROJECT COMMITMENTS AND MITIGATION	
<i>14.1 Introduction</i>	<i>No comment</i>
<i>14.2 Summary of Commitments</i>	<i>No comment</i>
<i>14.3 List of Acronyms</i>	<i>No comment.</i>
Table 14.2.1 Summary of Project Commitments and Mitigation	<p>1.3 In addition to the MMER requirements. Blue Pearl will be required to develop and implement an EEM program as part of the effluent permit authorized pursuant to the Environmental Management Act (EMA). (Permitting, C. Stewart)</p> <p>1.4 The mine water treatment plant will require a monitoring program (EMA) to ensure that effluent discharge is acceptable. The treatment plant and its monitoring program will be in effect through all phases and Blue Pearl will be responsible for the plants effective operation. (Permitting, C. Stewart)</p> <p>4.1, 4.2, 4.4, 6.1 In addition to the MMER requirements. Blue Pearl will be required to develop and implement an EEM program as part of the effluent permit authorized pursuant to the Environmental Management Act (EMA). (Permitting, C. Stewart)</p> <p>4.3 and 4.12 There is an overall concern regarding the sizing of the storage ponds and their on-going capacity to store effluent for treatment. (Strategic, Permitting; C. Stewart)</p> <p>4.6 The main sediment pond will require authorization as part of the EMA effluent permit. There are concerns regarding the effectiveness of this pond, and the potential for downstream impacts from it. With passive treatment and lack of flow control,.....increased risk. This discharge would be included within the primary discharge with capacity for possible treatment requirements. (Strategic, Permitting C. Stewart)</p> <p>5.1 Monitoring using multi-level piezometers may be required to ensure that the liners are functioning properly. MoE would be the responsible agency for the groundwater concerns. (Permitting, C. Stewart)</p> <p>6.6 A broken effluent pipeline would require the use of the storage pond for containment. There is major concern regarding the storage capacity of this pond as it is limited to 24hrs. (Strategic, C. Stewart, Refer to hydrology sections)</p> <p>8.9 Wastes: MoE will be concerned with waste handling on the site and will administer the handling of waste materials either through an Environmental Management Plan, authorization pursuant to EMA or both. (Permitting, C. Stewart)</p>
15. CONCLUSIONS	

15.1 Overview	No comment
15.2 Adverse Residual Effects	No comment
15.3 Commitment to Consultation	No comment
15.4 Conclusion	At this time, there are numerous strategic issues which require more information gathering and evaluation before the conclusions arrived at in this section are considered as appropriate. Please refer to the various sections and appendices review comments, as well as the concurrent permitting comment document. (Strategic, C. Stewart)
APPENDICES	
Appendix A.1: Geologic Cross Sections	Reviewing the cross sections as they trend from south to north, it is apparent that part of the workings currently exist below the Hudson Bay glacier (150 north x-cut) and that the deposit outcrops below and at the toe of the glacier; trending upwards from south to north as does the intrusive body. Depending upon the mine development, (not shown on the sections) there are a number of concerns with the potential for slope instability and increased water flow into the workings. What are the characteristics of the rock forming the crown pillar? How thick will the crown pillar be at maximum mining completion? The lack of geotechnical data in that area increases the risk factor for unknown, substantial water flows into the workings. Have the old drill holes located at the toe and on the glacier been evaluated for their geotechnical characteristics? (Strategic, C. Stewart) Action: Re-evaluate the existing diamond drill holes intersecting the crown pillar from surface to assess geotechnical characteristics and identification of any major structural concerns. Re-assess the crown pillar in terms of maximum mining and the potential for increase groundwater flow due to connection with the glacier bottom. These issues speak to water quality/quantity and the capacity of the water treatment plant.
Appendix B1: Comments on Baseline Studies Programs	No comment.
Appendix B2: Additional Public Communications	No comment.
Appendix B3: Communications with Special Interest Groups	No comment.
Appendix B4: Davidson Working Group Members and Responsibilities	No comment.
Appendix B5: Additional Government Communications	Please note that C. Stewart works for MoE, not MEMPR as stated.
Appendix C1: Underground Geotechnical Investigations	In terms of EM concerns, the potential for subsidence and structural connection to the surface relates directly to water inflow quantity, quality, long-term stability of the mine workings, seepage issues and the capacity/treatment requirements of the treatment plant facility; both during operations and post-closure. The underground geotechnical investigations identified the lack of adequate information regarding structural concerns, and provided some suggested mitigation strategies and information collection initiatives. In addition to those recommended in the report, others to be considered would include: refinement of the mine plan in relation to crown pillar extent and geology. It is noted that the volcanics may be included to the north, and may be intersected by the northern-most stopes. If so, what would be the structural, geochemical and overall impacts to the mine operation and closure? (Strategic, C. Stewart) Action: Due to the potential long-term impacts to the development and closure, further geotechnical information is required to assess the proposal. This could include the review of the existing drill holes from surface on and adjacent to the glacier, for structural information as well as an evaluation of the backfill plan taking into consideration the recommendations of the geotechnical report. (i.e. increased backfill of 2° stopes).
Appendix C2: Portal Access Road and Waste Dump Assessment	No comment.
Appendix C3: Geotechnical Assessment of the Mine Site	No comment.
Appendix C4: Prediction of Metal Leaching and Acid Rock Drainage (part 1 of 2)	Report Summary, page xxii: (Comment, C. Stewart) The report discusses the mineralogical balance as showing that "...significant portions of all rock units can generate net acidity.....and that ARD has not been detected." This is considered a "major contradiction" and that the prediction of ARD generation "is probably incorrect". In contrast to this conclusion perhaps it is more a function of the interaction between the various mineralogical components within the context of the local physical environment. The mineralogical balance is just that; the composition of the materials of interest and based on the mineralogy, the "predictions" are likely correct. But raw mineralogy is only one part of the equation. The other is how do these various components interact and over what time scale? Consideration must be given to weathering rates and characteristics of the various minerals, the host lithology, mode of origin (sedimentary vs. volcanic vs. intrusive), mode of mineralization, alteration, climatic conditions (snowfall, rainfall, run-off, temperature, etc), mineral mode and occurrence, chemical vs. biological reactions, and a host of other factors. It is also probable that acidic conditions exist at the micro-pore level but are unable to produce

sufficient acidity to be reflected externally. Note that with the 1066 waste rock dump, the Bowser sediments are at the bottom of the dump, are fully covered, and sampling is very difficult. Indications in the 700 adit area, are that these sedimentary units are acid generating, (as characterized by the kinetic tests and the drill core sampling) as well as evidence in the 1066 adit. **As such, the lack of obvious ARD from the 1066 adit or the waste rock dump does not illustrate that the predictions are incorrect, rather that there are other factors which over-ride the straight balance predictions. ABA data are neither right nor wrong as they are just based on proportions. Sobek methodology indicates silicate NP is present, but other factors will determine its availability and effectiveness. It is the other factors which impact how these proportions interact that will determine the occurrence and intensity of ARD production.**

Page xxv, 700m Lateral Drillhole This work confirmed the acid generating potential of the Bowser Sediments, however, the observations were discounted due to the lack of acidic drainage or indicators in the area. The scale of the local environment does not contradict the results but rather indicates that there are conditions greater than those identified in isolated tests. Glacier dominated drainage, limited surficial exposure that has weathered over millennia, high flushing rates, glacial overburden, etc all would contribute to the minimization of obvious ARD signs. Note that there are strong gossanous areas within Glacier Gulch and numerous other areas of Hudson Bay Mtn. indicative of sulphide mineralization and oxidation. There is a high probability that the Bowser sediments removed from the 700m adit will generate acid once exposed in bulk and relatively isolated. Also refer to comments above for page xxii. **(Concurrent Permitting, C. Stewart) Action: The lack of obvious ARD development at the Davidson Project is not to be dismissed and construed as a decreased probability of occurrence. Rather, the project must consider, and plan, that under different circumstances (larger, isolated waste rock dump of Bowser Sediments and Hazelton Volcanics), that ARD may be more likely to occur and the water quality inflow from the 700m waste rock dump must consider this possibility. Include results from the acid generating humidity cells in the water quality inflow predictions.**

Page xxv, Humidity Cells These tests confirmed the acid generating potential of the Bowser sediments and also spoke to the effective NP in that the High-NP volcanics were also generating acidity. (C. Stewart)

Page 17, Sulphur Species: Discusses averages and range, but does not consider population, (median, standard deviation, etc.) relative to the values obtained. The population considerations are important as they provide an insight as to what the groupings may be. (Comment, C. Stewart)

Page 22, NPR; Screening criteria are provided but there is no source for these ratios. What is the source of the criteria indicated? **(C. Stewart) Action: Provide the source and justification for these ratios.**

Page 24, ABA Predictions. As discussed above, the lack of apparent acid generation from materials predicted to be (based on ABA) is not a contradiction, but rather, could be evidence of other over-riding factors as discussed above. **(Comment, C. Stewart)**

Page 25, Based on the characteristics of the Bowser sediments, the results of the humidity cells and the acid generation occurring within the 700 adit (drill hole intersection), the Bowser sedimentary package would properly be considered an acid generating block. **(Comment, C. Stewart)**

Figure 4.38: Sulphide in Crushed Rock; It is interesting to note that the %S measured in the whole rock analysis is less than the sum of the 3 screen sizes for all 5 samples. The highest variance is within the 0.075 screen size. This may speak in part to the mode of sample occurrence (e.g. how the rock was formed). The key to this is that perhaps there is greater AP than is measured using whole rock analysis. This is reflected in figure 4.40 (NPR) which indicates lower NPR for the crushed material vs. whole rock analysis. Implication is that there is greater AP than would normally be measured. **(Comment, C. Stewart) Action: Consideration must be given to the potential for more contained sulphide than originally measured.**

Figure 4-39; In contrast to the sulphide, the NP variability between the crushed samples and the whole is small, indicating that the whole rock analysis is fairly representative of the NP. **(Comment, C. Stewart)**

	<p>Page 72, Section 4.8, 700 m Adit lateral Hole: It was noted that between the interval 20-35, m. 6 samples were acidic. This would indicate that perhaps a structure (fault, shear, contact?) was intersected at this interval, along which air and water could access the rock; thereby enabling the acid generation to occur. (Strategic, Concurrent Permitting, C. Stewart) Action: Re-assess the drill core to determine the presence or absence of a structural feature and relate the feature to the overall mine development. (Note that in Appendix C4, the drill log for DDH 179 shows badly broken ground, rusty fractures and poor recovery over the interval 10-20 and 20-30 feet. Section 4.8 discusses acidic samples in the 20-35 m area.....is there a mix-up in units as to the sample locations? Rubble also noted in the geotechnical log.</p> <p>The geotechnical log shows several areas of broken core with a 13' section between 123 and 135 (hole 179) There were 12 intervals of broken core indicted in the geotechnical log of DDH 179, and 6 in 179a (which may be the same as some of the ones in 179 due to overlap) These features represent potential conduits for groundwater into the 700 adit during and post-construction).</p> <p>Page 92CMR and sulphide/NP depletion. This section discusses the predicted time to the depletion of sulphides and NP. Two of the assumptions are that all NP is available for neutralization (which it is not a valid assumption) and that there is no additional NP in the samples (unknown, but given that Sobek methodology was used, it is likely that all possible NP, including non-available or very slow reacting NP, was measured). A third consideration could be that there is more sulphide than measured (Figure 4-38). This is indicated in crushed rock fines assessment where the sulphide measured cumulatively was greater than for the whole rock analysis. In contrast, the NP measured was only slightly variable. As such there may be more AP than originally thought, in conjunction with less NP. This speaks to factors over-riding a strictly mineralogical balance prediction, but it does not invalidate the mineralogical assessment. (Comment, C. Stewart)</p>
Appendix C4: Prediction of Metal Leaching and Acid Rock Drainage	Refer to comments above. (C. Stewart)
Appendix C5: Results of Davidson Molybdenum and Arsenic Work	<p>The information contained in this appendix illustrates that Mo and As may be removed from the adit discharge at Davidson at a bench scale level. Further questions as to the operational ability to achieve the same results remain. Some of the questions pertinent to this include:</p> <ul style="list-style-type: none"> • How well does the treatment plant operate at higher flow rates? What is the range for which acceptable treatment occurs? • Is it a batch process or flow-through? What is the required residence time for effective treatment? Does this change with varying flow? What impact does this have on the minewater storage pond capacity? • What additional treatment is required if other elevated metals are encountered (such as Cd, Cu, Zn), and how would any additional treatment methodologies affect the removal of As and Mo. • As the Brenda system is being used, what flow and concentration ranges are treated at Brenda, and how does the Davidson range compare? <p>As the treatment plant is required up-front, the issues relevant to the effectiveness of the plant are especially critical at this time. (Strategic, Concurrent Permitting, C. Stewart) Action: Provide the above information as part of the concurrent permitting assessment.</p>
Appendix C6: Groundwater Modelling of the Hudson Bay Mountain Area	<p style="text-align: center;">Refer to detailed comments by David Tamblyn, Groundwater Hydrologist</p> <p>Page 5-11; An average flow rate based on the modelling was found to be 30.6L/s. This was the value used for the design of the treatment plant and minewater storage pond. For anisotropic conditions, this is a third of the value of the upper bound (90 L/s), suggesting that for conservative design specifications, the value used may be significantly lower than what may actually occur. This value may require re-visiting for the treatment plant design specifications.; perhaps 45 L/s should be used as it is the upper bound of the highest confidence grouping or is there a justification to moving closer to the 90th percentile value? (Comment and question for Dave Tamblyn; C. Stewart)</p>
Appendix C7: Preliminary Investigations of the Haul Road	No comment.
Appendix C8: Geotechnical Investigations along the haul Road	Although one outcrop was noted, generally there is no mapping of the road alignment in terms of geology and potentially problematic areas for ARD/ML concerns. (Permitting, C. Stewart) Action: Provide the proposed study to identify and characterize bedrock and fill material in terms of ARD/ML issues along the road alignment.

Appendix C9: Bulkley River Water Quality Assessment	<p>Page 1-1, Discharge: It is stated that “the treated mine water would be combined with surface water collected at the mine site and pumped through a pipeline to the Bulkley River...” It is understood that with the exception of the sewage plant discharge, all water being discharged through the pipeline will have been treated first, and that the effluent being treated will be a combination of underground discharge, waste rock discharge, plant-site run-off and as proposed, sediment pond overflow as necessary. It was previously recommended that the sediment pond discharge be included in the treated discharge. Note that section 2.2.3 also speaks to a bypass directly to the pipeline. (Strategic, Concurrent Permitting, C. Stewart) Action: As the treatment plant is the first structure required to be constructed and operational, clarification is required as to what the in-flows to the plant are and how they are handled relative to treatment. Refer to detailed concurrent permitting comments.</p> <p>Page 3-1, Baseline Water Quality: States that only samples collected to January 2007 were used in the assessment. As the application report was not submitted until fall of 2008, the data collected through 2007 and the early part of 2008 should have been included in this baseline report. The larger database would provide increased confidence in the characterization and the subsequent evaluation of the data. (Strategic, Concurrent Permitting C. Stewart). It would be appropriate to re-evaluate the data by including the 2007/2008 information as an augmentation to the existing database and interpretation. As concurrent permitting has been requested, this re-evaluation would appropriately be completed during the first quarter of 2009.</p> <p>Page 3-19, 3.6.2.2: Refer to detailed MoE comments regarding the concurrent effluent permit application. (C. Stewart)</p> <p>Page 3-25, Table 3.5-5 Upset Conditions: Table is incomplete. The predicted dissolved metal concentrations for upset conditions are missing from the table. (Strategic, Concurrent Permitting, C. Stewart). Action: Provide a complete table 3.5-5 for review as part of the effluent permit application.</p>
Appendix C10: MSDS Sheets for Chemicals Listed	No comment.
Appendix C11: Davidson Project Haul Option Report	No comment.
Appendix C12: Design and Cost Estimate for Closure Plugs	<p>Page 5: It is noted that chemical attack is not considered in the plug designs at this time. (Closure Comment. C. Stewart) Action: At what stage of the design process will chemical attack be considered and how will it be considered over time as underground conditions change from oxic to anoxic (assuming they do)? What new information/studies would be required during the life of the mine to assist in the determination of possible effects and design changes?</p>
Appendix D1: Davidson Project Meteorology, Air Quality and Noise Baseline Study	Ben Weinstein will comment on appendix D1 Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008
Appendix D2: Air Quality Dispersion Modelling	Ben Weinstein will comment on appendix D2 Document titled: Davidson Project Assessment Volume 1 Ben Weinstein MoE, Nov 21 2008
Appendix D3: Davidson Project Noise Effects Assessment: Ore Hauling	No comment.
Appendix D4: Davidson Noise Effects Assessment: Mines Site and Loadout	No comment.
Appendix E1: Baseline Soil Survey, Sampling and Mapping	No comment.
Appendix E2: Overview Description of Geohazards	No comment.
Appendix E3: Terrain Stability Mapping and Overview Geohazards Assessment	No comment.
Appendix E4: Addendum to Soil CSurvey Sampling and Mapping	No comment.
Appendix F1: Davidson Project; Hydrology Baseline Study	<p>Refer to detailed comments by Patrick Hudson, Regional Hydrologist, MoE, Smithers.</p> <p>Page 3-3, Section 3.2.2 Hydrographs Comment: Given that the application report was not submitted until the fall of 2008, why is the period of record limited to January 2005- may 2006? Just in comparing April-May of the two years (Figures 3.2-2, 3.2-3), it is apparent that there is significant variability between the two years. As noted on page 2-10, “To make reliable estimates of key hydrological parameters...for a given stream, a historical record of at least 10 years is typically required...” and as such it is not understood as to why data for 2006, 2007 and freshet 2008 was not included in the dataset and assessment? As site engineering (i.e. treatment plant design), water quality predictions and other aspects of the project design require solid estimates of hydrology, a more robust data-set would be beneficial. (Strategic, Concurrent Permitting, C. Stewart) Action: Provide an addendum to the hydrology database which</p>

	<i>incorporates the data collected from May 2006 through the latest data in 2008, with the appropriate discussions and conclusions based on the upgraded database.</i>
<i>Appendix F2: Davidson Project; Groundwater Baseline Assessment</i>	
<i>Appendix F3: Water Quality Baseline Report 2005 to 2006</i>	<i>As noted above for the hydrology report, the baseline study is limited and it is unclear as to why data from 2006, 2007 and the early portion of 2008 was not included within the application report. Note that 1066 water quality for 2006/07 were included in the ARD/ML assessment. (Strategic, Concurrent Permitting, C. Stewart) Action: Provide an addendum to the waster quality database which incorporates the data collected from May 2006 through the latest data in 2008, with the appropriate discussions and conclusions based on the upgraded database.</i>
<i>Appendix F4: Packer Testing Report</i>	
<i>Appendix F5: Flow Path Assessment of Adit Creek and Kath Trib A</i>	
<i>Appendix F6: July 2007 Kath Trib A Salt Tracer Studies and Water Quality Sampling</i>	
<i>Appendix G1: Aquatic and Fisheries Baseline Report 2005</i>	
<i>Appendix G2: Aquatic and Fisheries Baseline Report 2006</i>	
<i>Appendix H1: Terrestrial Ecosystem Mapping and Rare Plant Community</i>	<i>No comment.</i>
<i>Appendix H2: Rare Plants and Lichens of the Davidson Project Area</i>	<i>No comment.</i>
<i>Appendix H3: Toboggan Creek Fan Sensitive Management Plan</i>	
<i>Appendix H4: Disturbance Tables</i>	<i>No comment.</i>
<i>Appendix I1: Davidson Project Wildlife and Wildlife Habitat Baseline Report</i>	<i>No comment.</i>
<i>Appendix I2: Wildlife Habitat Suitability Assessment and Vegetation Trace Metals</i>	<i>No comment.</i>
<i>Appendix J1: Archaeological Impact Assessment of the Proposed North Access Road</i>	<i>No comment.</i>
<i>Appendix J2: Archaeological Impact Assessment Report</i>	<i>No comment.</i>
<i>Appendix J3: Archaeological Chance Find Procedure</i>	<i>No comment.</i>
<i>Appendix K1: Land and Resource Use baseline Report</i>	<i>No comment.</i>
<i>Appendix L1: Socio-Community and Socio-economic Baseline Report</i>	<i>No comment.</i>
<i>Appendix M1: HAZOP Meeting summary</i>	<i>Refer to comments for Environmental Management Systems, Chapter 11 and other sections. (C. Stewart) Concerns regarding water storage capacity, non-operational vs. operational drainage, treatment system capacity, and proposed mitigation/contingency strategies.</i>
<i>Appendix N1: Drinking Water Assessment</i>	
<i>Appendix N2: Country Foods Baseline Assessment</i>	<i>No comment.</i>
<i>Appendix O1: Traffic Baseline and Impact Study</i>	<i>No comment.</i>
<i>Appendix P1: Wet' suwet' en Baseline</i>	<i>No comment.</i>
<i>Appendix Q1: Davidson Project Stream Crossings Memo</i>	<i>No comment.</i>
<i>Appendix Q2: Transport Canada Navigable Waters Response</i>	<i>No comment.</i>